No. 25A1096

In the Supreme Court of the United States

SAMUEL RONAN, ET AL.
Applicants,

v.

FRANK LAROSE, OHIO SECRETARY OF STATE, ET AL.
Respondents.

ON APPLICATION FOR AN INJUNCTION PENDING APPEAL TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

RESPONDENT'S RESPONSE IN OPPOSITION TO EMERGENCY APPLICATION FOR PRELIMINARY INJUNCTION PENDING APPEAL, ADMINISTRATIVE STAY, AND EXPEDITED BRIEFING

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TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES ii

INTRODUCTION 1

STATEMENT 2

STANDARD OF REVIEW 7

ARGUMENT 9

I. Ronan is unlikely to succeed on the merits. 9

A. Ronan cannot succeed on his First Amendment Claim. 9

B. Ronan has failed to state a claim under the Elections Clause and even if he did, he cannot succeed on it. 14

C. Ronan cannot succeed on his due-process claim. 15

II. The remaining equities weigh against enjoining a duly-enacted State law, this Court is unlikely to grant *certiorari*, and this Court should not enter the election fray when Ronan has not shown he is indisputably entitled to an injunction. 16

CONCLUSION 18

APPENDIX

Order, United States Court of Appeals for the Sixth Circuit, April 6, 2026 ..... App.1

Transcript of Deposition of Samuel Ronan, March 30, 2026 ..... App.9

Board of Election Materials, March 30, 2026 ..... App.177

TABLE OF AUTHORITIES

Cases **Page(s)**

Abbott v. League of United Latin American Citizens,
146 S. Ct. 418 (2025) 8

Boy Scouts of Am. v. Dale,
530 U.S. 640 (2000) 12, 13, 14

Burdick v. Takushi,
504 U.S. 428 (1992) 1, 10, 11, 13, 14, 16, 17

California Democratic Party v. Jones,
530 U.S. 567 (2000) 11, 12, 13

Caperton v. A. T. Massey Coal Co.,
556 U.S. 868 (2009) 16

Clingman v. Beaver,
544 U.S. 581 (2005) 11, 13

Crawford v. Marion Cnty. Election Bd.,
553 U.S. 181 (2008) 12

Does 1-3 v. Mills,
142 S. Ct. 17 (2021) 8

Hobby Lobby Stores, Inc. v. Sebelius,
568 U.S. 1401 (2012) 7

Hollingsworth v. Perry,
558 U.S. 183 (2010) 8, 17

Hosanna-Tabor Evangelical Lutheran Church & Sch. v. E.E.O.C.,
565 U.S. 171 (2012) 12

Hurley v. Irish–American Gay, Lesbian and Bisexual Group of Boston,
515 U.S. 557 (1995) 12

Jenness v. Fortson,
403 U.S. 431 (1971) 11

Labrador v. Poe,
144 S. Ct. 921 (2024) 8

Lux v. Rodrigues,
561 U.S. 1306 (2010) 7, 14, 15, 17

Maryland v. King,
567 U.S. 1301 (2012) 16

Merrill v. Milligan,
142 S. Ct. 879 (2022) 8, 9, 17

Miami Herald Pub. Co. v. Tornillo,
418 U.S. 241 (1974) 13

Nken v. Holder,
556 U.S. 418 (2009) 8, 16

Ohio Citizens for Responsible Energy, Inc. v. NRC,
479 U.S. 1312 (1986) 8

Purcell v. Gonzalez,
549 U.S. 1 (2006) 1, 9, 17

Ray v. Blair,
343 U.S. 214 (1952) 11

Republican National Committee v. Democratic National Committee,
589 U.S. 423 (2020) 8

Rosario v. Rockefeller,
410 U.S. 752 (1973) 11

Schuette v. Coal. to Defend Affirmative Action, Integration & Immigrant Rts. & Fight for Equal. By Any Means Necessary (BAMN),
572 U.S. 291 (2014) 14

Snowden v. Hughes,
321 U.S. 1 (1944) 15

Storer v. Brown,
415 U.S. 724 (1974) 10, 11

Tashjian v. Republican Party of Conn.,
479 U.S. 208 (1986) 11

Timmons v. Twin Cities Area New Party,
520 U.S. 351 (1997) 10, 11, 15

Trump v. CASA,
606 U.S. 831 (2025) 16

Turner Broadcasting System, Inc. v. FCC,
507 U.S. 1301 (1993) 7

United States v. Texas,
144 S. Ct. 797 (2024) 9

Washington State Grange v. Washington State Republican Party,
552 U.S. 442 (2008) 2, 12

Williams v. Rhodes,
393 U.S. 23 (1968) 10

Williams-Yulee v. Fla. Bar,
575 U.S. 433 (2015) 12

Winter v. Natural Resources Defense Council, Inc.,
555 U.S. 7 (2008) 8

Statutes

Ohio Rev. Code §3501.11 5

Ohio Rev. Code §3513.07 ..... 1, 3, 12, 13

Other Authorities

Domenico Montanaro & Scott Detrow, *Perez Elected as Chairman of Democratic National Committee*, NPR (Feb. 25, 2017) 2

N.Y. Times, *Ohio Primary Elections Results* (May 8, 2018) 3

N.Y. Times, *Ohio State House District 62: 2016 Election Results* (2016) 2

Ohio Sec'y of State, *2026 Voting Schedule (Text Only)* 7

Samuel Ronan, Facebook (Jan. 15, 2026) 4

INTRODUCTION

Samuel Ronan wanted to run for office in Ohio's Republican primary as a Republican. Just one problem: he is a Democrat. At least that is what he has said—more than once. In fact, Ronan had spent over a decade on a mission: for "Democrats" to "primary Republicans in deep red districts, as Republicans." App.217. And his campaign manager, Ana Cordero, confirmed that even in the upcoming Midterm Elections, their intent was to "torpedo the republican party from within." App.361, 411–12. He was ultimately removed from the May 2026 primary ballot for lying on his candidacy form about his membership in the Republican Party and willingness to abide by the Party's principles, in contravention of Ohio's good-faith candidacy-declaration requirement. Ohio Rev. Code §3513.07.

Ronan (and Cordero) filed suit alleging violations of his First Amendment rights, the Elections Clause, and his due-process rights. After being twice refused by the lower courts, first for a preliminary injunction from the district court and next for an injunction pending appeal from the Sixth Circuit, Ronan now asks this Court for an extraordinary, first-in-time injunction reinstating his candidacy in an ongoing election. He has not met his burden to show that he is "indisputably" entitled to an injunction in his favor—under any of the claims he raises. And he asks this Court to take the extraordinary step to interfere with an ongoing election (which federal courts are loath to do, *Purcell v. Gonzalez*, 549 U.S. 1, 4–5 (2006)) by enjoining a minimally burdensome and duly-enacted State law that protects the integrity and fairness of elections, *Burdick v. Takushi*, 504 U.S. 428, 439–440 (1992), and the associational

rights of political parties, *see Washington State Grange v. Washington State Republican Party*, 552 U.S. 442, 459 (2008) (Roberts, C.J., concurring).

Worse, Ronan asks this Court to circumvent any standards at all, much less the very high one for injunctions pending appeal, and to enter an interim injunction—fashioned as an administrative stay. Having been refused an injunction twice below, Ronan cannot ask for a stay to obtain what he wants—placement on the ballot.

This Court should reject both overreaching requests.

STATEMENT

1. In 2016, Plaintiff-Applicant Samuel Ronan, a member of the Democratic Party, ran unopposed in the Democratic primary for the 62nd District of the Ohio House of Representatives. App.39–40, 44. He lost in the general election by a wide margin. *See* N.Y. Times, *Ohio State House District 62: 2016 Election Results* (2016), https://perma.cc/84Y8-RRRZ.

Disillusioned by his loss in a deeply red district, Ronan changed tack: he would run as a Republican to make deep-red districts competitive for Democrats like himself. *See* App.213. In 2017, he ran for chair of the Democratic National Committee. App.45. On this national stage, Ronan continued to advocate for his strategy of running Democrats as Republicans in deeply red districts. App.61. He eventually withdrew his candidacy. *See* Domenico Montanaro & Scott Detrow, *Perez Elected as Chairman of Democratic National Committee*, NPR (Feb. 25, 2017), https://perma.cc/E5B9-K636.

But he remained committed to his mission—hiding Democrats in Republican elections. He declared, "I put my money where my mouth is." App.203 (quotation

omitted). And that he wanted to "put[] the rubber to the road" by employing the strategy himself. *Id.* (quotation omitted). So, in 2018, Ronan ran in the Republican primary for Ohio's 1st Congressional District. App.202. According to Ronan, this was "the only way" he was "going to make it through" to voters in the 1st District. App.203 (quotation omitted). He was defeated in the primary election. *See* N.Y. Times, *Ohio Primary Elections Results* (May 8, 2018), https://perma.cc/G7ZN-BP2A.

After dabbling in a few other unsuccessful political campaigns—including, Ronan claims, as a self-described "dark horse protest" candidate in the 2024 Republican presidential primary, App.26–27, 46—Ronan turned to the instant election, the 2026 midterms. He decided to run in the Republican primary in Ohio's 15th Congressional District in July of 2025. App.46. He began collecting signatures in October 2025. App.47, 218. As part of that process, Ronan completed a "Declaration of Candidacy," as required by Ohio Revised Code §3513.07. That statute requires candidates to sign a declaration stating: "I am a member of the ____ Party," and "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the ____ Party." Ohio Rev. Code §3513.07. Falsifying the election-candidacy declaration is a felony of the Fifth Degree. *Id.* As required by Ohio law, Ronan declared that he was "a member of the Republican Party" and if elected he would "support and abide by the principles enunciated by the Republican Party." App.218.

But even after signing this form, Ronan continued to push his vision that Democrats like himself should primary Republicans in deep red districts to "get a foot in

the door." App.217. In one notable exchange on social media, he was asked why he was running as a Republican despite having run for DNC chair just a few years back. App.217. In response, Ronan reiterated that he "very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, as Republicans." App.217. If "anything," he continued, he was "following the argument" that he made on that stage by running as a Republican in a deep red primary. App.217. And he distanced himself from the Democratic Party, claiming he was "NOT fighting on behalf of the traitorous Democrats." App.217. He was "running for office in the party of the dominant district." App.217. In another social-media post in January 2026, Ronan explained that "Leftists need to infiltrate republican spaces and primary them." Samuel Ronan, Facebook (Jan. 15, 2026), https://www.facebook.com/groups/662717436755426/posts/881656498194851/?comment_id=890386273988540. He continued, "Which is why I said Democrats needed to primary republicans in red states as republicans when I ran for DNC Chair and why I am running as a Repuboican [sic] now..." *Id.*

The Franklin County Board of Elections certified him as a candidate in February of this year. Ana Cordero (Ronan's campaign manager and the other Plaintiff-Applicant in this case) posted a celebratory message on her personal social-media account. App.232–33. In response, someone said, "I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems." App.233. Cordero responded, "yup! And we're testing out [that] theory lol." *Id.*

2. Marc A. Schare, a voter, filed a protest of Ronan's candidacy. App.212–216. He alleged that there was clear and convincing evidence that Ronan "is not in fact a Republican." App.212. Schare argued Ronan "has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles." App.212. He alleged that Ronan was "pretending to be a Republican as a tool to get a foot in the door." App.212 (quotation omitted). Schare further explained that this was "precisely the type of 'opportunistic' maneuvering the primary rules are designed to prevent." *Id.* (quotation omitted). And he argued that Ronan's declaration that he would "support and abide by the principles enunciated by the Republican Party" was "false," and thus Ronan should be disqualified from appearing on the primary ballot. *Id.*

3. The Board of Elections held a hearing on Schare's protest. Schare argued that Ronan's Republican affiliation was a sham. Ronan argued that only voters could conduct a good-faith test of ideology, not the Board. App.342–43. The Board ultimately split, voting two-to-two on the protest. App.345–46.

The issue was then referred to Ohio's Secretary of State, Frank LaRose, App.346; *see also* Ohio Rev. Code §3501.11(X), who broke the tie in favor of Schare's protest. App.178–180. The Secretary explained that Ronan's "public statements" made clear that Ronan was seeking the Republican nomination as part of his "longstanding strategy to have Democrats run as Republicans in Republican primaries." App.179. He clarified that "the issue" was not about "ideological purity" but about "the integrity of the electoral process." App.179. He noted that Ronan had "'openly and repeatedly'

stated that he (and others) should run as Republicans, not because they are Republicans, but so that Democrats can get a foothold in Republican-leaning districts." App.179. Those statements, even without applying any "ideological litmus test," did "not show a change in affiliation but instead highlight[ed]" Ronan's "ongoing mission to run Democrats as Republicans to infiltrate the party." App.180. Last, he rebuffed Ronan's contention that there is no "good faith" requirement for candidates seeking to affiliate with and run on the ballot of a political party. App.180.

4. Ronan and his campaign manager Coredero (together, "Ronan") filed suit against LaRose and members of the Franklin County Board of Elections alleging violations of his rights under the First Amendment and the Elections Clause of the United States Constitution. And he alleged that Meredith Freehoff, a Board Member, violated his due-process rights by failing to recuse herself from the protest hearing before the Board because of an alleged conflict. App.2–3. At the outset, the district court granted a Temporary Restraining Order. App.3. After a hearing, the court denied a preliminary injunction, finding that his claims were unlikely to succeed because Ohio law's good-faith requirement for candidacy was constitutional. *Id.* The court stayed its ruling and extended the TRO to noon on April, 6, 2026 to allow the Sixth Circuit to weigh in on a forthcoming request for stay pending appeal (though fashioned as a stay pending appeal, the request for preliminary relief in that posture is correctly categorized as an injunction pending appeal). *Id.*

5. The Sixth Circuit rejected Ronan's request for an injunction pending appeal. App.1–2. It agreed that Ronan is unlikely to show that Ohio's good-faith requirement

violated the First Amendment. App.4–6. Applying *Anderson-Burdick* balancing, the court noted that the good-faith requirement was not a severe burden on Ronan's candidacy because it "does not prevent Ronan from voting, supporting candidates, endorsing candidates, running for office, or even switching parties." App.5. Truthfulness in candidacy was not any severe burden. The court noted that the State had a substantial interest in protecting the fairness and integrity of elections, preventing fraud and corrupt practices, and avoiding confusion. App.6. And the good-faith measure was a reasonable means to achieve these interests. All in, Ohio's good-faith requirement likely passed constitutional muster. Last, the court quickly dismissed the Elections Clause and due-process claims. App.6–7.

Because the First Amendment is implicated in this case, the first factor in an injunction-pending-appeal analysis—the likelihood of success on the merits—is largely dispositive. *See* App.3–4. The Sixth Circuit denied the motion in full. The district court's TRO expired on April 6, at noon. *See* App.3. Early voting began on Tuesday April 7, 2026 in Ohio. Ohio Sec'y of State, *2026 Voting Schedule (Text Only)*, https://perma.cc/48MR-Q8PC.

STANDARD OF REVIEW

An injunction pending appeal is "extraordinary relief." *Hobby Lobby Stores, Inc. v. Sebelius*, 568 U.S. 1401, 1403 (2012) (Sotomayor, J., in chambers). To obtain an injunction in this posture, the applicant must demonstrate that "the legal rights at issue are 'indisputably clear.'" *Lux v. Rodrigues*, 561 U.S. 1306, 1307 (2010) (Roberts, C.J., in chambers) (quoting *Turner Broadcasting System, Inc. v. FCC*, 507 U.S. 1301,

1303 (1993) (Rehnquist, C. J., in chambers)). That is because such injunctions "do[] not simply suspend judicial alteration of the status quo but grant[] judicial intervention that has been withheld by lower courts" and therefore "demand[] a significantly higher justification" than that required for a stay. *Ohio Citizens for Responsible Energy, Inc. v. NRC*, 479 U.S. 1312, 1312 (1986) (Scalia, J., in chambers).

"A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). The last two considerations merge when the movant seeks to enjoin the government. *Nken v. Holder*, 556 U.S. 418, 435 (2009).

Applicants, like Ronan, seeking injunctions pending appeal face additional hurdles. *First*, they must show that this Court would likely grant *certiorari* on the questions presented. *See Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (per curiam); *Labrador v. Poe*, 144 S. Ct. 921, 931 (2024) (Kavanaugh, J., concurring); *Does 1-3 v. Mills*, 142 S. Ct. 17, 18 (2021) (Barrett, J., concurring). *Second*, the "traditional test for a stay or [injunction]" applies differently "in election cases" where a plaintiff seeks to enjoin "a state's election laws in the period close to an election." *Merrill v. Milligan*, 142 S. Ct. 879, 880 (Mem.) (2022) (Kavanaugh, J., concurring); *see id.* (collecting cases). "[F]ederal courts" ordinarily refrain from "alter[ing] the election rules on the eve of an election." *Abbott v. League of United Latin American Citizens*, 146 S. Ct. 418, 419 (2025); (quoting *Republican National Committee v. Democratic National*

Committee, 589 U.S. 423, 424 (2020) (*per curiam*)); *Purcell v. Gonzalez*, 549 U.S. 1, 4–5 (2006). Such interference—especially where, as here, the election is already underway—causes "chaos and confusion." *Merrill*, 142 S. Ct. at 880 (Kavanaugh, J., concurring). All told, a request to enjoin a state law in the middle of an ongoing election after two lower courts have refused that relief faces an all-but-insurmountable obstacle. Only a glaring constitutional violation could justify the relief sought here.

Ronan additionally requests an "administrative stay" that places him back on the ballot. That is a mislabeling. Because Ronan lost on his motion for a preliminary injunction, and for a stay of the district court's order pending appeal (properly characterized as a renewed request for an injunction pending appeal), the parties sit in *status quo ante*. Any order putting him on the ballot now is an injunction, not a stay. With that reorientation in mind, a request to pause proceedings *before* this Court applies the very high standards for injunctive relief is essentially a request for a standardless injunction. *See United States v. Texas*, 144 S. Ct. 797, 798 (2024) (Barrett, J., concurring). The threshold for receiving one should exceed even the highest standards articulated by this Court.

ARGUMENT

I. Ronan is unlikely to succeed on the merits.

A. Ronan cannot succeed on his First Amendment Claim.

1. The First Amendment does not restrict the State from promoting order, fairness, and integrity in their elections. Nor does it stop the State from facilitating political parties' associational rights under the First Amendment. Take each in turn.

The First Amendment places some limits on state ballot-access laws, but not in the way Ronan's Application envisions. The Court explained decades ago that the First Amendment writes no blank check for candidates to appear on a ballot, even though it does prevent States from enacting full-on prohibitions against, for example, independent candidates. *See, e.g.*, *Burdick v. Takushi*, 504 U.S. 428 (1992); *Williams v. Rhodes*, 393 U.S. 23 (1968). The First Amendment's role in ballot access is not a one-to-one correspondence with the First Amendment's guarantees in political speech generally. Instead, "[a]ttributing to elections a more generalized expressive function would undermine the ability of States to operate elections fairly and efficiently." *Burdick*, 504 U.S. at 439. The First Amendment, that is, recognizes that the States "may, and inevitably must, enact reasonable regulations of parties, elections, and ballots to reduce election- and campaign-related disorder." *Timmons v. Twin Cities Area New Party*, 520 U.S. 351, 358 (1997).

When it comes to state regulation of parties and ballots, this Court's cases repeatedly recognize that the First Amendment leaves States wide latitude to regulate party primaries and other candidate-selection mechanics so that those processes are characterized more by order than disorder. To promote order, and "the integrity of the various routes to the ballot," *Storer v. Brown*, 415 U.S. 724, 733 (1974), States may, for example, require independent candidates to demonstrate sufficient voter support to appear on the ballot, may ban write-in candidates, and may prohibit candidates who secure the endorsement of two parties from appearing on the

ballot under the banner of both parties, s*ee Jenness v. Fortson,* 403 U.S. 431, 442 (1971); *Burdick*, 504 U.S. at 439; *Timmons* 520 U.S. at 354.

The Court has also recognized the States' power to promote orderly elections by regulating who can run and vote in party primaries. On the candidate side, a State can ban a candidate from a partisan primary-election ballot if the candidate had been registered with any other political party in the year leading up to declaring candidacy for the partisan primary. *Storer*, 415 U.S. at 733. On the voter side, States may require primary-election voters to have been registered with the relevant party ahead of the election. *Rosario v. Rockefeller,* 410 U.S. 752, 753, 762 (1973). A state may even prohibit a political party from inviting voters registered with other parties from voting in its primary. *Clingman v. Beaver*, 544 U.S. 581, 587 (2005). The Court has even upheld a political party's requirement that its candidates pledge to support the winner of a nominating convention. Although that was not a First Amendment decision, the Court detected "no federal constitutional objection" to the pledge mandate. *Ray v. Blair*, 343 U.S. 214, 231 (1952).

There are, though, limits on States' power to regulate primary voting and primary candidates. Those limits follow from the general associational rights the First Amendment protects. Those rights run in both directions. In one direction, States do not have unchecked latitude to block a political party from allowing independent voters to participate in its primaries. *Tashjian v. Republican Party of Conn.*, 479 U.S. 208, 225 (1986). In the other direction, States may not force a political party to open its primary to all voters. *California Democratic Party v. Jones*, 530 U.S. 567, 577

(2000). *Jones* recognizes that "a corollary of the right to associate is the right not to associate." *Id.* at 574; *see also, e.g.*, *Boy Scouts of Am. v. Dale*, 530 U.S. 640 (2000); *Hurley v. Irish–American Gay, Lesbian and Bisexual Group of Boston,* 515 U.S. 557 (1995); *cf. Hosanna-Tabor Evangelical Lutheran Church & Sch. v. E.E.O.C.*, 565 U.S. 171, 196 (2012).

In short, while the States have significant power to regulate candidates and voters in primary elections, they may not "force[] political parties to associate with … those who … have expressly affiliated with a rival," *Jones*, 530 U.S. at 581, or "force parties to accept candidates they do not want," *Washington State Grange v. Washington State Republican Party*, 552 U.S. 442, 459 (2008) (Roberts, C.J., concurring).

2. Ohio's good-faith requirement for candidate declarations respects political parties' associational rights by shielding parties from candidates who do not share their values. Conditioning ballot access on a candidate's affirmation that the candidate is "a member of" the party and "will support and abide by the principles of" the party, Ohio Rev. Code §3513.07, is a logical way to promote order and confidence in primary elections. Ohio's law thus easily satisfies the Court's oft-deployed "balancing test" for voting regulations that weighs the burden on voting against the governmental interest in running orderly elections that engender voter confidence. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 190, 195–200 (2008) (Stevens, J., Op.). Indeed, Ohio's "effort to respect" political parties' "First Amendment interests," *Williams-Yulee v. Fla. Bar*, 575 U.S. 433, 451 (2015), should leave little doubt that it survives any First Amendment scrutiny.

3. Ronan pushes back on the good-faith requirement's constitutional bonafides by drawing on three cases, but each is woefully inadequate for the task. Ronan first spends pages detailing the litigation (including a decision from this Court) about Ohio's former law regulating campaign speech. Ronan Appl.15–17. Those decisions about candidates' *campaign* speeches hold little to no relevance in this case about *ballot access*. As the above discussion shows, States have far more power to regulate ballot access than campaign speech. Indeed, equating the two "would undermine the ability of States to operate elections fairly and efficiently." *Burdick*, 504 U.S. at 439.

Ronan also cites cases about viewpoint discrimination as justifying his request for an emergency injunction. Ronan Appl.17 (citing*, e.g.*, *Miami Herald Pub. Co. v. Tornillo*, 418 U.S. 241 (1974)). Again, the comparison is inapt. Whatever the evils of such discrimination for speech generally, those cases do not govern in the context of political-party association. If they did, the Court would not have held that California could not force political parties to accept all voters in partisan primaries or held that Oklahoma could ban non-party voters from partisan primaries. *See Jones*, 530 U.S. at 577; *Clingman,* 544 U.S. at 588.

Finally, and puzzlingly, Ronan cites *Dale*, a case upholding an associational right of exclusion. Ronan Appl.18. In Ronan's view, *Dale* means that courts cannot second-guess private entities' associational choices. But Ohio law *facilitates* those rights by requiring candidates to affirm that they have honestly declared party membership and commitment to that political party's "principles." Ohio Rev. Code §3513.07.

At bottom, Ronan's request is upside down. Political parties possess a First Amendment associational right to exclude those who do not share their values. So it would be quite surprising if the First Amendment forbids States from protecting that right when the Amendment "barely—and only provisionally—permits" States to compel association. *See Schuette v. Coal. to Defend Affirmative Action, Integration & Immigrant Rts. & Fight for Equal. By Any Means Necessary (BAMN),* 572 U.S. 291, 317 (2014) (Scalia, J., concurring in the judgment). *Dale* itself is a leading case about the associational right not to "accept members where such acceptance would derogate from the organization's expressive message." 530 U.S. at 661.

At the very least, in this posture, Ronan's right to an injunction is not "indisputably clear." *Lux*, 561 U.S. at 1307 (quotation omitted).

B. Ronan has failed to state a claim under the Elections Clause and even if he did, he cannot succeed on it.

Ronan next asserts that his removal from the ballot violates the Elections Clause. Fatal to his claim, he does not explain *how* his removal violated that clause. His bare arguments include that he has standing and a §1983 cause of action to challenge his removal under that clause. *See* Ronan Appl.18–20. Even assuming he is right, standing and a cause of action do not entitle him to an injunction. He must show that he is likely to succeed on the *merits* of his Elections Clause claim to be entitled to an injunction. He has not even tried.

Even if he had tried, he would have failed. That is because his Elections Clause claim would add nothing to his First Amendment claim. *Cf., e.g.*, *Burdick*, 504 U.S.

at 433–34; *Timmons*, 520 U.S. at 357–58. If there exists an Elections Clause argument that is distinct from his First Amendment argument, Ronan does not make it.

C. Ronan cannot succeed on his due-process claim.

Ronan's federal due-process claim is likewise unlikely to succeed. His argument is as follows: a Board Member, Freedhoff, who voted to remove Ronan from the ballot for violating Ohio's good-faith requirement, served as vice-chair in the Ohio Republican Party, which had endorsed and financially supported (through its subsidiary, the Franklin County Republican Party) Ronan's opponent. Ronan Appl.5–6, 14, 20. So, he argues, she should have been disqualified from participating in the hearing because she was "personally financially interested" in the outcome. Ronan Appl.20. This does not suffice to obtain an extraordinary injunction pending appeal for two reasons.

First, this Court has said that candidates for political office do not have a property or liberty interest in an elected position. *Snowden v. Hughes*, 321 U.S. 1, 7 (1944). So even if Ronan was wrongly denied a right to political office, any claim arising from that denial cannot be "secured" under the Due Process Clause. *Id.* But Ronan claims a circuit split. Ronan Appl.20–21 (collecting cases). Maybe so, but that counsels against relief because when the circuits are split on the critical issue of whether a due-process right even exists, Ronan's right to relief is anything but "indisputably clear." *Lux*, 561 U.S. at 1307–08 (explaining that circuit divergence on the legal issue defeats the "indisputably clear" standard for injunctive relief).

Second, even if Ronan had asserted a viable due-process claim, it fails on its merits. As the Sixth Circuit noted, Ronan conceded that he had "no evidence of any

personal financial benefit to Freedhoff" or that she had discussed the protest hearing with the Ohio Republican Party. App.7. And he offers nothing now beyond mere speculation and vague, attenuated theories of how Freedhoff could have potentially been influenced by her connection to the Ohio Republican Party and *its* potential connections. Ronan Appl.22. Nothing rises to the "probability of actual bias" that "is too high to be constitutionally tolerable." *Caperton v. A. T. Massey Coal Co.*, 556 U.S. 868, 872 (2009) (quotation omitted).

II. The remaining equities weigh against enjoining a duly-enacted State law, this Court is unlikely to grant *certiorari*, and this Court should not enter the election fray when Ronan has not shown he is indisputably entitled to an injunction.

Because Ronan seeks an injunction to vindicate his constitutional rights, this case largely ends where Ronan's likelihood of success on the merits fails. Nevertheless, the balance of equities and the public interest, which merge in this case, undermine Ronan's extraordinary request for a first-in-time injunction from this Court. *Nken*, 556 U.S. at 435. For one thing, "[a]ny time a State is enjoined by a court from effectuating statutes enacted by representatives of its people, it suffers a form of irreparable injury." *Trump v. CASA*, 606 U.S. 831, 861 (2025) (quoting *Maryland v. King*, 567 U.S. 1301, 1303 (2012) (Roberts, C.J., in chambers) (additional quotation marks omitted)). That means it is the *State* that will be injured by an injunction from this Court. That is especially true *here* because the State retains the power to regulate its own election. *Burdick*, 504 U.S. at 433. And it has an overwhelming interest in protecting the fairness and integrity of its elections by protecting against sham

candidacies, party raiding, and voter confusion. *See id.* at 439–40. All this is truer *now* because the election is already underway. *Purcell v. Gonzalez*, 549 U.S. 1, 4–5 (2006).

Ronan cannot clear the two other procedural hurdles required of applicants seeking an injunction pending appeal: certworthiness and an indisputable legal entitlement to an injunction. *See Hollingsworth*, 558 U.S. at 190; *Lux*, 561 U.S. at 1307. On certworthiness, this Court is unlikely to grant *certiorari* in this case. Only the due-process claim features a circuit split—that too, a lopsided one *against* Ronan's position. Even if the Court wanted to resolve that split, this case would not be the preferred vehicle to do so. And the remaining claims concern only straightforward applications of this Court's well-established law. A certworthy question is nowhere to be seen. On indisputable legal entitlement, for the reasons discussed above, Ronan has not shown that he is indisputably entitled to an injunction. *Above* 9–16.

That means this Court should hesitate to interfere with an election that is already underway. Putting Ronan on the ballot now given how unlikely he is to ultimately prevail in this litigation will cause "chaos and confusion." *Merrill*, 142 S. Ct. at 880 (Mem.) (Kavanaugh, J., concurring). "[E]ven heroic efforts" by state officials "likely would not be enough to avoid" the turmoil that will follow. *Id.*

CONCLUSION

The Court should deny the requests for injunction pending appeal, administrative stay, and expedited briefing.

April 2026

Respectfully submitted,

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Attorney General of Ohio

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Frank LaRose

Appendix

No. 26-3272

FILED
Apr 6, 2026
KELLY L. STEPHENS, Clerk

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

SAMUEL RONAN, et al.,	)	
	)	
Plaintiffs-Appellants,	)	
	)	
v.	)	O R D E R
	)	
FRANK LAROSE, et al.,	)	
	)	
Defendants-Appellees.	)	

Before: BATCHELDER, LARSEN, and READLER, Circuit Judges.

Plaintiffs Samuel Ronan and Ana Cordero moved the district court for a temporary restraining order and preliminary injunction directing the Ohio Secretary of State and Franklin County Board of Elections members to restore Ronan to the Republican primary ballot for the State of Ohio's Fifteenth Congressional District in time for votes to be cast for him and counted. The district court granted Plaintiffs a temporary restraining order. On April 2, 2026, after holding an evidentiary hearing, the district court vacated its temporary restraining order and denied Plaintiffs a preliminary injunction. It also stayed its dissolution of the temporary restraining order (TRO) until noon today. Plaintiffs filed this appeal on Friday, April 3, 2026, and moved for an injunction pending appeal and for an administrative stay.

We recognize the need for an expedited decision, given that early voting begins in Ohio tomorrow. Having reviewed the record, the pleadings, and the applicable law, we conclude that

Plaintiffs have failed to sustain their burden of showing a likelihood of success on the merits. Therefore, the motion for an injunction pending appeal is **DENIED**, and the request for an administrative stay is **DENIED AS MOOT**.

Samuel Ronan declared his candidacy in the State of Ohio's Fifteenth Congressional District as a Republican. To become eligible for the ballot, Ronan signed a declaration of candidacy stating: "I am a member of the Republican Party," and "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican Party." R. 31-1, Decl., PageID 1239; *see* Ohio Rev. Code § 3513.07. The declaration also contains a notice that "whoever commits election falsification is guilty of a felony of the fifth degree." R. 31-1, Decl., PageID 1239. Sometime after signing this declaration, Ronan posted on Facebook that "Leftists need to infiltrate [R]epublican spaces and primary them" and that's why he is "running as a Repub[l]ican now." R. 31-2, Exhibit, PageID 1241. Ronan had previously run for Chair of the Democratic National Committee. Referencing that campaign, he separately posted a Facebook comment stating, "I believe [I] very clearly mentioned [in the] DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, *as Republicans*. . . . So, if I am doing anything, it's following the argument I made on that stage." R. 31-3, Exhibit, PageID 1242 (emphasis added).

As permitted by Ohio law, an Ohio voter then protested Ronan's Republican candidacy. During a March 6, 2026 hearing on the protest, the Franklin County Board of Elections tied two-to-two on whether to remove Ronan from the ballot. On March 13, the issue was referred to Secretary Frank LaRose for a tie-breaking vote under Ohio Rev. Code § 3501.11(X).

After LaRose broke the tie in favor of the protest, Ronan and one of his supporters filed this suit against LaRose and the members of the Franklin County Board of Elections. Ronan

alleged that the defendants violated his rights under the First Amendment and the Elections Clause of the U.S. Constitution by excluding him from the ballot based on a purported requirement that he attest to his candidacy in good faith. He also alleged that Meredith Freedhoff, a Board member, violated his due process rights by failing to recuse herself from the protest hearing before the Board of Elections. Ronan then moved for a temporary restraining order and a preliminary injunction to keep his name on the ballot. The district court initially issued a fourteen-day temporary restraining order and ordered expedited discovery; the court held a hearing on the preliminary injunction on April 2, 2026.

After the hearing, the court denied the motion for preliminary injunction and dissolved the temporary restraining order. The court reasoned that Ronan was no longer likely to succeed on the merits based on the additional evidence presented to the court. In particular, the court found that Ronan's First Amendment claim was unlikely to succeed because Ohio law required declarations of candidacy to be made in good faith, and this requirement is constitutional. The court also found that Ronan's Elections Clause and Due Process claims were unlikely to succeed. But rather than dissolve the TRO immediately, the court stayed its ruling and extended the TRO until noon on Monday, April 6, 2026, to allow this court to weigh in on a potential motion for a stay pending appeal. We now decline to grant that temporary relief.

Four factors govern whether we issue an injunction pending appeal: (1) whether the movant is likely to prevail on the merits of the appeal; (2) whether the movant will suffer irreparable harm absent an injunction; (3) whether other interested parties will be harmed if an injunction issues; and (4) where the public interest lies. *A. Philip Randolph Inst. v. Husted*, 907 F.3d 913, 917 (6th Cir. 2018) (order). But where, as here, the First Amendment is implicated, only

the first factor generally matters. *See Fischer v. Thomas*, 52 F.4th 303, 307 (6th Cir. 2022) (per curiam).

First Amendment. We agree with the district court that Ronan is unlikely to show that Ohio Rev. Code § 3513.07 violates the First Amendment.

First, a note about the law in question. Ohio Rev. Code § 3513.07 requires candidates to sign a declaration of candidacy stating: "I am a member of the ___ Party," and "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the ___ Party." *Id.* The declaration also contains a notice that "whoever commits election falsification is guilty of a felony of the fifth degree." *Id.* While Ohio law permits candidates to change parties based on self-identification, *see State ex rel. Guest v. Husted*, 109 N.E.3d 1229, 1234–35 (Ohio 2018), we agree with the district court that Ohio law requires that change to be made in good faith. *Cf. Jolivette v. Husted*, 694 F.3d 760, 770 (6th Cir. 2012) (concluding that "the disqualification of an independent candidate based on 'a finding that the candidate's claim to have disaffiliated with a political party was not made in good faith because the candidate is not actually unaffiliated'" (quoting *State ex rel. Livingston v. Miami Cnty. Bd. of Elections*, 963 N.E.2d 187, 192 (Ohio Ct. App. 2011)); *Morrison v. Colley*, 467 F.3d 503, 511 (6th Cir. 2006).

Ronan has not shown that this good-faith requirement facially violates the First Amendment. A facial challenge is "hard to win" because it can "prevent[] duly enacted laws from being implemented in constitutional ways." *Moody v. NetChoice, LLC*, 603 U.S. 707, 723 (2024). We agree with the district court that Ronan has failed to meet his burden to show that signing a declaration of candidacy in good faith "prohibits a substantial amount of protected speech as

compared to its plainly legitimate sweep." *Doe v. Burlew*, 165 F.4th 525, 530 (6th Cir. 2026) (citation modified).

Nor is Ronan likely to show that the good-faith requirement violates the First Amendment as applied to him. "[T]he right to vote in any manner and the right to associate for political purposes through the ballot [are not] absolute"—especially because "states retain the power to regulate their own elections." *Burdick v. Takushi*, 504 U.S. 428, 433 (1992). A look at the facts here shows that the Board removed Ronan because Ronan's own speech disavowed his sworn statement, not, as Ronan claims, because the Board deemed Ronan's policies "unRepublican."

Under our caselaw, we use the *Anderson-Burdick* framework to determine whether a state ballot-access regulation violates the First Amendment. *See Anderson v. Celebrezze*, 460 U.S. 780 (1983); *Burdick*, 504 U.S. at 428; *Green Party of Tenn. v. Hargett*, 791 F.3d 684, 688, 693 (6th Cir. 2015). To apply this framework, "a court must: (1) evaluate whether an election restriction imposes a severe or incidental burden; (2) assess the state's interests in the restriction; and (3) ask if the state's interests make the burden necessary." *Kowall v. Benson*, 18 F.4th 542, 546 (6th Cir. 2021). *But see Daunt v. Benson*, 999 F.3d 299, 323 (6th Cir. 2021) (Readler, J., concurring in the judgment) ("*Anderson-Burdick*'s hallmark is standardless standards.").

First, this ballot-access restriction does not impose a severe burden on Ronan. *See Morrison*, 467 F.3d at 507. The good-faith requirement prevents a candidate from running a sham election in which he self-identifies as a Democrat but tells voters that he is a Republican, or vice versa. That restriction does not prevent Ronan from voting, supporting candidates, endorsing candidates, running for office, or even switching parties. The only requirement is that he switch parties truthfully.

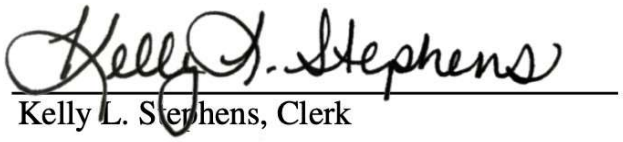
Second, the state has a substantial interest in this restriction. *See id.* at 508. States may protect the fairness and integrity of elections, prevent fraud and corrupt practices, and avoid confusion. *See Burdick*, 504 U.S. at 439–40 ("The State has a legitimate interest in preventing . . . maneuvers" like "party raiding" and may "require that party candidates be members of the party." (citation modified)).

Finally, a good-faith requirement is a reasonable means to achieve the state's interest. *See Morrison*, 467 F.3d at 506. That's especially true in the case before us, which as the district court noted, presents "unique factual circumstance[s]." R. 34, Hearing, PageID 1322. Here, Ronan swore that he was a Republican and would abide by Republican Party doctrine; afterwards he made public statements that the factfinders here could reasonably decide showed that Ronan had made those declarations in bad faith. So Ronan is unlikely to "succeed on his federal constitutional claims because he has not shown that the application of Ohio law's 'good faith' standard . . . violated his constitutionally protected rights as a candidate." *Jolivette*, 694 F.3d at 770 n.4.

Elections Clause. Defendants argue that that a candidate for office cannot bring a claim to enforce the Elections Clause. We need not decide that question because even if Ronan can bring this claim, he likely cannot show a constitutional violation. That is true for largely the same reasons that his First Amendment claim fails—the good-faith requirement under Ohio law likely does not exceed constitutional bounds. "States may, and inevitably must, enact reasonable regulations of parties, elections, and ballots to reduce election- and campaign-related disorder." *Timmons v. Twin Cities Area New Party*, 520 U.S. 351, 358 (1997) (citing *Burdick*, 504 U.S. at 433). Ronan gives no independent reason why his claim should succeed under the Elections Clause once it has failed under the First Amendment.

Due Process Clause. Finally, Ronan is not likely to show that Elections Board member Freedhoff violated his due process rights when she participated in the vote to remove Ronan from the ballot. "[S]tate administrators are assumed to be [people] of conscience and intellectual discipline, capable of judging a particular controversy fairly on the basis of its own circumstances." *Withrow v. Larkin*, 421 U.S. 35, 55 (1975) (citation omitted). Ronan argues that Freedhoff's position as an official in the Franklin County Republican Party and her connections thereto violated his due process rights to an impartial tribunal. But Ronan conceded that he had no evidence of any personal financial benefit to Freedhoff nor that Freedhoff discussed the protest with the Ohio Republican Party. And he also conceded that Freedhoff had no knowledge of any alleged Ohio Republican Party involvement before the hearing or her vote. Ronan likely cannot show that "the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 872 (2009) (citation omitted).

ENTERED BY ORDER OF THE COURT



Kelly L. Stephens, Clerk

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

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Clerk

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Filed: April 06, 2026

Mr. Mark R. Brown

Mr. Oliver B. Hall

Ms. Jeanine Amid Hummer

Ms. Julie M. Pfeiffer

Mr. Eli Redfern

Mr. Stephen P. Tabatowski

Mr. Mark D. Tucker

Mr. Brian Zagrocki

Re: Case No. 26-3272
Samuel Ronan, et al v. Frank LaRose, et al
Originating Case No. 2:26-cv-00343

Dear Counsel,

The Court issued the enclosed Order today in this case.

Sincerely yours,

s/Kelly Stephens
Case Management Specialist: Antoinette
Direct Dial No. 513-564-7015

cc: Mr. Richard W. Nagel

Enclosure

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

_____

SAMUEL RONAN and ANA CORDERO,
Plaintiffs,
v. Case No.
FRANK LAROSE, in his official 2:26-CV-00343
capacity as Secretary of State
of Ohio; DOUGLAS J. PREISSE, in
his official capacity as Chair
of the Franklin County Board of
Elections; MEREDITH FREEDHOFF,
in her official capacity as
Member of the Franklin County
Board of Elections; JAMIE L.
SHUMAKER, in her official
capacity as Member of the
Franklin County Board of
Elections; and MICHAEL E.
SEXTON, in his official capacity
as Member of the Franklin County
Board of Elections,
Defendants.

_____

DEPOSITION OF
SAMUEL RONAN

DATE: Friday, March 27, 2026
TIME: 10:06 a.m.
LOCATION: Office of the Ohio Attorney General
30 East Broad Street, 20th Floor
Room 2001
Columbus, OH 43215
REPORTED BY: Asia Mays
JOB NO.: 7986054

A P P E A R A N C E S

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A P P E A R A N C E S (Cont'd)

ON BEHALF OF DEFENDANTS DOUGLAS J. PREISSE, MEREDITH FREEDHOFF, JAMIE L. SHUMAKER, AND MICHAEL E. SEXTON:

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I N D E X

EXAMINATION:	PAGE
By Mr. Rustico	8
By Mr. Zagrocki	85

E X H I B I T S

NO.	DESCRIPTION	PAGE
Exhibit 1	Grove City Area Progress Facebook Post	58
Exhibit 2	Ana Aleida-March Facebook Post	61

P R O C E E D I N G S

THE REPORTER: Good morning. My name is Asia Mays. I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 10:06 a.m.

This is the deposition of Samuel Ronan, taken in the matter of Samuel Ronan, et al. vs. Frank LaRose, in his official capacity as Secretary of the State of Ohio, et al. on Friday, March 27, 2026, at the office of the Ohio Attorney General, 30 East Broad Street, 20th Floor, Room 2001, Columbus, Ohio 43215.

I am a notary authorized to take acknowledgements and administer oaths in Ohio.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and
- shall constitute written stipulation of such.

At this time, will everyone in attendance please identify yourself for the record. And we will be begin with my taking attorney.

MR. RUSTICO: Hi. I'm Greg Rustico from the Ohio Attorney General's Office. I'm here on behalf of Senate Secretary Frank LaRose.

MR. TABATOWSKI: Steve Tabatowski, also with the Ohio Attorney's General also on behalf of defendant LaRose.

MR. REDFERN: Eli Redfern, assistant Franklin County prosecuting attorney here on behalf of Defendants Douglas Preisse, Meredith Freedhoff, Jamie Shumaker, and Michael Sexton, in their official capacities as members of the Franklin County Board of Elections.

MR. ZAGROCKI: Brian Zagrocki, also from the Franklin County Prosecutor's Office, and also on behalf of the Franklin County Board of Election members.

MS. HUMMER: Jeanine Hummer on behalf of the Franklin County Prosecutor Shayla D. Favor, representing the members of the Board of Elections previously named by Mr. Redfern.

MR. BROWN: Mark Brown, representing the plaintiff, Samuel Ronan.

MR. RONAN: Samuel Ronan, the plaintiff.

THE REPORTER: Thank you.

Hearing no objection, I will now swear in the witness.

Mr. Ronan, please raise your right hand.

WHEREUPON,

SAMUEL RONAN,

called as a witness and having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

THE REPORTER: Thank you.

Counsel, you may proceed.

EXAMINATION

BY MR. RUSTICO:

Q Good morning.

A Good morning.

Q I know we already did it. But if you could start by just stating your name and spelling your last name for the record.

A Yeah. Samuel Ronan, spelled R-O-N, as in Nathan, A, as in apple, N as in Nathan.

Q Have you ever been deposed before?

A I -- I'm honestly not certain. I don't

think so.
Q Okay. Do you understand that you're under oath here today?
A Yes.
Q And so you must tell the truth.
A Yes.
Q So because you said you may or may not have done this before, I'm going to try to help you, walk you through this, explain a little bit of the process. So the first thing to keep in mind, this is being audio recorded, not video recorded. So please always give verbal answers.
A Yes, sir.
Q There's often a tendency to just nod or shake your head. We're going to need to get those audible yeses or nos.
The other thing is, because the stenographer's trying to, you know, get a clean record, we want to try not to talk over each other. So if you can, please let me finish my questions. And I'll try to do the same for you, let you finish your answers.
And I'm sure there'll be times we'll talk over each other. But we'll make sure to get everything clean for the record.

A All right.
Q If you don't understand one of my questions, please just let me know.
A All right.
Q But if you answer a question, I'll assume that you understood it.
A Yes, sir.
Q Everything you say is going to become part of the record in this case. There'll be a transcript that's created afterwards that you'll have a chance to review for any errors. Does that make sense?
A So for the sake of argument, if I say something that I thought in the moment was correct and then I find out later it was incorrect, I can correct the record?
Q There may be a means for you to do that through your attorney. But the things you say here today are under oath. And so the transcript can't be changed in that way. You'll get a chance to look at the transcript for, like, typographical errors or something like that.
A Yes, sir.
Q Your attorney may object from time to time. But after that objection, unless he says otherwise, you're still going to answer the question. So what we

do is we preserve objections for the record. But you'll actually answer the question.

So it's different than maybe what you've seen on TV where they yell, "Objection," "Sustained." There's no judge here to either sustain or overrule the objections.

A Okay.

Q If you need a break at any time, please just let us know. The only real rule is that you just can't take a break while a question is pending.

A Okay.

Q So you -- if you'll finish answering the -- the question that's open and then we would take a break.

A Okay.

Q Are you taking any medications that might affect your ability to answer the questions truthfully today?

A No, sir.

Q Okay. Have you done anything to prepare for this deposition?

A Other than take time off to be here, no.

Q Without telling me the content of any discussion, did you meet with your attorney to prepare for this deposition?

A No.
Q Have you spoken to anyone else about this deposition?
A The fact that it's happening.
Q But not the content?
A In so far as this deposition deals with my ballot access. But not -- I wouldn't have any internal information.
Q Okay. So who did you speak with about the deposition?
A My campaign manager.
Q Okay. And who's that?
A Ana Cordero.
Q Okay. So she's the other plaintiff in this case?
A Yes.
Q Okay. Did she give you any advice?
A No.
Q Did you review any documents in preparation for this deposition?
A No.
Q Did you bring any notes with you today?
A No.
Q So you're one of the plaintiffs in this case; correct?

A Yes, sir.
Q What do you understand the nature of your claims to be?
A My claims?
Q Yeah.
A That I am a Republican. That I am authorized to be on the ballot as a Republican under both Ohio Law and the previous Board of Elections determination. And that my values and stance within the Republican Party has been on the record. So --
Q What remedy are you seeking in this case?
A My attorney would be best able to answer that question. But as far as I understand it, it is a minimum of being on the ballot for the primary.
Q And that's the May 5th Republican Primary for the 15th Congressional District? Is that right?
A Yes, sir.
Q Have you spoken publicly about this case?
A I have posted on social media that the -- the facts -- that I had a hearing. And the -- the ruling was what it was. I have not said anything other than that.
Q And the hearing you're referring to was --
A The federal one that we did last week with the --

Q Okay. So you posted about the TRO hearing we had last Friday?

A Yeah. Simply that it was ruled that I am on the ballot as of that moment.

Q Okay. What was your understanding of that ruling? What did you say in your post?

A I literally only wrote that. I can pull it up, I suppose, if --

Q No, it's -- it's okay. It's --

A My understanding is that I am on the ballot pending whatever outcome from April 2nd.

Q Okay. How old are you?

A Thirty-six.

Q Have you lived in Ohio your whole life?

A Most of my life.

Q All right. Give me a little bit of your background, biographical sketch.

A I mean, I went to school here. I was raised here. But I -- in the military, I was stationed in Okinawa, Japan, Keesler Air Force Base for training, and Arkansas, Little Rock Air Force Base.

Q Have you been a resident -- when you were in Ohio, was it the Columbus area?

A No, it was Fairfield County, Lancaster.

Q Okay. When did you move to the Columbus

area?
A July 14th last year I bought a house.
Q Okay. What do you do for work?
A I'm a maintenance planner. So I guess in context of what an attorney would do is I manage the workflow of my department. So --
Q And what -- where's -- what department is that?
A The maintenance department.
Q For, sorry, what organization? Who do you work for?
THE WITNESS: Quick question. Is that something that is relevant?
MS. HUMMER: Yes.
THE WITNESS: Okay. Marzetti.
BY MR. RUSTICO:
Q Okay. Have you ever been employed by a political campaign?
A Employed?
Q Yeah.
A I have not received any sort of monetary compensation, official or otherwise, from a campaign, no.
Q Okay. Have you volunteered for any political campaigns before?

A I have attempted to, yes.
Q Okay. Can you tell me a little bit more about that?
A I think it was a couple years back. I offered advice to the Jill Stein campaign because their social media presence was abysmal. And I had just gone through my own social media rebuild. And I happened to be friends with a member of the Jill Stein campaign. And I reached out to them for that reason.
Q You mentioned it was a few years back. Was that likely her 2024 campaign?
A Probably, yeah.
Q Okay. And did you end up doing any work for her?
A No.
Q Were you given a reason why you weren't?
A Largely because, I believe -- well, let me -- let me think about that for a second. If I remember correctly, and I think I do, it was because of my political affiliation.
So in 2024, I also ran as a Republican trying to do a presidential dark horse campaign and -- against the current administration as -- as the front runner.
And it was during that time that I reached

out to them. So there was -- it was just more like friendly advice, "Hey, this is what I learned in what I experienced."

Q So you believe you were affiliated with the Republican Party at that time?

A I absolutely was.

Q Okay. And so they weren't interested in your advice because they saw you as a Republican?

A I -- I believe that was the gist of it. Or rather maybe they didn't have the means to follow up on it. Or I -- I don't remember. That was two years ago. But I -- I think that's the gist of the conversation.

Q I was planning to ask you a little bit more about that later. But since we -- the topic came up, tell me a little bit more about your 2024 presidential campaign. Did you ever file any paperwork? Did you collect any signatures? What kind of actions did you take as a candidate?

A So I did not -- I -- I might have filed with the FEC as in, like, the candidate thing that you're supposed to file. But I didn't collect signatures, nor did I -- I don't believe I even succeeded in fundraising.

What I did end up doing was spending a lot

of money to go on a lot of different talk shows and radio interviews, one of which was the Alabama thing. I was attempting to get 1-percent polling so that I could get onto the debate stage. That was the primary goal. That obviously did not happen.

Q So this was during the presidential primary. This was not the general election. This was during the primary stage?

A Yes.

Q Okay. Did you ever file any paperwork with the Secretary of State and do a similar declaration of candidacy like you did here?

A No, that was just -- no. Like I said, I was trying to do a dark horse protest type candidate. And it didn't get far enough to where I would have filed with multiple states, let alone Ohio.

Q Sure. What do you mean by a dark horse?

A My understanding of the term, it's colloquial as a very unlikely to win. But potentially an upset.

Q Okay. Is that distinct from -- you also said a protest. What would make --

A Oh, I -- I see what you're saying.

Q I'm just trying to understand your -- I'm just --

A I use those terms interchangeably. But I understand that there might be -- if it -- if it is easier to utilize one word, then it would be dark horse.

Q Okay. You're welcome to use multiple words. I was just trying to expound on what you said. What other steps did you take as part of that campaign? You mentioned you went on some talk shows?

A That -- yeah. I mean, I -- I tried to get as much, quote/unquote, publicity as possible by going on conservative talk shows and radio and news. And I -- I did succeed to a degree with that. But again, it didn't amount to what I was hoping.

Q Did you create a campaign website?

A I've had a campaign website since -- since I ran in 2015. Well, no. 2016.

Q Okay. And that's samronan.com?

A Yes, sir.

Q So have you just changed it as you've run for different offices?

A Yes, sir. I either updated policies as my own understanding of policies and platforms came to the office that I ran for. Obviously, State Representative versus House versus POTUS versus whatever. So --

Q Were there any other campaigns that you volunteered for over the years?

A I don't believe so.

Q Have you ever advocated for a particular candidate, maybe in an informal way? It sounds like you haven't formally volunteered for any candidates. Have you ever advocated for a candidate?

A In what way?

Q Expressing your support for them, encouraging others to vote for them. I'm just curious if you've been involved. You mentioned that you didn't -- you haven't been employed. You haven't volunteered except your attempt with Jill Stein.

I'm just trying to figure out what other interaction you've had with politicians in that way. Like, have you ever endorsed a candidate perhaps or posted about them in a positive light?

A I'm sure I have endorsed candidates because there was a time in 2018 where we were going out of our way to cross-endorse each other. Couldn't tell you their names off the top of my head.

And there have been candidates that I have said good things about, and there are candidates that I have said bad things about. And depending on their trajectory in politics, I may have reversed some of

those opinions to the present. So is there anyone in particular you're trying to ask about?

Q No.

A Okay.

Q No. Were some of them Democrats?

A Oh, I'm sure there were Democrats, Republicans, Green, Libertarians.

Q Have you ever been affiliated with any other political organizations? So we talked about parties. But I could imagine something like a college group or, you know, local groups of certain parties. Do you have a -- are you a member of any or have you been a member of any political organizations?

A I don't think I've been a card-carrying member of political organizations. I think I've advocated for some. Like, one of the ones was brand new Congress back in 2017 or '18. They were trying to help grassroots candidates like myself run for office. So I advocated on that type of deal.

I've probably, at protests or as an activist, worked with some for sure. I -- again, unless you have a specific one, I -- I can't nail it down.

Q Okay. When did you first get interested in politics?

A Oh, October 1, 2013. Specifically because of the government shutdown that was led by Ted Cruz. And the fact that I was active duty at the time, and we were all brought into a room much like this. Maybe not like this, but you know what I mean.

And we were told by our chief that we weren't going to get paid. We were going to be expected to come to work and serve our country. And I'm okay with that. That's -- that's whatever. That's what you signed up for.

But at the time, I was -- I -- I believe I was a unit deployment monitor at that time. And you know what that is; right? You were in the Navy?

Q Yes, I -- yeah.

A So I had just sent people downstream, down range into the desert. And sure, my unit isn't exactly the 82nd Airborne. But my unit is still in the desert. It's still deployed. It is still a lawful target in times of war.

And we did have -- I've researched since. We had 26 fatalities during that shutdown. And that stood with me ever since, that we had elected officials who could so brazenly act on -- against the wellbeing and means of the American people so that they can win political points.

It filled me with such rage, contempt, and disgust that I immediately started looking into ways to get out of active duty sooner than my contract would allow, which allowed me to go into the reserves. And then I immediately started running for office as an anti-war candidate.

Q Okay. So anti-war, was that kind of the first animating political issue for you?

A I would say so, yes.

Q And what was it about the government shutdown that was particularly animating?

A It was the audacity. It was simply the audacity, the failure of democracy that our elected officials could not work together to deal with whatever issue it was. I think at the time it was the Affordable Care Act.

And rather than come up with some sort of -- of course naively thinking -- compromise, they just chose a nuclear option that -- that had dire consequences against our service members, not to mention civilians who furloughed, whatever else.

Q Were -- you mentioned you had contempt, anger, disgust, I think you said?

A Yeah.

Q Is that towards Republicans?

A No. That was towards politicians generally.
Q Okay. So Republicans and Democrats?
A Absolutely. That was a failure of democracy.
Q Are there any politicians that you idealize?
A Absolutely.
Q Who are some of those?
A Eisenhower is one of them. If we're talking American politicians, Eisenhower certainly. FDR certainly. I think those were two of our greatest back-to-back presidents in -- in our history.

As far as more modern politicians, not really. I would say there might have been a time -- a time, mind you, where I thought Bernie Sanders was a decent candidate.

But since then, he has proven to be not what I had envisioned and not what kind of leadership I was looking for in terms of, if you're going to support people and be against war, then don't support Israel and genocide. Again, something that I've stood by for a very long time.

Same thing with Eisenhower. You know, for all of his faults, he was the one that allowed the LGBTQ to remain in the military. He established don't ask don't tell. He was vehemently against it. But he

was a leader and made the right decision.

So -- and -- and again, taxing the highest income to build our -- like, the highest earners so that we could build roads, bridges, schools, hospitals, I mean, admirable.

I -- again, I would have to say my favorite president is by far Eisenhower. I know I said FDR as well. FDR did good things too. He did populism. He -- like, Social Security and Medicaid.

So those are things that helped. I -- I can't -- I'm not going to turn a blind eye to that just because he was a Democrat. So for me, my number one favorite American politician is by far Eisenhower.

Q Are there any politicians that come to mind that you dislike? I mean, you mentioned Ted Cruz, for instance.

A Yeah. And I -- I doubt I'm alone with that, even within the Republican Party. Hell, I would even say my dislike for Donald Trump is not alone in the Republican Party.

So again, knowing what I know and being involved in politics the way that I am, I know that Iran was on the verge of signing a nuclear peace deal, that -- that trade deal that was this big, long kerfuffle for decades.

Iran was on the verge, in fact went out of their way to tell this administration that they were not only willing to sign that document, that they were willing to move their nuclear material handling outside of their country. It was going to be the perfect win. It was actually going to be a diplomatic victory to define the century.

And instead of that, Israel, one could argue -- did argue -- actually they said it themselves. Israel convinced this administration to attack Iran instead.

And now we are mired in yet a -- potential, another never-ending war. So my criticism of Trump is both policy and practical and consistent with my longstanding anti-war stance.

Q What do you see as some of the key differences between the major political parties?

A Well, that's an interesting question because, objectively speaking, the only major differences are in their stated platforms. Their donor base is the same. The passage of bills is the same. And their willingness to comply with whatever is put before them is the same.

Where they also diverge is the Democrats argued in 2017, I believe, that they have the legal

right and imperative to choose who their primary candidates are, who wins their primaries.

And they argued further in court that democratic voters do not have a right and should not believe that they have a right to influence their primary elections.

And I believe the Court allowed that. I don't quite remember, but it was definitely in 2017 when that court case happened. And that was at the end of my DNC Chair race, and one of the primary reasons why I stopped associating with the Democratic Party.

I was filled with absolute contempt because, for one, that's election tampering. And that's voter fraud. If -- if you're going to have a primary and give the people a chance to vote but you are arguing that you can disregard that vote altogether, that, in my opinion, uneducated in law as it may be, is voter fraud.

And I found that reprehensible, which is immediate -- why I immediately ran for Congress in 2018 as a Republican. Now, I don't know if that answers the question. But --

Q Have your views of the parties changed over time?

A My understanding of the parties has changed over time. I always thought Republicans were more interested on, like, spending concerns. And Democrats were more concerned about, like, social justice issues.

But as it turns out, neither of those things are the case. Ever since Citizens United, public opinion has driven precisely less than 1 percent, so effectively 0 percent of all policy.

And therefore most of the policies that we get -- most of legislation we get has nothing to do with benefiting society, humanity, or our infrastructure.

And so, as far as I'm concerned, Democrats arguing that they can manipulate their elections is a non-starter. Republicans have been an open tent. In fact, the first party I reached out to after active duty was the Republican Party.

I didn't get ahold of them. I talked to the Democrats and shared my platform with them. And they said, "Sure. You can run with us." But as I ran, I discovered that the party system itself did not support people. And that's why I ran for DNC Chair, to argue that supporting people should be your primary focus.

And when that fell through and then they argued in court, I was like, "Okay. Then I'm going to go with the big tent Republican Party. I don't care how I have to find them, get ahold of them, or associate with them."

As it turns out, I never needed to call them in the first place. I wasn't aware of that. I didn't know I could have just ran as a Republican. I thought I had to get permission from the party.

So naivete, I -- I'll admit -- I'll admit. I know better now. It's one of the reasons why I didn't get permission from the Republican Party, which may have spared a bunch of this stuff; right?

But that's also not the law. The law does not require you to get permission from the Republican Party. The law does not require the Republican Party to even like you or want you or have any -- the party, as in the leadership of the party.

They have to -- the establishment, as the terminology goes, they can despise everything you stand on. But as long as the Republican voter, the 50 signatures plus 1 or however -- up to 150, like, what you have to say, then that's all that really matters.

And with my platform, my policies, my views, and my ability to reach voters, I was able to achieve

that. And I stand by it.

Q So if I understand you correctly, it was -- 2017 was -- you ran for Democratic National Committee Chair?

A Yeah.

Q And it was after losing that that you, in your mind at least, switched to being a Republican. Is that correct?

A I never considered -- so I see where you're going with that question. Thank you for that question. I never considered myself a Democrat to begin with.

I always thought that my views were conservative views: taking care of the country, taking care of our infrastructure, taking care of people, making sure we have healthcare right. I mean, it's in the preamble: life, liberty, and pursuit of happiness. So I've -- I've always considered conserving as my principle core values.

If -- if I had done anything in -- in context, it was using the Democrats because I got out of active duty to run for office. And I wasn't not about to do that and throw away my career for nothing.

What running for the DNC Chair did was reaffirm that the Democratic Party does not care about

1 people. And once I found out about their -- their
2 case, thereafter, I -- that is when I was like, "I'm
3 not even going to try to work with these people
4 anymore."
5 Q Okay. So if I understand you correctly, you
6 ran for -- to be the Chair of the Democratic National
7 Committee in 2017. But at that time, you did not
8 believe you were a Democrat?
9 A No -- no. I've always considered myself,
10 like I said -- well, I guess I didn't -- I haven't
11 said the word yet. Populist. And populism is not
12 limited to conservative, Republican, Democrat, or
13 liberal.
14 Q But you felt that you could run for that
15 position without actually being a member of that
16 party?
17 A Well, just like I'm a member of the
18 Republican Party now. All you have to do is be -- at
19 the time, which I was, I voted in the Democratic
20 primary. So at the time, I was a card-carrying member
21 of the Democratic Party. And at the time, that was
22 the only requirement.
23 So yes, I chose to bring my platform of
24 populism to the national level and I would dare say
25 succeeded within my first appearance.

The entire argument that was being made for the chair race had shifted from a 50-state strategy and a corporate-donor focus to a 3,760-county member focus, focusing on grassroots initiatives, which I'm sure the next couple of questions are infiltrating Republican Primary, so on and so forth.

In my naivete, I did say that. And I stood by it then. But I -- as I'm learning now, some states would have an issue with that. Some states do not have open primaries. So wouldn't work that way. And that's fine. I -- I can admit that. I was 27 years old and still learning about politics.

Q If you would, I'm -- I know you're trying to get ahead to some of these topics. I'm trying to ask you fairly targeted questions for everybody's sake.

A Oh, I'm --

Q No, you're -- listen, this is your deposition. You're welcome to talk. I'm just -- I'm not trying to trick you or trap you. But I'm trying to ask some particular questions. And we're going to kind of go in circles, I think, if we don't rein it in a little bit.

So if I understood you correctly, you used the term -- you were a card-carrying member of the Democratic Party. But then you also said that you

were not a Democrat when you ran. I'm just trying to understand what you were in 2017 from a party perspective.

A From a party perspective, in 2017, I was a Democrat as far as the party perspective.

Q Okay. But you didn't see yourself as a Democrat?

A I mean, how many people see themselves as a Democrat or a Republican when they hold different values? They see themselves as a person who either happens to align with Republicans at the time or Democrats at the time.

Q So after this break in 2017, did you immediately then consider yourself a Republican? Did you consider yourself an independent? I know you've used the term populous. What -- how would you have defined yourself, let's say, early 2018 when -- after this incident?

A I mean, as I said, in early 2018, I made the decision to run for Congress as a Republican. So I established myself as a Republican. I learned where my platform may have differed with local conservative views.

And then I addressed those local conservative views with my platform, which turns out

wasn't the platform itself. It was just the language of it; right?

At the time, things like universal healthcare weren't exactly accepted. So I made sure to, when I talked about healthcare reform, I talked about it from -- like it's an American healthcare program or things along those lines. If the -- the core of the question is identity, then my core identity has never shifted to populist.

Q Okay. So in 2017 you said you were a Democrat but didn't see yourself as a Democrat. And so you -- but you felt comfortable running for DNC Chair?

A Yes.

Q Okay. In 2018, did you see yourself as a Republican, or just you were a Republican? I'm trying to see -- figure out where your party affiliation was at that time.

A So again, if I'm understanding your question correctly -- and it's a big if -- have I been loyal to parties when I was in the party, as in, did I drink their Kool-Aid?

The answer is I have been a populist who has at times worked within the Democratic Party and with -- at times worked within the Republican Party

without any sort of compromise to my populist ideology.

I'm not going to sit here and -- and try and word salad that I was a true-blue Democrat when I was a Democrat and a true-red Republican when I was running as a Republican. I was a populist under the Democratic Party, and I was a populist under the Republican Party.

Q So we've talked a little bit about some of your previous candidacies. I'd like to walk through some of those. Let me know if I'm missing any. So is it correct that in 2016 you ran for House District 62?

A Yes.

Q As a Democrat?

A Yes.

Q Okay. Did you formally become a candidate in that case, in the sense that: did you collect the signatures, make the declaration, file?

A Yeah.

Q Okay. And what was the outcome?

A I made it through the primary, but I was the only one. And then the general, I lost.

Q Okay. And did you run against a Republican in that campaign?

A I did, yeah. It was a -- it was also an

extremely -- what do you call it -- packed primary in the Republican side. So --

Q So in 2017, you ran to be the Chair of the Democratic National Committee? We've talked about that a little bit.

A Yeah.

Q Were there any candidacies in between there? I just want to make sure I get them all.

A I don't --

Q Have you run for anything else?

A I don't believe so, no.

Q Okay. So then next was 2018, the Ohio First Congressional District; right?

A Yes. I ran against Steve Chabot in the primary.

Q Okay. And with that candidacy, you collected the signatures?

A Uh-huh.

Q Okay. You made the declarations?

A Did -- did all the Ps and Qs.

Q Next that I found was 2022. You ran for Ohio Senate. Is that accurate?

A It's accurate in so far as I was approached to do it, and nothing ever came of it. I never signed any paperwork. I never collected any signatures. I

never filed with the FEC. I never paid any money. So to say that I ran would be a stretch.

Q Okay. And then 2024, you ran as a dark horse protest candidate for president?

A Yes, sir.

Q Okay. And I -- you may have already answered this. Did you collect any of the signatures about --

A No -- no. Did not get far enough.

Q When did you decide that you were going to run for this current office, the 15th Congressional District?

A That's a great question. I think I made the decision to pull the trigger right around the time I bought my house, so after I bought my house, so July, last year.

Q Okay. And at some point you created a campaign. I know you mentioned you had an existing website. But do you remember when you started kind of taking steps towards your candidacy?

A Yeah, probably around August.

Q And you -- at some point you started collecting signatures?

A Yeah. That was in the winter.

Q I know there was some discussion at the

board meeting; the form has a date in October. Is that maybe when you started collecting the signatures or --

A That's when I printed out the form and was -- was trying to figure out with my schedule when I would go out and get the signatures and trying to plan out, like: where would be the best places to go? But work and life kind of got ahead of me from there.

Q And so when you filled out that form, you declared that you were, quote, a member of the Republican Party; right?

A Yes, sir.

Q Okay. And you further declared that "If elected to said officer position, I will qualify, therefore, and that I will support and abide by the principles annunciated by the Republican Party"; correct?

A Correct.

Q And you understood those statements were going to be made under penalty of election falsification?

A Yes, sir.

Q Did you read the declaration before you signed it?

A Yes, sir.

Q Do you always read the terms of service before you signed something?
A I try to. But I'll admit that I may have skipped a couple on the internet.
Q But you understood that this was important?
A Yeah. This had real legal consequences.
Q What did you understand that you were declaring?
A That I would abide by the RNC platform of 2024, the most recent platform. Not that I was taking a loyalty oath for this administration.
Q Did you sign it in good faith?
A I believe so.
Q You signed it honestly?
A Yes.
Q And at the time you signed it, you believed you were a Republican?
A Yes.
Q And at the time you signed it, you believed that you would abide by the principles annunciated by the Republican Party; right?
A Within my understanding, yes.
Q What was your source of understanding what the principles annunciated by the Republican Party were?

A The RNC 2024 platform.
Q And you had read and reviewed that before you signed that you were Republican?
A Yes, sir. There's -- there was a lot of, like, good economic policy on there. Good -- you know, like the military to -- you know, modernizing our military type stuff.
There were, I think, only two things that I vehemently disagreed with, and that was, you know, forced deportation and that kind of stuff, that I didn't really agree with that in terms of border policy.
But strengthening our economy, absolutely. Making things more affordable, absolutely. I mean, I -- I understood it as an economic -- a predominantly economic platform.
Q Would you agree that that platform, that document, was drafted in pretty broad terms?
A I mean, I would say that only strengthens my argument. But yes.
Q And that when something's drafted in really broad terms, it could be interpreted different ways?
A I suppose so, yes.
Q So for instance, I believe there was something on the platform -- and I'm just going to

paraphrase here -- something about keeping men out of women's sports?

A Uh-huh.

Q And so you felt you agreed with that because cis-gender men should be kept out of women's sports; correct?

A Right. You and I should not be competing with, like, Venus or Serena Williams or something like that. Right.

Q And did you honestly believe that's what the Republican Party platform was concerned with, cis-gender men playing women's sports?

A I think if we're going to argue about ideology rather than the platform and the reality of where I stand, then I think we're having a different conversation and not legality.

Q So I think what I'm trying to figure out though is: is it possible that you interpreted the Republican Party platform differently than they intended it?

A I'm sure we could ask everybody in this room where they stand on different conservative issues or even liberal issues and get that many different answers.

Q See, but I'm not asking about your position

on issues. I'm asking about your interpretation of a particular document. We can -- we can pull it out if we want to go line by line. I was hoping not to for everybody's time sake.

What I'm trying to figure out is: is it possible that you interpreted the platform differently than the people who drafted it?

A I mean, we interpret the Constitution differently every single day. That -- that's the whole point of law is interpretation of law. Otherwise we wouldn't be having this conversation.

Q Right. So I'll ask my question again. Is it possible that you interpreted this platform more broadly or differently than the authors intended?

A In so far as anything could be interpreted or misquoted or misrepresented or taken out of context?

Q Yes. If you could give me a yes or no to my yes-or-no question, I would appreciate it.

MR. BROWN: Objection. I think he answered your question.

BY MR. RUSTICO:

Q Okay. I'll ask one more time. If you could ask -- if you could give me a yes or a no. Do you -- if you recall, we discussed -- I know this is

new for you.
A I see.
Q -- discussed this before. If he tells you not to answer, we can deal with that separately. I'm just trying to get a yes-or-no answer. I know you have a lot of opinions. I understand that. I respect that. Is it possible that you interpreted the Republican Party platform differently than the authors intended it?
A Yes.
Q And that platform was your basis for determining that you could abide by the principles annunciated by the Republican Party? That was your key source?
A Not my key source. It was definitely one of the -- I -- again, Eisenhower is a Republican. Roosevelt, like not FDR, the other Roosevelt, was a Republican. Reagan was a Republican. Nixon was a Republican. Bush was a Republican. Bush Jr. was a Republican. Even Trump the first term was a different Republican than he is this term.
So again, my ideology is what allows me to think that I could be a Republican, both historically and in the present. So again, I'm not -- I'm not -- I don't understand the -- maybe I'm not understanding

the question.
Q And I apologize if that's the case. I'm always willing to rephrase or ask it again. You -- oh, go ahead.
A Let me -- let me try understanding it. Whether -- the -- the crux I think of the question is: do I only think I'm a Republican because I may have misunderstood the Republican platform? Is again trending towards an ideological and literal, like, political debate part of the question.
If I think I'm a Republican and I sign up to be a Republican, that's all that matters. Just like every single voter out there that thinks they align with a Republican, even if their values may not align with the as-intended platform.
There's also single-issue voters. I -- I mean, if we want to go down that road, I don't -- I don't think we're going to get to where we have any sort of clarity.
Q Would you agree that a document can be interpreted in bad faith?
A I mean, I -- I know that's a loaded question that I have to answer. But, I mean, for the record --
MR. BROWN: Answer if you can.
THE WITNESS: Ask me that question

again, please.
BY MR. RUSTICO:
Q Do you agree that a document can be interpreted in bad faith?
A I feel like that's what's happening right now with this deposition. So yes.
Q I know you're not a lawyer.
A I apologize if I --
Q But you mentioned that -- let me just strike that. I'll start over.
Do you think it's possible for someone to twist words to serve their purpose?
A I -- I don't know how to answer that without being cheeky. I -- I really don't.
MR. BROWN: Objection to it calls for speculation.
BY MR. RUSTICO:
Q Have you ever had an experience in your life where someone interpreted something that you said or something that you wrote differently than how you intended it?
A Sure. Or yes.
Q Have you ever had an experience where someone twisted your words in bad faith?
A Absolutely.

Q So you agree then that that's something that could happen?
A Yes, and it happened to me during the Board of Elections meeting.
Q Okay. So we've discussed a little bit of the declaration of candidacy. At that point, you went out and started collecting petition signatures. Is that right?
A I did.
Q Did anyone help you collect the signatures?
A No. I -- I did go the first day with Ana and her daughter as, like, a unit. But we decided against that in the future. So I was the sole person gathering signatures at that point.
Q Is Ana a Republican to your knowledge? Obviously you could say you don't know, I guess.
A I mean, I don't know.
Q All right. Have you ever talked with her about politics?
A I mean, we are working together on this campaign. So yes.
Q Has she ever suggested to you that she is a Republican?
A She has suggested to me that she is also a populist. I -- I think in terms of -- if you're

getting at core political identity, it would be populist.

Q Are you aware of whether she's voted in Republican primaries in the past?

A I don't know.

Q When you were collecting these signatures, did you ask the signers if they were Republicans?

A Oh, I made absolutely certain to verify they were Republicans.

Q And how did you confirm that?

A Either, A, asking them. So I'm sure everyone here's aware. But for the record, I went on the Secretary of State website, downloaded the -- the District 15 voter files. And then, I mean, my god, they're comprehensive and free, no less.

So I was able to partition those files to where I could get what I thought to be the most likely Republican voter who voted Republican in the last two primaries and the last two generals.

And I specifically went out of my way to ask them. But I obviously verified: "Hi. Samuel Ronan. Is this the whatever residence? I just want to make sure we've got a good strong Republican here. And I just want to talk to you for a bit about my platform and earn your signature."

Q Were people receptive to your platform?
A Oh, yeah, many times actually.
Q Do you have any other staff on your campaign?
A No.
Q Do you have any volunteers?
A Oh, I'm sorry. Interns, yes. I -- I apologize. That was --
Q That's fine. Yeah. No one's memory is perfect. So --
A Okay.
Q So let's talk a little bit about that. So who are these interns?
A Just that, I mean, students.
Q Students --
A From OSU.
Q How many interns do you have?
A Four that have been consistent.
Q What do you mean by consistent?
A Well, it's just like with anything volunteer. I'm sure you've had -- well, it might be different for you guys. In the grassroots community, there's a lot of people who want to be associated with something. And a whole lot less of them that are actually willing to do anything with it.

And the same has been true for volunteering, for an unpaid internship with a campaign. I think we originally had like 12 sign up. And only four have stuck it through.

Q How did you go about soliciting these volunteers or interns?

A Through the internship office and figuring out what their process was and what their requirements were. And --

Q This is an internship office at Ohio State?

A Uh-huh.

THE REPORTER: Is that a yes?

THE WITNESS: Yes. Sorry.

BY MR. RUSTICO:

Q And you -- have you ever asked these interns whether they're republicans?

A No. I was just happy to have the help.

Q What was the vetting process like? How did you end up with these interns? I understand you went to this office at Ohio State. But just educate me 'cause this is something I know nothing about.

A So there was no vetting process. I presented the internships that I needed, filled, the internship office put it out to the respective offices and departments, and students volunteered. And I was

grateful for it.

If there was any vetting done at all, it was to determine, like, "Are you certain this is the internship thing you want to do? Because this is your degree, and this may or may not align."

Q So did you create some kind of profile or request for volunteers that they then responded to?

A I created an internship packet that described the role and what was needed.

Q And what -- oh, sorry. You can keep going. But then what is that? Like, what do you ask your interns to do?

A Oh, some of them are doing social media. Some of them are doing, like, outreach. Just whatever that they signed up for and that would help the campaign.

Q Do they run their statements by you?

A Yes.

Q And so you get a chance to sign off on most or all of what they say on your behalf?

A Yeah, I encourage it. Just one, they're not used to working on a campaign. And so they usually ask me things like, "Hey, is this the right language? Is this the right formatting? Hey, if we're going to reach out to this people, do we need to phrase it

differently?" So --

Q Is that true for Ana as well?

A When it's official campaign correspondence, yes.

Q Okay. And that can include social media posts?

A That is from my official campaign page, yes. What she does with her own time is her own time.

Q And is her -- while we're talking about Ana, I'll jump ahead. Is her name on Facebook different than Ana? You said her name's Ana Cordero, at least it is in this case. Does she have a different name on Facebook?

A I would imagine so.

Q Okay. If I told you there's an Ana Aleida-March, is that her?

A That's probably her, yeah. She has multiple accounts. I -- I'd have to check to see which one we usually correspond on. She also got -- she got harassed on social media recently. So she had to change her name. So --

Q Got you. Okay. So is that at least a name you recognize?

A Yes.

Q Okay. As one that she's used?

A Yeah -- yeah.
Q Okay. If I may, I'd like to turn back the clock to 2017. When you were running for Democratic -- Chair of the Democratic National Committee, part of your platform was to run Democrats as Republicans; right?
A Yeah. So with my naive understanding of that, that was even allowed, which obviously now I know that that's not allowed everywhere.
Q Do you recall the interview you did with Rebel HQ in 2018?
A I remember. I re-watched part of that video. Yes. I don't -- if -- if you're asking me if I remember sitting there and talking to the guy, no.
Q Who is Rebel HQ?
A A person. I -- I genuinely -- I -- I -- what do you call him now? Independent journalist. Something like that.
Q Do you remember how you got in contact with him or how he got in contact with you?
A I do not. That was definitely a blur. I'm assuming they reached out to me. At the time I was popular.
Q And you were popular why?
A Because of my populist approach to arguably

bottom-up rebuilding the Democratic Party to actually serve the democratic voter base, which as we have already discussed, they argued in court they don't have to. So --

Q Okay. But this was 2018. And so by that time, you had become a Republican; right?

A By that time I was a populist running in the Republican Primary. Yes.

Q But you didn't consider yourself a Republican?

A I -- I mean we've gone through this one a few times too. I consider myself a populist; that is my identity.

Q I'd like to read a passage from that interview. And if you question its authenticity, I think it was in the record from the board below. That's where I pulled it from. I'll just tell you that.

So in response to a question, you said: "I put my money where my mouth is. Last year, I ran for DNC Chair. And I said, 'If I were the chair, we would still have to run Democrats as Republicans because that's the only way you're going to make it through.' And here I am, I guess, putting the rubber to the road." Does that sound familiar to you?

A I mean, I would say this is that example you brought up earlier about taking words out of context and using them against people, because that's not the full quote. That is a cherry-picked portion of that answer.

The very next bit of that is: "But that's not what I'm doing. What it turns out is being progressive," populist, the terminology, "has been very well received within the Republican community. And this is something that we should all embrace as progressives, populists.

"That we don't have to rely on one party or another. That we can in fact reach our brothers in the Republican Party because they do in fact like what we have to say."

Q What did you mean when you said "run Democrats as Republicans"?

A That's what I said in the DNC Chair race. That --

Q Oh, sorry. My question was what did you mean by "run Democrats as Republicans"?

MR. BROWN: Can you be specific as to the date?

MR. RUSTICO: This was back in -- well, I guess this is 2018. He's I think technically

quoting himself in 2017.

MR. BROWN: Yeah.

MR. RUSTICO: And he uses the term in 2018.

BY MR. RUSTICO:

Q I can read it back if you -- "We would still have to," quote, "'run Democrats as Republicans.'" I'm just curious what you meant by that.

A What I meant by that was, like you said, I was quoting myself probably in that regard. And I probably used -- I probably just used it as -- as that, as simply a quote to bring up to the next part of that very same segment, that it was about progressive ideology, populist ideology, actually resonating within conservative and Republican communities.

So again, since we so specifically spent 10 or 15 minutes talking about: do I believe in words, documents, and quotes being taken out of context, misrepresented or misunderstood? I think it's worth pointing out, this is one of those examples.

Q So when you said "run Democrats as Republicans," were you endorsing a strategy of Democrats pretending to be Republicans?

A No. As I just said and will continue to say

no matter how many different ways you ask me this question, the next thing I said is we don't have to do any of that because populist ideology resonates with Republican voters as much as it does with any other voter.

Q So when you said, "We need to run Democrats as Republicans," you meant to say that we need to run populists as Republicans?

A I didn't mean anything. I said that which led specifically into the -- the point that I was making. It's kind of like saying we used to have horse-and-buggy carriages. Now we have cars.

In the beginning, there were horse-and-buggy carriages. We really relied on horses to use transportation. And now we don't have to because we have cars. Is -- does that metaphor help? Because that's how I meant it.

Q So in that interview, you also mentioned something along the lines of calling yourself a Republican was, quote, "the trick to get people to listen to you." Do you recall saying something like that?

A Oh, I'm sure there was some language like that in there.

Q So do you think that in order to be listened

to by certain voters, you need to call yourself a Republican?

A I don't think so. No. Not anymore. I think I did at the time.

Q So at the time, this being 2018, you were calling yourself a Republican?

A In so far as we have established that I have always identified myself as a populist and ran within both parties, yes. To be clear, why are we litigating something from eight years ago?

Q I'm not the one being deposed. I'm just here to ask you some questions; okay?

A Okay.

Q So if you recall at the hearing there was also some discussion of a Facebook post that you made on the Grove City area progress page. Do you recall that?

A That one right there?

Q Yes. If you'd like, I can mark it as an exhibit. We can look at it.

A Oh, I'm sorry, what -- was that --

Q That's fine. If I may, I'd like --

A Yeah. Answer yes.

MR. RUSTICO: Yeah, we can mark this as an exhibit. And then we can talk about it more

easily.
MR. TABATOWSKI: I think they have copies.
MR. RUSTICO: Yeah.
THE REPORTER: Do you want 1?
MR. RUSTICO: Yeah. 1 is fine.
(Exhibit 1 was marked for identification.)
So for the record, I'm handing the deponent Exhibit 1 as well as a copy to Counsel.
You guys want a copy as well?
And this was the document that Deponent pointed to a moment ago.
BY MR. RUSTICO:
Q So if you want to take a look at this, do you -- and let me know if you recognize it.
A I recognize the document we are about to discuss.
Q Okay. And what is it?
A A Facebook post.
Q Do you remember the timeframe in which this post was from?
A Some, yeah. Probably February-ish, January-ish.
Q Okay. So certainly after your declaration

of candidacy in October?
A Yeah. This -- I -- I -- this was one of many Facebook groups I joined to get the word out.
Q So in this post, Mark Gavin Sr. said, quote: "Samuel Ronan, didn't you run for DNC Chair a few years ago? Now you're running for Congress as a Republican. Stop grifting." Do you recall responding to that?
A Yes.
Q Okay. If you could, could you read your response there?
A As long as I'm allowed to read it in full.
Q Everything on this document.
A Thank you: "Mark Gavin Sr., I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep-red districts as Republicans just to get a foot in the door.
"So if I'm doing anything, it's following the argument I made on that stage. That said, I am not fighting on behalf of the traitorous Democrats who just crossed the party line to vote for more ICE funding. I am not a grifter. I'm running for office in the party of the dominant district fighting for the

working class."

So if we need some clarity on that, as we have been doing in this entire deposition, is I quoted myself as myself from 2018 to clarify where that quote came from.

And then I brought it to the present, 2026, stating that I am not associated with the Democrats, have no desire to be with them, and in fact called them traitorous for crossing the party line.

Which if we're talking about party platform, I don't believe there is anything on the Democratic Party platform that has anything to do with supporting ICE funding.

So if we want to go down these different routes of parties being adherent to their own platform and that somehow being a justifying reason to say I am not adhering to the platform, then in this example alone there are parties that are not adhering to their platform.

And one could even argue that the Republicans aren't adhering to their own anti-war stance by literally declaring war against Iran.

Q So you would agree that in this post, in response to Mr. Gavin, you didn't state that you were a Republican?

A In that particular response, that very, very specific, isolated response, no. I did not say those words.

Q Instead you responded by talking about back when you were running for DNC Chair?

A Because that's the question that he raised.

Q Okay. And you distanced yourself from the Democratic Party in your response by calling them traitorous?

A I feel that that would be an accurate assessment.

Q You can put that aside.

MR. RUSTICO: I have just one more exhibit. We can mark this as Exhibit 2.

(Exhibit 2 was marked for identification.)

BY MR. RUSTICO:

Q Again, this should hopefully be familiar to you. Oh, yes. This is also, again, from the hearing. I wasn't at that hearing. You know, so I need a chance to kind of walk through some of these documents.

MR. RUSTICO: So I'm going to hand Deponent what's been marked as Exhibit 2. I've got copies for Counsel.

THE WITNESS: Should I give this to you when we're done with that?

THE REPORTER: Thank you.

BY MR. RUSTICO:

Q Do you recognize this document

A From the hearing, yes.

Q And what is it?

A A post, a Facebook post.

Q By?

A Ana Aleida-March.

Q And I know we talked a little bit about her name. Do you see her picture there?

A Uh-huh.

Q Does that appear to be Ana Cordero?

A It appears to be.

Q Do you have any reason to doubt whether this was actually Ana Cordero?

A I do not.

Q And this is a post of her saying, quote: "It's official. Samuel Ronan's on the ballot. Woo-hoo"; correct?

A Yeah. What she does on her own personal page is her business.

Q Okay. Would you agree that in response to that post, someone by the name of Paul Ryan said:

"I've always wondered if it might be easier to torpedo the Republican Party from within as opposed to trying to take on the Dems.

"As long as a progressive was labeled Republican, I feel like Republican voters would be like," quote, "'Oh, hell yeah. Good policies,'" end quote. And that Ana responded: "Paul Ryan, yeah. And we're testing out theory, LOL"

A If that's what she posted on her personal page, I can't argue that.

Q Did you agree with what she said?

A I don't control what she says on her social media post.

Q Did you agree with what she said?

A Did I agree with what she said? Did I put a like on it? No. I did not put a like on it. I did not react to it.

Q Would you agree with me that someone can agree with something without liking it on Facebook?

A I mean, sure. We can agree on a lot of things without it being on social media.

Q So I'm going to ask again, specific question. Did you agree with her statement?

A Did I agree with her statement? I'm not entirely certain I saw her entire post chain, so I

can't answer about what I saw in the past.
Q That's fine. Do you agree with it now?
A Do I agree with it now? No because that's not what we're doing. And I would have corrected her on that.
Q If you had seen it, you would have corrected her?
A I would have corrected her.
Q Do you recall if she tagged you in this post? I know this is in black and white, so we can't tell. But she says: "It's official. Samuel Ronan is on the ballot." Did she tag you?
A She might have. That doesn't necessarily mean I saw it. You know how much I post and how much I get reacted on? It's easy for something to get buried.
Q Okay. All right. You can put that aside or give it to the court reporter.
A Okay.
Q Yeah, we're not going to -- I don't think we'll need it again. But in case, she can give it back to you if we do.
So -- do you believe that when you declare as a candidate for a party, you need to do so in good faith?

A Do I believe that?
Q Uh-huh.
A So that's a really good question because it's directly tying to: did I declare in good faith? And the answer is I felt I was declaring in good faith.
Do I think it's a necessity? Not according to Ohio Law. And besides, people change their party affiliation all the time with -- through whatever confines of the law allows them to.
Like, I know for instance, California -- or maybe I don't know. I assume -- I think -- I think California has closed primaries. So if you want to change your party affiliation, you have to sign real paperwork to do that.
And so it ends up having maybe stronger identity to say that "You know what? I'm officially going to be a Republican, or I'm officially going to be a Democrat."
But in an open primary, like Ohio has been for as long as I can remember, voters will flip flop every other election. I mean, that's historic within the US politics as well. For Republicans in office by the midterms, it -- the -- the Congress flips to the other color.

I -- so I -- it's a difficult one for me to answer because I thought I was doing it in good faith. But do I think it has to be in good faith? I -- I don't think that's -- one, I -- I don't think that's the right question. And, two, even if I agree with the law that it doesn't have to be in good faith doesn't mean that I wouldn't have acted in good faith.

I think that it is certainly possible people could take advantage of that and not be in good faith. I -- I think that's the best way I can answer your question.

Q So you've voted in primaries before. So you've done that process that you just described where you picked one ballot or the other; right?

A Yes, sir.

Q How did you know which ballot to pick?

A By asking for it.

Q Sorry. No. How did you decide which ballot to pick?

A Can you be a little bit more clear on that question?

Q Sure. So let's say it was the past election, last primary that you voted in. You walked to the polls. They asked you which ballot would you like after they checked your ID probably; right?

A Right.
Q How did you determine which ballot you were going to pick? Did you flip a coin, for instance?
A No.
Q Did you ask your sister? Like, I'm trying --
A Yeah. Okay.
Q -- to figure out how you -- yeah, and I apologize again.
A Yeah.
Q It's my job to make these questions clear. I'm trying to figure out: how did you determine which ballot to pick?
A In the past, it -- it was probably because of one candidate or another, whether I wanted to vote for them or vote against them. So very -- yeah, if -- if there happened to be a Republican that I wanted to vote for, that I really, really wanted to vote for, I would have picked the Republican ballot and then voted for them.
If there was a Republican that I really, really, really didn't want to see get elected, I would also pick a Republican ballot and then vote against whoever was primarying them or the person that I thought would be a better option that was primarying

them.

Q Do you think that voters are typically adequately informed when --

A Absolute -- absolutely not. And that is empirical fact.

Q Tell me more about that.

A The -- if you ask -- if we go out right now and stop 20 people in the street and ask them about an economic issue, a domestic policy, like a different domestic policy issue, a trade issue, and a foreign policy issue; I guarantee they would not have the adequate understanding to make a confident -- or what -- what's the word -- informed answer on those things.

And we can go a little further. We can blame social media. We can blame regular media. We can blame any number of things.

But I think our country, unfortunately, has drifted away from ensuring the masses have a clear understanding of what the issues are, which goes back to the aforementioned money in politics and how corporations get involved with politics and legislation and how public opinion no longer really applies.

I think what people are the most informed on

are their one or two topics that they care about most, which right now seems to be the Iran war, the Epstein files, and cost of living.

Q So if voters are not always adequately informed, as you seem to agree quite wholeheartedly, would you agree that party labels then are a helpful guide for voters about which ballot to choose?

A Not always.

Q So your conception is that when someone walks into a primary ballot -- or excuse me -- a poll -- primary polling place, they should not rely on party labels when they decide which ballot to pick?

A I think party labels doesn't do as much help as you are suggesting it does. It has not been my personal experience. I think, in primaries especially, both parties throughout every district, by the way, have voted consistently: 50,000 voters in the Republican, 50,000 in the Democratic primary voters.

I think a lot of primary voters might associate with that party strongly more often than not. But I don't think that in and of itself is informative. And it's indicative of the turnout for primaries as well.

Q Do you think that someone could declare candidacy for a different party in bad faith?

A As we discussed, yes, I do believe it is possible.

Q Do you think that that could cause any voter confusion?

A It -- I would -- I would argue against it because, for instance, Donald Trump was a Democrat for most of his life. And then he ran as a Republican in 2017 and ultimately won.

So if that argument was valid, then Trump himself would have been a bad-faith Republican who then managed to take over the Republican Party over the course of eight years of being in politics.

So if we're arguing that a politician could infiltrate another party and then take over its identity, then we'd have to make the argument that that's already happened at the highest levels.

Q So is it your view that the party labels are essentially meaningless?

A It's my view that the party labels have meaning when they have meaning to the individual. And for me, being a Republican is not my primary identity. My primary identity is populist.

But I feel that some of our greatest leadership came from the Republican Party. And I try to emulate and espouse those values and ideals. And

that person for me is Republican President Dwight D. Eisenhower.

Q In your opinion, what does it mean to be a Republican?

A Whatever it means to the individual. What does it mean to be a Christian? We can't have that conversation. That's -- that's a -- I don't think that's a -- I don't think we're going to get anywhere with that line of questioning.

Q What does it mean to be a Democrat?

A What does it mean to be a Muslim?

Q So you believe these labels are fluid?

A I think these labels are defined by the individual. Hence why parties evolve. Hence why we have primaries. If labels were the 10 Commandments, the Bible, we wouldn't have primaries. So I -- I -- again, I don't understand this line of questioning.

Q So would you prefer that we have a single primary ballot then?

A As in, like, anybody that was running under any party label would just get voted on all at once?

Q Well, I guess what I'm trying to understand is you seem to have expressed a general distrust in the party labels, that the labels -- maybe they're not

meaningless, but they're fluid. They're hard to pin down.

And so again, I'm back to the situation. If someone walks into a polling place in Ohio at a primary election, they have to pick which ballot to choose. And I'm trying to figure out how they would do that.

So in your case, you mentioned that you researched the candidates. I'm trying to figure out: how is someone -- let's say another voter. How are they supposed to choose which ballot to take if the labels are, if not meaningless, of low value, I guess maybe? And I apologize. That was a long question.

A Yeah.

MR. BROWN: I'm going to object. I think it's all been asked and answered, actually. So I think this is kind of redundant.

BY MR. RUSTICO:

Q You can go ahead and give it a shot.

A I -- I mean, what does it mean to be an American? What do you think about being an American? What do you think about being an American? Let's take it even further. You're a veteran. What does your service mean to you? Those are the same exact questions with different labels.

Even better. We're all lawyers here, except for me. What does it mean to --

THE WITNESS: Wait. Are you a lawyer? I'm sorry.

All of us except for -- what does it mean to be a lawyer for you -- a lawyer for you? We can -- we can play this game any -- many different ways.

BY MR. RUSTICO:

Q But you would agree someone could assume a label disingenuously?

A Yeah. I mean, don't people have bad opinions of lawyers?

Q Oh, no. Sorry. I think my question was unclear. I'm saying someone could assume a label. So I could say, for instance, I'm a Supreme Court Justice but that not actually be true. That's something I can do; right?

A I can lie about being the Pope.

Q And so someone could also lie about being a republican?

A Which we've established. I didn't.

Q I know. But that's not my question. I'm just trying to figure out if that's -- under your view of what the political parties are, someone can claim

to be one even when they're another.

A And I think we've given several examples of that being presently the case.

Q Okay. What are some of your core political beliefs?

A Anti-war is -- so -- and I know that's going to be interesting that I'm a veteran. And you're a veteran too. We both signed up for the same thing: to fight for our country. And I would still fight for my country.

That being said, we're not fighting for our country in Iran. We are not fighting for our country by blowing up boats in the Caribbean. We're not fighting for our country by blockading Cuba and starving them to death. Those aren't wars. Those are actually war crimes.

So by being against war, what I guess would be a more clarifying answer is I'm against war crimes. That being said, core issue.

I -- I want to provide actually the same benefits that you and I got to enjoy while we were active duty: free healthcare, free education, housing assistance, food assistance, transportation support. I mean, my goodness, if ever there was a populist wet dream, it would be what the military does.

If we could expand that to the American people, there would be no housing crisis. There would be no food scarcity. There would be no transportation crisis or utility crisis or access to healthcare, access to education.

So if anything, I would expand the policies. Mind you, I'm not going to force everybody to enlist. But I would expand the benefits that our service members enjoy to as many of our population as I could.

Q We talked about this a little bit before. You have a campaign website; correct?

A samronan.com.

Q And do you manage that website?

A I do.

Q Do you create the content on there?

A I do.

Q Okay. So everything on your website is from you?

A I have touched at some point, yes.

Q Okay. And you have some pretty extensive political views on that website; right?

A Oh, and aggressive ones. I've toned down my language on a few. And if I missed a couple, I probably need to edit those.

Q Oh, no. That's fine. I'm not planning to

go through all of them. I'm just trying to get a sense of what the -- if the website -- you would say the website is a reliable source of your political views.

A I hope so. That's why I built it.

Q So I'm just going to run through just a handful of these. I'm not going to belabor the point, but just to make sure that I understand. So you believe there should be a minimum wage of 26.50?

A Yes.

Q You want to abolish the Federal Reserve?

A That's one of my cheekier positions. Yes.

Q You support statehood for Puerto Rico, D.C., the territories, and Native American reservations?

A I do.

Q You support the exoneration of all Antifa members?

A I don't think that's the phrasing. I think, if I remember that correctly, Antifa isn't an organization that exists. It's anti-fascism. And yes, prosecuting people for being anti-fascist and protesting their government is something that needs to be exonerated.

Q Okay. You support a complete divestment from fossil fuels by 2035?

A Or sooner.
Q You support full decriminalization of all drugs -- drug offenses. Excuse me.
A The nuance there is, like, the -- the position in the user, like possession and using. Don't treat that as criminality; treat it as healthcare. To be clear on that.
Q And you believe that drug -- past drug offenders should be released and compensated?
A If they were drug offenders for possession or use in -- in the context of it -- it being a healthcare crisis, yes.
Q You'd like to federalize public utilities?
A Absolutely.
Q You want to federalize all forms of banking and merge them with the postal service?
A Yes.
Q You want to federalize all airlines and airports?
A As it was for many years, yes.
Q You want to federalize most private housing?
A That's -- it's accurate to say that. But the -- the principle would be to take corporations out of the housing market and, by -- by extension, private banks, like forcing people into -- into really bad

loans.
Q And you would -- if -- if I understood your website correctly, any real estate that's not a primary residence would be taken away or confiscated from people. Like, people can't have more than one residence; right?
A Yes. Which goes right back into the corporations owning, like, hundreds if not thousands or hundreds of thousands of residencies.
Q You'd like to privatize -- or excuse me -- federalize agriculture, private agriculture?
A Uh-huh.
Q You'd like to federalize all police forces?
A Yes. Which seems to be happening anyway.
Q You support universal healthcare?
A Yes.
Q You support universal basic income?
A Yes.
Q You support the use of price controls?
A Absolutely.
Q Specifically the cost of all goods, services, and products specific to women's health and hygiene shall be universally reduced by 50 percent and frozen in price for a period of ten years?
A I think that would be a great start.

Q You believe that all rents should be reduced by 50 percent.
A At the very least,
Q You believe that food, clothing, beverages, and other cost-of-living goods should be reset to January 1, 2000, prices?
A That's one of my cheekier ones. Yes.
Q In the banking sector, all loans should be set to 1 interest -- or 1-percent interest? Excuse me.
A Yes.
Q You think we should abolish all credit scores?
A Yes.
Q Immediately erase all medical and student debt?
A Absolutely.
Q You're pro-choice; right?
A Yes -- yes.
Q And your view is that you should actually require doctors to perform abortions. Is that right? You said there should be no ability to opt out for religious reasons?
A Yes.
Q I think the language -- yeah, it's --

A I think that's about right.
Q Religious exemption shall not be tolerated. A doctor or medical professional shall not deny one, in this case we're talking about an abortion, for their own political beliefs. You agree with that?
A Yeah.
Q That's on your website.
A Yeah.
Q Okay. You support a 12-month grace period for immigration?
A Yes.
Q And that all persons admitted to the United States shall be afforded 12-month visa and become eligible citizens upon its expiration?
A One of the ways to deal with our immigration, yes.
Q You would like to convert all current power plants to solar arrays by 2035?
A That would be the dream.
Q And you consider those beliefs to be consistent with the Republican Party platform that you cited?
A It would achieve every single -- except -- well, it wouldn't achieve the -- the immigration reform 'cause they wanted to do

deportation. But it would achieve a vast majority of the remaining platform. Yes.

Q Okay. And we talked a little bit earlier about how you label your political beliefs, that you consider yourself a populist; right?

A Yes, sir.

Q Do you also consider yourself a conservative?

A In some -- some specific policies, yeah.

Q Do you consider yourself a liberal?

A In some specific policies.

Q Do you consider yourself a progressive?

A In so far as that's interchangeable with populist, yes.

Q Would you consider yourself a socialist?

A No.

Q A democratic socialist?

A No.

Q A communist?

A No.

Q A Marxist?

A No.

Q A Libertarian?

A No.

Q Populist?

A Yes.
Q Okay. I'd like to take a break, five, ten minutes.
A Okay.
THE REPORTER: All right. One moment. The time is 11:34 a.m. We're now off the record.
(Off the record.)
THE REPORTER: We are back on the record. The time is 11:50 a.m.
BY MR. RUSTICO:
Q Mr. Ronan, you understand you're still under oath?
A Yes, sir. I do now.
Q Yes. I have just a few follow-up questions for you. In your view, how is someone to determine which primary ballot they should pick when they go to the polls?
A I would abstain from telling anybody how to choose how they want to vote. I know in the past people do single issues. So do that if that's what you feel.
If it's a moral compass, do that, what you feel. If it's a candidate that you like, do that. I am not going to sit here and say, "People should vote this way because of that reason."

Q Do you think someone could identify with a particular party and just pick that ballot?

A Do I think people have identity with a party? Absolutely.

Q And so would you agree that there are voters who rely on those party labels as a shortcut to understanding some of what those candidates believe?

A In the same regard that people stick to religious texts for moral guidelines. So, I mean, I think it's more cultural and social rather than necessarily identity.

But if they choose to identify, like, I am a Republican and that label means this to me, and they don't know otherwise, or they don't think otherwise; then I don't see a problem with that.

Q So would you agree that, when a voter selects a particular ballot, whether it be a Democratic ballot, Republican ballot, Libertarian ballot, that there's certain assumptions that go with what that -- the people on that ballot believe?

A I -- that's up to the person. Again, if they are picking a ballot based on those assumptions, then yes. If they're picking a ballot based on any of the other criteria, then no.

Q I had just one other question about one of

your beliefs, if you'll indulge me.

A I'll indulge.

Q This is from your website. And I just -- I want to know if you stand by this. This is from your website, that the headline is the American Nuremberg Trials.

I'm going to quote here. And then just let me know if you still agree with this position on your website:

"Every single member of ICE, every agent, every leader, every administrator, every support personnel, every single individual who receives, has received, or contributed to ICE activities since 2003; shall be arrested, charged with war crimes, crimes against humanity, terrorism, instilling public fear, violation of the Constitution, and treason with a mandatory life sentence without the possibility of parole for those with indirect involvement and a mandatory death penalty for those with direct involvement."

A Yes.

MR. RUSTICO: All right. Those are my only questions.

We can switch places if that -- sorry. I know we're still on record. Yeah. We can go off

the record if that's --

THE REPORTER: Okay. One moment.

MR. RUSTICO: Thank you. Sorry, I should have said that.

THE REPORTER: The time is 11:53 a.m. We're now off the record.

(Off the record.)

THE REPORTER: We are back on the record. The time is 12:01 p.m.

EXAMINATION

BY MR. ZAGROCKI:

Q Good afternoon, Mr. Ronan. It's officially good afternoon since we've been -- to twelve o'clock. My name is Brian Zagrocki. I represent the Franklin County Board of Election members that are defendants in this action.

I'm going to go over some preliminary stuff. It's going to be the same stuff you already heard. But just for our efforts, if you can just help me. And we'll walk through it. So you understand that you remain under oath today?

A I do.

Q You understand that you must answer all questions truthfully, to the best of your knowledge?

A Yes, sir.

Q And if you do not understand a question, you will let me know?
A Yes, sir.
Q If you need a question repeated or clarified, you will ask?
A Yes, sir.
Q And you understand that, again, because there's no video recording, you can't use gestures, meaning you need to answer verbally yes or no; correct?
A Yes, sir.
Q Okay. And you will allow me to finish my question before answering, just like I'll allow you to answer fully the question before I move on?
A Yes, sir.
Q Okay. Last thing, and I know this is because it's been long, you may request a break at any time so long as a question is not pending. Do you understand that?
A Yes, sir.
Q Okay. We're going to focus our questions today specifically on the March 6th protest hearing, 2026 protest hearing --
A Okay.
Q -- of your candidacy. You attended the

March 6, 2026, protest hearing of your candidacy before the Franklin County Board of Elections; correct?

A Yes.

Q You were present for the entirety of that hearing?

A Yeah. From the very beginning, I'd say.

Q You testified under oath at that hearing; correct?

A Yes.

Q And you were represented by counsel at that hearing?

A Yes.

Q Your counsel had the opportunity to present arguments on your behalf?

A Yes. Well, for the most part, yes.

Q We can accept that. Your counsel also had the opportunity to cross-examine the protester. Is that correct?

A For the most part, yes.

Q And you personally answered questions from members of the board, including Defendant Freedhoff; correct?

A For the most part, yes.

Q When you say for the most part, can you

explain that for me?
A I was not allowed to answer contextually or completely to some of her questions where she was specifically challenging my views and my platform.
Q When you say you weren't allowed contextually, what do you mean by that?
A She said -- I mean, she -- she made it very clear that that was the end of the hearing and I was not to speak further.
Q Okay. We'll visit later on about the question.
A I'm just trying to answer.
Q I appreciate that. You -- at the hearing, you were given the opportunity to explain your qualifications and political positions; correct?
A My qualifications?
Q Your qualifications as a candidate.
A As in the signatures? 'Cause that's the only qualifications.
Q We can back up. What is your understanding of why there was a protest against your candidacy?
A Ideological differences.
Q When you say ideological differences, were they claiming that there was a law that you violated? Or was it purely just a difference of opinion?

A Purely a difference of opinion. I don't believe there was any argument made that I violated the law.

Q Okay. At the hearing, no one prevented you from -- excuse me -- from presenting your testimony though; correct?

A Yes.

Q Okay. I want to move on a little bit specifically to Ms. Freedhoff. When did you become aware that Ms. Freedhoff was Chair of the Franklin County Republican Party?

A At some point before the hearing,

Q Can you tell me, you know, was it a few days before the hearing? Was it a few weeks? Be a little more specific, please.

A I would have to defer to my attorney 'cause he was the one that kind of let me know.

Q And again, I'm asking you specifically. So if you can just estimate?

A Days.

Q Days?

A Days maybe.

Q Okay. What specific facts did you rely on in concluding that her role created a conflict of interest?

A Well, in my capacity as a not-lawyer, someone who is on an official capacity of, say, in this case the Republican Party, the chair, the committee, and the person filing a grievance against me is also an official member of that particular committee; then that would be a conflict of interest because she would supersede him.

And therefore, they would have the same argument or the same -- I don't know the legal words. But that to me screams as a conflict of interest.

Q Okay. We're going to unpack everything there. Right now, I'm focusing on the Franklin County Republican Party; okay?

A Yeah.

Q Now, when you say that there was a conflict of interest with the Republican Party, are you referring to the Ohio Republican Party or the Franklin County Republican Party?

A Based on your question that you just asked, I'm -- I was answering it from the understanding of the Franklin County Party, like the -- the committee, the organization.

Q Okay. Based on your understanding, what was the Franklin County Republican Party's involvement with the protest?

A That the chairman was sitting on the Board of Elections, which that -- and, I mean, that's -- that's the reason, the chair is -- that would be -- I mean, isn't that why judges have to recuse themselves in general, because they have a vested interest in whatever the thing was? I mean, that --

Q I'm not being deposed here. So, Ms. Freedhoff is the Chair of the Franking County Republican Party. Beyond that allegation, what specifically about her being the Chair of the Franklin County Republican Party speaks to bias or why she should refuse -- excuse me -- recuse herself from the protest?

A I -- either I'm not saying it right. That is the primary reason. Which the -- the -- I guess, again, without my legal knowledge, the only way I can answer that is with yet another metaphor.

If a judge was presiding over a trial between Company X and a victim from Company X, but the judge had a vested interest in Company X; then that judge would have a conflict of interest in that whole trial.

So by -- by the comparison of the metaphor, Freedhoff was the judge. The -- the Republican Party

being Company X and me being the victim. So clear conflict of interest.

Q I want to speak a little bit more, I guess, about specifically now the Franklin County Republican Party's interest in the protest. What was the Franklin County Republican Party's interest in the protest?

A Given that the chair is on the board and the protestor was also in the committee, it would be a direct interest of putting their thumb on the scale of who they felt ideologically could or could not be on the ballot.

Q And you're saying that the protestor was a member of the Franklin County Republican Party?

A Yes. Like, with -- not -- not just the party, but like the -- the literal organization, the -- the committee that makes decisions on behalf of the -- like, that does motions and whatever. So --

Q Okay. Besides this allegation that the protestor is associated with the Franklin County Republican Party, anything else involving the Franklin County Republican Party that you think could have created an issue because Ms. Freedhoff was the Chair of the Franklin County Republican Party?

A I don't -- maybe I'm not equipped to answer

that question further. I -- I'm -- I'm -- I think I've answered that question to the best of my ability.

Q Okay. Do you have any information about the financial relationship between the Franklin County Republican Party and Mike Carey?

A Yes. Mike Carey donated $10,000 to the Franklin County Committee. And then at some point, either before or after that, I don't remember quite, the Franklin County Committee also donated $500 to Mike Carey.

And they have already endorsed him in this race. Which that's the other reason. They've already made a decision for Mike Carey. I'm sorry. I --

Q At the time that you filed -- or excuse me -- your counsel filed your recusal motion, were you aware of any involvement by the Ohio Republican Party in the protest?

A No.

Q Okay. Let's just take a step back. Can you -- we'll go back to the Franklin County Republican Party and the Ohio Republican Party shortly.

Just broad strokes, can you identify all facts that you contend demonstrate that Ms. Freedhoff was biased against you during the protest?

A So specifically in the hearing or generally?

Q Specifically that it would show that she should have recused herself and that it was not a fair hearing because she decided ultimately not to recuse herself. What facts do you claim demonstrate that she should have recused herself because she was biased?

A So the -- the money, for one. The fact that the endorsement already occurred, for two. The fact that they then also didn't put me on their own website 'cause they did put primary candidates on the website, but they did not put me on it at any point in time, not even prior to this -- the -- the hearing that was occurred.

So the -- the money going both ways, for one. And then the fact that she was, in fact, the chair. And the fact that the -- the protestor was in -- was in direct communication with her in the capacity as chair and whatever his role was. I mean, there was direct -- I mean, I don't --

Q Yeah. I'll follow up on that. So when you say the protestor was in direct communication with Ms. Freedhoff, what do you mean?

A In the hearing, he specifically said that he was part of the -- I -- I want to say legislative committee. But it was probably like the endorsement committee or something.

Either way, he was a part of the committee. And he saw my name. And he brought that up to her after he dug into my platform. And then they had conversation. And then that led to this protest, which led us to here.

Q So it's your testimony that the protestor communicated directly with Ms. Freedhoff about the merits of the protest.

A It's actually the protester's testimony that he talked to her about the merits of the protest.

Q And what specifically did he talk to her about the merits of the protest?

A That should I even be allowed on the ballot that? Or what should we do about him? And that's when she communicated. That's in the -- the hearing. As far -- as far as I understood, that's how that went.

Q Do you have any other reason to believe other than your recollection of the hearing that there was any conversations between Ms. Freedhoff and the protestor?

A I mean, are you asking if I have a smoking gun? I guess I'm really not understanding.

Q No.

A I've -- I've been very clear. I think they

1 were caught in communication. I think money was
2 exchanged between Mike Carey, the campaign -- Mike
3 Carey campaign and the Franklin County Board of
4 Elections. That's definitive; that's in the FEC
5 filings.
6 And it's also definitive that the Franklin
7 County Board of Elections gave money to the Mike Carey
8 campaign. So that in of itself, she was chair during
9 both of those periods, both of those exchanges, which
10 is, as far as my legal understanding goes, more than
11 enough reason to say a conflict of interest.
12 When you add the fact that Mark Share was a
13 committee member in the Franklin County Board
14 of -- for the GOP, and that they were in direct
15 communication about me, and that that resulted in the
16 protest happening itself, which was -- wasn't even
17 filed correctly because the man didn't know it was
18 written, didn't see the document in the first place,
19 didn't know who was hiring counsel on his behalf, and
20 effectively showed up with his name being affiliated
21 and agreeing to it by the implication.
22 Now sure. Fine. We can argue that and
23 debate that in other ways. But I'm just saying my
24 understanding is that there is a excessive amount of
25 conflict of interest. Whether I am articulating that

well or not is apparently up for question.

Q Okay. And I'm just going to repeat something I think you probably heard from the prior deposition. But just please try to focus on answering the specific question.

You know, I think I am also trying to whittle down and be very precise and direct with my question. So if it's a yes or no, just say yes or no. If I'm asking about something specifically, if you would just try to focus on that specific question and answer.

You mentioned that there was a financial donation between Mike Carey or his campaign and the Franklin County Board of Elections. Can you tell me what facts you have in support of that?

A I have the FEC filing record. I mean, obviously I didn't print it out or anything to bring to the deposition. But you can go on the FEC website. You can go to the Mike Carey campaign. And you can go through his filing records.

And there is one record that's about eleven or twelve thousand dollars that is an expense that is going directly into the Franklin County Republican Party Committee as shown by the FEC.

Q Okay. And I just want to stop you. You

said two different things there. So you said on one hand $10,000, the Franklin County Republican Party. On other hand, it was a donation specifically to the Franklin County Board of Elections. Which one was it?

A I'm sorry. I did misspeak. I meant the County Party. I'm -- we're talking about a lot of different things that have Franklin County in it. My apologies. I specifically, for the record, mean that $12,000 went to the Franklin County Republican Party, not the Board of Elections.

Q Okay. And you don't have any reason to believe that there was any direct financial exchange between the Franklin County Board of Elections and the Mike Carey campaign; correct?

A Are you saying I don't have reason to believe that?

Q Yes. I'm just trying to clarify because initially you said that there was money donated to the Franklin County Board of Elections. And so I'm just clarifying.

A Okay.

Q You have no reason to believe that that's the case; correct?

A Correct. I don't think the Board of Elections is compromised.

Q Okay. When you say you don't think the Board of Elections is compromised, can you just elaborate on that? Why do you think it's not compromised?

A In the regard of the money exchange, just answering and following up to your question.

Q Okay. Do you have any -- are you aware of any statement by Ms. Freedhoff expressing a personal animus towards you?

A Personal animus? No.

Q Do you have any evidence that Ms. Freedhoff had a direct financial interest in the outcome of your protest?

A Do I have evidence? No.

Q Let's go back to the hearing. At the March 6th hearing, did Ms. Freedhoff prevent you from presenting evidence or testimony?

A The last question she asked me when she read about the -- the interview, she didn't let me follow up and rebut. So that would be the only time where I was, I think, denied.

Q Okay. Do you contend that any actions by Ms. Freedhoff at the hearing were improper?

A Can you clarify that please?

Q Sure. So part of the issue that we're

dealing with here is whether or not there was a due-process violation specifically at the hearing. So do you contend that any actions by Ms. Freedhoff at the hearing were improper? Is there anything that she did at the hearing that you claim was improper?

A Aside from her being present when she should have been recused, do I think she did anything improper? Is that what I'm understanding?

Q You can take it however you want.

A Okay. So outside of her being present when I feel she should have been recused and counsel felt that she should have been recused, she was also extremely friendly with the -- the protestor themselves.

And it made it seem like there was a favorite outcome or a perceived favorite outcome for the sake of argument in context.

Q In what ways was she friendly with the protestor?

A Engaging in small talk, saying how handsome he looked, "Nice to see you again. Can't wait to see you," whatever. And then they stepped out. And then I don't know what conversation occurred after that. But I would say preferential treatment was certainly visible and present.

Q What -- beyond the small talk that you've described, what other evidence do you have of preferential treatment towards the protestor on the day of the hearing?

A The fact that they -- every time my counsel objected, it was completely and dismissively overruled. Whereas when my counsel was trying to do the same and establish a specific line of questioning, it was constantly interrupted by Protestor Counsel and constantly reinforced by Board of Election members, either -- either Freedhoff or the other guy.

I don't -- I can't remember which ones kept doing the interrupting. But suffice to say there was this "antsiness" that, after I got the third degree and they were given free rein to speak and establish whatever they wanted to establish, there was this sense of urgency to get me out the door.

Q And it's your -- you understand that Ms. Freedhoff is not the chair of the Board of Elections; correct?

A In so far as I understand any of what the Board of Elections does, yes.

Q Okay. So I'll represent to you she's not the Chair of the Franklin County Board of Elections. At what point did Ms. Freedhoff ever issue a direct

ruling on any of the objections that you mentioned from your counsel?

A Again, I don't remember who was doing the objections. I just know that there was a lot of it going on.

Q So if you can't remember who was doing the objections, how can you tell me that specifically Ms. Freedhoff was the one that was biased?

A By --

MR. BROWN: Objection. Argumentative.

BY MR. ZAGROCKI:

Q Go ahead and answer the question please.

A By the fact that she was there despite the overwhelming, in my unprofessional opinion, evidence that she should have recused herself. And there was a significant and severe conflict of interest of her being there, period.

Q Right. And I'm talking outside of her being there.

A Isn't that ex post facto?

Q Well --

A I get pulled over for speeding, and then I get arrested for having, I don't know, my seatbelt off. They found that out after the fact. So the fact that she may have shown bias or not shown bias is

irrelevant to the fact that she was there. And that's the problem. And that's my answer.

Q Well, we'll -- okay. We'll get to the recusal issue in a second. Right now, I'm focusing on after the decision that she made to not recuse herself, and I'm focusing on: what evidence of bias do you have in the way that she carried out at the hearing?

A And I have to reiterate, the fact that she was participating, that is the bias.

Q Okay. Yes or no? Do you have any evidence of bias outside of her decision not to recuse herself?

A As far as I know, do we?

Q Again, I'm going to ask you to answer the question.

A I mean, again, in my limited capacity, no. I don't know if there's any evidence.

Q Okay. The same day of your protest, so this is March 6, 2026, are you aware of a protest involving a Libertarian candidate in the same congressional race that was decided the same day?

A I was.

Q Were you in attendance for that hearing?

A I was.

Q Were you in attendance for the entirety of

that hearing?
A Yes, I was.
Q Do you understand how Ms. Freedhoff voted in that matter?
A Yes. Or I'm sorry. Do I understand how she voted for it?
Q Yes.
A I -- I know that she voted in favor. I don't know how she came to that conclusion.
Q When you say in favor, it's -- you're understanding Ms. Freedhoff voted to deny that protest; correct?
A I -- hold on. Let me -- let me understand the language here. By denying the protest, it allowed the Libertarian to be on the ballot. Is -- is that my understanding?
Q So again, I -- you know, I'm not the one being opposed here. I'll try to clarify the question.
A Yeah, that's -- I'm asking --
Q I can do a better job of this. So you understand that there was a protest filed against a Libertarian candidate?
A Yes.
Q And that protest sought for the Libertarian candidate to be removed from the ballot; correct?

A Correct.
Q And part -- or the main reason that the protestor was arguing that the Libertarian candidate should not be on the ballot is because they were arguing that the Libertarian candidate was in fact not a Libertarian; correct?
A Yes, I remember that argument.
Q Okay. And ultimately, every board member voted against the protest and for the Libertarian candidate to remain on the ballot; correct?
A Yes.
Q And that includes Ms. Freedhoff. She also voted to deny the protest and for the candidate to remain on the ballot. Is that correct?
A That is correct.
Q Okay. Do you think that it -- a Libertarian candidate would pose a threat to Mike Carey in the Republican Primary?
A No.
Q Why would a Libertarian candidate not pose a threat to Mike Carey in the Republican Primary?
A Because a Libertarian is running in the Libertarian Primary, not the Republican.
Q I'm -- again, I'm not talking about the -- sorry. I should specify. In the general, if

there was in general -- Mike Carey, let's say that he is the Republican nominee. Do you think that a Libertarian candidate could pose a threat to Mike Carey in the Republican general election for the 15th Congressional race?

A No.

Q Why is that?

A Because, one, the Libertarian Party is small. And it's a question of: can that candidate, outside of him being a Libertarian, get his name out there enough?

So I -- I think the -- the question is implying: could the Libertarian candidate by his existence be an upset candidate? And I think it's certainly possible.

But that's -- we can make the same argument that there's a Democrat that could beat Mike Carey. I mean, isn't that the whole point of elections? So let me -- I'm sorry. Ask the question again because maybe I'm just not understanding. I'm -- I'm so sorry.

Q So is it your position that it's not likely a Libertarian candidate would pose a threat to whoever wins the general election for the 15th Congressional -- or excuse me -- whoever wins the Republican Primary for the 15th Congressional race?

A Okay. I think I understand the question now. I'm sorry. I did misunderstand it. Do I think a Libertarian candidate specifically poses a threat to a Republican candidate in the general?

Q Yes.

A No.

Q And why is that?

A Because they're two different parties. Just like a Democrat doesn't pose a threat to a Republican either. That's -- that's not how that works. It's -- it's politics; it's elections. It's: who do people want to vote for?

Saying one person is a threat to another, we could turn that on its head. Mike Carey is a threat to the -- to the Democrat, or Mike Carey is a threat to the Libertarian. That doesn't make sense.

Q I'll clarify what I mean by threat. Do you think that by having a Libertarian on the ballot in the general election for the 15th Congressional race, that some people will vote for the Libertarian candidate that otherwise would have voted for the Republican candidate?

A That's very speculative. I couldn't answer that.

Q You don't think it's possible that there's

at least one person that would have voted for the Republican candidate in the 15th Congressional race?

A Are you -- are you asking me if people have more options will they embrace those other options? Because that's the whole premise of our country's constitution and democracy.

Q Yes. I'm just asking yes or no. Is it likely that there will be some people that will vote for the Libertarian candidate that otherwise would have voted for the Republican candidate?

MR. BROWN: Objection. That's calling for speculation. He can answer if he knows.

THE WITNESS: Yeah, I don't know.

BY MR. ZAGROCKI:

Q Okay. You understand that there is no other Libertarian candidate that is running in the 15th Congressional race; correct?

A Correct.

Q Okay. Therefore, you understand that the Libertarian candidate will be on the general election ballot running against the Republican candidate in the 15th Congressional race?

A False. He is running against both or however many candidates, Independent, Republican, Democrat, or otherwise. He is one of many.

Q Okay. We're parsing my question. I'm just asking, again, that the Libertarian candidate will be on the general election ballot running against the Republican candidate in addition to the other candidates that will be on the general election ballot.

A Correct. He's running against them all, not just one.

Q Okay. How do you reconcile your claim of bias in favor of Mr. Carey regarding Ms. Freedhoff's vote to allow another opposing candidate to remain on the ballot?

A The fact that she's on the Republican Franklin County Chair in charge of making final decisions with regards to both, I'm assuming, money being received and/or dispensed as well as endorsements.

I wasn't interviewed for an endorsement. It doesn't matter if I would have been interviewed and then not endorsed. What matters is I was ignored outright.

And the fact that there's money exchange between that campaign and the fact that all of this stuff occurred within the establishment, Franklin County Committee.

1 So the bias is real because she is putting
2 her thumb on the scale, trying to litigate the
3 primary, which should be up to the people and which
4 should have already been laid to rest by the simple
5 fact that I submitted and got approved 50-plus
6 signatures from Republican voters per the rules of the
7 same Board of Elections that is now with her as part
8 of it and being chair of the Republican Party -- is
9 trying to influence the outcome of an election, the
10 Republican Primary election, by removing me from the
11 ballot after authorizing it or certifying it.
12 Q You mentioned that you were ignored outright
13 by the Republican Party. Did you make attempts to
14 contact the Franklin County Republican Party about
15 your congressional run?
16 A I made attempts to every county party for
17 regards to my Republican run. And only a couple ever
18 really responded, London being one of them. Well, I
19 guess that's not the county.
20 But London -- oh, no. I'm sorry. It is the
21 county. But I just remember it as London, Ohio. They
22 invited me out. I got to speak there. But no, the
23 Franklin County did not respond. And I did reach out
24 to them.
25 Q And when you say that the Franklin County

Republican Party did not respond, do you blame Ms. Freedhoff as the Chair of the Franklin County Republican Party for not responding to --

A That would be too speculative.

Q Okay. Do you think that Ms. Freedhoff had a role in deciding not to respond to you on behalf of the Franklin County Republican Party?

A Yes. In -- in the -- in the scope of this -- oh, wait. No. Hold on. When I reached out to her in the -- or not to her, but reached out to the Franklin Party in the first place, do I think she put a thumb on the scale in not responding?

Q No.

A Sorry. I misunderstood the question.

Q I want to go back just briefly to this issue. We were talking about the Libertarian candidate. There was a protest. Libertarian candidate, ultimately the Board of Elections decided to remain on the ballot. You mentioned that you don't think that the Libertarian candidate could take votes away from --

A I said that would be speculative. I mean, a Green Party candidate could take away from Republican votes if the Republican that chose to vote Green would have otherwise voted Republican without a Green Party.

I mean, that's like saying if the Republican ran unopposed completely, like, not even a Democrat, would voters otherwise have voted for that? Like, that doesn't -- that doesn't make sense. I'm sorry. I -- I don't think that's a line of questioning that gets us to any sort of answer.

Q What -- I want to go back to this question. What evidence do you have that Ms. Freedhoff treated your case differently from any of the other protest cases that day?

A Well, she's not a Libertarian. So she didn't have a chicken in the fight, as it were, metaphorically speaking, of course. I'm not accusing her of cock fighting or anything.

But she didn't have skin in the game. That's a better metaphor. I'm sorry. She didn't have skin in the game with the Libertarian beyond the fact that it's alleged that the same counsel was paid by the same primary party of interest, the Ohio Republican Party.

That being said, they -- her decision to side with the -- the Libertarian wouldn't have been biased or would have -- I don't know. I -- I would have been much harder to argue for bias one way or the other because, again, it's the Libertarian Party, not

the Republican Party.

Whereas this is the Republican Party. And she should have recused herself because of the conflict of interests, which you keep trying to not discuss. And you keep trying to ask questions to circumvent that fact and my belief and in my defense. So can we move past that?

Q And again, a couple more questions on this. But I'm the one that's going to be asking the questions and narrowing the scope of what the questions are. So do you think that the -- sorry. Strike that.

Let me -- can you identify any case where a board member was required to recuse solely due to party leadership status?

A I'm not a lawyer, nor do I have the skill set to even begin to understand how to even go against that question.

Q I -- again, I'm not asking for your opinion as a non-lawyer or lawyer. I'm asking are you just aware of any protests, any cases before Franklin County, or any Board of Election member was required to recuse solely because of their party leadership status?

A I don't even think I'm qualified to answer

that question. My -- I'm -- I'm ignorant to the legal system. So I -- I couldn't answer. I'm -- I guess the short of it is, by the fact that I'm ignorant, yes. I was definitely -- I have no way of knowing one way or the other. I am not capable of knowing that answer.

Q Okay. So you're not aware of any other board members that have recused themselves solely because of party leadership status; right?

A I am not aware.

Q Okay. Are you aware of the political party involvements of other members of the Franklin County Board of Elections?

A Am I aware of their involvement? I know that Board of Elections have usually an even split of party affiliation. To what degree that affiliation is, no.

Q Are you aware of any leadership roles that they might have in any of the party offices, whether that's county or state?

A I am not personally aware, no.

Q Okay. But you didn't ask any other board members to recuse here; correct?

A Correct.

Q Okay. If they -- if the other board members

held leadership positions in political parties, would that be cause for a recusal, do you think, in a protest hearing?

A In my opinion, yes.

Q Do you contend that every board member affiliated with a political party must recuse from all primary-related protests involving that party?

A If they are in leadership positions of that party, yes.

Q Last thing, I want to talk about briefly the Ohio Republican Party's involvement with the protest or alleged involvement with the protest. So you alleged that the Ohio Republican Party was involved. And this was disclosed after the hearing. What role do you believe that played in Ms. Freedhoff's decision making at the time of the vote?

A Well, she's the vice chair. So again, the same bias, the same conflict of interest.

Q Do you have any evidence that Ms. Freedhoff knew prior to voting that the Ohio Republican Party -- excuse me -- was funding or directing the protest?

A I don't have evidence. But I absolutely would assume so, being she is the vice chair,

Q If she didn't have any knowledge that the

Ohio Republican Party was funding the protest, would that change your opinion of whether or not Ms. Freedhoff was biased?

A No.

Q Why?

A Because she's still a part of the organization and would therefore still have a vested interest in following whatever the decision is of that organization or the intent of the -- that organization's interest.

Q How would she have a vested interest if she wasn't aware that -- of the fact that the Republican Party was funding the protest?

A So now we're going in circles again with -- it's speculative. It -- it doesn't matter whether or not she was aware.

The fact that she was vice chair of the Ohio GOP makes it a conflict of interest to talk about a Republican candidate being eligible for anything under any circumstances, any argument made for any reason at all. It is a conflict of interest. That is my opinion. It doesn't matter how much she did or didn't know.

Q You just want to take five minutes? Is that okay?

A Yeah.
MR. ZAGROCKI: Off the record.
THE REPORTER: All right. One moment. The time is 12:36. We're now off the record.
(Off the record.)
THE REPORTER: We are back on the record. The time is 12:40 p.m.
MR. ZAGROCKI: And we have no additional questions for Plaintiff.
MR. BROWN: I have no questions.
THE WITNESS: Okay. You sure?
MR. BROWN: I'm sure.
THE REPORTER: Okay. And then read and sign?
MR. BROWN: We'd like to read.
THE REPORTER: Okay. All right. And then, Counsel Rustico, will you be ordering the transcript?
MR. RUSTICO: Yes. Expedited please.
THE REPORTER: Okay. All right. And do you have a particular day that you want?
MR. RUSTICO: Well, we have a brief do on Monday. So I don't know what it costs, but as fast as possible is what I would say.
MR. TABATOWSKI: This afternoon.

THE REPORTER: Okay. And then, Counsel Brown, will you be ordering the transcript?

MR. BROWN: Not expedited. I'm going to have to get back with you; okay?

THE REPORTER: Okay. And then, Counsel --

MR. BROWN: I got your card.

THE REPORTER: Okay. And then, Counsel Zagrocki, will you --

MR. ZAGROCKI: Yes, I believe so. I probably need to confirm that with Jeanine, who was unfortunately not here.

MR. REDFERN: Let's get back to you.

THE REPORTER: Very well.

MR. REDFERN: Let's get back to you in an expedited fashion.

THE REPORTER: Yes, sir. All right. One moment.

The time is 12:41 p.m. We're now off the record.

(Signature reserved.)

(Whereupon, at 12:41 p.m., the proceeding was concluded.)

CERTIFICATE OF DEPOSITION OFFICER

I, ASIA MAYS, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Asia Mays

ASIA MAYS
Notary Public in and for the
State of Ohio

[X] Review of the transcript was requested.

CERTIFICATE OF TRANSCRIBER

I, ANDREW TINGLEY-BARRAZA, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Andrew Tingley

ANDREW TINGLEY-BARRAZA

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

March 30, 2026

To: MARK R. BROWN

Case Name: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.

Veritext Reference Number: 7986054

Witness: Samuel Ronan Deposition Date: 3/27/2026

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 7986054
CASE NAME: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.
DATE OF DEPOSITION: 3/27/2026
WITNESS' NAME: Samuel Ronan

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have made no changes to the testimony as transcribed by the court reporter.

_____ _____
Date Samuel Ronan

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal

this _____ day of_____, 20____.

_____
Notary Public
_____
Commission Expiration Date

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 7986054
CASE NAME: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.
DATE OF DEPOSITION: 3/27/2026
WITNESS' NAME: Samuel Ronan

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

_____ _____
Date Samuel Ronan

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They have listed all of their corrections in the appended Errata Sheet;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this _____ day of_____, 20____.

_____
Notary Public

_____
Commission Expiration Date

ERRATA SHEET

VERITEXT LEGAL SOLUTIONS MIDWEST

ASSIGNMENT NO: 7986054

PAGE/LINE(S) / CHANGE /REASON

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_____ _____

Date Samuel Ronan

SUBSCRIBED AND SWORN TO BEFORE ME THIS _____

DAY OF _____, 20_____ .

_____

Notary Public

_____

Commission Expiration Date

0

0 28:9
00343 1:7

1

1 5:8 18:3 22:1 28:8 29:22 58:5,6,7,10 79:6,9,9
10 55:17 71:15
10,000 93:6 98:2
10:06 2:4 6:5
1100 121:1
11:34 82:6
11:50 82:9
11:53 85:5
12 49:3 80:9,13
12,000 98:9
12:01 85:9
12:36 117:4
12:40 117:7
12:41 118:19 118:22
14th 15:2
15 47:14 55:18
150 29:22
15th 13:16 37:11 106:4,23 106:25 107:19 108:2,16,22
16th 3:13,20
18 21:17
1820 121:2

2

2 5:10 61:14,15 61:24
20 68:8 122:16 123:22 124:22
2000 79:6
2001 2:7 6:11
2003 84:13
2013 22:1
2015 19:16
2016 19:16 35:12
2017 21:17 26:25 27:8 30:3 31:7 33:2 33:4,13 34:10 36:3 52:3 55:1 70:8
2018 20:19 27:22 33:17,19 34:15 36:12 52:11 53:5 54:25 55:4 57:5 60:4
2022 36:21
2024 16:11,21 17:16 37:3 39:10 40:1
2026 2:3 6:9 60:6 86:23 87:1 103:19 121:4
2035 76:25 80:18
20th 2:6 6:11
216-523-1313 121:3
236-6500 3:8
26 22:21
26.50 76:9
27 2:3 6:9 32:11
2:26 1:7
2nd 14:11

3

3,760 32:3
3/27/2026 121:8 122:3 123:3
30 2:6 3:13,20 6:10 121:4
303 3:5
32278 120:14
33838 119:16
373 4:6,13,20

4

43215 2:8 3:6 3:14,21 4:7,14 4:21 6:11
44114 121:2
466-2872 3:16 3:23

5

50 29:21 32:2 78:23 79:2 110:5
50,000 69:17,18
500 93:9
525-3269 4:16
525-3520 4:9
525-3658 4:23
58 5:9
5th 13:15

6

6 87:1 103:19
61 5:10
614 3:8,16,23 4:9,16,23
62 35:12
6th 86:22 99:16

7

7986054 2:10 121:7 122:2 123:2 124:2

8

8 5:3
82nd 22:17
85 5:4

a

a.m. 2:4 6:5 82:6,9 85:5
abide 38:15 39:9,20 43:12

ability 11:17 29:25 79:22 93:2 119:10 120:7
able 13:12 29:25 47:16
abolish 76:11 79:12
abortion 80:4
abortions 79:21
above 121:17
absent 6:14
absolute 27:13 68:4
absolutely 17:6 24:3,6 40:13 40:14 45:25 47:8 68:4 77:14 78:20 79:17 83:4 115:23
abstain 82:18
abysmal 16:6
accept 87:17
accepted 34:4
access 12:7 75:4,5
accordance 122:5 123:5
accounts 51:18
accurate 36:22 36:23 61:10 77:22 119:9 120:5
accusing 112:13
achieve 29:25 80:23,24 81:1
acknowledge 122:11 123:16
acknowledge... 6:13
act 22:23 23:16 122:14 123:20
acted 66:7
action 85:16 119:12,16 120:8,12
actions 17:18 99:22 100:3
active 22:3 23:3 28:17 30:22 74:22
activist 21:21
activities 84:13
actually 11:2 26:6,9 31:15 48:2,25 53:1 55:14 62:17 72:16 73:17 74:16,20 79:20 95:9
add 96:12
addition 109:4
additional 117:9
additionally 6:14
address 121:15
addressed 33:24
adequate 68:12
adequately 68:3 69:4
adherent 60:15
adhering 60:17 60:18,21
administer 6:13
administration 16:23 26:2,10 39:11
administrator 84:11
admirable 25:5
admit 29:10,10 32:11 39:3
admitted 80:12
advantage 66:9
advice 12:17 16:5 17:2,8
advocated 20:4 20:7 21:16,19
affect 11:17
affiliated 17:4 21:8 96:20 115:6
affiliation 16:20 34:17 65:9,14 114:16
affixed 122:15 123:21
affordable 23:16 40:14
afforded 80:13
aforemention... 68:21
afternoon 85:12,13 117:25
agent 84:10
aggressive 75:22
ago 17:12 57:10 58:13 59:6
agree 6:16 40:11,17 44:20 45:3 46:1 60:23 62:24 63:11,14,15,18 63:19,20,23,24 64:2,3 66:5 69:5,6 73:10 80:5 83:5,16 84:8
agreed 41:4
agreeing 96:21
agriculture 78:11,11
ahead 32:14 38:8 44:4 51:10 72:19

102:12
ahold 28:19 29:4
aid 34:22
air 14:20,21
airborne 22:17
airlines 77:18
airports 77:19
al 6:7,9 121:6,6 122:3,3 123:3 123:3
alabama 18:2
aleida 5:10 51:16 62:10
align 33:11 44:13,14 50:5
allegation 91:10 92:19
alleged 112:18 115:12,13
allow 23:4 86:12,13 109:11
allowed 23:4 24:23 27:7 52:8,9 59:12 88:2,5 95:13 104:14
allows 43:22 65:10
altogether 27:17
american 22:24 24:9 25:13 34:6 72:21,21 72:22 75:1 76:14 84:5
americans 59:17
amount 19:13 96:24
ana 1:4 5:10 12:13 46:11,15 51:2,9,11,11,15 62:10,14,17 63:7
andrew 120:2 120:15
anger 23:23
animating 23:8 23:11
animus 99:9,10
annunciated 38:16 39:20,24 43:13
answer 10:5,25 11:2,17 13:12 34:23 43:4,5 44:23,24 45:13 54:5 57:23 64:1 65:5 66:2 66:10 68:13 74:18 85:23 86:9,14 88:2 88:12 91:18 92:25 97:11 102:12 103:2 103:14 107:23 108:12 112:6 113:25 114:2,6
answered 37:7 42:21 72:16 87:21 93:2
answering 11:12 86:13 90:20 97:4 99:6
answers 9:12 9:22 27:23 41:24
anti 23:6,7 26:15 60:21 74:6 76:20,21
antifa 76:16,19
antsiness 101:14
anybody 71:21 82:18
anymore 31:4 57:3
anyway 78:14
apologies 98:8
apologize 44:2 45:8 48:8 67:9 72:13
apparently 97:1
appear 62:14 122:11 123:15
appearance 31:25
appears 62:15
appended 123:11,18
apple 8:23
applicable 6:20
applies 68:24
appreciate 42:19 88:13
approach 52:25
approached 36:23
approved 110:5
april 14:11
area 5:8 14:23 15:1 57:16
arguably 52:25
argue 26:9,9 28:24 41:13 60:20 63:10 70:5 96:22 112:24
argued 26:25 27:3 29:2 53:3
arguing 27:16 28:15 70:13 105:3,5
argument 10:12 32:1 40:20 59:21 70:9,15 89:2 90:9 100:17 105:7 106:16

116:20
argumentative 102:10
arguments 87:15
arkansas 14:21
arrays 80:18
arrested 84:14 102:23
articulating 96:25
asia 2:9 6:3 119:2,17
aside 61:12 64:17 100:6
asked 49:15 66:24 72:16 90:19 99:18
asking 41:25 42:1 47:11 52:13 66:17 89:18 95:22 97:9 104:19 108:3,7 109:2 113:9,19,20
assessment 61:11
assigned 6:3
assignment 122:2 123:2 124:2
assistance 74:23,23
assistant 7:10
associate 29:5 69:20
associated 48:23 60:7 92:20
associating 27:11
assume 10:5 65:12 73:10,15 115:24
assuming 52:22 109:15
assumptions 83:19,22
attached 123:7
attack 26:11
attempt 20:13
attempted 16:1
attempting 18:3
attempts 110:13,16
attendance 7:2 103:23,25
attended 86:25
attorney 2:5 3:12,19 4:5,12 4:19 6:10 7:3,5 7:11 10:17,23 11:24 13:12 15:5 89:16 119:14 120:10
attorney's 7:8
audacity 23:12 23:13
audible 9:16
audio 9:11 119:8 120:4
august 37:21
authenticity 53:15
authorize 123:11
authorized 6:12 13:7
authorizing 110:11
authors 42:14 43:8
ave 121:1
aware 29:7 47:3,12 89:10 93:16 99:7 103:19 113:21 114:7,10,11,14 114:18,21 116:12,16

b

b 5:6
back 16:4,10 21:17 24:11,11 52:2 54:24 55:6 61:4 64:22 68:20 72:3 78:7 82:8 85:8 88:20 93:19,20 99:15 111:15 112:7 117:6 118:4,13 118:15 121:15
background 14:17
bad 20:24 44:21 45:4,24 69:25 70:10 73:12 77:25
ballot 12:7 13:7 13:14 14:4,10 62:20 64:12 66:14,16,18,24 67:2,13,19,23 69:7,10,12 71:20 72:5,11 82:16 83:2,17 83:18,18,19,20 83:22,23 92:12 95:13 104:15 104:25 105:4 105:10,14 107:18 108:21 109:3,6,12 110:11 111:19
banking 77:15 79:8
banks 77:25
barraza 120:2 120:15
base 14:20,21 26:21 53:2

based 83:22,23 90:19,23
basic 78:17
basis 43:11
beat 106:17
beginning 56:13 87:7
behalf 3:2,10 4:2 7:6,8,11,18 7:20 50:20 59:22 87:15 92:17 96:19 111:6
belabor 76:7
belief 113:6
beliefs 74:5 80:5,20 81:4 84:1
believe 16:17 17:4,9,23 20:3 22:11 26:25 27:5,7 31:8 36:11 39:13 40:24 41:10 55:18 59:14 60:11 64:23 65:1 70:1 71:12 76:9 77:8 79:1,4 83:7,20 89:2 95:18 98:12,16 98:22 115:15 118:10
believed 39:16 39:19
benefiting 28:12
benefits 74:21 75:8
bernie 24:14
best 13:12 38:7 66:10 85:24 93:2 119:9 120:6
better 29:11 67:25 73:1 104:20 112:16
beverages 79:4
beyond 91:10 101:1 112:17
bias 91:12 102:25,25 103:6,10,12 109:10 110:1 112:24 115:18
biased 93:24 94:5 102:8 112:23 116:3
bible 71:16
big 25:24 29:3 34:20
bills 26:21
biographical 14:17
bit 9:9 14:16 16:2 17:14,16 32:22 35:9 36:5 46:5 47:24 48:12 54:6 62:11 66:20 75:10 81:3 89:8 92:3
black 64:10
blame 68:16,16 68:17 111:1
blind 25:11
blockading 74:14
blowing 74:13
blue 35:4
blur 52:21
board 1:11,15 1:18,22 7:14 7:18,22 13:8 38:1 46:3 53:16 85:15 87:2,22 91:1 92:8 96:3,7,13 97:14 98:4,10 98:13,19,24 99:2 101:10,19 101:22,24 105:8 110:7 111:18 113:14 113:22 114:8 114:13,15,22 114:25 115:5
boats 74:13
border 40:11
bottom 53:1
bought 15:2 37:15,15
brand 21:16
brazenly 22:23
break 11:8,10 11:14 33:13 82:2 86:17
brian 4:4 7:16 85:14
bridges 25:4
brief 117:22
briefly 111:15 115:10
bring 12:22 31:23 55:12 97:17
broad 2:6 3:5 3:13,20 6:10 40:18,22 93:22
broadly 42:14
brothers 54:13
brought 22:4 54:2 60:6 95:2
brown 3:3 7:24 7:24 42:20 44:24 45:15 54:22 55:2 72:15 102:10 108:11 117:10 117:12,15 118:2,3,7 121:5
buggy 56:12,13

build 25:3,4
built 76:5
bunch 29:13
buried 64:16
bush 43:19,19
business 62:23
bzagrocki 4:8

c

c 3:1 4:1 6:1
ca 121:25
california 65:11,13
call 29:6 36:1 52:17 57:1
called 8:10 60:8
calling 56:19 57:6 61:8 108:11
calls 45:15
campaign 12:11 15:18,22 16:5,9,11,22 17:17 19:7,14 19:15 35:24 37:18 46:21 48:4 49:2 50:16,22 51:3 51:7 75:11 96:2,3,8 97:13 97:19 98:14 109:23
campaigns 15:25 20:1
candidacies 35:10 36:7
candidacy 18:12 36:16 37:20 46:6 59:1 69:25 86:25 87:1 88:21
candidate 17:19,21 18:14 20:5,7,16 23:6 24:15 35:16 37:4 64:24 67:15 82:23 88:17 103:20 104:22,25 105:3,5,10,13 105:17,20 106:3,9,13,14 106:22 107:3,4 107:21,22 108:2,9,10,16 108:20,21 109:2,4,11 111:17,18,20 111:23 116:19
candidates 20:6,18,22,23 21:18 27:2 72:9 83:7 94:9 108:24 109:5
capable 114:5
capacities 7:14
capacity 1:8,10 1:13,17,20 6:8 90:1,2 94:17 103:16
capital 3:4
card 21:14 31:20 32:24 118:7
care 23:16 29:3 30:14,15,15,25 69:1
career 30:23
carey 93:5,6,10 93:13 96:2,3,7 97:13,19 98:14 105:17,21 106:1,4,17 107:14,15 109:10
caribbean 74:13
carriages 56:12 56:14
carried 103:7
carrying 21:14 31:20 32:24
cars 56:12,16
case 1:6 10:9 12:15,25 13:11 13:18 27:9 28:7 31:2 35:17 44:2 51:12 64:21 72:8 74:3 80:4 90:3 98:23 112:9 113:13 121:6 122:3 123:3
cases 112:10 113:21
caught 96:1
cause 49:21 70:3 80:25 88:18 89:16 94:9 115:2
century 26:7
certain 8:25 21:11 47:8 50:3 57:1 63:25 83:19
certainly 24:9 24:10 58:25 66:8 100:24 106:15
certificate 119:1 120:1 123:11
certification 122:1 123:1
certified 6:17
certify 119:3 120:2
certifying 110:11
chabot 36:14
chain 63:25
chair 1:10 27:10 28:23

30:4,24 31:6 32:2 34:13 36:3 52:4 53:21,21 54:18 59:5,15 61:5 89:10 90:3 91:3,9,11 92:8 92:23 94:15,17 96:8 101:19,24 109:14 110:8 111:2 115:17 115:24 116:17
chairman 91:1
challenging 88:4
chance 10:10 10:19 27:16 50:19 61:21
change 51:21 65:8,14 116:2 121:13,14 123:8 124:3
changed 10:19 19:19 27:24 28:1
changes 121:12 122:7 123:7,9
charge 109:14
charged 84:14
check 51:18
checked 66:25
cheekier 76:12 79:7
cheeky 45:14
cherry 54:4
chicken 112:12
chief 22:6
choice 79:18
choose 27:1 69:7 72:6,11 82:19 83:12
chose 23:19 31:23 111:24
christian 71:6
circles 32:21 116:14
circumstances 116:20
circumvent 113:6
cis 41:5,12
cited 80:22
citizens 28:7 80:14
city 5:8 57:16
civil 122:5 123:5
civilians 23:21
claim 73:25 94:4 100:5 109:9
claiming 88:24
claims 13:3,4
clarified 86:5
clarify 60:4 98:17 99:24 104:18 107:17
clarifying 74:18 98:20
clarity 44:19 60:2
class 60:1
clean 9:18,25
clear 57:9 66:20 67:11 68:19 77:7 88:8 92:1 95:25
clearly 59:15
cleveland 121:2
clock 52:3
closed 65:13
clothing 79:4
cock 112:14
coin 67:3
collect 17:18,22 35:17 37:7 46:10
collected 36:17 36:25
collecting 37:23 38:2 46:7 47:6
college 21:10
colloquial 18:19
color 65:25
columbus 2:8 3:6,14,21 4:7 4:14,21 6:11 14:23,25
come 22:8 23:17 25:14
comfortable 34:12
commandme... 71:15
commission 122:19 123:25 124:25
committee 30:4 31:7 36:4 52:5 90:4,6,21 92:9 92:17 93:7,9 94:24,25 95:1 96:13 97:24 109:25
communicated 95:7,15
communication 94:16,20 96:1 96:15
communist 81:19
communities 55:16
community 48:22 54:9
company 91:20 91:20,21 92:1
comparison 91:24
compass 82:22
compensated 77:9

compensation 15:22
competing 41:7
complete 76:24
completed 121:15
completely 88:3 101:6 112:2
comply 26:22
comprehensive 47:15
compromise 23:18 35:1
compromised 98:25 99:2,4
conception 69:9
concerned 28:4 28:14 41:11
concerns 28:3
concluded 118:23
concluding 89:24
conclusion 104:9
confident 68:12
confines 65:10
confirm 47:10 118:11
confiscated 78:4
conflict 89:24 90:6,10,15 91:22 92:2 96:11,25 102:16 113:4 115:18 116:18 116:21
confusion 70:4
congress 21:17 27:21 33:20 59:6 65:24
congressional 13:16 36:13 37:11 103:20 106:5,24,25 107:19 108:2 108:17,22 110:15
consequences 23:20 39:6
conservative 19:11 30:14 31:12 33:22,25 41:22 55:15 81:8
conserving 30:18
consider 33:14 33:15 53:9,12 80:20 81:5,7 81:10,12,15
considered 30:9,11,18 31:9
consistent 26:14 48:18,19 80:21
consistently 69:17
constantly 101:9,10
constitute 6:24
constitution 42:8 84:16 108:6
cont'd 4:1
contact 52:19 52:20 110:14
contempt 23:1 23:22 27:13
contend 93:23 99:22 100:3 115:5
content 11:23 12:5 75:15
context 15:5 30:21 42:17 54:2 55:19 77:11 100:17
contextually 88:2,6
continue 55:25
contract 23:3
contributed 84:13
control 63:12
controls 78:19
conversation 17:13 41:16 42:11 71:7 95:4 100:23
conversations 95:20
convert 80:17
convinced 26:10
copies 58:3 61:25
copy 58:10,11
cordero 1:4 12:13 51:11 62:14,17
core 30:19 34:8 34:8 47:1 74:4 74:19
corporate 32:3
corporations 68:22 77:23 78:8
correct 10:13 10:14 12:25 30:8 35:12 38:17,18 41:6 62:21 75:11 86:10 87:3,9 87:19,23 88:15 89:6 98:14,23 98:24 101:20 104:12,25 105:1,6,10,14 105:15 108:17

108:18 109:7 114:23,24
corrected 64:4 64:6,8
corrections 121:12 123:17
correctly 16:19 30:2 31:5 32:23 34:20 76:19 78:3 96:17
correspond 51:19
corresponden... 51:3
cost 69:3 78:21 79:5
costs 117:23
counsel 8:14 58:10 61:25 87:11,14,17 93:15 96:19 100:11 101:5,7 101:9 102:2 112:18 117:17 118:1,6,8 119:10,13 120:7,10
country 22:8 26:5 30:14 68:18 74:9,10 74:12,12,14
country's 108:5
county 1:11,14 1:18,21 4:5,12 4:19 7:11,14 7:17,18,21 14:24 32:3 85:15 87:2 89:11 90:12,18 90:21,24 91:9 91:12 92:4,6 92:14,20,22,24 93:4,7,9,20 96:3,7,13 97:14,23 98:2 98:4,6,7,9,13 98:19 101:24 109:14,25 110:14,16,19 110:21,23,25 111:2,7 113:22 114:12,20 122:10 123:15
couple 16:4 32:5 39:4 75:23 110:17 113:8
course 23:18 70:12 112:13
court 1:1 27:3 27:7,9 29:2 53:3 64:18 73:16 122:7
create 19:14 50:6 75:15
created 10:10 37:17 50:8 89:24 92:23
credit 79:12
crimes 74:16 74:18 84:14,14
criminality 77:6
crisis 75:2,4,4 77:12
criteria 83:24
criticism 26:13
cross 20:20 87:18
crossed 59:23
crossing 60:9
crux 44:6
cruz 22:2 25:15
cuba 74:14
cultural 83:10
curious 20:10 55:8
current 16:23 37:11 80:17
cv 1:7

d

d 4:4 5:1 6:1 7:21 71:1
d.c. 76:13
dare 31:24
dark 16:22 18:14,17 19:3 37:3
date 2:3 38:1 54:23 121:8 122:3,9,19 123:3,13,25 124:20,25
daughter 46:12
day 42:9 46:11 101:4 103:18 103:21 112:10 117:21 122:16 123:22 124:22
days 89:13,20 89:21,22 121:18
deal 21:19 23:14 25:23,24 43:4 80:15
dealing 100:1
deals 12:6
dear 121:10
death 74:15 84:19
debate 18:4 44:10 96:23
debt 79:16
decades 25:25
decent 24:15
decide 37:10 66:18 69:12
decided 46:12 94:3 103:21 111:18
deciding 111:6

decision 25:1 33:20 37:14 93:13 103:5,12 112:21 115:15 116:8
decisions 92:17 109:15
declaration 18:11 35:18 38:23 46:6 58:25
declarations 36:19
declare 64:23 65:4 69:24
declared 38:10 38:13
declaring 39:8 60:22 65:5
decriminaliza... 77:2
deed 122:14 123:20
deemed 121:19
deep 59:18
defendant 3:10 7:9 87:22
defendants 1:23 4:2 7:12 85:15
defense 113:6
defer 89:16
define 26:7
defined 33:17 71:13
definitely 27:8 43:15 52:21 114:4
definitive 96:4 96:6
degree 19:12 50:5 101:14 114:16
democracy 23:13 24:4 108:6
democrat 25:12 30:11 31:8,12 33:1,5,7,9 34:11,11 35:4 35:5,14 65:19 70:6 71:10 106:17 107:9 107:15 108:25 112:2
democratic 27:4,11 30:3 30:25 31:6,19 31:21 32:25 34:24 35:7 36:4 52:4,4 53:1,2 60:11 61:8 69:18 81:17 83:18
democrats 21:5 21:6 24:2 26:24 28:3,14 28:20 30:21 33:12 52:5 53:22 54:17,21 55:7,22,24 56:6 59:16,22 60:7
demonstrate 93:23 94:4
dems 63:3
denied 99:21
deny 80:3 104:11 105:13
denying 104:14
department 15:6,7,9 121:22
departments 49:25
depending 20:24
deployed 22:18
deployment 22:12
deponent 58:10 58:12 61:24
deportation 40:10 81:1
deposed 8:24 57:11 91:8
deposition 2:1 6:6,22 11:21 11:25 12:3,6 12:10,20 32:18 45:6 60:3 97:4 97:18 119:1 121:8,11 122:1 122:3 123:1,3
described 50:9 66:13 101:2
description 5:7
desert 22:16,18
desire 60:8
despise 29:20
despite 102:13
determination 13:9
determine 50:3 67:2,12 82:15
determining 43:12
differed 33:22
difference 88:25 89:1
differences 26:17,20 88:22 88:23
different 11:3 18:1 19:20 33:9 40:22 41:15,22,23 43:20 48:22 51:10,12 56:1 60:14 68:9 69:25 72:25 73:7 98:1,7 107:8
differently 41:19 42:6,9

42:14 43:8 45:20 51:1 112:9
difficult 66:1
digital 119:8 120:3
diplomatic 26:6
dire 23:19
direct 84:19 92:10 94:16,18 94:20 96:14 97:7 98:12 99:12 101:25
directing 115:21
directly 65:4 95:7 97:23
disagreed 40:9
disclosed 115:14
discovered 28:22
discuss 58:18 113:5
discussed 42:25 43:3 46:5 53:3 70:1
discussion 11:24 37:25 57:15
disgust 23:2,23
disingenuously 73:11
dislike 25:15,19
dismissively 101:6
dispensed 109:16
disregard 27:17
distanced 61:7
distinct 18:21
district 1:1,2 13:16 35:12 36:13 37:12 47:14 59:25 69:16
districts 59:18
distrust 71:24
diverge 26:24
divestment 76:24
dnc 27:10 28:23 30:24 34:12 53:21 54:18 59:5,15 61:5
doctor 80:3
doctors 79:21
document 26:3 40:18 42:2 44:20 45:3 58:12,17 59:13 62:5 96:18
documents 12:19 55:19 61:22
doing 16:13 17:25 50:13,14 54:7 59:20 60:3 64:4 66:2 101:13 102:3,6
dollars 97:22
domestic 68:9 68:10
dominant 59:25
donald 25:19 70:6
donated 93:6,9 98:18
donation 97:13 98:3
donor 26:21 32:3
door 59:19 101:17
doubt 25:17 62:16
douglas 1:9 4:2 7:12
downloaded 47:13
downstream 22:15
drafted 40:18 40:21 42:7
dream 74:25 80:19
drifted 68:19
drink 34:21
driven 28:8
drug 77:3,8,8 77:10
drugs 77:3
due 100:2 113:14
dug 95:3
duly 8:10 119:5
duty 22:3 23:3 28:18 30:22 74:22
dwight 71:1

e

e 1:19 3:1,1 4:1 4:1,3 5:1,6 6:1 6:1
earlier 54:2 81:3
early 33:17,19
earn 47:25
earners 25:3
easier 19:3 63:1
easily 58:1
east 2:6 3:5,13 3:20 6:10
easy 64:15
economic 40:5 40:15,16 68:9
economy 40:13
edit 75:24
educate 49:20

education 74:22 75:5
effectively 28:9 96:20
efforts 85:19
eight 57:10 70:12
eisenhower 24:8,9,22 25:7 25:13 43:16 71:2
either 11:5 19:21 33:10 47:11 91:15 93:8 95:1 101:11,11 107:10
elaborate 99:3
elected 22:22 23:13 38:14 67:22
election 7:18 18:7 27:14 38:20 65:22 66:23 72:5 85:15 101:10 106:4,23 107:19 108:20 109:3,5 110:9 110:10 113:22
elections 1:12 1:15,19,22 7:15,22 13:8 27:6 28:15 46:4 87:2 91:2 96:4,7 97:14 98:4,10,13,19 98:25 99:2 101:19,22,24 106:18 107:11 110:7 111:18 114:13,15
eleven 97:21
eli 4:18 7:10
eligible 80:14 116:19
email 121:17
embrace 54:10 108:4
empirical 68:5
employed 15:17,19 20:12 119:11,14 120:8,11
employee 119:13 120:10
emulate 70:25
enclosed 121:11
encourage 50:21
encouraging 20:10
endorse 20:20
endorsed 20:16 20:18 93:11 109:20
endorsement 94:7,24 109:18
endorsements 109:17
endorsing 55:23
ends 65:16
engaging 100:20
enjoy 74:21 75:9
enlist 75:7
ensuring 68:19
entered 123:9
entire 32:1 60:3 63:25 122:5 123:5
entirely 63:25
entirety 87:5 103:25
envisioned 24:17
epstein 69:2
equipped 92:25
erase 79:15
eredfern 4:22
errata 121:13 121:18 123:7 123:10,18 124:1
errors 10:11,20
es 119:4
especially 69:16
espouse 70:25
esquire 3:3,11 3:18 4:4,11,18
essentially 70:18
establish 101:8 101:15,16
established 24:24 33:21 57:7 73:22
establishment 29:19 109:24
estate 78:3
estimate 89:19
et 6:7,9 121:6,6 122:3,3 123:3 123:3
everybody 41:21 75:7
everybody's 32:15 42:4
evidence 99:11 99:14,17 101:2 102:14 103:6 103:11,17 112:8 115:19 115:23
evidentiary 6:21
evolve 71:14
ex 102:20
exact 72:24
exactly 22:17 34:4

examination 5:2 8:15 85:10
examine 87:18
examined 8:12
example 54:1 60:17
examples 55:21 74:2
except 20:13 73:1,5 80:24
excessive 96:24
exchange 98:12 99:5 109:22
exchanged 96:2
exchanges 96:9
excuse 69:10 77:3 78:10 79:9 89:5 91:13 93:14 106:24 115:21
executed 123:10
execution 122:14 123:19
exemption 80:2
exhibit 5:8,10 57:20,25 58:7 58:10 61:14,14 61:15,24
existence 106:14
existing 37:18
exists 76:20
exonerated 76:23
exoneration 76:16
expand 75:1,6 75:8
expected 22:8
expedited 117:19 118:3 118:16
expense 97:22
experience 45:18,23 69:15
experienced 17:3
expiration 80:14 122:19 123:25 124:25
explain 9:9 88:1,14
expound 19:6
expressed 71:24
expressing 20:9 99:8
extension 77:24
extensive 75:20
extremely 36:1 100:13
eye 25:11

f

f 4:18
facebook 5:8 5:10 51:10,13 57:15 58:20 59:3 62:8 63:19
fact 12:4 22:3 26:1 28:17 54:13,14 60:8 68:5 94:6,7,14 94:14,15 96:12 101:5 102:13 102:24,24 103:1,9 105:5 109:13,22,23 110:5 112:17 113:6 114:3 116:12,17
facto 102:20
facts 13:20 89:23 93:23 94:4 97:15
failure 23:13 24:3
fair 94:2
fairfield 14:24
fairly 32:15
faith 39:12 44:21 45:4,24 64:25 65:4,6 66:2,3,6,7,9 69:25 70:10
false 108:23
falsification 38:21
familiar 53:25 61:18
far 12:6 13:13 18:15 24:12 25:7,13 28:14 33:5 36:23 37:9 42:15 57:7 81:13 95:16,16 96:10 101:21 103:13
fascism 76:20
fascist 76:21
fashion 118:16
fast 117:23
fatalities 22:21
faults 24:23
favor 7:21 104:8,10 109:10
favorite 25:6 25:13 100:16 100:16
fdr 24:9 25:7,8 43:17
fear 84:15
february 58:23
fec 17:21 37:1 96:4 97:16,18 97:24
federal 13:24 76:11
federalize 77:13,15,18,21 78:11,13

feel 45:5 61:10 63:5 70:23 82:21,23 100:11
fell 29:1
felt 31:14 34:12 41:4 65:5 92:11 100:11
fight 74:9,9 112:12
fighting 59:22 59:25 74:11,12 74:14 112:14
figure 20:14 34:17 38:5 41:17 42:5 67:8,12 72:6,9 73:24
figuring 49:7
file 17:17,22 18:10 35:18
filed 17:20 18:15 37:1 93:14,15 96:17 104:21
files 47:14,16 69:3
filing 90:4 97:16,20
filings 96:5
filled 23:1 27:13 38:9 49:23
final 109:14
financial 93:4 97:12 98:12 99:12
financially 119:15 120:11
find 10:14 29:4 121:11
fine 32:11 48:9 57:22 58:6 64:2 75:25 96:22
finish 9:20,21 11:12 86:12
first 8:10 9:10 21:24 23:8 28:17 29:7 31:25 36:12 43:20 46:11 96:18 111:11
five 82:2 116:24
flip 65:21 67:3
flips 65:24
floor 2:6 3:13 3:20 6:11
flop 65:21
fluid 71:12 72:1
focus 28:25 32:3,4 86:21 97:4,10
focusing 32:4 90:12 103:4,6
follow 17:10 82:14 94:19 99:19
following 59:20 99:6 116:8
follows 8:12
food 74:23 75:3 79:4
foot 59:19
force 14:20,21 75:7
forced 40:10
forces 78:13
forcing 77:25
foregoing 119:3,4 120:4 122:13 123:18
foreign 68:10
form 38:1,4,9
formally 20:6 35:16
formatting 50:24
forms 77:15
forth 32:6
forward 121:15
fossil 76:25
found 27:20 31:1 36:21 102:24
four 48:18 49:3
frank 1:7 3:10 6:7 7:6 121:6 122:3 123:3
franking 91:9
franklin 1:11 1:14,18,21 4:5 4:12,19 7:11 7:14,17,18,21 85:14 87:2 89:10 90:12,17 90:21,24 91:11 92:4,6,14,20,21 92:24 93:4,7,9 93:20 96:3,6 96:13 97:14,23 98:2,4,7,9,13 98:19 101:24 109:14,24 110:14,23,25 111:2,7,11 113:21 114:12
franklincount... 4:8,15,22
fraud 27:15,19
free 47:15 74:22,22 101:15 122:14 123:20
freedhoff 1:12 4:3 7:12 87:22 89:9,10 91:9 91:25 92:23 93:23 94:21 95:7,20 99:8 99:11,16,23 100:3 101:11 101:19,25

102:8 104:3,11 105:12 111:2,5 112:8 115:19 116:3
freedhoff's 109:10 115:15
friday 2:3 6:9 14:2
friendly 17:2 100:13,18
friends 16:8
front 16:24
frozen 78:24
fuels 76:25
full 54:4 59:12 77:2
fully 86:14
funding 59:24 60:13 115:21 116:1,13
fundraising 17:24
furloughed 23:21
further 27:3 38:13 68:15 72:23 88:9 93:1 119:12 120:9
future 46:13

g

g 6:1
game 73:7 112:15,17
gathering 46:14
gavin 59:4,14 60:24
gender 41:5,12
general 2:5 3:12,19 6:10 7:8 18:7 35:22 71:24 91:5 105:25 106:1,4 106:23 107:4 107:19 108:20 109:3,5
general's 7:5
generally 24:1 93:25
generals 47:19
genocide 24:20
genuinely 52:17
gestures 86:8
getting 47:1
gist 17:9,12
give 9:12 12:17 14:16 27:16 42:18,24 62:1 64:18,21 72:19
given 16:16 74:2 88:14 92:8 101:15
go 18:1 23:4 29:3 32:21 38:6,7 42:3 44:4,17 46:11 49:5 60:14 68:7,15 72:19 76:1 82:16 83:19 84:25 85:17 93:20 97:18,19,19 99:15 102:12 111:15 112:7 113:17
goal 18:5
god 47:14
goes 29:20 68:20 78:7 96:10
going 9:8,15 10:8,25 19:10 20:19 22:7,7 24:18 25:11 26:5,6 27:15 29:2 30:10 31:3 32:20 35:3 37:10 38:20 40:25 41:13 44:18 50:10,24 53:23 61:23 63:22 64:20 65:18,18 67:3 71:8 72:15 74:6 75:7 76:6,7 82:24 84:7 85:17,18 86:21 90:11 94:13 97:2,23 102:5 103:14 113:9 116:14 118:3
good 6:2 8:17 8:18 20:23 25:8 39:12 40:5,5 47:23 63:6 64:24 65:3,4,5 66:2,3 66:6,7,9 85:12 85:13
goodness 74:24
goods 78:21 79:5
gop 96:14 116:18
govern 59:16
government 22:2 23:10 76:22
grace 80:9
grassroots 21:18 32:4 48:22
grateful 50:1
great 37:13 78:25
greatest 24:10 70:23
green 21:7 111:23,24,25
greg 7:4

gregory 3:11
gregory.rustico 3:15
grievance 90:4
grifter 59:24
grifting 59:7
group 21:10
groups 21:11 59:3
grove 5:8 57:16
guarantee 68:11
guess 15:4 31:10 46:16 53:24 54:25 71:23 72:12 74:17 91:16 92:3 95:23 110:19 114:2
guide 69:7
guidelines 83:9
gun 95:23
guy 52:14 101:11
guys 48:22 58:11

h

h 5:6
hand 8:7 61:23 98:2,3
handful 76:7
handing 58:9
handling 26:4
handsome 100:20
happen 18:5 46:2
happened 16:8 27:9 46:3 67:17 70:16
happening 12:4 45:5 78:14 96:16
happens 33:11
happiness 30:17
happy 49:17
harassed 51:20
hard 72:1
harder 112:24
head 9:15 20:21 107:14
headline 84:5
health 78:22
healthcare 30:16 34:4,5,6 74:22 75:4 77:7,12 78:15
heard 85:18 97:3
hearing 8:4 13:20,23 14:1 57:14 61:19,20 62:6 86:22,23 87:1,6,8,12 88:8,13 89:4 89:12,14 93:25 94:3,11,22 95:15,19 99:15 99:16,23 100:2 100:4,5 101:4 103:8,23 104:1 115:3,14
held 115:1
hell 25:18 63:6
help 9:8 21:18 46:10 49:17 50:15 56:16 69:13 85:19
helped 25:10
helpful 69:6
hereto 119:14 120:11
hey 17:2 50:23 50:24
hi 7:4 47:21
high 4:6,13,20
highest 25:2,3 70:16
hiring 96:19
historic 65:22
historically 43:23
history 24:11
hold 33:9 104:13 111:9
honestly 8:25 39:14 41:10
hoo 62:21
hope 76:5
hopefully 61:18
hoping 19:13 42:3
horse 16:22 18:14,17 19:4 37:4 56:12,13
horses 56:14
hospitals 25:5
house 15:2 19:24 35:12 37:15,15
housing 74:22 75:2 77:21,24
hq 52:11,15
huh 36:18 41:3 49:11 62:13 65:2 78:12
humanity 28:12 84:15
hummer 4:11 7:20,20 15:14
hundreds 78:8 78:9
hygiene 78:23

i

ice 59:23 60:13 84:10,13
idealize 24:5
ideals 70:25
identification 58:8 61:16

identified 57:8
identify 7:2 83:1,12 93:22 113:13
identity 34:8,9 47:1 53:13 65:17 70:15,21 70:22 83:3,11
ideological 44:9 88:22,23
ideologically 92:11
ideology 35:2 41:14 43:22 55:14,14 56:3
ignorant 114:1 114:3
ignored 109:20 110:12
imagine 21:10 51:14
immediate 27:21
immediately 23:2,5 27:21 33:14 79:15
immigration 80:10,16,25
imperative 27:1
implication 96:21
implying 106:13
important 39:5
improper 99:23 100:4,5,8
incident 33:18
include 51:5
included 121:13
includes 105:12
including 87:22
income 25:3 78:17
incorporated 123:12
incorrect 10:14
independent 33:15 52:18 108:24
indicating 121:13
indicative 69:22
indirect 84:18
individual 70:20 71:5,14 84:12
indulge 84:1,2
infiltrate 70:14
infiltrating 32:5
influence 27:5 110:9
informal 20:5
information 12:8 93:3
informative 69:22
informed 68:3 68:13,25 69:5
infrastructure 28:13 30:15
initially 98:18
initiatives 32:4
instance 25:16 40:24 65:11 67:3 70:6 73:16
instilling 84:15
intended 6:19 41:20 42:14 43:9 44:15 45:21
intent 116:9
interaction 20:15
interchangea... 81:13
interchangea... 19:1
interest 79:9,9 89:25 90:6,10 90:16 91:6,21 91:22 92:2,5,6 92:10 96:11,25 99:12 102:16 112:19 115:18 116:8,10,11,18 116:21
interested 17:7 21:24 28:3 119:15 120:12
interesting 26:18 74:7
interests 113:4
internal 12:8
internet 39:4
interns 48:7,13 48:17 49:6,15 49:19 50:12
internship 49:2 49:7,10,24 50:4,8
internships 49:23
interpret 42:8
interpretation 42:1,10
interpreted 40:22 41:18 42:6,13,15 43:7 44:21 45:4,19
interrupted 101:9
interrupting 101:13
interview 52:10 53:15 56:18 99:19
interviewed 109:18,19

interviews 18:2
invited 110:22
involved 20:11 25:22 68:22 115:13
involvement 84:18,20 90:24 93:16 114:14 115:11,12
involvements 114:12
involving 92:21 103:19 115:7
iran 25:23 26:1 26:11 60:22 69:2 74:12
irrelevant 103:1
ish 58:23,24
isolated 61:2
israel 24:19 26:8,10
issue 23:8,15 32:9 44:16 68:9,10,10,11 74:19 92:23 99:25 101:25 103:4 111:16
issues 28:5 41:22,23 42:1 68:20 82:20

j

j 1:9 4:2
jamie 1:15 4:3 7:12
january 58:24 79:6
japan 14:20
jeanine 4:11 7:20 118:11
jhummer 4:15
jill 16:5,8 20:13
job 2:10 67:11 104:20
joined 59:3
journalist 52:18
jr 43:19
judge 11:5 91:19,21,22,25
judges 91:4
july 15:2 37:15
jump 51:10
justice 28:4 73:16
justifying 60:16

k

keep 9:10 50:10 113:4,5
keeping 41:1
keesler 14:20
kept 41:5 101:12
kerfuffle 25:25
key 26:16 43:14 43:15
kind 17:18 23:7 24:17 32:21 37:19 38:8 40:10 50:6 56:11 61:21 72:17 89:17
knew 115:20
know 8:19 9:18 10:3 11:9 21:11 22:5,13 24:22 25:7,21 25:22 27:22 29:8,11 32:13 33:15 35:11 37:18,25 40:6 40:6,9 42:25 43:5 44:22 45:7,13 46:16 46:17 47:5 49:21 52:9 58:16 61:20 62:11 64:10,14 65:11,12,17 66:16 73:23 74:6 82:19 83:14 84:4,8 84:25 86:2,16 89:13,17 90:9 96:17,19 97:6 100:23 102:4 102:23 103:13 103:17 104:8,9 104:17 108:13 112:23 114:14 116:23 117:23
knowing 25:21 114:4,5
knowledge 46:15 85:24 91:17 115:25 119:9 120:6
knows 108:12
kool 34:22

l

l 1:15 4:3
label 71:22 73:11,15 81:4 83:13
labeled 63:4
labels 69:6,12 69:13 70:17,19 71:12,13,15,25 71:25 72:12,25 83:6
laid 110:4
lancaster 14:24
language 34:1 50:23 56:23 75:23 79:25 104:14
largely 16:17
larose 1:7 3:10 6:8 7:6,9 121:6 122:3 123:3

law 3:4 13:8 27:18 29:14,14 29:16 42:10,10 65:8,10 66:6 88:24 89:3
law.capital.edu 3:7
lawful 22:19
laws 6:21
lawyer 45:7 73:3,6,6 90:1 113:16,20,20
lawyers 73:1 73:13
leader 25:1 84:11
leadership 24:17 29:18 70:24 113:15 113:23 114:9 114:18 115:1,8
learned 17:2 33:21
learning 32:8 32:12
led 22:2 56:10 95:4,5
legal 26:25 39:6 90:9 91:17 96:10 114:1 121:1 124:1
legality 41:16
legislation 28:11 68:23
legislative 94:23
letter 121:19
level 31:24
levels 70:16
lgbtq 24:24
liberal 31:13 41:23 81:10
libertarian 81:23 83:18 103:20 104:15 104:22,24 105:3,5,6,9,16 105:20,22,23 106:3,8,10,13 106:22 107:3 107:16,18,20 108:9,16,20 109:2 111:16 111:17,20 112:11,17,22 112:25
libertarians 21:7
liberty 30:17
lie 73:19,20
life 14:14,15 30:17 38:8 45:18 70:7 84:17
light 20:17
likely 16:11 47:17 106:21 108:8
liking 63:19
limited 31:12 103:16
line 42:3,3 59:23 60:9 71:9,17 101:8 112:5 121:13 123:7 124:3
lines 34:7 56:19
listed 123:7,17
listen 32:17 56:21
listened 56:25
listing 123:7
literal 44:9 92:16
literally 14:7 60:22
litigate 110:2
litigating 57:9
little 9:9 14:16 14:21 16:2 17:14,16 32:22 35:9 36:5 46:5 48:12 62:11 66:20 68:15 75:10 81:3 89:8,14 92:3
lived 14:14
living 69:3 79:5
loaded 44:22
loans 78:1 79:8
local 21:11 33:22,24
location 2:5
lol 63:8
london 110:18 110:20,21
long 24:21 25:24 29:21 59:12 63:4 65:21 72:13 86:17,18
longer 68:23
longstanding 26:15
look 10:19 57:20 58:15
looked 100:21
looking 23:2 24:18
losing 30:6
lost 35:22
lot 17:25 18:1 40:4 43:6 48:23,24 63:20 69:19 98:6 102:4
low 72:12
loyal 34:20
loyalty 39:11

m

madam 121:10
made 25:1 32:1 33:19 34:4 35:21 36:19 37:13 38:20 47:8 57:15 59:21 88:7 89:2 93:13 100:15 103:5 110:16 116:20 122:7
main 105:2
maintenance 15:4,9
major 26:17,19
majority 81:1
make 9:24 10:11 18:22 35:18 36:8 47:22 53:23 67:11 68:12 70:15 76:8 106:16 107:16 110:13 112:4
makes 92:17 116:18
making 30:16 40:14 56:11 109:14 115:16
man 96:17
manage 15:5 75:13
managed 70:11
manager 12:11
mandatory 84:17,19
manipulate 28:15
manner 6:22
march 2:3 5:10 6:9 51:16 62:10 86:22 87:1 99:15 103:19 121:4
mark 3:3 7:24 57:19,24 59:4 59:14 61:14 96:12 121:5
marked 58:7 61:15,24
market 77:24
marxist 81:21
marzetti 15:15
masses 68:19
material 26:4
matter 6:7 56:1 104:4 109:19 116:15,22
matters 29:23 44:12 109:20
mays 2:9 6:3 119:2,17
mbrown 3:7
mean 14:18 18:17 19:9 22:5 25:5,15 30:16 33:8,19 40:14,19 42:8 44:17,22,23 46:17,20 47:14 48:14,19 53:11 54:1,16,21 56:9 63:20 64:14 65:22 66:7 71:3,6,10 71:11 72:20,20 72:24 73:2,6 73:12 74:24 83:9 88:6,7 91:2,4,6 94:17 94:18,21 95:22 97:16 98:8 103:16 106:18 107:17 111:22 112:1
meaning 70:20 70:20 86:9
meaningless 70:18 72:1,12
means 6:23 10:16 17:10 22:24 71:5 83:13
meant 55:8,9 56:7,17 98:5
media 13:19 16:6,7 50:13 51:5,20 63:13 63:21 68:16,16
medicaid 25:9
medical 79:15 80:3
medications 11:16
meet 11:24
meeting 38:1 46:4
member 1:14 1:17,21 16:8 21:12,13,15 31:15,17,20 32:3,24 38:10 84:10 90:5 92:14 96:13 105:8 113:14 113:22 115:5
members 7:14 7:19,22 23:20 75:9 76:17 85:15 87:22 101:10 114:8 114:12,23,25
memory 48:9
men 41:1,5,12
mention 23:21
mentioned 16:10 19:8 20:11 23:22 25:15 37:18 45:9 56:18 59:15 72:8 97:12 102:1 110:12 111:19

meredith 1:12 4:2 7:12
merge 77:16
merits 95:8,10 95:12
metaphor 56:16 91:18,24 112:16
metaphorically 112:13
michael 1:19 4:3 7:13
midterms 65:24
midwest 121:17 124:1
mike 93:5,6,10 93:13 96:2,2,7 97:13,19 98:14 105:17,21 106:1,3,17 107:14,15
military 14:19 24:24 40:6,7 74:25
mind 9:10 24:14 25:14 30:7 75:7
minimum 13:14 76:9
minutes 55:18 82:3 116:24
mired 26:12
misquoted 42:16
misrepresented 42:16 55:20
missed 75:23
missing 35:11
misspeak 98:5
misunderstand 107:2
misunderstood 44:8 55:20 111:14
modern 24:12
modernizing 40:6
moment 10:13 14:4 58:13 82:5 85:2 117:3 118:18
monday 117:23
monetary 15:21
money 18:1 37:1 53:20 68:21 94:6,13 96:1,7 98:18 99:5 109:15,22
monitor 22:12
month 80:9,13
moral 82:22 83:9
morning 6:2 8:17,18
motion 93:15
motions 92:18
mouth 53:20
move 14:25 26:4 86:14 89:8 113:7
multiple 18:16 19:5 51:17
muslim 71:11

n

n 3:1 4:1 5:1 6:1 8:22,23
nail 21:22
naive 52:7
naively 23:18
naivete 29:10 32:7
name 6:2 8:20 8:21 51:10,12 51:21,22 62:12 62:25 85:14 95:2 96:20 106:10 121:6 122:3,4,15 123:3,4,21
name's 51:11
named 7:23
names 20:21
narrowing 113:10
nathan 8:23,23
national 30:3 31:6,24 36:4 52:4
native 76:14
nature 13:2
navy 22:13
necessarily 64:13 83:11
necessity 65:7
need 9:15 11:8 50:25 56:6,7 57:1 60:2 61:20 64:21,24 75:24 86:4,9 118:11
needed 29:6 49:23 50:9
needs 76:22
neither 28:6 119:10 120:7
never 26:13 29:6 30:9,11 34:9 36:24,25 37:1,1
new 21:17 43:1
news 19:11
nice 100:21
nixon 43:18
nod 9:14
nominee 106:2
non 28:16 113:20
nos 9:16
notarized 121:14

notary 6:12 119:18 121:25 122:10,18 123:15,23 124:23
note 121:12
notes 12:22
nuance 77:4
nuclear 23:19 25:23 26:4
number 25:12 68:17 121:7,13
numbers 123:7
nuremberg 84:5

o

o 6:1 8:22
o'clock 85:13
oath 9:3 10:18 39:11 82:12 85:21 87:8
oaths 6:13
object 10:23 72:15
objected 101:6
objection 6:14 8:4 10:24 11:4 42:20 45:15 102:10 108:11
objections 11:1 11:6 102:1,4,7
objectively 26:19
obviously 18:5 19:23 46:16 47:21 52:8 97:17
occurred 94:7 94:12 100:23 109:24
october 22:1 38:1 59:1
offenders 77:9 77:10
offenses 77:3
offered 16:5
office 2:5 6:10 7:5,17 19:23 21:18 23:5 30:22 37:11 49:7,10,20,24 59:24 65:23
officer 38:14 119:1,2
offices 19:20 49:24 114:19
official 1:7,10 1:13,16,20 6:8 7:13 15:22 51:3,7 62:20 64:11 90:2,5 122:15 123:21
officially 65:17 65:18 85:12
officials 22:23 23:14
oh 2:8 3:6,14 3:21 4:5,7,12 4:14,19,21 18:23 21:6 22:1 32:16 44:4 47:8 48:2 48:7 50:10,13 54:20 56:23 57:21 61:19 63:6 73:14 75:22,25 110:20 111:9
ohio 1:2,9 2:5 3:12,19 6:9,10 6:11,13 7:5,8 13:8 14:14,23 18:16 36:12,22 49:10,20 65:8 65:20 72:4 90:17 93:16,21 110:21 112:19 115:11,13,20 116:1,17 119:19 121:2
ohioago.gov 3:15,22
okay 9:2 11:7 11:11,15,20 12:9,12,14,17 14:1,5,9,12,25 15:3,15,17,24 16:2,13 17:7 18:10,21 19:5 19:17 21:4,24 22:9 23:7 24:2 29:2 31:5 33:6 34:10,15 35:16 35:20,23 36:12 36:16,19 37:3 37:6,17 38:13 42:23 46:5 48:11 51:5,15 51:22,25 52:2 53:5 57:12,13 58:19,25 59:10 61:7 62:24 64:17,19 67:7 74:4 75:17,20 76:24 80:9 81:3 82:2,4 85:2 86:12,16 86:21,24 88:10 89:4,8,23 90:11,13,23 92:19 93:3,19 97:2,25 98:11 98:21 99:1,7 99:22 100:10 101:23 103:3 103:11,18 105:8,16 107:1 108:15,19 109:1,9 111:5 114:7,11,22,25 116:25 117:11 117:13,16,20 118:1,4,5,8

okinawa 14:20
old 14:12 32:12
once 31:1 71:22
one's 48:9
ones 21:16 75:22 79:7 101:12
open 11:13 28:16 32:10 65:20
opinion 27:18 28:8 68:23 71:3 88:25 89:1 102:14 113:19 115:4 116:2,22
opinions 21:1 43:6 73:13
opportunity 87:14,18 88:14
opposed 63:2 104:18
opposing 109:11
opt 79:22
option 23:19 67:25
options 108:4,4
order 56:25
ordering 117:17 118:2
organization 15:10 76:20 90:22 92:16 116:7,9
organization's 116:10
organizations 21:9,13,15
originally 49:3
osu 48:16
outcome 14:11 35:20 99:12 100:16,16 110:9 119:15 120:12
outreach 50:14
outright 109:21 110:12
outside 26:5 100:10 102:18 103:12 106:10
overrule 11:5
overruled 101:7
overwhelming 102:14
own 16:7 19:22 51:8,8 60:15 60:21 62:22 80:5 94:8
owning 78:8

p

p 3:1,1,18 4:1,1 6:1
p.m. 85:9 117:7 118:19,22
packed 36:1
packet 50:8
page 5:2,7 51:7 57:16 62:23 63:10 121:13 121:15 123:7 124:3
paid 22:7 37:1 112:18
paperwork 17:17 18:10 36:25 65:15
paraphrase 41:1
parole 84:18
parsing 109:1
part 10:8 19:7 44:10 52:5,12 55:12 87:16,20 87:24,25 94:23 95:1 99:25 105:2 110:7 116:6 123:9
participating 103:10
particular 20:4 21:2 32:20 42:2 61:1 83:2 83:17 90:5 117:21
particularly 23:11
parties 6:15 21:9,11 26:17 27:24 28:1 34:21 57:9 60:15,18 69:16 71:14 73:25 107:8 115:1 119:11,14 120:8,11
partition 47:16
party 13:10 17:5 25:18,20 27:12 28:17,18 28:22 29:3,9 29:12,16,16,17 29:18 30:25 31:16,18,21 32:25 33:2,4,5 34:17,21,24,25 35:7,8 38:11 38:16 39:21,24 41:11,19 43:8 43:13 53:1 54:12,14 59:23 59:25 60:9,10 60:12 61:8 63:2 64:24 65:8,14 69:6 69:12,13,20,25 70:11,14,17,19 70:24 71:22,25 80:21 83:2,4,6 89:11 90:3,13 90:16,17,18,21 91:10,12,25 92:14,16,21,22

92:24 93:5,16 93:21,21 97:24 98:2,6,9 106:8 110:8,13,14,16 111:1,3,7,11,23 111:25 112:19 112:20,25 113:1,2,15,23 114:9,11,16,19 115:6,7,9,13,21 116:1,13
party's 90:24 92:5,6 115:11
passage 26:21 53:14
past 47:4 64:1 66:22 67:14 77:8 82:19 113:7
paul 62:25 63:7
peace 25:23
penalty 38:20 84:19
pending 11:10 14:11 86:18
people 22:15,24 24:19 27:16 28:23,24 30:15 31:1,3 33:8 42:7 48:1,23 50:25 54:3 56:20 65:8 66:8 68:8,25 73:12 75:2 76:21 77:25 78:5,5 82:20 82:24 83:3,8 83:20 107:12 107:20 108:3,8 110:3
perceived 100:16
percent 18:3 28:8,9 78:23 79:2,9
perfect 26:6 48:10
perform 79:21
period 78:24 80:9 102:17
periods 96:9
permission 29:9,12,15
permitted 6:19
person 33:10 46:13 52:16 67:24 71:1 83:21 90:4 107:13 108:1
personal 62:22 63:9 69:15 99:8,10
personally 87:21 114:21 122:11 123:15
personnel 84:12
persons 80:12
perspective 33:3,4,5
petition 46:7
phone 121:3
phrase 50:25
phrasing 76:18
pick 66:16,19 67:3,13,23 69:12 72:5 82:16 83:2
picked 54:4 66:14 67:19
picking 83:22 83:23
picture 62:12
pin 72:1
place 29:7 69:11 72:4 96:18 111:11
places 38:7 84:24
plaintiff 3:2 7:25 8:2 12:14 117:9
plaintiffs 1:5 12:24
plan 38:7
planner 15:4
planning 17:14 75:25
plants 80:18
platform 28:20 29:24 31:23 33:22,25 34:1 39:9,10 40:1 40:16,17,25 41:11,14,19 42:6,13 43:8 43:11 44:8,15 47:24 48:1 52:5 60:10,12 60:15,17,19 80:21 81:2 88:4 95:3
platforms 19:22 26:20
play 73:7
played 115:15
playing 41:12
please 7:2 8:6 9:11,20 10:3 11:8 45:1 89:15 97:4 99:24 102:12 117:19 121:11 121:11
plus 29:22 110:5
point 37:17,22 42:10 46:6,14 56:10 75:19 76:7 89:12 93:7 94:10 101:25 106:18
pointed 58:13
pointing 55:21

points 22:25
police 78:13
policies 19:21 19:22 28:10 29:24 63:6 75:6 81:9,11
policy 26:14 28:9 40:5,12 68:9,10,11
political 15:18 15:25 16:20 21:9,13,15 22:25 23:8 26:17 44:10 47:1 73:25 74:4 75:21 76:3 80:5 81:4 88:15 114:11 115:1,6
politician 25:13 70:13
politicians 20:15 24:1,5,9 24:12 25:14
politics 20:25 21:25 25:22 32:12 46:19 65:23 68:21,22 70:12 107:11
poll 69:11
polling 18:3 69:11 72:4
polls 66:24 82:17
pope 73:19
popular 52:23 52:24
population 75:9
populism 25:8 31:11,24
populist 31:11 34:9,23 35:1,6 35:7 46:25 47:2 52:25 53:7,12 54:8 55:14 56:3 57:8 70:22 74:24 81:5,14 81:25
populists 54:11 56:8
populous 33:16
portion 54:4
pose 105:17,20 106:3,22 107:9
poses 107:3
position 31:15 38:14 41:25 77:5 84:8 106:21
positions 76:12 88:15 115:1,8
positive 20:17
possession 77:5 77:10
possibility 84:17
possible 19:10 41:18 42:6,13 43:7 45:11 66:8 70:2 106:15 107:25 117:24
post 5:9,10 14:6 57:15 58:20,22 59:4 60:23 62:8,8 62:19,25 63:13 63:25 64:10,14 102:20
postal 77:16
posted 13:19 14:1 20:17 63:9
posts 51:6
potential 26:12
potentially 18:19
potus 19:24
power 80:17
practical 26:14
preamble 30:17
precise 97:7
precisely 28:8
predominantly 40:15
prefer 71:19
preferential 100:24 101:3
preisse 1:9 4:2 7:12
preliminary 85:17
premise 108:5
preparation 12:19
prepare 11:20 11:24
prepared 120:3
presence 16:6
present 21:1 43:24 60:6 87:5,14 100:6 100:10,25
presented 49:23
presenting 89:5 99:17
presently 74:3
preserve 11:1
president 25:7 37:4 71:1
presidential 16:22 17:16 18:6
presidents 24:11
presiding 91:19
pretending 55:24
pretty 40:18 75:20
prevent 99:16
prevented 89:4

previous 13:8 35:10
previously 7:23
price 78:19,24
prices 79:6
primaries 27:2 32:10 47:4,19 65:13 66:12 69:15,23 71:15 71:16
primary 13:14 13:15 18:4,6,8 27:1,6,10,15 28:24 31:20 32:6 35:21 36:1,15 53:8 59:17 65:20 66:23 69:10,11 69:18,19 70:21 70:22 71:20 72:5 78:4 82:16 91:16 94:9 105:18,21 105:23 106:25 110:3,10 112:19 115:7
primarying 67:24,25
principle 30:19 77:23
principles 38:16 39:20,24 43:12
print 97:17
printed 38:4
prior 94:11 97:3 115:20 119:5
private 77:21 77:24 78:11
privatize 78:10
pro 79:18
probably 16:12 21:20 37:21 51:17 55:10,11 55:11 58:23 66:25 67:14 75:24 94:24 97:3 118:11
problem 83:15 103:2
procedural 6:20
procedure 122:5 123:5
proceed 8:14
proceeding 6:4 6:18 118:23 120:4
proceedings 119:3,4,6,8 120:6
process 9:9 49:8,18,22 66:13 100:2
produced 6:17
production 121:15,17,22
products 78:22
professional 80:3
profile 50:6
program 34:7
progress 5:8 57:16
progressive 54:8 55:14 63:4 81:12
progressives 54:11
prosecuting 4:5 4:12,19 7:11 76:21
prosecutor 7:21
prosecutor's 7:17
protest 18:14 18:22 37:4 86:22,23 87:1 88:21 90:25 91:14 92:5,7 93:17,24 95:4 95:8,10,12 96:16 99:13 103:18,19 104:12,14,21 104:24 105:9 105:13 111:17 112:9 115:3,11 115:12,22 116:1,13
protester 87:18
protester's 95:9
protesting 76:22
protestor 92:9 92:13,20 94:15 94:20 95:6,21 100:13,19 101:3,9 105:3
protests 21:20 113:21 115:7
proven 24:16
provide 74:20
ps 36:20
public 28:7 68:23 77:13 84:15 119:18 122:10,18 123:15,23 124:23
publicity 19:10
publicly 13:18
puerto 76:13
pull 14:7 37:14 42:2
pulled 53:17 102:22
purely 88:25 89:1
purpose 45:12

pursuit 30:17
put 26:23 49:24 53:20 61:12 63:15,16 64:17 94:8,9,10 111:11
putting 53:24 92:10 110:1

q

qs 36:20
qualifications 88:15,16,17,19
qualified 113:25 119:7
qualify 38:14
question 10:5 10:25 11:2,10 11:13 13:13 15:12 26:18 27:23 30:10,11 34:8,19 37:13 42:12,19,21 44:1,6,10,22,25 53:15,19 54:20 56:2 61:6 63:23 65:3 66:5,11,21 72:13 73:14,23 83:25 86:1,4 86:13,14,18 88:11 90:19 93:1,2 97:1,5,8 97:10 99:6,18 102:12 103:15 104:18 106:9 106:12,19 107:1 109:1 111:14 112:7 113:18 114:1
questioning 71:9,18 101:8 112:5
questions 9:20 10:2 11:17 32:5,15,20 57:12 67:11 72:25 82:14 84:23 85:24 86:21 87:21 88:3 113:5,8 113:10,11 117:9,10
quick 15:12
quite 27:8 69:5 93:8
quote 19:10 38:10 54:4 55:7,12 56:20 59:4 60:4 62:19 63:6,7 84:7
quoted 60:3
quotes 55:19
quoting 55:1 55:10

r

r 3:1,3 4:1 6:1 8:22 121:5
race 27:10 32:2 54:18 59:16 93:12 103:20 106:5,25 107:19 108:2 108:17,22
radio 18:2 19:11
rage 23:1
raise 8:6
raised 14:18 61:6
ran 16:21 19:16,23 27:21 28:21,23 29:8 30:3 31:6 33:1 35:12 36:3,14 36:21 37:2,3 53:20 57:8 70:7 112:2
range 22:16
rather 17:10 23:17 41:14 83:10
reach 29:25 50:25 54:13 110:23
reached 16:9 16:25 28:17 52:22 111:9,10
react 63:17
reacted 64:15
read 38:23 39:1 40:2 53:14 55:6 59:10,12 99:18 117:13 117:15 122:5,6 122:12 123:5,6 123:17
reading 121:19
reaffirm 30:25
reagan 43:18
real 11:9 39:6 65:14 78:3 110:1
reality 41:14
really 24:13 29:23 40:11,21 45:14 56:14 65:3 67:18,18 67:21,22,22 68:23 77:25 95:23 110:18
reason 16:9,16 60:16 62:16 82:25 91:3,16 93:12 95:18 96:11 98:11,15 98:22 105:2 116:20 121:14 123:8 124:3
reasons 27:11 29:11 79:23

rebel 52:11,15
rebuild 16:7
rebuilding 53:1
rebut 99:20
recall 42:25 52:10 56:21 57:14,16 59:7 64:9
receipt 121:18
received 15:21 54:9 84:13 109:16
receives 84:12
recent 39:10
recently 51:20
receptive 48:1
recognize 51:23 58:16,17 62:5
recollection 95:19
reconcile 109:9
record 6:4,5,15 7:2 8:21 9:19 9:25 10:9,15 11:1 13:10 44:23 47:12 53:16 58:9 82:6,7,9 84:25 85:1,6,7,9 97:16,21 98:8 117:2,4,5,7 118:20 119:9 120:5 123:9
recorded 6:22 9:11,11 119:6
recording 6:17 86:8 119:8 120:4
records 97:20
recusal 93:15 103:4 115:2
recuse 91:5,13 94:3 103:5,12 113:14,23 114:23 115:6
recused 94:2,5 100:7,11,12 102:15 113:3 114:8
red 35:5 59:18
redfern 4:18 7:10,10,23 118:13,15
reduced 78:23 79:1 119:6
redundant 72:17
reference 121:7 122:2 123:2
referenced 122:11 123:15
referring 13:23 90:17
reform 34:5 80:25
refuse 91:13
regain 59:17
regard 55:10 83:8 99:5
regarding 109:10
regards 109:15 110:17
regular 68:16
rein 32:21 101:15
reinforced 101:10
reiterate 103:9
related 115:7 119:11 120:7
relationship 93:4
relative 119:13 120:10
released 77:9
relevant 15:13
reliable 76:3
relied 56:14
religious 79:23 80:2 83:9
rely 54:12 69:11 83:6 89:23
remain 24:24 85:21 105:10 105:14 109:11 111:19
remaining 81:2
remedy 13:11
remember 16:19 17:11 27:8 37:19 52:12,14,19 58:21 65:21 76:19 93:8 101:12 102:3,6 105:7 110:21
removed 104:25
removing 110:10
rents 79:1
repeat 97:2
repeated 86:4
rephrase 44:3
reported 2:9
reporter 6:2,3 8:3,13 49:12 58:5 62:3 64:18 82:5,8 85:2,5,8 117:3 117:6,13,16,20 118:1,5,8,14,17 122:7
reprehensible 27:20
represent 85:14 101:23
representative 19:24
represented 87:11

representing 7:22,24
republican 13:6,7,10,15 16:21 17:5,8 25:18,20 27:22 28:18 29:3,8 29:12,15,16,21 30:7 31:12,18 32:6 33:9,14 33:20,21 34:16 34:16,25 35:5 35:6,8,23 36:2 38:11,16 39:17 39:21,24 40:3 41:11,19 43:8 43:13,16,18,18 43:19,19,20,21 43:23 44:7,8 44:11,12,14 46:15,23 47:4 47:18,18,23 53:6,8,10 54:9 54:14 55:15 56:4,20 57:2,6 59:7 60:25 63:2,5,5 65:18 67:17,19,21,23 69:18 70:7,10 70:11,21,24 71:1,4 73:21 80:21 83:13,18 89:11 90:3,13 90:16,17,18,24 91:10,12,25 92:4,6,14,21,22 92:24 93:5,16 93:20,21 97:23 98:2,9 105:18 105:21,23 106:2,4,25 107:4,9,22 108:2,10,21,24 109:4,13 110:6 110:8,10,13,14 110:17 111:1,3 111:7,23,24,25 112:1,20 113:1 113:2 115:11 115:13,20 116:1,12,19
republicans 21:7 23:25 24:2 28:2,16 33:11 47:7,9 49:16 52:6 53:22 54:17,21 55:7,23,24 56:7,8 59:18 59:18 60:21 65:23
request 50:7 86:17 123:9,11
requested 119:21
require 29:15 29:16 79:21
required 113:14,22 121:25
requirement 31:22
requirements 49:8
researched 22:20 72:9
reservations 76:14
reserve 76:11
reserved 118:21
reserves 23:4
reset 79:5
residence 47:22 78:4,6
residencies 78:9
resident 14:22
resonates 56:3
resonating 55:15
respect 43:6
respective 49:24
respond 110:23 111:1,6
responded 50:7 61:4 63:7 110:18
responding 59:7 111:3,12
response 53:19 59:11 60:24 61:1,2,8 62:24
rest 110:4
resulted 96:15
returned 121:18
reversed 20:25
review 10:11 12:19 119:21 121:12 122:1 123:1
reviewed 40:2
rico 76:13
right 8:6 10:1,4 13:16 14:16 22:13 25:1 27:1,4,5 29:13 30:16 34:2 36:13 37:14 38:11 39:21 41:7,9 42:12 45:5 46:8,18 50:23,24 52:6 53:6 57:18 64:17 66:5,14 66:25 67:1 68:7 69:2 73:18 75:21 78:6,7 79:18 79:21 80:1 81:5 82:5 84:22 90:12 91:15 102:18

103:4 114:9 117:3,16,20 118:17
rnc 39:9 40:1
road 44:17 53:25
roads 25:4
rock 14:21
role 50:9 89:24 94:17 111:6 115:14
roles 114:18
ronan 1:4 2:2 3:2 6:6,7 7:25 8:1,1,6,9,22 47:21 59:5 64:11 82:11 85:12 121:6,8 122:3,4,9 123:3,4,13 124:20
ronan's 62:20
room 2:7 6:11 22:4 41:21
roosevelt 43:17 43:17
routes 60:15
rubber 53:24
rule 11:9
ruled 14:3
rules 6:21 110:6 122:5 123:5
ruling 13:21 14:6 102:1
run 19:19 21:18 28:21 30:22 31:14 33:20 35:23 36:10 37:11 50:17 52:5 53:22 54:16,21 55:7,22 56:6,7 59:5 76:6 110:15,17
runner 16:24
running 23:5 30:24 34:12 35:6 52:3 53:7 59:6,24 61:5 71:21 105:22 108:16,21,23 109:3,7
rustico 3:11 5:3 7:4,4 8:16 15:16 42:22 45:2,17 49:14 54:24 55:3,5 57:24 58:4,6 58:14 61:13,17 61:23 62:4 72:18 73:9 82:10 84:22 85:3 117:17,19 117:22
ryan 62:25 63:7

s

s 3:1 4:1 5:6 6:1 121:15 123:8,8 124:3
sake 10:12 32:15 42:4 100:17
salad 35:4
samronan.com 19:17
samronan.com. 75:12
samuel 1:4 2:2 3:2 6:6,7 7:25 8:1,9,22 47:21 59:5 62:20 64:11 121:6,8 122:3,4,9 123:3,4,13 124:20
sanders 24:14
saw 17:8 63:25 64:1,14 95:2
saying 18:23 56:11,21 62:19 73:15 91:15 92:13 96:23 98:15 100:20 107:13 112:1
says 10:24 63:12 64:11
scale 92:10 110:2 111:12
scarcity 75:3
schedule 38:5
school 3:4 14:18
schools 25:4
scope 111:8 113:10
scores 79:13
screams 90:10
seal 122:15 123:21
seatbelt 102:23
second 16:18 103:4
secretary 1:8 6:8 7:6 18:11 47:13
sector 79:8
security 25:9
see 18:23 26:16 30:9 33:6,8,10 34:11,15,17 41:25 43:2 51:18 62:12 67:22 83:15 96:18 100:21 100:21
seeking 13:11
seem 69:5 71:24 100:15
seems 69:2 78:14
seen 11:4 64:6

segment 55:13
selects 83:17
senate 7:6 36:22
sense 10:11 35:17 76:2 101:17 107:16 112:4
sent 22:15
sentence 84:17
separately 43:4
serena 41:8
serve 22:8 45:12 53:2
service 23:20 39:1 72:24 75:8 77:16
services 78:22
set 79:9 113:17
several 74:2
severe 102:16
sexton 1:20 4:3 7:13
shake 9:15
share 96:12
shared 28:20
shayla 7:21
sheet 121:13 123:7,10,18 124:1
shifted 32:2 34:9
short 114:3
shortcut 83:6
shortly 93:21
shot 72:19
show 94:1
showed 96:20
shown 97:24 102:25,25 121:16
shows 18:1 19:8,11
shumaker 1:16 4:3 7:13
shutdown 22:2 22:21 23:11
side 36:2 112:22
sign 26:3 39:12 44:11 49:3 50:19 65:14 117:14
signature 47:25 118:21 119:16 120:14 121:14
signatures 17:18,22 29:22 35:18 36:17,25 37:7,23 38:2,6 46:7,10,14 47:6 88:18 110:6
signed 22:10 36:24 38:24 39:2,14,16,19 40:3 50:15 74:8 122:13 123:18
signers 47:7
significant 102:16
signing 25:23 121:19
similar 18:11
simple 110:4
simply 14:3 23:12 55:12
sincerely 121:21
single 42:9 44:13,16 71:19 80:24 82:20 84:10,12
sir 9:13 10:7,22 11:19 13:1,17 19:18,21 37:5 38:12,22,25 40:4 66:15 81:6 82:13 85:25 86:3,6 86:11,15,20 118:17 121:10
sister 67:5
sit 35:3 82:24
sitting 52:14 91:1
situation 72:3
six 14:13
sketch 14:17
skill 113:16
skills 119:10 120:6
skin 112:15,17
skipped 39:4
small 100:20 101:1 106:9
smoking 95:22
social 13:19 16:6,7 25:9 28:4 50:13 51:5,20 63:12 63:21 68:16 83:10
socialist 81:15 81:17
society 28:12
solar 80:18
sole 46:13
solely 113:14 113:23 114:8
soliciting 49:5
solutions 121:1 124:1
something's 40:21
sooner 23:3 77:1
sorry 15:10 48:7 49:13 50:10 54:20 57:21 66:18 73:4,14 84:24 85:3 93:13

98:5 104:5 105:25 106:19 106:20 107:2 110:20 111:14 112:4,16 113:11
sort 15:21 23:17 35:1 44:19 112:6
sought 104:24
sound 53:25
sounds 20:5
source 39:23 43:14,15 76:3
south 4:6,13,20
southern 1:2
spared 29:13
speak 12:9 88:9 92:3 101:15 110:22
speaking 26:19 112:13
speaks 91:12
specific 21:22 54:22 61:2 63:22 78:22 81:9,11 89:15 89:23 97:5,10 101:8
specifically 22:1 47:20 55:17 56:10 78:21 86:22 88:4 89:9,18 91:11 92:4 93:25 94:1,22 95:11 97:9 98:3,8 100:2 102:7 107:3
specify 105:25
speculation 45:16 108:12
speculative 107:23 111:4 111:22 116:15
speeding 102:22
spelled 8:22
spelling 8:20
spending 17:25 28:3
spent 55:17
split 114:15
spoken 12:2 13:18
sports 41:2,5 41:12
sr 59:4,14
staff 48:3
stage 18:4,8 59:21
stance 13:9 26:15 60:22
stand 29:21 30:1 41:15,22 84:4
start 8:20 45:10 78:25
started 23:2,5 37:19,22 38:2 46:7
starter 28:16
starving 74:15
state 1:8 6:9 18:11 19:23 32:2 47:13 49:10,20 60:24 114:20 119:19 122:10 123:15
stated 26:20
statehood 76:13
statement 63:23,24 99:8 122:13,14 123:19,19
statements 38:19 50:17
states 1:1 18:16 32:8,9 80:13
stating 8:20 60:7
stationed 14:19
status 113:15 113:24 114:9
stein 16:5,8 20:13
stenographer's 9:18
stenographic 6:23
step 93:19
stephen 3:18
stephen.tabat... 3:22
stepped 100:22
steps 19:7 37:20
steve 7:7 36:14
stick 83:8
stipulation 6:24
stood 22:22 24:20 32:7
stop 59:7 68:8 97:25
stopped 27:11
strategy 32:2 55:23
street 2:6 3:5 3:13,20 4:6,13 4:20 6:11 68:8
strengthening 40:13
strengthens 40:19
stretch 37:2
strike 45:9 113:12
strokes 93:22
strong 47:23
stronger 65:16
strongly 69:20
stuck 49:4

student 79:15
students 48:14 48:15 49:25
stuff 29:13 40:7 40:10 85:17,18 109:24
submitted 110:5
subscribed 122:10 123:14 124:21
succeed 19:12
succeeded 17:23 31:25
suffice 101:13
suggested 46:22,24
suggesting 69:14
suite 121:2
superior 121:1
supersede 90:7
support 20:9 24:18,19 28:23 38:15 74:23 76:13,16,24 77:2 78:15,17 78:19 80:9 84:11 97:15
supporting 28:24 60:12
suppose 14:8 40:23
supposed 17:22 72:11
supreme 73:16
sure 9:23,24 18:17 20:18 21:6,21 22:16 28:21 30:16 32:5 34:4 36:8 41:21 45:22 47:11,23 48:21 56:23 63:20 66:22 76:8 96:22 99:25 117:11,12
sustain 11:5
sustained 11:4
swear 8:4
switch 84:24
switched 30:7
sworn 6:15 8:10 119:5 122:10,13 123:14,18 124:21
system 28:22 114:2

t

t 5:6
tabatowski 3:18 7:7,7 58:2 117:25
tag 64:12
tagged 64:9
take 6:4,12 11:10,13,22 17:19 19:7 58:15 63:3 66:9 70:11,14 72:11,22 77:23 82:2 93:19 100:9 111:20 111:23 116:24
taken 6:7 42:16 55:19 78:4 119:3,12 120:9
talk 9:19,23 18:1 19:8,11 32:18 47:24 48:12 57:25 95:11 100:20 101:1 115:10 116:18
talked 21:9 28:19 34:5,5 35:9 36:4 46:18 62:11 75:10 81:3 95:10
talking 24:8 51:9 52:14 55:18 60:10 61:4 80:4 98:6 102:18 105:24 111:16
tampering 27:14
target 22:19
targeted 32:15
taxing 25:2
technically 54:25
ted 22:2 25:15
tell 8:11 9:5 16:2 17:16 20:20 24:25 26:2 53:17 64:11 68:6 89:13 97:14 102:7
telling 11:23 82:18
tells 43:3
ten 78:24 82:2
tendency 9:14
tent 28:16 29:3
term 18:18 32:24 33:16 43:20,21 55:3
terminology 29:20 54:8
terms 19:1 24:18 39:1 40:11,18,22 46:25
territories 76:14
terrorism 84:15
testified 8:12 87:8

testifying 119:5
testimony 89:5 95:6,9 99:17 122:6,7 123:6 123:9,12
testing 63:8
texts 83:9
thank 8:3,13 30:10 59:14 62:3 85:3
theory 63:8
thing 9:10,17 17:21 18:2 24:22 50:4 56:2 74:8 86:16 91:6 115:10
things 10:17 20:23,24 25:8 25:10 28:6 34:3,7 40:8,14 50:23 63:21 68:14,17 98:1 98:7
think 9:1 16:4 16:18,19 17:12 21:14,15 23:15 23:23 24:10 32:21 37:13 40:8 41:13,15 41:17 42:20 43:23 44:6,7 44:11,18 45:11 46:25 49:2 53:16 54:25 55:20 56:25 57:3,4 58:2 64:20 65:7,12 65:12 66:3,4,4 66:8,10 68:2 68:18,25 69:13 69:15,19,21,24 70:3 71:7,8,13 72:16,17,21,22 73:14 74:2 76:18,18 78:25 79:12,25 80:1 83:1,3,10,14 92:22 93:1 95:25 96:1 97:3,6 98:24 99:1,3,21 100:7 105:16 106:2,12,14 107:1,2,18,25 111:5,11,20 112:5 113:11 113:25 115:2
thinking 23:18
thinks 44:13
third 101:14
thirty 14:13 121:18
thought 10:13 24:14 28:2 29:8 30:13 47:17 66:2 67:25
thousand 97:22
thousands 78:8 78:9
threat 105:17 105:21 106:3 106:22 107:3,9 107:13,14,15 107:17
throw 30:23
thumb 92:10 110:2 111:12
time 2:4 7:1 10:23,23 11:8 11:22 16:25 17:5 20:19 22:3,11,12 23:15 24:13,14 24:21 27:25 28:2 31:7,19 31:20,21 33:11 33:12 34:3,18 37:14 39:16,19 42:4,23 51:8,8 52:22 53:6,7 57:4,5 65:9 82:6,9 85:5,9 86:18 93:14 94:10 99:20 101:5 115:16 117:4,7 118:19
timeframe 58:21
times 9:23 22:19 34:24,25 48:2 53:12
tingley 120:2 120:15
today 9:3 10:18 11:18 12:22 85:21 86:22
together 23:14 46:20
told 22:6 51:15
tolerated 80:2
toned 75:22
top 20:21
topic 17:15
topics 32:14 69:1
torpedo 63:1
touched 75:19
towards 23:25 24:1 37:20 44:9 99:9 101:3
trade 25:24 68:10
training 14:20
traitorous 59:22 60:9 61:9
trajectory 20:25
transcribed 122:7
transcriber 120:1

transcript 6:17 10:9,18,20 117:18 118:2 119:21 120:3,5 121:11,12 122:5,12 123:5 123:11,17
transcriptionist 119:7
transportation 56:15 74:23 75:3
trap 32:19
treason 84:16
treat 77:6,6
treated 112:8
treatment 100:24 101:3
trending 44:9
trial 91:19,23
trials 84:6
trick 32:19 56:20
tried 19:9
trigger 37:14
tro 14:1
true 35:4,5 49:1 51:2 73:17 119:9 120:5
trump 25:19 26:13 43:20 70:6,9
trust 59:17
truth 8:11,11 8:12 9:5
truthfully 11:17 85:24
try 9:8,19,21 31:3 35:3 39:3 44:5 70:24 97:4,10 104:18
trying 9:18 16:22 18:14,24 19:6 20:14 21:2,17 32:13 32:14,19,19 33:1 34:16 38:5,6 41:17 42:5 43:5 63:2 67:6,12 71:23 72:6,9 73:24 76:1 88:12 97:6 98:17 101:7 110:2,9 113:4,5
turn 25:11 52:2 107:14
turnout 69:22
turns 28:6 29:6 33:25 54:7
tv 11:4
twelve 85:13 97:22
twist 45:12
twisted 45:24
two 17:11 24:10 40:8 47:18,19 66:5 69:1 94:7 98:1 107:8
tying 65:4
type 18:14 21:19 40:7
typewriting 119:7
typically 68:2
typographical 10:20

u

uh 36:18 41:3 49:11 62:13 65:2 78:12
ultimately 70:8 94:3 105:8 111:18
unclear 73:15
under 6:20 9:2 10:18 13:7 35:6,7 38:20 71:21 73:24 82:11 85:21 87:8 116:19
understand 6:16 9:2 10:2 13:2,13 18:24 19:2 30:2 31:5 33:2 39:7 43:6 43:25 49:19 71:17,23 76:8 82:11 85:20,23 86:1,7,19 101:18,21 104:3,5,13,21 107:1 108:15 108:19 113:17
understanding 14:5,10 18:18 19:22 28:1 34:19 39:22,23 43:25 44:5 52:7 68:12,20 83:7 88:20 90:20,23 95:23 96:10,24 100:8 104:11,16 106:20
understood 10:6 32:23 38:19 39:5 40:15 78:2 95:16
uneducated 27:18
unfortunately 68:18 118:12
unit 22:12,16 22:17 46:12
united 1:1 28:7 80:12
universal 34:3 78:15,17

universally 78:23
university 3:4
unopposed 112:2
unpack 90:11
unpaid 49:2
unprofessional 102:14
unquote 19:10
updated 19:21
upset 18:20 106:14
urgency 101:17
use 19:1,5 56:14 77:11 78:19 86:8
used 32:23 33:16 50:22 51:25 55:11,11 56:11
user 77:5
uses 6:19 55:3
using 30:21 54:3 77:5
usually 50:22 51:19 114:15
utilities 77:13
utility 75:4
utilize 19:3

v

v 1:6 121:6 122:3 123:3
valid 70:9
value 72:12
values 13:9 30:19 33:10 44:14 70:25
vast 81:1
vehemently 24:25 40:9
venus 41:8
verbal 9:12
verbally 86:9
verge 25:23 26:1
verified 47:21
verify 47:8
veritext 6:3 121:1,7 124:1
veritext.com. 121:17
versus 19:24,24 19:24
vested 91:6,21 116:7,11
veteran 72:23 74:7,8
vetting 49:18 49:22 50:2
vice 115:17,24 116:17
victim 91:20 92:1
victory 26:7
video 9:11 52:13 86:8
view 70:17,19 73:24 79:20 82:15
views 27:24 29:24 30:13,14 33:23,25 75:21 76:4 88:4
violated 88:24 89:2
violation 84:16 100:2
visa 80:13
visible 100:25
visit 88:10
volunteer 48:21
volunteered 15:24 20:2,6 20:13 49:25
volunteering 49:1
volunteers 48:6 49:6 50:7
vote 20:10 27:16,17 59:23 67:15,16,18,19 67:23 82:19,24 107:12,20 108:8 109:11 111:24 115:16
voted 31:19 47:3,18 66:12 66:23 67:20 69:17 71:22 104:3,6,8,11 105:9,13 107:21 108:1 108:10 111:25 112:3
voter 27:14,18 29:21 44:13 47:14,18 53:2 56:5 70:3 72:10 83:16
voters 27:4 29:25 44:16 56:4 57:1 63:5 65:21 68:2 69:4,7,17,18,19 83:5 110:6 112:3
votes 111:20,24
voting 115:20
vs 6:7

w

wage 76:9
wait 73:3 100:21 111:9
waived 121:19
walk 9:8 35:10 61:21 85:20
walked 66:23
walks 69:10 72:4
want 9:19 29:17 36:8 42:3 44:17

47:22,24 48:23 50:4 58:5,11 58:15 60:14 65:13 67:22 74:20 76:11 77:15,18,21 82:19 84:4 89:8 92:3 94:23 97:25 100:9 107:12 111:15 112:7 115:10 116:24 117:21
wanted 59:16 67:15,18,18 80:25 101:16
war 22:19 23:6 23:7 24:19 26:13,15 60:21 60:22 69:2 74:6,16,17,18 84:14
wars 74:15
watched 52:12
way 10:19 20:5 20:8,15,20 25:22 26:2 32:10 47:20 53:23 66:10 69:17 82:25 91:17 95:1 103:7 112:24 114:4,5
ways 23:2 40:22 56:1 73:8 80:15 94:13 96:23 100:18
we've 35:9 36:4 46:5 47:23 53:11 73:22 74:2 85:13
website 19:14 19:15 37:19 47:13 75:11,13 75:17,21 76:2 76:3 78:3 80:7 84:3,5,9 94:8,9 97:18
week 13:24
weeks 89:14
welcome 19:5 32:18
wellbeing 22:24
went 14:18 19:8 26:1 46:6 47:12,20 49:19 95:17 98:9
wet 74:24
white 64:10
whittle 97:7
wholeheartedly 69:5
williams 41:8
willing 26:3,4 44:3 48:25
willingness 26:22
win 18:19 22:25 26:6
wins 27:2 106:23,24
winter 37:24
witness 6:15,16 8:5,10 15:12 15:15 44:25 49:13 62:1 73:3 108:13 117:11 119:4 121:8,11 122:1 122:4,11 123:1 123:4,15
witness' 121:14
women's 41:2,5 41:12 78:22
won 70:8
wondered 63:1
woo 62:21
word 19:3 31:11 35:4 59:3 68:13
words 19:5 45:12,24 54:2 55:18 61:3 90:9
work 15:3,11 16:13 22:8 23:14 31:3 32:10 38:8
worked 21:21 34:24,25
workflow 15:6
working 46:20 50:22 60:1
works 107:10
worth 55:20
written 6:24 96:18
wrote 14:7 45:20

x

x 5:1,6 91:20 91:20,21 92:1 119:21

y

yeah 8:22 13:5 14:3 15:20 16:12 19:9 22:14 23:24 25:17 30:5 35:19,25 36:6 37:21,24 39:6 48:2,9 50:21 51:17 52:1,1,7 55:2 57:23,24 58:4,6,23 59:2 62:22 63:6,7 64:20 67:7,8 67:10,16 72:14 73:12 79:25 80:6,8 81:9 84:25 87:7

90:14 94:19
104:19 108:13
117:1
year 15:2 37:16
53:20
years 16:4,10
17:11 20:2
32:11 57:10
59:6 70:12
77:20 78:24
yell 11:4
yeses 9:16

z

zagrocki 4:4
5:4 7:16,16
85:11,14
102:11 108:14
117:2,8 118:9
118:10

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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4:09

Grove City Area Progress · Join
Admin · Steve Church · 1d

RONAI samuelronan.com

Reply 1

Mark Gavin Sr. 20h
Samuel Ronan didn't you run for DNC chair a few years ago? Now you're running for congress as a Republican? Stop grifting.
Reply

Samuel Ronan 19h · Follow
Mark Gavin Sr. I believe i very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door.

So, if I am doing anything, it's following the argument I made on that stage.

That said, I am NOT fighting on behalf of the traitorous Democrats who JUST crossed the party line to vote for MORE ICE funding.

I'm not a grifter. Im running for office in the party of the dominant district fighting for the working class.
Reply

Katie Beth 19h
Samuel Ronan so you're an anti ice republican?
Reply

Comment publicly as Henry Mo...

EXHIBIT
tabbies
P 2
Ronan

PENGAD 800-631-6989
EXHIBIT 1.M
Ronan
1
3/27/24

EXHIBIT
PS
Ronan

3:33

Ana Aleida-March
5d

IT'S OFFICIAL! Samuel Ronan is on the ballot! Woot, woot!

https://vote.franklincountyohio.gov/getmedia/9486ba44-ea96-4de7-9143-238a3f82c006/2026-Primary-Candidates-Filed-List-4

Republican	COUNTY COMMISSIONER
Republican	JUDGE OF THE COURT OF COMMON
Republican	REPRESENTATIVE TO CONGRESS - 03
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	STATE CENTRAL COMMITTEE - Man
Republican	STATE CENTRAL COMMITTEE - Man
Republican	STATE CENTRAL COMMITTEE - Man

26 12

Most relevant

Garrett Roberts 5d by Author
That's fucking awesome.
2

Paul Ryan 5d by Author
I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems. As long as a progressive was labeled republican, I feel like the republican voters would be like "oh hell yeah! good policies!"
4

Ana Aleida-March 5d
Paul Ryan yup! And we're testing out theory lol
2

PENGAD 800-631-6989
EXHIBIT A.M.
2
Ronan
3/21/26

EXHIBIT A

Frank LaRose
Ohio Secretary of State

Via Electronic Mail

March 19, 2026

Douglas J. Preisse, Chairman
Meredith Freedhoff
Michael E. Sexton
Jamie Schumaker
Franklin County Board of Elections
1700 Morse Road
Columbus, OH 43229

Re: Tie Vote Regarding the Protest of Candidacy of Samual Ronan

Dear Chairman Preisse and Board Members,

I have reviewed the tie vote referred to me by the Franklin County Board of Elections ("the Board") on March 13, 2026, as well as the arguments, authorities, and evidence submitted to my office. I now break the tie vote submitted to my office in favor of the protest against the candidacy of Samuel Ronan for Representative from the 15th Congressional District.

Background Information

A protest was timely filed with the Franklin County Board of Elections regarding the candidacy of Samual Ronan as a Republican candidate for the office of Representative to Congress from the 15th District. On March 6, 2026, the Board met and held a hearing on the protest. The protest, which was brought by Marc A. Schare, alleged that Mr. Ronan is not a Republican and therefore should not be on the May 5, 2026, primary ballot as a candidate for Congress.

At the conclusion of the hearing, and following a closed session to deliberate, board member Jamie Shumaker made the following motion:
After conducting a hearing regarding the protest against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress in the 15th District, submitted by Marc Schare…I move that the Franklin County Board of Elections determine that the candidate's declaration of candidacy and petition of Samual Ronan are valid and deny the protest based on the evidence presented at this hearing. I find that the protest [sic] failed

to meet his burden by clear and convincing evidence to show that Samuel Ronan failed to comply with Chapter 3513 of the Ohio Revised Code.

The motion was seconded by Member Michael Sexton.

The Board vote resulted in a tie. Members Shumaker and Sexton voted to deny the protest, and Chairman Preisse and Member Freedhoff voted in favor of the protest.

On March 13, 2026, the Board submitted this tie vote to me for consideration in accordance with Ohio Revised Code Section 3501.11(X). On that date, the Board also submitted to my office the position statements, supporting evidence admitted during the hearing, and a copy of the hearing transcript. Additionally, although not consistent with established practice, counsel for the candidate and counsel for the protester each submitted briefs on behalf of their clients.[1]

Analysis

After consideration of the arguments and the materials provided, I am breaking the tie in favor of the protest. Mr. Ronan's public statements, and those of individuals associated with him and his candidacy, make clear that Mr. Ronan is seeking the Republican nomination as part of his longstanding strategy to have Democrats run as Republicans in Republican primaries.

As Board Members Preisse and Freedhoff argued in their letter explaining their vote, the issue here is not "ideological purity." Members of political parties are obviously free to disagree internally about a range of issues, and my decision does not suggest otherwise. However, this case presents questions about the integrity of the electoral process. As Members Preisse and Freedhoff point out, Mr. Ronan has "openly and repeatedly" stated that he (and others) should run as Republicans, not because they are Republicans, but so that Democrats can get a foothold in Republican-leaning districts. The goal of his scheme is to get voters to vote for Democrats, believing they are voting for Republicans.

[1] A post-hearing analysis by the Protestor's counsel was included in the materials submitted to my office by the Board of Elections, and Mr. Ronan's counsel additionally forwarded his briefs to my office. Mr. Ronan's merit brief included arguments and allegations that Board Member Freedhoff had a conflict of interest and was required to abstain from participating in Mr. Ronan's hearing. I find these arguments without merit. It is worth noting that the two Democratic board members did not mention the alleged conflict of interest in their statements supporting their votes.

Mr. Ronan argues that there is no "good faith" requirement on candidates seeking to affiliate with political parties in order to run for office. I agree that it is not the job of the state or this office to impose ideological litmus tests on a candidate's self-identification. But again, that is not the fact pattern presented here.

On each petition, Mr. Ronan declared that if elected, he would support and abide by the principles enunciated by the Republican Party. He signed this declaration. Yet there is ample evidence demonstrating that his goal is not to support the party's principles, but rather for Democrats to "primary Republicans…just to get a foot in the door." (Exhibit P2). To be clear, candidates can change party affiliation. (*See* R.C. 3513.191). Here, however, Mr. Ronan's statements do not show a change in affiliation but instead highlight his ongoing mission to run Democrats as Republicans to infiltrate the party.

I reject Mr. Ronan's apparent argument that a candidate may affiliate with a political party in bad faith. In another context—specifically, the question of whether a candidate has disaffiliated from a political party in order to become an "independent"—both state and federal courts have required that the candidate's action be undertaken in good faith. *See State ex rel. Coughlin v. Summit Cty. Bd of Elections*, 136 Ohio St.3d 371, 375 (2013) (citing *Morrison v. Colley*, 467 F.3d 503, 509 (6th Cir. 2006)); *Jolivette v. Husted*, 886 F. Supp.2d 820, 823-24, 833 (S.D. Ohio Aug. 15, 2012). Those cases are instructive here.

For the foregoing reasons, I break the tie in favor of the protest and against certifying Mr. Ronan to the May 5, 2026, Republican Primary Election Ballot for the Representative to Congress for the 15th District.

If you have any questions regarding this decision, please contact Lisa Eschbacher, Deputy Chief Legal Counsel for Elections at the Secretary of State's Office, at leschbacher@ohiosos.gov.

Yours in service,

Frank LaRose
Ohio Secretary of State

cc: Antone White, Director
David R. Payne, Deputy Director

EXHIBIT B

Franklin County
BOARD OF ELECTIONS
VOTE

1700 Morse Rd
Columbus, Ohio 43229

http://Vote.FranklinCountyOhio.gov
(614) 525-3100
(614) 782-1773 FAX

BOARD MEMBERS: Douglas J. Preisse, Chairman ★ Meredith Freedhoff ★ Michael E. Sexton ★ Jamie Shumaker

Antone White, **DIRECTOR** David R. Payne, **DEPUTY DIRECTOR**

March 13, 2026

Office of the Ohio Secretary of State
Attn: Director of Elections Division
P.O. Box 2828
Columbus, OH 43216

Re: Tie Vote regarding Protest of Samuel Ronan

Dear Secretary LaRose,

On Friday, March 6, 2026 the Franklin County Board of Elections met to consider the protest filed against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress from the 15th Congressional District. After conducting an administrative hearing in accordance with R.C. 3513.05, which included testimony and exhibits presented by counsels for the protestor and the candidate, Board Member Jamie Shumaker made the following motion (verbatim):

See Transcript, Page 99-100: **"Mr. Chairman, Jamie Shumaker. After conducting a hearing regarding the protest against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress in the 15th District, submitted by Marc Schare -- sorry if I said it wrong -- I move that the Franklin County Board of Elections determine that the candidate's declaration of candidacy and petition of Samuel Ronan are valid and deny the protest based on the evidence presented at this hearing. I find that the protest failed to meet his burden by clear and convincing evidence to show that Samuel Ronan failed to comply with Chapter 3513 of the Ohio Revised Code, and I also request a roll call vote."**

The Board vote on the motion was a 2-2 tie. Member Shumaker and Member Sexton voted in favor of the motion and Chairman Preisse and Member Freedhoff voted against the motion.

Accompanying this letter are the statements from the Board Members setting forth their positions, as well as a copy of the protest filed by Marc A. Schare, minutes of the proceedings, and exhibits admitted into evidence.

Please do not hesitate to contact us if you have any questions regarding these materials.

Sincerely,

Antone White
Director

David R. Payne
Deputy Director

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Antone White, **DIRECTOR** David R. Payne, **DEPUTY DIRECTOR**

March 13, 2026

Office of the Ohio Secretary of State
Attn: Director of Elections Division
P.O. Box 2828
Columbus, OH 43216

Re: Tie Vote regarding Protest of Samuel Ronan

Dear Secretary LaRose,

We, the undersigned members of the Franklin County Board of Elections, submit this written statement regarding the tie vote that occurred during the March 6, 2026 Regular Meeting of the Franklin County Board of Elections on the motion to deny the protest filed against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress from the 15th Congressional District.

Board Member Jamie Shumaker moved, and Board Member Michael Sexton seconded, the following motion (verbatim):

"Mr. Chairman, Jamie Shumaker. After conducting a hearing regarding the protest against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress in the 15th District, submitted by Marc Schare -- sorry if I said it wrong -- I move that the Franklin County Board of Elections determine that the candidate's declaration of candidacy and petition of Samuel Ronan are valid and deny the protest based on the evidence presented at this hearing. I find that the protest failed to meet his burden by clear and convincing evidence to show that Samuel Ronan failed to comply with Chapter 3513 of the Ohio Revised Code, and I also request a roll call vote."

Both of us voted in favor of this motion and respectfully encourage you to do the same.

Statement of Facts

On January 27, 2026, Samuel Ronan filed his Declaration of Candidacy and nominating petitions to become a Republican candidate for Representative to Congress from the 15th Congressional District.

At the Regular Meeting of the Franklin County Board of Elections held on February 17, 2026, Board of Elections staff recommended that Mr. Ronan be certified to the May 5, 2026 Primary Election ballot because his Declaration of Candidacy and petitions were found to be timely, accurate, and sufficient. The Board voted 3-0 to certify Mr. Ronan to the ballot, with one member absent.

On February 20, 2026, a protest against Mr. Ronan's candidacy was filed by Marc A. Schare, a member of the Republican Party and a qualified elector in the State of Ohio. In part, Mr. Schare contends:

"Ronan has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles. He has consistently and unequivocally associated with and advocated for progressive positions and policies of other parties, most prominently the Democratic party."
— Schare Protest, p.1

Mr. Schare further states:

"Ohio law does not and should not allow a candidate to intentionally 'trick' voters about their party affiliation."
— Schare Protest, p.4

An administrative hearing was conducted on March 6, 2026 to review the relevant facts related to Mr. Schare's protest.

Legal Analysis

Based on a review of the applicable legal standards, including R.C. 3513.191, and published guidance from the Ohio Secretary of State, we believe that Mr. Ronan should remain on the ballot.

R.C. 3513.191 sets forth the party-affiliation requirements for candidates in party primary elections, which may form the basis of a challenge under R.C. 3513.05. The relevant language provides:

R.C. 3513.191(A):

"No person shall be a candidate for nomination or election at a party primary if the person voted as a member of a different political party at any primary election within the current year and the immediately preceding two calendar years."

However, R.C. 3513.191(B) provides an important exception:

"Notwithstanding division (A) of this section, either of the following persons may be candidates for nomination of any political party at a party primary:

(1) A person who does not hold an elective office;
(2) A person who holds an elective office other than one for which candidates are nominated at a party primary."

This same provision is reiterated in the Ohio Secretary of State's 2026 Ohio Candidate Requirement Guide, which states:

"A person may be a candidate for nomination of any political party at a primary election (regardless of party affiliation established by voting in a prior partisan primary) if either of the following apply (R.C. 3513.191):

• The person does not hold elective office; or
• The person holds an elective office for which candidates are not nominated at a primary election."

The Secretary of State states this even more succinctly in Chapter 14: Candidates of the Ohio Election Official Manual:

"A person who does not currently hold any elective office can run in any party's primary election regardless of party affiliation established by voting."
— citing R.C. 3513.191(B)

During the hearing, Mr. Ronan provided sworn testimony (see hearing transcript, p.___) that he does not currently hold elective political office.

Conclusion

After conducting an administrative hearing in accordance with R.C. 3513.05, and based on the legal standards set forth in R.C. 3513.191(B), as well as the guidance provided in the 2026 Ohio Candidate Requirement Guide and the Ohio Election Official Manual, we believe that Mr. Ronan should remain on the May 5, 2026 Primary Election ballot as a Republican candidate for Representative to Congress for the 15th Congressional District.

While the protestor contends that "Ohio law does not and should not allow a candidate to intentionally 'trick' voters about their party affiliation" (Schare Protest, p. 4), the protest does not identify any specific provision of Ohio law that would prohibit the candidate from appearing on the ballot under the circumstances presented.

Respectfully Submitted,

Michael Sexton
Board Member

Jamie Shumaker
Board Member

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BOARD MEMBERS: Douglas J. Preisse, Chairman ★ Meredith Freedhoff ★ Michael E. Sexton ★ Jamie Shumaker

Antone White, **DIRECTOR** David R. Payne, **DEPUTY DIRECTOR**

March 13, 2026

Hon. Frank LaRose
Ohio Secretary of State
180 Civic Center Drive
Columbus, Ohio 43215

Dear Secretary LaRose,

This statement is in response to the hearing conducted by the Franklin County Board of Elections relative to the protest of the candidacy of Mr. Samuel Peter Ronan, on 3/6/2026, regarding his putative candidacy in the May, 2026 primary.

The issue raised at the hearing was not ideological purity. From our perspective, it was about preserving the integrity of the primary process. Mr. Ronan has openly and repeatedly admitted he was running as a Republican because it was the only way that Democrats could get a foothold in a Republican district. He declared this when he was running for chairman of the Democratic National Committee, no less, and again on social media, an example of which was included as part of the formal protest. Much the same was also stated during the podcast interview that was submitted and played at the hearing. Our conclusion that Mr. Ronan should not remain on the ballot as a Republican is based on his own past, recent, and repeated declarations.

Mr. Brown, Ronan's attorney, stated that Ohio law does not prohibit bad faith when one signs a declaration of candidacy. If he is adjudicated correct, one could assert that the right strategy for the Franklin County Republican Party and, indeed, the Ohio Republican Party, is to run Republicans in every Democratic district in Franklin County and, indeed, the State of Ohio. Mr. Ronan made the point that people will not consider his views in a Republican district so he has to masquerade, thinly veiled, and run as a Republican. That view, if carried to its logical conclusion, would negate any benefit or rationale for party primaries. Republicans can then run in Democratic districts as Democrats, and we would anticipate

Democrats would continue to follow Mr. Ronan's strategy and do the same in Republican districts. Mr. Ronan is the test case that, should he be approved to run as a Republican, would set a dangerous precedent.

Mr. Ronan signed a sworn partisan declaration. But it is abundantly clear he misrepresented himself. He stated he is "gaming the system". He presented no evidence that he has met with the Franklin County

Republican Party, attended meetings or events, supported a Franklin County Republican candidate, or sought the party's well publicized and long publicly established endorsement.

This ruling will affect all political parties. If this is indeed the rule, there would be many ways this strategy could be used to shape future Ohio primaries. For example, if two legitimate Democrats compete in a Democratic district, a Republican could enter the race, align with one or the other, split those votes and nominate the Democrat of their choice. Mr. Ronan stated in evidence submitted at the hearing that this is his strategy. As a Democrat he is gaming it out. If this interpretation of Ohio law is sustained, we believe all parties would begin planning now for how to operate in a system where sworn partisan declarations no longer function as meaningful safeguards in primary elections.

Therefore, after close consideration of the evidence and testimony presented at the hearing regarding Mr. Ronan, we absolutely hold to our vote "no", and assert that Mr. Ronan should not remain on the May 5, 2026 primary ballot.

Accompanying this letter we attach the post-hearing analysis prepared by counsel for protestor Marc Schare, which we also point to for further justification and confirmation of our reasoned position.

Sincerely,

Doug Preisse
Chairman

Meredith Freedhoff
Board Member

303 East Broad Street
Columbus, Ohio 43215

614-236-6590
mbrown@law.capital.edu

March 10, 2026

Frank LaRose
Ohio Secretary of State
180 Civic Center Dr.
Columbus, Ohio 43215

Delivered via email to Sarah Huffman, shuffman@ohiosos.gov

In re Protest of Samuel Ronan (Franklin County BOE)

Dear Secretary LaRose,

I represent Samuel Ronan, a candidate for the 15th Congressional District Republican primary in Ohio. Mr. Ronan's candidacy was protested by Marc A. Schare, and a hearing was held on March 6, 2026 before the Franklin County Board of Elections. The hearing resulted in a 2-2 tie vote on a motion to deny the protest. My understanding is that under R.C. § 3501.11(x) the matter is now in your hands to resolve the tie. I was informed by the Franklin County Prosecutor that the matter will be referred by the BOE to your office shortly.

I write to explain to you the legal problems and relevant facts raised by Mr. Schare's protest and to disclose to you – because it was not disclosed to the Board -- that the protestor's attorneys have finally revealed that the Ohio Republican Party is paying their bills and financing the protest. As explained below, Mr. Ronan moved to disqualify Ms. Freedhoff before the Board, but (acting without a Board vote) she refused to do so. Mr. Ronan also moved to dismiss the protest as being improper under Ohio law, but the Board ruled it did not have authority to dismiss. Mr. Ronan then was forced to present his defense to the protest and asked the Board to deny it. All of these issues have been properly preserved.

In sum, as explained below, Ms. Freedhoff should have disqualified, the protest should have been dismissed, and the protest should have been denied following the presentation of evidence. For these reasons, Mr. Ronan respectfully requests that you vote in his favor to break the tie and deny the protests. Alternatively, given the newly revealed evidence about the Ohio Republican Party's involvement, remand is in order for the Board to reconsider the motion to disqualify, the refusal to consider dismissal, and its 2-2 tie vote on the merits.

I. Board Member Freedhoff Should Have Disqualified.

Meredith Freedhoff, a member of the Franklin County Board of Elections who participated in Mr. Ronan's protest and voted against denying the protest, chairs the Franklin County Republican Party (FCRP). *See* Franklin County Republican Party, https://franklincountygop.org/history-fcgop ("Meredith Freedhoff serve[s] as chair"). FCRP on August 26, 2025 contributed $500 to the 2026 congressional campaign of Mike Carey. *See*

Federal Election Commission, Schedule B, Franklin County Republican Party, https://docquery.fec.gov/cgi-bin/forms/C00913681/1919146/sb/ALL. Mike Carey is Samuel Ronan's sole opponent in the 2026 15th Congressional District Republican primary in Ohio. A ruling against Mr. Ronan will automatically elevate Mr. Carey (whom the FCRP and Ms. Freedhoff support) to the general election as the Republican Party's candidate.
Ms. Freedhoff's public support for Mr. Ronan's primary opponent's 2026 congressional campaign (i.e., Mr. Carey's campaign) creates a debilitating conflict of interest on her part. Just as she cannot participate in a hearing addressing the validity of Mr. Carey's candidacy and petition papers, she cannot ethically participate in a hearing addressing the validity of the candidacy and petition papers of Mr. Carey's sole opponent, Samuel Ronan. Ms. Freedhoff's role as chair of the FCRP, which has taken sides in this contest by contributing to and supporting Mr. Carey's 2026 congressional campaign, renders her unable to project the appearance of objective impartiality that Ohio's elections require. Ms. Freedhoff is disqualified as a matter of law from participating in Mr. Ronan's hearing.

Boards of Elections are governed by Ohio's ethics laws "enumerated in Ohio Revised Code Chapters 102 and 2921 as well as in the Ohio Ethics Commission's advisory opinions and in case law." Ohio Secretary of State Ethics Policy, https://www.ohiosos.gov/globalassets/elections/eoresources/general/ethicspolicy.pdf, at page 1. "All members and employees of the Ohio boards of elections shall familiarize themselves with Ohio ethics laws and comply with Ohio ethics laws at all times." *Id*. (emphasis added). Compliance is mandatory.

Under Ohio's ethics laws and the Secretary of State's Ethics Policy, "Members and employees of the boards of elections should avoid actions and associations that create an appearance of impropriety, that undermine public confidence in Ohio elections officials, or that interfere with the performance of duties by Ohio elections officials." *Id*. at 3 (emphasis added). Because Ms. Freedhoff chairs FCRP, which has publicly supported Mr. Ronan's opponent in the primary election at issue by donating cash to him campaign, her participation in removing Mr. Ronan would create "an appearance of impropriety" and partiality that "undermine[s] public confidence in Ohio elections officials." She must accordingly be disqualified from participating in all aspects of Mr. Ronan's hearing.

While the "appearance of impropriety" created by FCRP's contribution to Mr. Ronan's opponent alone requires Ms. Freedhoff's disqualification, two additional ethical restrictions on board members' participation in matters affecting "business associates" also disqualify her. Campaign finance records reveal that Mr. Carey's campaign on December 31, 2025 paid to FCRP, which Ms. Freedhoff chairs, $10,807.12. *See* Itemized Disbursements, Committee: Carey Victory Fund, https://docquery.fec.gov/cgi-bin/forms/C00790691/1939947/sb/ALL. Mr. Carey, FCRP and Ms. Freedhoff thus have an established business/economic relationship. Mr. Carey is a "business associate" of FCRP, and thus likewise a business associate of FPRC's chair, Ms. Freedhoff.

As explained by the Secretary of State, "[m]embers and employees of the boards of elections shall not participate in the consideration of any matter involving … business associates or other individuals or entities with whom they have a close association." Ohio Secretary of

State's Ethics Policy, *supra*, at 3 (emphasis added). Further, "[m]embers or employees of the board of elections shall not participate in the consideration of any matter in which they have a personal or economic interest." *Id*. This latter restriction includes matters that affect the personal or economic interests of a member's "business associate," too. *Id*.

Under either and both of these "business associate" prohibitions, Ms. Freedhoff was disqualified from participating in Mr. Ronan's case. Ms. Freedhoff's FCRP has not only donated money to Mr. Carey's campaign, it has received disbursements from Mr. Carey's campaign totaling over ten thousand dollars. Mr. Carey's campaign can only be described as a "business associate" of FCRP and Ms. Freedhoff. The large payment from Mr. Carey's campaign to FCRP reveals that FCRP and Ms. Freedhoff have an "economic interest" in Mr. Carey's success. And even if Ms. Freedhoff were not herself to have an economic interest, Mr. Carey's campaign will benefit from a decision removing Mr. Ronan from the ballot. Because Mr. Carey is a business associate of FCRP, which Ms. Freedhoff chairs, Ms. Freedhoff cannot participate in any matter that might benefit Mr. Carey's "personal or economic" interest. Removing Mr. Ronan would clearly benefit Mr. Carey's "personal or economic" interest. Ms. Freedhoff is accordingly disqualified.

Even were these "business associate" prohibitions not to technically apply, the financial connections between FCRP (chaired by Ms. Freedhoff) and Mr. Carey's campaign – with donations flowing to Mr. Carey's campaign and disbursements flowing from his campaign to FCRP – cannot be ignored. They reinforce the "appearance of impropriety" that would permeate any involvement Ms. Freedhoff might have in the case. For all these reasons, Ms. Freedhoff was disqualified from participating in Mr. Ronan's case. Her participation was erroneous and prejudicial, given that she spoke against Mr. Ronan and voted against the motion to deny the protest. Had she not participated, the motion to deny the protest would have passed.

Further, the protestor's counsel's refusal to fully disclose the real party in interest to the Mr. Ronan and the Board of Elections, which is described in more detail below, made it impossible for the Board to assess the full magnitude of the potential conflict of interest. Mr. Ronan has now been informed by protestor's counsel that the Ohio Republican Party is paying the protestor's legal bills. Ms. Freedhoff, of course, chairs the Ohio Republican Party's Franklin County affiliate. Given this disclosure, it appears that Ms. Freedhoff is even more conflicted than initially thought.

What influence Mr. Carey's campaign might have had or is having over that decision, moreover, is left clear. Only further questioning can shed light on that question. As things stand, it may be that the Carey campaign was involved with the Ohio Republican Party in planning this protest. At bare minimum, Mr. Ronan is entitled to question the protestor to fully unravel who is and who is not behind the protest. Should the Secretary decide that disqualification is not yet required, further proceedings are required for Ms, Freedhoff and the Board to reconsider the matter for themselves in light of this new unsettling evidence.

II. The Protester Comes to the Secretary With Unclean Hands.

As Ohio courts and the United States Supreme Court have recognized, one who comes to a proceeding with unclean hands cannot be afforded relief. One "who asks relief must have acted

in good faith." *Keystone Driller v. General Excavator*, 290 U.S. 240, 245 (1933). The Supreme Court defined good faith in this way:

> It is one of the fundamental principles upon which equity jurisprudence is founded, that before a complainant can have a standing in court he must first show that not only has he a good and meritorious cause of action, but he must come into court with clean hands. He must be frank and fair with the court, nothing about the case under consideration should be guarded, but everything that tends to a full and fair determination of the matters in controversy should be placed before the court.'

Id. at 244 (quoting Story's Equity Jurisprudence § 98 (14th Ed.)). It added that "'[t]he equitable powers of this court can never be exerted in behalf of one who has acted fraudulently, or who by deceit or any unfair means has gained an advantage. To aid a party in such a case would make this court the abetter of iniquity.'" *Id*. (citation omitted). *See generally Blankenship v. Blackwell*, 341 F. Supp.2d 911, 924 (S.D. Ohio 2004) (applying clean hands doctrine in election contest).

The protest against Mr. Ronan runs afoul of the clean hands doctrine. For Mr. Schare to have standing he must not only meet the standards spelled out in the statute, he must come before the Board with "clean hands." "He must be frank and fair" with the Board and with the Secretary, "nothing about the case under consideration should be guarded, but everything that tends to a full and fair determination of the matters in controversy" must be disclosed.

Here, the protestor admitted he was not paying the attorneys who wrote and filed the protest. Moreover, he admitted that he did not know who was. However, he was unable to inform the Board who is paying the bills – and thus is the real party in interest – because his lawyers had not provided him with this information. Ohio's Rule of Professional Conduct 1.18(f) requires that lawyers disclose to their clients the identities of those persons paying their clients bills. That is the only way a client can render the informed consent required to hire a lawyer. The protestor's lawyers – who finally just hours ago disclosed to Mr. Ronan that the Ohio Republican Party is paying the protestor's lawyers -- kept this information from the Board. And not passively, the protestor's lawyers actively objected to questioning about the real party in interest in order to keep Mr. Ronan and the Board in the dark.

The protest's prosecution was a far cry from being "frank and fair." The identity of the real party in interest is always relevant to the merits of a dispute. Indeed, Ohio Rule of Civil Procedure 17(A) requires that "[e]very action shall be prosecuted in the name of the real party in interest." For these and other reasons, Courts have recognized that the identity of the paying person is relevant in election law protests, not privileged and subject to discovery. *See*, *e.g*., *Libertarian Party of Ohio v. Husted*, 2014 WL 3928293 (S.D. Ohio 2014) (holding that protestor who challenged candidate had to turn over information disclosing who was paying his lawyers).

The protest hearing before the Board was nothing short of an attempt to perpetrate a fraud on Mr. Ronan and the Board itself. The protestor, through his lawyers, has the audacity to accuse Mr. Ronan of committing a crime by falsely representing his party membership and future intention to abide by the principles of the Republican party, while he kept the identity of the real party in interest a secret. Secrecy, "deceit and … unfair means" employed to "gain[] an advantage" in this matter – a tactic that prejudiced Mr. Ronan's ability to make his case before the Board – cannot be rewarded. The protest should be dismissed and/or denied. The protestor, his lawyers and the newly disclosed real party in interest lack clean hands. Should

dismissal/denial not be ordered, at bare minimum the matter should be remanded to the Board so that this new evidence might be considered and further evidence elicited. In particular, it is crucial that any involvement of Mr. Carey's campaign be fully disclosed.

III. Section 3513.191 Imposes No Subjective Good Faith Requirements on Candidates Seeking to Associate With Political Parties in Order to Run for Office.

Section 3513.191 of the Ohio Revised Code states, in relevant part:

> (A) No person shall be a candidate for nomination or election at a party primary if the person voted as a member of a different political party at any primary election within the current year and the immediately preceding two calendar years.
>
> (B) Notwithstanding division (A) of this section, either of the following persons may be candidates for nomination of any political party at a party primary:
>
> (1) A person who does not hold an elective office;
>
> (2) A person who holds an elective office other than one for which candidates are nominated at a party primary.

Under subsection (A), one who voted in a different party's primary within the preceding two years is precluded from running. Because Mr. Ronan has not voted in any other party's primary within the last two years he is not precluded by subsection (A) from running.

Even if he had, however, he would still be qualified to run under subsection (B) in "any political party primary," since he does not hold elective office. Simply put, Mr. Ronan qualifies under both subsections found in § 3513.191, and neither imposes any additional requirement allowing disqualification based on bad faith or false association.

That § 3513.191 means exactly what is says and does not imply a "good faith" requirement was made clear in *Jolivette v. Husted*, 886 F. Supp. 2d 820 (S.D. Ohio), *aff'd*, 694 F.3d 760 (6th Cir. 2012), where the Court discussed the differing requirements for candidates seeking to disassociate to run as independents and those seeking to change political parties in Ohio. The plaintiff argued that because only those seeking to run as independents had to act in good faith when they disassociated themselves from their political parties, while those changing political parties to run in primaries did not, the Equal Protection Clause was violated. The Court disagreed that Equal Protection was violated, but agreed that Ohio required only good faith on the part of those disassociating from parties to run as independents:

> for a candidate to be qualified to run as an independent candidate, the individual must actually be unaffiliated or disaffiliated from any political party, and there is a corresponding requirement that the claim of unaffiliation or disaffiliation must be made in good faith. *See Morrison.* <u>There is no similar requirement for a partisan candidate to show that the change in party affiliation was made in good faith</u>.
>
> …

> Thus, while there are restrictions in Ohio as it relates to a candidate changing parties, there is no requirement that the candidate make the change in good faith, unlike the rule that applies to a candidate who disaffiliates from a party.

886 F. Supp.2d at 834-35 (emphasis added). The Sixth Circuit affirmed this precise point, stating that "[b]ecause of the differences between the pathways to the ballot of partisan versus independent candidates in Ohio, we agree with the district court that *Jolivette's* equal-protection arguments lack merit." 694 F.3d at 771-72.

The Ohio Secretary of State has reiterated these Courts' conclusions in the Ohio Candidate Requirement Guide 2026, https://www.ohiosos.gov/globalassets/publications/election/2026_crg.pdf, at page 24:

> A person may be a candidate for nomination of any political party at a primary election (regardless of party affiliation established by voting in a prior partisan primary) if either of the following apply (R.C. 3513.191): The person does not hold elective office[, or] [t]he person holds an elective office for which candidates are not nominated at a primary election.

(Emphasis added). The *Jolivette* Court's and the Secretary's description of Ohio law is correct. Ohio law is clear. So is the history behind Ohio's law. In 1976 § 3513.191 stated that "[n]o person shall be a candidate for nomination or election at a party primary if he voted as a member of a different political party at any primary election within the next preceding four calendar years." *See Kay v. Brown*, 424 F. Supp. 588, 591 (S.D. Ohio 1976). A three-judge federal district court had four years before sustained this provision in *Lippitt v. Cippolone*, 337 F. Supp. 1405 (N.D. Ohio), *aff'd*, 404 U.S. 1032 (1972). Still, that same Court in 1976 *Kay v. Brown* invalidated the four-year exclusion as applied to primary candidates whose prior political parties no longer existed. In effect, *Kay* overturned *Lippitt*. Thereafter, by Directive the Secretary of State shortened the period found in § 3513.191 to two years. See Secy of State Directive 84-12.

In 1995, Ohio added subsection (B), *see* 1995 Ohio Laws File 60 (H.B. 99), thus effectively rendering subsection (A)'s two-year requirement superfluous. Before this change in 1995 **no court** had ever ruled that a candidate who satisfied either the prior four-year and later two-year requirements might still be prevented from running because of bad faith. Instead, candidates who had not voted in any other party's primary were always automatically allowed to run in a party's primary under § 3513.191 with no questions asked about their good faith or party honesty.

Subsection (B), of course, expanded candidates' ability to cross-over and associate with a different political party by removing the two-year waiting period for those candidates who did not hold office. Candidates who do not hold office can now run in "any" party's primary regardless of their past primary voting record. It is inconceivable that this expansion was meant to limit candidate's options by imposing a "good faith" requirement that was never in place before. Indeed, just as before the change, **no court** has ever ruled that a primary party candidate can be removed for not honestly, in good faith declaring his party membership and intent to abide by principles of the party. The protest should have been dismissed on this ground alone for failing to state a proper claim.

IV. Section 3513.07 Does Not Smuggle Into Ohio Law a "Bad Faith" Requirement That Allows Protests Against Candidates Based on Party Membership or Future Intent to Abide by Party Principles.

The protestor argues that while § 3513.191 allows candidates to freely choose any party, no questions asked, § 3513.07 somehow smuggles back in a good faith requirement that authorizes boards of elections to disqualify candidates they do not believe or trust. Never mind that the federal court in *Jolivette* rejected this argument, concluding instead that Ohio's primary ballot access law does not impose any good faith requirement on candidates who seek to associate with parties in order to run for office (as opposed to those who seek to disassociate from parties to run as independents).

Putting to one side that *Jolivette* refutes the protestor's argument, the protestor's logic fails under both the weight of history and its own terms. The protestor's claim is that because 3513.07 requires that primary candidates declare "I am a member of the _____ Party," and "that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the _____ Party," boards of elections must necessarily have the authority to decide that candidates are not presently party members or will not in the future abide by party "principles." Candidates who do not make both these declarations in good faith to the satisfaction of the board of elections decisions as to what is acceptable party membership and what acceptable party principles are, the protestor claims, must be removed from the ballot.

Notwithstanding that § 3513.07's two political party declarations in virtually identical form have been part of Ohio's law for over 75 years, *see* Ohio Code § 4785-71, 122 Laws of Ohio 334 (1947) (including declarations "I am a member of the ____ Party" and "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the ____ Party in its national and state platforms"),[1] **no court** has ever ruled that protestors, boards of elections or any other state officials may disqualify primary candidates under § 3513.07 or its predecessors based on the candidates having made false declarations about their party membership or intent to abide by party principles if elected.

This history teaches that § 3513.07 was not intended and has never been used to allow protestors and boards of elections to test primary candidates' good faith party affiliations. Nor could they in any objective fashion under Ohio law. "[P]arty affiliation or membership [in Ohio] is that which [a voter or candidate] desires it to be from time to time." *State ex rel. Young v. Gasser*, 257 N.E.2d 389, 391 (Ohio 1970). *See also Pirincin v. Board of Elections of Cuyahoga County*, 368 F. Supp. 64, 70 (N.D. Ohio 1973) ("In practice Ohio's election laws permit and result in shifting party affiliations."). Party affiliation and membership are purely subjective in Ohio. A candidate who declares he is a member of a particular party in his § 3513.07 declaration

[1] In 1980, the language of the second declaration was changed to: "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the ___ Party." 138 Law of Ohio 4722 (1980) (striking out "in its national and state platforms").

cannot be making a fraudulent statement because he is simply declaring that he believes himself to be a member of that party. He cannot be wrong. His statement cannot be false.

The "abide by party principles" declaration found in § 3513.07, meanwhile, is conditional and speaks to the future. A candidate states that "if elected to this office or position, I will qualify therefor, and … will support and abide by the principles enunciated by the _____ Party." It cannot be presently false, since a candidate is stating what he intends to do in the future should a condition (winning the election) occur. The candidate is declaring a future aspirational intent, one that cannot be presently false or fraudulent.

Still, the protestor claims that § 3513.07 requires boards of elections to determine that a candidate acted in "good faith" in making both declarations, even though no court over the course of 75+ years has ever said that boards of elections have that power, and even though the *Jolivette* court concluded that they don't. How boards of elections are to do this is left unclear. No standards exist, nor could they given that the party's principles are left to future determination. At best, boards will be left to cherry pick from candidates past statements in order to predict what it thinks those candidates will do in the future. In the present case, for example, the protestor pointed to Mr. Ronan's past political activities and policy statements and argued that because he (the protestor) found them to be inconsistent with undefined Republican principles Mr. Ronan was lying and had to be removed from the ballot. If the protestor is correct, then any candidate who ever changes parties in Ohio – which Ohio freely allows – can be accused of lying and removed from the ballot. Indeed, even candidates who have not changed parties can be protested as not being "true" party members or properly abiding by standardless party principles, whatever protestors and boards of elections deem them to be.

Ohio courts have not even attempted or purported to apply such a vague, subjective standard to primary elections for state central committees, which are more highly restricted than other elections in Ohio. In order to run in a primary for a party's state central committee, a candidate must under § 3513.05 abstain from voting in another party's primary in the current or two previous calendar years. *See State ex rel. Stevens v. Fairfield County Board of Elections*, 99 N.E.3d 376 (Ohio 2018).

In *Stevens* the Ohio Supreme Court recognized that not having voted in another party's primary during the two-year window was sufficient to allow a candidate to run in a party primary for that office. No requirement of good faith was imposed, and no mention of candidates needing to convince election officials of their present or future intent to abide by party principles was made. Instead, the Supreme Court made plain the opposite: "Party affiliation in Ohio is purely a matter of self-identification, and that self-identification is subject to change." *Id*. at 382. To prove its point, it noted that even "incumbents holding offices for which candidates are nominated in partisan primary elections … [may] change parties while in office; that is, the incumbents can seek reelection under the banner of one party notwithstanding the fact that they cast primary-election ballots for the opposing party in a primary election within the preceding two calendar years." *Id*. (citing R.C. § 3513.19(A)(3)(a) and § 3513.191(C)(1)). If good faith were a requirement because of 3513.07 the *Stevens* Court would have mentioned it.

V. The Federal Constitution Prohibits States from Placing Political Ideological Requirements on Congressional Candidates.

Candidates within a political party can and do disagree over their party's proper principles. Indeed, they must. That is what builds the party's evolving platform and establishes the "principles enunciated by the Republican Party." Mr. Ronan can be a member of the Republican party without agreeing with each and every Republican about anything and everything. He can truthfully declare that he will support and abide by party principles in the future, whatever they may turn out to be in Ohio following the primaries, even though others in the party disagree. It is up to Republican voters – and not a single protestor or this Board of Elections -- to choose their party's principles and the candidates who will best support them. To the extent the protestor is correct, and Ohio law allows a board of elections to remove a candidate for not being Republican enough, not being a good faith Republican, or not truthfully stating a future intent to abide by undefined and unknowable "party principles," that interpretation of Ohio law would violate both the Elections Clause in Article I of the United States Constitution and the Constitution's First Amendment.

The Supreme Court of the United States observed in *Cook v. Gralike*, 531 U.S. 510 (2001), that unlike local and State elections, State ballot restrictions on congressional (House and Senate) races are governed not by powers found in State Constitutions but by the grant of authority to States located in section 4 of Article I of the United States Constitution. This federal grant of power allows States to "regulate the 'Times, Places and Manner of holding Elections for Senators and Representatives,' subject to a grant of authority to Congress to 'make or alter such Regulations.'" *Id*. at 522 (quoting U.S. Const., art.I, § 4). "No other constitutional provision gives the States authority over congressional elections, and no such authority could be reserved under the Tenth Amendment." *Id*. at 522-23.

The Court further explained that while States have authority to enact "procedural regulations," *id*. at 523, they have no "power to dictate electoral outcomes, to favor or disfavor a class of candidates, or to evade important constitutional restraints." *Id*. (citation omitted). Applying this logic to Missouri's attempt to force candidates to include labels on their ballots stating whether they supported term limits, the Court had little difficulty concluding that the federal Elections Clause had been violated. "[Missouri's law] is not a procedural regulation. It does not regulate the time of elections; it does not regulate the place of elections; nor, we believe, does it regulate the manner of elections." *Id*. (footnote omitted). It "bears no relation to the 'manner' of elections as we understand it …." *Id*. "Rather, [it] is plainly <u>designed to favor candidates who are willing to support the particular form of a term limits amendment</u> set forth in its text and to disfavor those who either oppose term limits entirely or would prefer a different proposal." *Id*. (emphasis added) "[F]ar from regulating the procedural mechanisms of elections, it attempts to '<u>dictate electoral outcomes</u>.' Such 'regulation' of congressional elections simply is not authorized by the Elections Clause." *Id*. at 525-26 (citation omitted and emphasis added).

Justice Kennedy joined in the Court's unanimous decision, adding that "[a] <u>State is not permitted to interpose itself between the people and their National Government</u> as it seeks to do here." *Id*. at 527 (Kennedy, J., concurring) (emphasis added). "In today's case the question is not close. Here the State attempts <u>to intrude upon the relationship between the people and their congressional delegates by seeking to control or confine the discretion of those delegates</u>, and the interference is not permissible." *Id*. at 530 (emphasis added).

Chief Justice Rehnquist and Justice O'Connor added a separate concurrence, arguing that "Missouri's [law] violates the First Amendment to the United States Constitution." *Id*. at 531 (Rehnquist, CJ, concurring). Restrictions on congressional ballots are valid, the Chief Justice noted, "'provided that they are justified without reference to the content of the regulated speech, that they are narrowly tailored to serve a significant governmental interest, and that they leave open ample alternative channels for communication of the information.'" *Id*. (citations omitted and emphasis added). "Missouri's [law] flunks two of these three requirements. [It] is not only not content neutral, but it actually discriminates on the basis of viewpoint because only those candidates who fail to conform to the State's position receive derogatory labels." *Id*. at 531-32 (emphasis added). "The result is that the State injects itself into the election process at an absolutely critical point—the composition of the ballot, which is the last thing the voter sees before he makes his choice—and does so in a way that is not neutral as to issues or candidates." *Id*. at 532 (emphasis added).

Any attempt by a lone protestor or board of elections to remove a congressional candidate on the basis of that candidate's perceived ideology, political platform or ostensible failure to truthfully declare an intent to abide by "political principles" if elected would necessarily run afoul of all these federal constitutional propositions. The majority's conclusion under the Elections Clause in *Cook v. Gralike*, Justice Kennedy's concurring opinion, and the Chief Justice's concurring First Amendment rationale in that case would all be violated. *See* Vicki C. Jackson, Cook v. Gralike: *Easy Cases and Structural Reasoning*, 2001 S. CT. REV. 299, 323-24. Simply put, States cannot "favor candidates," "attempt[] to dictate electoral outcomes," "intrude upon the relationship between the people and their congressional delegates," or "inject[] [themselves] into the election process" in a way that is "not neutral as to issues or candidates."

Forcing a candidate to wear a government-created label violates the federal Constitution. Removing a primary candidate based on that candidate's perceived ideology – which is what the protestor argued for here and which Board Members Freedhoff and Preisse sought to do -- and or perceived failure to truthfully state a future intent to abide by government-approved orthodox "party principles" is just as offensive. Such an interpretation violates the Elections Clause and the First Amendment no less than applying a government-approved label.

In the specific context of party membership and party ideology, *Duke v. Smith*, 13 F.3d 388 (11th Cir. 1994), illustrates the federal constitutional limits placed on States that choose to use government actors to decide who is, and who is not, qualified to run in a political party primary. There, the Eleventh Circuit ruled that Florida's "state-created procedures" could not be used to inject ideology into the calculus in order to "make the *final* determination as to who will appear on the ballot in each primary election." *Id*. at 393 (footnote omitted and emphasis original). Instead, that final decision must be made by the political parties themselves, either through their own procedures or through the decisions of their members as prescribed by State law. Applying strict scrutiny to Florida's removal process, which vested a large amount of discretion in State officials to pick and choose who appeared on primary ballots, the Eleventh Circuit concluded that the First Amendment had been violated. Florida's approach was not "narrowly tailored to advance a compelling state interest." *Id*. (citations omitted).

Likewise in the present case, it cannot be left up to a lone protestor or board of elections to decide whether a political party primary candidate qualitatively satisfies a political party's principles or can truthfully state an intent to do so in the future. To do so vests unbridled

discretion in government officials to decide what a political party's principles are and what they are not. Since 1980, when Ohio changed § 3513.07's requirement that candidates state an intent to abide by "principles enunciated by the ___ Party in its national and state platforms," *see* 138 Law of Ohio 4722 (1980), to the present declaration that a candidate will abide by "principles enunciated by the _____ Party," Ohio has had no standard in place for what those principles are. If the protestor is to be believed, the board of elections is allowed to simply guess or make them up. Any candidate can be protested and any candidate removed using protestor's ideological test.

Because every candidate can be challenged and any candidate removed by state officials based on the candidate's perceived ideology, the First Amendment is plainly violated. Party identification and promises to abide by party principles are plainly attributes of constitutionally protected "core political speech." Here, under the protestor's logic, Ohio may punish this core political speech should it conclude (in its discretion) that the speech is not truthful. A candidate who declares "I am a Republican" or "I will abide by Republican principles if elected" can be removed from the ballot by a government that doesn't believe the statements are true. A greater assault on free speech rights cannot be imagined.

That this kind of procedure in Ohio violates the First Amendment was made clear by the Sixth Circuit in *Susan B. Anthony List v. Driehaus*, 814 F.3d 466 (6th Cir. 2016). There, Ohio's false political speech law, which authorized the Ohio Elections Commission to investigate and punish allegedly false speech made about political campaigns, was found to violate the First Amendment. In drawing this conclusion, the Sixth Circuit first noted that false speech remains constitutionally protected. Though this is true generally, it is especially true with "core political speech." *Id*. at 472 (citing *United States v. Alvarez*, 567 U.S. 709 (2012)). Allowing government to whimsically punish what it perceives to be "false" political speech, the Sixth Circuit stated, "could lead to unwanted consequences and abuses." *Id*. (citation omitted). The Sixth Circuit reasoned that "[p]ermitting the government to decree this speech to be a criminal offense ... would endorse government authority to compile a list of subjects about which false statements are punishable. That governmental power has no clear limiting principle." *Id*. at 472. Because "the First Amendment protects the 'civic duty' to engage in public debate, with a preference for counteracting lies with more accurate information, rather than by restricting lies," *id*. (citation omitted), punishing allegedly false political speech severely threatens First Amendment rights and accordingly requires strict scrutiny review under the Supreme Court's *Anderson-Burdick* analysis. *Id*. at 472-73. "Political speech," after all "is at the core of First Amendment protections." *Id*. at 473.

While recognizing that Ohio has a compelling interest in fair elections, the Sixth Circuit concluded that its means – allowing practically anyone without screening mechanisms to initiate proceedings before the Elections Commission challenging a candidate's political speech – were not narrowly tailored. "Ohio fails to screen out frivolous complaints prior to a probable cause hearing," the Court stated. *Id*. (citation omitted). "While this permits a panel of the Commission to review and reach a probable cause conclusion on complaints as quickly as possible, it also provides frivolous complainants an audience and requires purported violators to respond to a potentially frivolous complaint." *Id*. "'Because the universe of potential complainants is not restricted to state officials who are constrained by explicit guidelines or ethical obligations, there is a real risk of complaints from, for example, political opponents.'" *Id*. (citations omitted). "Indeed, some complainants use the law's process 'to gain a campaign advantage without ever

having to prove the falsity of a statement ... tim[ing] their submissions to achieve maximum disruption ... forc [ing political opponents] to divert significant time and resources ... in the crucial days leading up to an election.'" *Id*. (citations omitted). Consequently, the Sixth Circuit ruled, "having a panel conduct a probable cause review for plainly frivolous or non-actionable complaints is not narrowly tailored to preserve fair elections." *Id*. at 475.

Further, Ohio's methodology for punishing allegedly false statements was found to be "both over-inclusive and underinclusive. Causing damage to a campaign that ultimately may not be in violation of the law … does not preserve the integrity of the elections and in fact undermines the state's interest in promoting fair elections." *Id*. "[C]ourts have consistently erred on the side of permitting more political speech than less." *Id*. at 476 (citation omitted). "Other courts to evaluate similar laws post-*Alvarez*," the Sixth Circuit added, "have reached the same conclusion." *Id*. (citing *281 Care Comm. v. Arneson,* 766 F.3d 774, 785 (8th Cir. 2014) ("[N]o amount of narrow tailoring succeeds because [Minnesota's political false-statements law] is not necessary, is simultaneously overbroad and underinclusive, and is not the least restrictive means of achieving any stated goal."); *Commonwealth v. Lucas,* 472 Mass. 387, 34 N.E.3d 1242, 1257 (2015) (striking down Massachusetts' law, which was similar to Ohio's); *Rickert v. State Pub. Disclosure Comm'n,* 161 Wash.2d 843, 168 P.3d 826, 829–31 (2007) (striking down Washington's political false-statements law, which required proof of actual malice, but not defamatory nature); *Serafine v. Branaman,* 810 F.3d 354, 361 (5th Cir.2016) (striking down a Texas law regulating use of the professional title "psychologist" because it was not narrowly tailored to serve the state's compelling interest in protecting mental health "where it regulates outside the context of the actual practice of psychology ... [to a] political website or filing forms for political office")).

The procedure under § 3513.05 used by protestors to challenge allegedly false candidate declarations (i.e., speech) – as was done by Mr. Schare and his attorneys here -- is constitutionally faulty for all of these reasons. Even assuming a compelling end, Ohio allows any party member – defined as an Ohio voter who had not voted in another party's primary within two years – to file a protest. Protests are not restricted to state officials who are constrained by strict guidelines and ethical obligations. Just as in *Driehaus*, "there is a real risk of complaints from, for example, political opponents." Indeed, that is exactly what has happened here. Mr. Schare is a dupe of the Ohio Republican Party, which hoped to keep its participation secret while financing and directing the removal of Mr. Ronan from the ballot. The Ohio Republican Party for reasons known only to itself is trying to sabotage Mr. Ronan's campaign. Regardless of its motivation, the Ohio Republican Party's direct, secret participation in the removal of one of its candidates from the ballot opens a legal can of worms; one that the Ohio Republican Party obviously was hoping through secrecy to avoid. [2]

Even when a protest is not filed by a political opponent, "some complainants [will] use the law's process 'to gain a campaign advantage … tim[ing] their submissions to achieve maximum disruption ... forc [ing political opponents] to divert significant time and resources ...." Further, just like the Ohio Elections Commission, Boards of Elections – if the Board here is

[2] Courts for example have ruled that because a major party is involved in state action when it seeks to remove candidates from its primary it must comply with due process. *See*, *e.g*., *Meeks v. Tallahatchie County*, 513 So.2d 563 (Miss. 1987). Whether secret participation in a removal hearing satisfies due process is an interesting question.

correct -- have no power to screen out and dismiss frivolous protests. Here, for example, the Board of Elections rejected Mr. Ronan's attempt to dismiss the protest by expressly stating that it had no power to entertain a motion to dismiss.

Allowing protestors to challenge the truthfulness of candidate's campaign declarations in actions before boards of elections consequently fails First Amendment scrutiny for the exact same reasons Ohio's false political speech law failed in *Driehaus*. Indeed, it fails for the additional reason that it allows boards of elections to effectively exercise editorial review of a party candidate's core political speech. The Sixth Circuit in *Brown v. Yost*, 113 F.4th 725 (6th Cir. 2025), *stay denied*, 145 S. Ct. 1957 (2025), recently concluded that Ohio's delegation of authority to the Attorney General to review initiative summaries prepared by petitioners for truth and accuracy violated the First Amendment. "The state may not exercise editorial control over speech concerning initiative petitions. Intrusions on petitioners' exercise of 'editorial control and judgment' over the content of those petitions severely infringe First Amendment interests." *Id*. at 732.

Just as in *Yost*, a board of elections cannot consistent with the First Amendment be delegated the power to determine whether core political speech is false or "fair and truthful." Such a power would be the equivalent of editorial review, which is exactly what two Board members attempted to do here. Ms. Freedhoff, in particular, picked through Mr. Ronan's campaign statements and public positions and concluded that they were not, in her estimation, consistent with Republican party principles. Consequently, she determined, Mr. Ronan's claim to be a Republican who would abide by party principles if elected was false. She imposed nothing less than her own subjective ideology test and concluded that Mr. Ronan's position – not being consistent with what she viewed as proper Republican principles -- was not fair and truthful. This is exactly what the Court in *Yost* deemed to contradict the First Amendment.

Cook v. Gralike, *Driehaus* and *Yost* are all binding precedent in Ohio. They make clear that the federal constitution does not allow boards of elections to exercise the kind of ideological control over the congressional ballot that protestor insists they must. The process insisted upon by the protestor plainly violates the federal Constitution, including both Article I and the First Amendment.

Conclusion

Parties should not be rewarded for misdeeds and bad faith. Mr. Ronan now knows that the Ohio Republican Party is financially responsible for protesting his candidacy. He only knows that because he forced Mr. Schare's lawyers to disclose the information. No disclosure was had before the Board, however, which was left in the dark. Indeed, the Ohio Republican Party knew that Mr. Ronan was seeking to disqualify a Board member based on connections between the Franklin County Republican Party and Mr. Ronan's opponent, but it still actively attempted to keep its involvement in the protest a secret. Surreptitious behavior of this sort is the antithesis of clean hands. This matter should therefore be dismissed.

Should the Secretary choose to reach the merits, he will find that the protestor has invented Ohio law. No court has ever ruled that a candidate can be removed for making allegedly false statements about his party membership and future intent to abide by party principles if

elected. Indeed, the Sixth Circuit has stated the contrary. Indeed, if Ohio law allowed this sort of procedure it would be in violation of both Article I of the Constitution and the First Amendment. The protest should accordingly be denied.

Last but not least, should the Secretary not be disposed to break the tie in favor of Mr. Ronan, at bare minimum the matter should be remanded for reconsideration of the disqualification motion and the merits in light of the newly disclosed evidence that the Ohio Republican Party – and perhaps even Mr. Carey's campaign -- is behind the protest.

Respectfully submitted,

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BRICKER GRAYDON WYATT, LLP

Counsel for Marc A. Schare

March 13, 2026

Via Electronic Mail

Franklin County Board of Elections
22 North Fourth Street
Columbus, Ohio 43215

Re: **Protest of Candidacy of Samuel Peter Ronan as a Republican Candidate for office of Representative to Congress from the 15th District**

Dear Members of the Franklin County Board of Elections:

On behalf of our client Marc A. Schare, a member of the Republican party and qualified elector in the state of Ohio, we submit this post-hearing letter in support of Mr. Schare's protest of the candidacy of Samuel Ronan as a Republican candidate for the office of Representative to Congress from the 15th District.

This protest asks whether a candidate who has openly, consistently, and recently admitted that he is not a Republican can lawfully pretend to be a Republican and appear on a Republican ballot at a primary election. Unless Ohio law allows a candidate to lie on the declaration of candidacy, the answer is and must be no, as two members of this Board correctly held.

As explained in Mr. Schare's written protest, which we incorporate here by reference and attach as Appendix A, Ronan has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles and has previously campaigned as a Democrat, including for the role as *chairman of the Democratic National Committee.*

To be sure, as counsel for Mr. Ronan stresses, a candidate can lawfully change parties. R.C. 3513.191. That's beside the point. Critically, the clear and convincing evidence cited in the protest and presented during the March 6, 2026 hearing confirms that didn't happen here. Instead, as the evidence makes clear, Mr. Ronan's sudden shift is not driven by a sincere change in politics, but rather by a transparent and unapologetic strategy to sabotage the party from within.

Mr. Ronan's social media posts and interview statements demonstrate that Mr. Ronan considers pretending to be a Republican and running in a Republican primary as a tool to "get a foot in the door" for progressive candidates like himself and an opportunity to double the chances of ousting a Republican incumbent.

In 2018, he ran in the Republican primary for U.S. House Ohio District 1 against incumbent Steve Chabot. In a video interview featured on an online interview series entitled "Rebel Headquarters," Ronan freely admitted that the party flip stemmed not from any genuine change in political

ideology, but from a new experimental strategy for trying to defeat Republican incumbents and get progressive candidates elected:

> Q. There is something unique about your candidacy, you are running as the only Republican, I believe that we have profiled here . . . You are running to replace Steve Chabot as a Republican, but you are a Progressive?
>
> A. Yes sir. . . . I put my money where my mouth is. Last year I ran for the DNC Chair and I said if I were the Chair, we would still have to run Democrats as Republicans because that's the only way you're going to make it through. And here I am, I guess, putting the rubber to the road.
>
> Q. Well, it's going to be an amazing test case.

2018 Rebel HQ interview, "DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!," *available at:* https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF.

Ronan further explained that the Democratic leadership was not supportive of his candidacy and the Democratic candidate field was crowded, so going to "the GOP side" to "challenge the incumbent directly" would be a more effective strategy in his view. *Id.*

Perhaps most telling, Ronan explained that calling himself a Republican was "the trick" to try to get people to listen to him. *Id.*

Although this interview took place in 2018, Ronan recently reaffirmed his continued support for this strategy. Just weeks ago, *after he submitted his declaration of candidacy as a Republican*, Ronan openly acknowledged that he is simply following the strategy he has been advocating for years:

> "I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of American, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door. So if I'm doing anything, it's following the argument I made on that stage."

Sam Ronan post on Grove City Area Progress Facebook page: https://www.facebook.com/groups/1052994605934831, Screenshot Exhibit A.

Importantly, Ronan does not deny or dispute that he made these statements. To the contrary, at the March 6, 2026 hearing he openly acknowledged these statements were his.

Ronan further admitted that both he and his campaign are affiliated with a person who posts online as "Ana Aleida-March." She posted about Ronan's campaign just weeks ago. In response, a follower commented "I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems." *See* Testimony of Sam

Ronan and corresponding Exhibits admitted at the March 6, 2026 hearing. To which Ronan's personal confidant and campaign advisor said: "yup! And we're testing out theory lol." *Id.*

Again, when asked about this post, Ronan made no attempt to disavow the strategy.

To the contrary, the crux of his argument, as further evidenced through the filings of his counsel, is not that Sam Ronan's campaign isn't a sham, but that it shouldn't matter under Ohio law.

Ronan's counsel insists that there is no "good faith" requirement to show party affiliation for purposes of declaring candidacy. He misreads snippets from Ohio cases to argue that Ohio law *allows a bad faith affiliation*. But the case law does not support this illogical leap.

Although Ohio law allows candidates to change parties, it prohibits them from "altering their political party affiliations for opportunistic reasons" as Ronan admittedly seeks to do here. *See, e.g.*, *State ex rel. Guest v. Husted*, 2018-Ohio-3161, ¶ 15; *Jolivette v. Husted*, 694 F.3d 760, 770 (6th Cir. 2012). While these cases specifically addressed these issues in the context of disaffiliation from a political party, nothing in their language or reasoning suggests this maxim is limited to situations in which a party seeks to disaffiliate, rather than affiliate.

Indeed, to hold otherwise would essentially equate to a conclusion that Ohio law allows a candidate for office to commit fraud. It does not.

In *Morrison v. Colley*, 467 F.3d 503, 511 (6th Cir. 2006), the Sixth Circuit explicitly stated that "A person of ordinary intelligence . . . is put on notice that 'claims' of *party affiliation* or non-affiliation must be made in good faith; otherwise the person is subject to criminal prosecution." (emphasis added)

While it may be true that Ohio law does not require a candidate to affirmatively demonstrate that his affiliation is in good faith as a precondition to running for a partisan office, that does not mean that where, as here, the Board is presented with clear and convincing evidence that the affiliation is in *bad faith*, the Board should or even can turn a blind eye to that fact.

The bottom line here is that there is clear and convincing evidence that Samuel Ronan's purported affiliation with the Republican party and declaration to "support and abide by the principles enunciated by the Republican Party" are false, the Board should disqualify Ronan from appearing on the ballot in the May 5, 2026 Republican primary election.

A few final points bear mention. Mr. Ronan's counsel continues to insist that Board member Ms. Meredith Freedhoff should have been disqualified from participating in the protest hearing and decision even after the Board unanimously denied his motion to disqualify. Because there was no tie on that issue, it is finally resolved and therefore not before the Secretary of State. It is important to note, however, that the Board's decision was fully supported by Ohio law. Ronan has shown nothing other than that Ms. Freedhoff is an active member of the Franklin County Republican Party and as such has supported Republican candidates and interacted with the party and its members. Mr. Ronan's emphasis on this connection ignores the legal and factual reality that *all*

members of the Boards of election are statutorily required to be affiliated with either the Democratic or Republican party. If that association somehow made the members unqualified to participate in Board decisions, it would defeat the entire purpose of the statute to ensure that the inherently political decisions a Board must resolve are adjudicated by a politically balanced and representative Board.

Mr. Ronan's unfounded focus on who is or is not paying invoices associated with Mr. Schare's protest is equally irrelevant to the issues that were before the Board and are now in front of the Secretary of State. Mr. Brown cites no authority to suggest that there is anything improper about the unsurprising fact that the Ohio Republican party would have an interest in ensuring that political candidates running for office as Republicans are in fact Republicans. As already mentioned, Mr. Ronan has made clear that his entire campaign is a strategy designed to undermine the party. The party has an undeniable interest in ensuring the Board has an opportunity to evaluate that information and make an informed decision.

As this Board already unanimously concluded, such information is irrelevant to the validity of Mr. Schare's protest or Mr. Ronan's eligibility to appear on a Republican ballot. Counsel's voluntary release of that information less than one business day following that hearing as a courtesy to Mr. Ronan's counsel is no way alters or affects the issues before the Board. Put simply, it is a red herring that can only be intended to distract the Board and the Secretary from the real issues before it.

In short, Ohio law does not and should not allow a candidate to intentionally lie about their party affiliation. That is precisely what Ronan openly admits to doing here. If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to "support and abide by the principles" of the Republican Party is meaningless.

Accordingly, Republican voter Marc A. Schare respectfully urges the Secretary of State to break the tie vote in favor of those Board members who voted to disqualify Mr. Ronan from appearing on the Republican ballot.

Respectfully submitted,

Brodi J. Conover, bconover@bricker.com
Rachael N. Guastella, rguastella@bricker.com
Ryan L. Richardson, rrichardson@bricker.com

BRICKER GRAYDON WYATT, LLP

2 East Mulberry Street
Lebanon, OH 45036

100 South Third Street

Columbus, Ohio 43215

Counsel for Protestor

Samuel's Post

Samuel Ronan	Republican	REPRESENTATIVE TO CONGRESS - 15TH CONGRESSIONAL DISTRICT
Brian Gillen	Republican	STATE CENTRAL COMMITTEE - Man - 03rd District
Clayton Henson	Republican	STATE CENTRAL COMMITTEE - Man - 03rd District
Jesse Kessler	Republican	STATE CENTRAL COMMITTEE - Man - 03rd District

Ana Aleida-March
February 16 at 12:30 PM

IT'S OFFICIAL! Samuel Ronan is on the ballot! Woot, woot!

https://vote.franklincountyohio.gov/.../2026-Primary...

11 5 comments

Like Comment

All comments

Steve Church Admin
I love that like-minded folks are attacking this race from every angle. Make him work Sam!

4d Like Reply Share 3

Samuel Ronan Author
Steve Church that's the goal!

4d Like Reply Share

Jessica Gall
Congrats!

4d Like Reply Share

Matt Jividen
I'm confused. Literally nothing on your platform resembles anything on the Republican platform.

3d Like Reply Share

Samuel Ronan Author
Matt Jividen not from the present, but it does reflect Eisenhowers platform pretty well! Also being progressive and Republican are not antithetical, its imperative with this gerrymandering

Submit your first comment...

303 East Broad Street
Columbus, Ohio 43215

614-236-6590
mbrown@law.capital.edu

March 13, 2026

Frank LaRose
Ohio Secretary of State
180 Civic Center Dr.
Columbus, Ohio 43215

Delivered via email to Lisa Eschbacher, leschbacher@OhioSOS.Gov

In re Protest of Samuel Ronan (Franklin County BOE)

Dear Secretary LaRose,

I write on behalf of Mr. Ronan to briefly reply to the protestor's response (which was filed on March 13, 2026 with the Franklin County BOE with instructions to file with your office) to Mr. Ronan's Merits Brief (which was accepted for filing with your office on March 10, 2026).

I. The Protestor Can Cite No Authority Holding that a Primary Candidate May Be Removed Under R.C. § 3513.07 Or Any Other Statute For Not "Truthfully" Declaring His Party Membership and Future Intent to Abide By Party Principles.

As Mr. Ronan states in his Merits Brief filed on March 10, 2026 with the Secretary of State, no case supports the protestor's claim that R.C. § 3513.07 authorizes boards of elections to remove primary candidates who do not – in the boards' opinion – truthfully declare their party membership and future intent, if elected, to abide by the party's principles. The protestor's response fails to cite a single case supporting this proposition just as the protestor failed to cite a single case to the Franklin County BOE. None exist, even though the statute has been on the books in the precise same form for over 75 years.

The best the protestor can do is (again) cite *State ex rel. Guest v. Husted*, 109 N.E.2d 1229 (Ohio,) and *Jolivette v. Husted*, 886 F. Supp. 2d 820 (S.D. Ohio) *aff'd*, 694 F.3d 760 (6th Cir. 2012), neither of which involved primary candidates attempting to associate with political parties, and misrepresent that "[w]hile these cases specifically addressed these issues in the context of disaffiliation from a political party, nothing in their language or reasoning suggests this maxim is limited to situations in which a party seeks to disaffiliate, rather than affiliate." Protestor's Letter to Franklin County BOE, March 13, 2026, at 22.

This is a misrepresentation because *Jolivette*, quite to the contrary stated that the maxim the protestor relies upon does not apply when a candidate in Ohio seeks to associate with a

political party in a primary: "while there are restrictions in Ohio as it relates to a candidate changing parties, there is no requirement that the candidate make the change in good faith, unlike the rule that applies to a candidate who disaffiliates from a party" *Jolivette*, 886 F. Supp.2d at 835. The only issue presented in *Guest*, 109 N.E.2d at 1236, meanwhile, was "whether [the independent candidate's] claim of disaffiliation from the political party was made in good faith." Its resolution of this issue could not have been meant to apply to party affiliation claims, too, especially given that the *Guest* Court extensively cited and relied on the reasoning in *Jolivette*.

The protestor's reliance on *Morrison v. Colley*, 467 F.3d 503 (6th Cir. 2006), fairs no better, as that case also involved a candidate who wanted to run as an independent attempting to disassociate himself from a political party in Ohio. That Court's holding stated that "[a] candidate possessing ordinary intelligence and common sense would readily understand that <u>the claim of independence must be made in good faith</u> …." *Id.* at 509. The Court in *Jolivette*, 886 F. Supp.2d at 827 cited *Morrison* as "a case in which the Sixth Circuit found that the candidate's claim of unaffiliation with a political party was not made in good faith." This, the *Jolivette* Court stated, proved the divide in Ohio between candidates who run in party primaries and who do not need to satisfy a good faith requirement and those who seek to run as independents and who do need to satisfy a good faith requirement;

> for a candidate to be qualified to run as an independent candidate, the individual must actually be unaffiliated or disaffiliated from any political party, and there is a corresponding requirement that the claim of unaffiliation or disaffiliation must be made in good faith. *See Morrison.* <u>There is no similar requirement for a partisan candidate to show that the change in party affiliation was made in good faith</u>.

Id. at 834 (emphasis added)

It is telling that the protestor <u>cannot cite a single case</u> where any court or authority has ever ruled that a primary candidate in Ohio can legally be removed from a primary ballot for not truthfully – to the satisfaction of the board of elections or anyone else-- identifying himself as a member of a political party who will abide by party principles if elected. *Jolivette* says the exact opposite. Neither *Morrison* nor *Guest* offer support or suggest that their holdings apply to party primaries. Notwithstanding that R.C. § 3513.07 has been on the books for over 75 years, <u>no cases</u> and <u>no authorities</u> support the protestor's interpretation.

II. The Secretary Has Authority to Require Compliance With The Ethical Standards He Has Imposed on Boards of Elections.

The protestor argues that because Board Member Freedhoff chose not to disqualify herself the Secretary has no authority over the disqualification question. He is wrong. First, the disqualification decision was not made following a full disclosure of the relevant, material facts by the protestor. The protestor deceived the Board by not disclosing that the real party in interest is the Republican Party of Ohio. Only after the hearing, at Mr. Ronan's insistence, did the

protestor's lawyers reveal that the Ohio Republican Party is paying the lawyer's fees -- and thus directing the protest's prosecution. The protestor, after all, admitted that he did not draw up the protest, did not deliver it, and did not sign it.

The protestor's lawyers at the hearing, moreover, would not allow Mr. Ronan to explore who was paying their fees and who was behind the protest. Mr. Ronan specifically sought to inquire whether the Carey campaign was involved with the protest, but the protestor's lawyers objected and the protestor admitted he did not know. All of this is relevant to both the disqualification decision and the merits of the protest, because it not only compounds the appearance of impropriety projected by Ms. Freedhoff's participation in the matter – after all, she chairs the Ohio Republican Party's Franklin County chapter that has contributed to the Carey campaign and received disbursements from it – but also informs the true motivation behind the protest. This protest was not borne of any objective concerns about Mr. Ronan's connection with the Republican party. It is an attempt by the Ohio Republican Party and Carey's campaign to clear the ballot of opposition. The Libertarian party candidate, after all, was challenged on these exact same grounds at the same Franklin County Board of Elections hearing by the same law firm. No disclosure was made there either. Let there be no doubt that the Ohio Republican Party and the Carey campaign were behind that, too. And let there be no doubt that this sort of surreptitious sabotage is certainly unethical and probably illegal.

This was no passive oversight, moreover. It was calculated. The protestor's lawyers in the protest of Mr. Ronan kept this information from the protestor in order to keep it from Mr. Ronan and the Board. This was precisely because the disclosure of the Ohio Republican Party's and the Carey campaign's involvements would have factored into the disqualification decision. Further, the involvement of either is material to the merits of the cases. As the Sixth Circuit made clear in *Susan B. Anthony List v. Driehaus*, 814 F.3d 466, 473 (6th Cir. 2016), quoting the Supreme Court, "a real risk of complaints from … political opponents" being used to punish candidates makes it very difficult for a State law to satisfy strict scrutiny and survive the First Amendment..

Second, the Secretary just last week remanded a decision by the Delaware Board of Election for further consideration following a tie vote that involved a board member who chose not to recuse herself. *See* Anna Staver, LaRose orders revote after local official removes opponent from primary ballot, Cleveland.com, March 5, 2026, https://www.cleveland.com/news/2026/03/larose-orders-revote-after-local-official-removes-opponent-from-primary-ballot.html. The Secretary obviously has the authority to do what the protestor claims he cannot do.

Conclusion

For these reasons and those expressed in Mr. Ronan's Merits Brief, the tie should either be resolved in Mr. Ronan's favor or the matter remanded to the Board for reconsideration of disqualification and the merits in light of the newly uncovered admission that the Ohio

Republican Party is the real party in interest. Further disclosures by the protestor will likely reveal that the Carey campaign, too, is involved with the protest.

Respectfully submitted,

Mark R. Brown

Attorney for Samuel Ronan

Cc:

Brodi J. Conover, bconover@bricker.com
Rachael N. Guastella, rguastella@bricker.com
Ryan L. Richardson, rrichardson@bricker.com

BRICKER GRAYDON WYATT, LLP
Counsel for Marc A. Schare

and

David R. Payne, drpayne@vote.franklincountyohio.gov

Deputy Director
Franklin County BOE

February 20, 2026

Via Electronic Mail and Hand Delivery

Franklin County Board of Elections
22 North Fourth Street
Columbus, Ohio 43215

Re: **Protest of Candidacy of Samuel Peter Ronan as a Republican Candidate for office of Representative to Congress from the 15th District**

Dear Members of the Franklin County Board of Elections:

Pursuant to § 3513.05 of the Ohio Revised Code, Marc A. Schare, a member of the Republican party and qualified elector in the state of Ohio, hereby protests the candidacy of Samuel Ronan as a Republican candidate for the office of Representative to Congress from the 15th District.

The basis for this protest is straightforward: although Ronan filed a Declaration of Candidacy for the Republican primary, clear and convincing evidence confirms ***he is not in fact a Republican***.

To the contrary, as explained in greater detail below, Ronan has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles. He has consistently and unequivocally associated with and advocated for progressive positions and policies of other parties, most prominently the Democratic party. Indeed, he has previously (and recently) campaigned as a Democrat, including for the role as *chairman of the Democratic National Committee.*

In short, Ronan's past *and current* statements and actions unmistakably demonstrate that Ronan is not and does not want to be a Republican. Instead, he is simply pretending to be a Republican as a tool to "get a foot in the door." January 2026 Facebook Post, Exhibit A. ; 2018 Rebel HQ interview, "DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!," *available at* https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF.

This is precisely the type of "opportunistic" maneuvering the primary rules are designed to prevent. *State ex rel. Bible v. Bd. of Elections of Hamilton Cnty.,* 22 Ohio St. 2d 57, 60 (1970).

Because the evidence outlined below supplies clear and convincing evidence that Samuel Ronan's purported affiliation with the Republican party and declaration to "support and abide by the principles enunciated by the Republican Party" are false, the Board should disqualify Ronan from appearing on the ballot in the May 5, 2026 Republican primary election.

A. Ronan's political history and prior campaigns reveal a strong and consistent affiliation with the Democratic and other left-wing/progressive parties.

Ronan's political career spans nearly a decade and demonstrates strong, consistent ties to the Democratic party and other liberal organizations. Ronan's political career formally began in 2016 when he ran as a Democrat in the Democratic primary for the Ohio House of Representatives District 62 seat. Ballotpedia profile, Ex. B, *available at* https://ballotpedia.org/Samuel_Ronan. Although he won the Democratic nomination, he lost in the general election. *Id.* The next year, he sought to *lead* the Democratic party, running as a candidate for chair of the Democratic National Committee, which he lost. *Id.*

Ballotpedia reports that Ronan has also been associated with the PDPR [People for Democratic Party Reform], the Green Party, the Sunrise Movement, a progressive group focused on climate change issues, and the Socialists of America. *Id.*

B. Ronan has explicitly and repeatedly proclaimed that Democrats should run for office as Republicans to get elected in conservative districts and admits to doing so here.

Unable to get elected in the progressive parties with which he actually aligns, Ronan tried a different strategy. In 2018, he ran in the Republican primary for U.S. House Ohio District 1 against incumbent Steve Chabot. In a video interview featured on an online interview series entitled "Rebel Headquarters," Ronan freely admitted that the party flip stemmed not from any genuine change in political ideology, but from a new experimental strategy for trying to defeat Republican incumbents and get progressive candidates elected:

> Q. There is something unique about your candidacy, you are running as the only Republican, I believe that we have profiled here . . . You are running to replace Steve Chabot as a Republican, but you are a Progressive?
>
> A. Yes sir. . . . I put my money where my mouth is. Last year I ran for the DNC Chair and I said if I were the Chair, we would still have to run Democrats as Republicans because that's the only way you're going to make it through. And here I am, I guess, putting the rubber to the road.
>
> Q. Well, it's going to be an amazing test case.

2018 Rebel HQ interview, "DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!," *available at:* https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF.

Ronan further explained that the Democratic leadership was not supportive of his candidacy and the Democratic candidate field was crowded, so going to "the GOP side" to "challenge the incumbent directly" would be a more effective strategy in his view. *Id.*

Perhaps most telling, Ronan explained that calling himself a Republican was "the trick" to try to get people to listen to him. *Id.*

Although this interview took place in 2018, Ronan recently reaffirmed his continued support for this strategy. Just weeks ago, *after he submitted his declaration of candidacy as a Republican*, Ronan openly acknowledged that he is simply following the strategy he has been advocating for years:

> "I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of American, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door. So if I'm doing anything, it's following the argument I made on that stage."

Sam Ronan post on Grove City Area Progress Facebook page:
https:/ www.facebook.com groups/1052994605934831, Screenshot Exhibit A.

Although Ohio law allows candidates to change parties, it prohibits them from "altering their political party affiliations for opportunistic reasons" as Ronan admittedly seeks to do here. *See, e.g.*, *State ex rel. Guest v. Husted*, 2018-Ohio-3161, ¶ 15; *Jolivette v. Husted*, 694 F.3d 760, 770 (6th Cir. 2012).

C. According to his own statements, Ronan aligns with Democratic leaders and positions and does not support the positions of the Republican Party.

Ronan's political history and unapologetic gamesmanship amply demonstrate Ronan's claimed affiliation with the Republican party is a sham, and his candidacy as a Republican should not be allowed. His public statements and policy statements only further cement the point.

The Internet is replete with videos, social media posts, and position statements in which Ronan openly and explicitly discusses his views on politics and government. His platform is clear, and as one social media commenter aptly put it, "[l]iterally nothing on [his] platform resembles anything on the Republican platform." Comment of Matt Jividen, February 16, 2026 in response to Sam Ronan post on Grove City Area Progress Facebook page. Ex. C.

To the contrary, his political positions, which, unlike his political affiliation, have stayed constant over the course of his political career, include the following:

- **Providing Universal Healthcare** (Samronan.com, https://www.samronan.com/more-issues/universal-healthcare
- **Abolishing ICE and using their funding for public services** (*See Ballotpedia 2026, Ex. B, Candidate Survey* (*"My goal is to abolish ICE, and BPD, reallocate their funds to public services, and prosecute all members of those agencies for their many crimes.*), *available at https://ballotpedia.org/Samuel_Ronan*)
- **Federalizing the police, ending all state and local funding for police forces** (https://www.samronan.com/police-reforms).

- **Federalization of all transportation services, banking, the Internet,** (https://www.samronan.com/taxation-economics).
- **"Immediate erasure of Medical and Student Loan debt, universally across the country."** *Id.*

These policies and positions unequivocally align with the far-left views of the most liberal factions in American politics. It is perhaps no surprise then that Ronan also publicly aligns himself with liberal leaders like Bernie Sanders.

D. Disqualifying Ronan from appearing on a Republican ballot when clear and convincing evidence shows his declaration of intent to support Republican positions is false serves important state interests.

The abundant evidence of Ronan's current and past political involvement, public statements, and alignment with Democratic leaders clearly and convincingly demonstrate that Ronan is not a Republican and does not support Republican positions. *Cf. Jolivette*, 694 F.3d at 769; *Guest* 2018-Ohio-3161, ¶ 15.

Ronan's statements to the contrary in his Declaration of Candidacy are false. Accordingly, this Board should disqualify Ronan from appearing on the Republican ballot.

Limiting party primary ballots to those candidates who are genuine members of that party serves the state's legitimate interests in "avoiding overcrowded ballots" and "protect[ing] the integrity of its political processes from frivolous or fraudulent candidacies." *Jolivette*, 694 F.3d at 769 *quoting* Bullock *v. Carter,* 405 U.S. 134, 145 (1972). Moreover, "the state has an interest in regulating ballot access in order to avoid confusion, deception, and even frustration of the democratic process at the general election. *Id.* (internal quotation marks and citations omitted).

Permitting Samuel Ronan to appear on the Republican ballot at the May 5, 2026 primary would undermine these important objectives and undermine the integrity of Ohio's primary system.

E. Conclusion

In short, Ohio law does not and should not allow a candidate to intentionally "trick" voters about their party affiliation. That is precisely what Ronan openly admits to doing here. If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to "support and abide by the principles" of the Republican Party is meaningless.

Accordingly, Republican voter Marc A. Schare respectfully asks the Board to disqualify Ronan from appearing on the ballot.

Please direct all future correspondence to my counsel.

Respectfully submitted,

Marc A. Schare
Protestor

Brodi J. Conover, bconover@bricker.com
Rachael N. Guastella, rguastella@bricker.com
Ryan L. Richardson, rrichardson@bricker.com

BRICKER GRAYDON WYATT, LLP

2 East Mulberry Street
Lebanon, OH 45036

100 South Third Street
Columbus, Ohio 43215

Counsel for Protestor

4:09

Grove City Area Progress · Join
Admin · Steve Church · 1d

RONAI samroman.com

Reply 1

Mark Gavin Sr. 20h
Samuel Ronan didn't you run for DNC chair a few years ago? Now you're running for congress as a Republican? Stop grifting.
Reply

Samuel Ronan 19h · Follow
Mark Gavin Sr. I believe i very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door.

So, if I am doing anything, it's following the argument I made on that stage.

That said, I am NOT fighting on behalf of the traitorous Democrats who JUST crossed the party line to vote for MORE ICE funding.

I'm not a grifter. Im running for office in the party of the dominant district fighting for the working class.
Reply

Katie Beth 19h
Samuel Ronan so you're an anti ice republican?
Reply

Comment publicly as Henry Mo...

EXHIBIT
P2
Ronan

EXHIBIT
tabbies
P3
Ronan

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

Declaration of Candidacy
by Primary Election for District Office
Representative to Congress

000217

RECEIVED
2026 JAN 27 AM 11:33

be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of 40th day before the primary election.
R.C. 3513.05, 07, 08, 09, .10, 191, 3501.38, 3513.06

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is

1574 Riverbend Road, Columbus, Ohio 43223, and I am a qualified elector.
Street Number and Address (or rural route and number, if any) — City or Village — Zip Code

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican Party from the 15 District for the: Check one ☒ full term or ☐ unexpired term ending _____, at the primary election to be held on the 5 day of May, 2026.
Political Party — District Number — Unexpired Term Ending Date — Day — Month — Year

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican Party.
Political Party

Dated this 28 day of October, 2025.
Day — Month — Year

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican Party, hereby certify that Samuel Ronan, whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.
Political Party — Name of Candidate

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1. Cindi Keisling	5549 Crystal Falls St	Hilliard	Franklin	1/17/26
2. Doc Ochsler	1171 Yausland Dr	Columbus	Franklin	1/17/26
3. [illegible]	1026 N High St	Gahanna Franklin	Franklin	1/17/26
4. [illegible]	3149 Andrew James Dr	Hilliard	Franklin	01.17.26
5. [illegible]	3149 Andrew James Dr	Hilliard	Franklin	01/17/26
6. [illegible]	5293 Bressler Dr	Hilliard	Franklin	1/17/26
7. [illegible]	5149 Norwich St	Hilliard	Franklin	1/17/26
8. Joyce C. Dorsey	8146 Morris Rd	Hilliard	Franklin	1/17/26
9. Ronald W. Roberts	2027 Tuckaway Ct	Columbus	Franklin	1/17/26
10.				

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
11. [illegible]	2965 Fremont St	Columbus	Franklin	1-17-26
12. [illegible]	2967 Fremont St	Columbus	Franklin	1-17-26
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Rowan (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 11 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

[illegible]
Signature of Circulator

1574 Riverbend Rd
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

Declaration of Candidacy

Party Primary Election for District Office

For Representative to Congress

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.

R.C. 3513.05, .07, .08, .09, .10, .191, 3501.38, 3513.06

000218

2026 JAN 27 AM 11:33

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is

1574 Riverbend Road, Columbus, Ohio 43223, and I am a qualified elector.
Street Number and Address (or rural route and number, if any) — City or Village — Zip Code

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican Party from the 15 District for the: Check one ☒ full term or ☐ unexpired term ending _____, at the primary election to be held on the 5 day of May, 2026.
Political Party — District Number — Unexpired Term Ending Date — Day — Month — Year

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican Party.
Political Party

Dated this 28 day of October, 2025.
Day — Month — Year

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican Party, hereby certify that Samuel Ronan, whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.
Political Party — Name of Candidate

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1. Carol G. Park	3183 Stephen Dr S	Cols, Ohio	Franklin	4th JAN 26
2. Clark Ely	836 BRIXHAM	COLS, OHIO	FRANKLIN	4TH JAN 26
3. Nancy J. Smith	1556 Whitcomb Way	Cols, OH	Franklin	1-04-26
4. Gary Smith	1556 Whitcomb Way	Cols OH	Franklin	1-04-26
5. [illegible]	6044 Bell Pl	Dublin	F	1-11-26
6. [illegible]	5976 Trafalgar	Alum	Franklin	1/11/26
7. [illegible]	6885 FORESTHAVEN LOP	DUBLIN	FRANKLIN	1/11/26
8. Schneider [illegible]	5633 Montrug	Dublin	Franklin	1-11-26
9. David Jackson	4823 Drayton	Hilliard	Franklin	1-11-26
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App.220

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Ronan (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 9 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

Signature of Circulator

1574 Riverbend Rd
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

Form No 2-E Prescribed by the Ohio Secretary of State (12/2024)

000219

Declaration of Candidacy
Party Primary Election for District Office
For Representative to Congress

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.
R.C 3513.05, .07, .08, .09, .10, .191, 3501.38, 3513.06

2026 JAN 27 AM 11:33

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is

1574 Riverbend Road (Street Number and Address (or rural route and number, if any)), Columbus (City or Village), Ohio 43223 (Zip Code), and I am a qualified elector.

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican (Political Party) Party from the 15 (District Number) District for the: (Check one) ☒ full term or ☐ unexpired term ending _____ (Unexpired Term Ending Date), at the primary election to be held on the 5 (Day) day of May (Month), 2026 (Year).

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican (Political Party) Party.

Dated this 28 (Day) day of October (Month), 2025 (Year).

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican (Political Party) Party, hereby certify that Samuel Ronan (Name of Candidate), whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1.	4064 Lohdale	Cols	Franklin	12/20/25
2.	1655 Greenridge	Cols	Franklin	12/20/25
3.	349 Hatch	Col	Franklin	12-20-2025
4.	3580 Rodney	Cols	Franklin	12/20/2025
5.	1639 Fall Brook Rd	Col	Franklin	12/20/25
6.	1635 Fall Brook Rd Col. OH. 43223		Franklin	12/20/25
7.	318 Kinnamon Col. OH 43204	HTSP	Franklin	12/27/25
8.	865 Aladdin	HTSP	Franklin	12-27-25
9.	885 Aladdin	HTSP	Franklin	12-27-25
10.	5021 Astoria	HTSP	Franklin	12-27-25

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
11. Clarissa Hylton	5021 ASTORIA	HTSP	FRANKLIN	12/27/25
12. [illegible]	854 Traci	Col OH	Franklin	12/27/25
13. Mona Ashcraft	869 Traci ct	Colu OH	Franklin	12/27/2025
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Ramm (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 13 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

[illegible]
Signature of Circulator

1574 Riverbend Rd
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

000220

Declaration of Candidacy

Party Primary Election for District Office

For Representative to Congress

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.

R.C 3513.05, 07, 06, 09, 10, 191, 3501 38, 3513 06

2026 JAN 27 AM 11:33

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (Include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is 1574 Riverbend Road (Street Number and Address (or rural route and number, if any)), Columbus (City or Village), Ohio 43223 (Zip Code), and I am a qualified elector.

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican (Political Party) Party from the 15 (District Number) District for the: Check one ☒ full term or ☐ unexpired term ending _____ (Unexpired Term Ending Date), at the primary election to be held on the 5 (Day) day of May (Month), 2026 (Year).

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican (Political Party) Party.

Dated this 28 (Day) day of October (Month), 2025 (Year).

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican (Political Party) Party, hereby certify that Samuel Ronan (Name of Candidate), whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1.	7311 Cavanee Dr	London	Madison	1-6-26
2.	79 South ST	LONDON	MADISON	1-6-26
3.	11768 Riverside Plaschiar	Mt Sterling	Madison	1-6-26
4.	2050 Palouse Dr	London	Madison	1-6-26
5.	4940 LAFAYETTE London	MONROE-AFE	Madison	1-6-26
6.	1013 Willow Creek Dr	Plain City	Madison	1/6/26
7.	285 Thomas Ct	London	Madison	1/6/26
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Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Ronan (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 7 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

Signature of Circulator

1574 Riverbend Rd

Permanent Residence Address

Columbus OH 43223

City or Village State Zip Code

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

Declaration of Candidacy

Party Primary Election for District Office

For Representative to Congress

000221

RECEIVED

2026 JAN 27 AM 11:33

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.

R.C. 3513.05, 07, .08, 09, .10, .191, 3501.38, 3513.06

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is

1574 Riverbend Road (Street Number and Address (or rural route and number, if any)), Columbus (City or Village), Ohio 43223 (Zip Code), and I am a qualified elector.

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican (Political Party) Party from the 15 (District Number) District for the: Check one ☒ full term or ☐ unexpired term ending _____ (Unexpired Term Ending Date), at the primary election to be held on the 5 (Day) day of May (Month), 2026 (Year).

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican (Political Party) Party.

Dated this 28 (Day) day of October (Month), 2025 (Year).

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican (Political Party) Party, hereby certify that Samuel Ronan (Name of Candidate), whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1	826 Albern Dr	Columbus	Franklin	12/27
2	891 Albern Dr	Columbus	Franklin	43207
3	913 Albern Dr	Cols	Franklin	43207
4	913 Albern Dr	Cols.	Franklin	12/27/25
5	5137 Meadowbrook Dr	Cols	Franklin	12/27/25
6	5156 Meadowbrook	Cols	Franklin	12-27-25
7	5154 Rangent	Cols	Franklin	12-27-25
8	5414 STRUIF CT	Col	Franklin	12-28-25
9	5353 Edgeview Rd	Colu	Franklin	12-28-25
10.	5353 EDGEVIEW	COL	Franklin N	12/28/25

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
11. Robert P Harper	1119 Hoover Park	Hamilton Twp	Franklin	12-28-25
12. Jane E Francis	1031 Meadowbrook	HTSP	FRANKLIN	12-28-25
13. Linda Sullo	1064 Belford	Hamilton	Franklin	28 Dec 2025
14. [illegible] Wood	1051 Belford	Hamilton	Franklin	12-28-25
15. [illegible]	1032 Secrest	Hamilton	Franklin	12-28-25
16. Steph Dunn	4503 Hickory Wood	Cbus	Franklin	12/28/25
17. [illegible]	4454 Hickory Woods	Col Off	Franklin	12/28/25
18. [illegible]	4392 Logwood	Lane	Franklin	12/28/25
19. [illegible]	4392 Logwood Ln	Cbus	Franklin	12-28-25
20. [illegible]	5201 Main St	Col S	FRANKLIN	12-28-25
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Roman (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 20 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

Signature of Circulator

1574 River Bend Rd
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

000222

RECEIVED

2026 JAN 27 AM 11:33

Declaration of Candidacy

Party Primary Election for District Office

For Representative to Congress

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.

R.C. 3513.05, .07, .08, 09, .10, .191, 3501.38, 3513.06

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is 1574 Riverbend Road (Street Number and Address (or rural route and number, if any)), Columbus (City or Village), Ohio 43223 (Zip Code), and I am a qualified elector.

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican (Political Party) Party from the 15 (District Number) District for the: Check one ☒ full term or ☐ unexpired term ending _____ (Unexpired Term Ending Date), at the primary election to be held on the 5 (Day) day of May (Month), 2026 (Year).

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican (Political Party) Party.

Dated this 28 (Day) day of October (Month), 2025 (Year).

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican (Political Party) Party, hereby certify that Samuel Ronan (Name of Candidate), whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1. Major E Young	361 Chatham Rd	Circleville, OH	Pickaway	1/3/2026
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Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Ruan (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 1 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

Signature of Circulator

1574 Riverbend Rd.
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

Form No. 2-E Prescribed by the Ohio Secretary of State (12/2024)

Declaration of Candidacy

Party Primary Election for District Office

For Representative to Congress

000223

To be filed with the Board of Elections of the most populous county or part county of the district not later than 4 p.m. of the 90th day before the primary election.

R.C. 3513.05, 07, .08, 09, .10, .191, 3501.38, 3513.06

2026 JAN 27 AM 11:33

Declaration of Candidacy

NOTE - The candidate must fill in, sign and date this declaration of candidacy before the signatures of electors are affixed.

I, Samuel P. Ronan,
Name of Candidate (include all prior names used in the past 5 years, excluding marriage name changes)

the undersigned, hereby declare under penalty of election falsification that my voting residence address is

1574 Riverbend Road (Street Number and Address (or rural route and number, if any)), Columbus (City or Village), Ohio 43223 (Zip Code), and I am a qualified elector.

I further declare that I desire to be a candidate for nomination to the office of Representative to Congress as a member of the Republican (Political Party) Party from the 15 (District Number) District for the: (Check one) ☒ full term or ☐ unexpired term ending _____ (Unexpired Term Ending Date), at the primary election to be held on the 5 (Day) day of May (Month), 2026 (Year).

I further declare that, if elected to this office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican (Political Party) Party.

Dated this 28 (Day) day of October (Month), 2025 (Year).

Signature of Candidate

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Petition for Candidate

This petition shall be circulated only by a member of the same political party as stated above by the candidate.

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township, set opposite our names, and members of the Republican (Political Party) Party, hereby certify that Samuel Ronan (Name of Candidate), whose declaration of candidacy is filed herewith, is in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

Signatures on this petition should be from only one county and must be written in ink. Signatures on this petition shall be of persons who are of the same political party as stated above by the candidate.

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
1.	3089 Neil Ave Columbus	Columbus	Franklin	12/21/25
2.	4071 Clearview	Columbus	"	12/21/25
3.	2327 Sonora Dr 43123	Grove City	"	12/21/25
4.	515 Oakwood Park Ave 203	Columbus	"	12/21/25
5.	5445 Westerville Rd	"	"	12/21/25
6.	5445 Westerville	"	"	12/21/25
7.	[illegible]	Hilliard		12/21/25
8.	1954 Quality Crest	Columbus	Franklin	12/21/25
9.	3567 Cypress Creek Dr	Columbus	Franklin	12-21-25
10.	~~[illegible]~~	~~[illegible]~~	~~[illegible]~~	~~12-21-25~~

Signature	Voting Residence Street Number and Address	City, Village, or Township	County	Date of Signing
11	4900 Hernden Dr	Columbus	Franklin	12/21
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WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE

Circulator Statement

Must be completed and signed by the circulator.

I, Samuel Roman (Printed Name of Circulator), declare under penalty of election falsification that I reside at the address appearing below my signature; that I am a member of the Republican (Political Party) Party; that I am the circulator of the foregoing petition containing 10 (Number) signatures; that I witnessed the affixing of every signature; that all signers were to the best of my knowledge and belief qualified to sign; and that every signature is to the best of my knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact acting pursuant to section 3501.382 of the Revised Code.

Signature of Circulator

1574 Riverbend Rd
Permanent Residence Address

Columbus OH 43223
City or Village State Zip Code

EXHIBIT
tabbies
P4
Ronan

Ana Aleida-March

400 friends

Yes, it's me, AGAIN! I'm back! Lol
My enemies call me a dirty commie. My friends do, too! lol

Add friend Message ···

Posts Photos Reels

Details

Works at Samuel Ronan Campaign

Lives in **Nuremberg**

Married

··· See Ana's About Info

Ana's posts

App.232

EXHIBIT
tabbies
P5
Ronan

3:33

Ana Aleida-March
5d ·

IT'S OFFICIAL! Samuel Ronan is on the ballot! Woot, woot!

https://vote.franklincountyohio.gov/getmedia/9486ba44-ea96-4de7-9143-238a3f82c006/2026-Primary-Candidates-Filed-List-4

Republican	COUNTY COMMISSIONER
Republican	JUDGE OF THE COURT OF COMMON
Republican	REPRESENTATIVE TO CONGRESS - 03
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	STATE CENTRAL COMMITTEE - Man ·
Republican	STATE CENTRAL COMMITTEE - Man ·
Republican	STATE CENTRAL COMMITTEE - Man ·

26 12

Most relevant

Garrett Roberts 5d by Author
That's fucking awesome.
2

Paul Ryan · 5d by Author
I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems. As long as a progressive was labeled republican, I feel like the republican voters would be like "oh hell yeah! good policies!"
4

Ana Aleida-March · 5d
Paul Ryan yup! And we're testing out theory lol
2

EXHIBIT
C1
Ronan

1. SEAL THE BORDER, AND STOP THE MIGRANT INVASION – Opposed, I believe in a streamline Immigration Process
2. CARRY OUT THE LARGEST DEPORTATION OPERATION IN AMERICAN HISTORY – Opposed, same as above
3. END INFLATION, AND MAKE AMERICA AFFORDABLE AGAIN – Agree, Inflation is largely driven by market manipulation and high interest rates
4. MAKE AMERICA THE DOMINANT ENERGY PRODUCER IN THE WORLD, BY FAR! – Agree, although this administration prefers fossil fuels, I believe we can still achieve this goal through Hydrogen, and thorium which would additionally meet the nuclear support of the platform
5. STOP OUTSOURCING, AND TURN THE UNITED STATES INTO A MANUFACTURING SUPERPOWER – Agree, we should absolutely bring back as much manufacturing and industry to America as possible
6. LARGE TAX CUTS FOR WORKERS, AND NO TAX ON TIPS! – Agree, workers pay the majority of taxes in America. This was also standard before WWII.
7. DEFEND OUR CONSTITUTION, OUR BILL OF RIGHTS, AND OUR FUNDAMENTAL FREEDOMS, INCLUDING FREEDOM OF SPEECH, FREEDOM OF RELIGION, AND THE RIGHT TO KEEP AND BEAR ARMS – Agreed, 100% agree with protecting our Constitutional Rights and liberties
8. PREVENT WORLD WAR THREE, RESTORE PEACE IN EUROPE AND IN THE MIDDLE EAST, AND BUILD A GREAT IRON DOME MISSILE DEFENSE SHIELD OVER OUR ENTIRE COUNTRY -- ALL MADE IN AMERICA – Agree, I 100% believe in global peace throughout the various areas of operation for our military. The Iran War has proven that our capabilities are technologically superior, but that we are severely depleted in stockpiles, and should develop cost efficient alternatives.
9. END THE WEAPONIZATION OF GOVERNMENT AGAINST THE AMERICAN PEOPLE – Agreed, the government should always serve the people first and foremost
10. STOP THE MIGRANT CRIME EPIDEMIC, DEMOLISH THE FOREIGN DRUG CARTELS, CRUSH GANG VIOLENCE, AND LOCK UP VIOLENT OFFENDERS – Agreed, I think the "migrant crime epidemic" is oversold, but I have a very strong policy against organized crime, up to and including declaring them terrorists and using the military to destroy them.

11. REBUILD OUR CITIES, INCLUDING WASHINGTON DC, MAKING THEM SAFE, CLEAN, AND BEAUTIFUL AGAIN. – Agreed, this directly aligns with my clean energy and America Works Programs.

12. STRENGTHEN AND MODERNIZE OUR MILITARY, MAKING IT, WITHOUT QUESTION, THE STRONGEST AND MOST POWERFUL IN THE WORLD – Agreed, technological superiority has always been the primary determining factor of sovereign strength

13. KEEP THE U.S. DOLLAR AS THE WORLD'S RESERVE CURRENCY – Agreed, the stronger our currency, especially in the global economy, the stronger our spending power and economic influence will be.

14. FIGHT FOR AND PROTECT SOCIAL SECURITY AND MEDICARE WITH NO CUTS, INCLUDING NO CHANGES TO THE RETIREMENT AGE – Agreed, Eliminating the income caps in which are eligible for taxing them is the singular most direct way to fulfill this stated goal.

15. CANCEL THE ELECTRIC VEHICLE MANDATE AND CUT COSTLY AND BURDENSOME REGULATIONS – Agreed, I believe I emphasize a focus on Hydrogen, and Thorium as the primary energy source for vehicle production, alongside fossil fuel vehicles being phased out as the other technologies become streamlined.

16. CUT FEDERAL FUNDING FOR ANY SCHOOL PUSHING CRITICAL RACE THEORY, RADICAL GENDER IDEOLOGY, AND OTHER INAPPROPRIATE RACIAL, SEXUAL, OR POLITICAL CONTENT ON OUR CHILDREN – Agreed, there should never be any curriculum that is inappropriate to our children being taught.

17. KEEP MEN OUT OF WOMEN'S SPORTS – Agreed, Cisgender Men should not compete in women's sports.

18. DEPORT PRO-HAMAS RADICALS AND MAKE OUR COLLEGE CAMPUSES SAFE AND PATRIOTIC AGAIN – Agreed, I agree with the second half of the provision, in that our campuses endure school shootings, and even a high-profile assassination of a prominent Conservative speaker. This is dangerous and unacceptable. Hamas doesn't operate in the US, as far as I am aware.

19. SECURE OUR ELECTIONS, INCLUDING SAME DAY VOTING, VOTER IDENTIFICATION, PAPER BALLOTS, AND PROOF OF CITIZENSHIP – Agreed, My universal voter registration process, includes streamlining, and securing the voting process.

20. UNITE OUR COUNTRY BY BRINGING IT TO NEW AND RECORD LEVELS OF SUCCESS – Agreed, the more prosperous a nation, the more successful her people will be!

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EXHIBIT
C2
Ronan

GOP Presidential candidate Samuel Ronan gives one-on-one interview with APR

Alabama Public Radio

Published January 9, 2024 at 4:00 AM CST

SamRonan.Com

A new candidate for the Republican presidential ballot has emerged.
is the latest person to declare his 2024 bid for the White House.

Prior to this presidential run, Ronan ran for Ohio Senate in 2022, Ohio's 1st Congressional District in 2018 and Democratic National Committee Chair in 2017. He said the reason he declared he was running so late in the Presidential race is because the current options for President are not ideal.

"What we have is a bunch of people running for office, whether it's on the left or the right, who are effectively offering the American people," he said. "Nothing new.

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same listen to your masters, follow, obey, etc.," Ronan continued. "The reason why I'm running for office this late in the game as a regular person, is to prove that it can be done. There are better ways, better opportunities, for our country to thrive, and for all of us Americans, just regular folks like you or me, to actually participate in the process."

Ronan said he chose to run on the GOP ballot for this election because his policies and values align more with that party.

"I believe my values are actually better received in the Republican Party. So, I am choosing to run as a Republican. Now, taking it a step further, I'm choosing to run as a Republican because the current cadre of candidates do not represent the needs and the ideals of the American people," he said. "In fact, the frontrunner [Donald] Trump is offering and worse, whereas the four other candidates are offering watered down versions of some or all of his policies."

Another reason Ronan said he chose to run on the Republican ballot is because the party is open to hearing new ideas from their candidates.

"The Republican Party, for all of the faults or all of its good, is open to varying ideas," he explained. "They do not prevent people from running. They do not close their primaries, and they do not deny the winner their victory so they can have their preferred candidate in place. My values match the Republican Party of yesterday. I feel that I represent the history of the Republican Party, the true value of where the Republican Party thrived back during the years," Ronan said.

One of Ronan's main policies is the . Through this program, Americans would have access to a job board and national training centers for major industries in the nation. Ronan said these training centers would help usher younger people into America's aging workforce.

"If we can train our soldiers straight out of high school how to fix multimillion dollar aircrafts and multibillion dollar ships, surely we can train our citizens how to get involved in rail, in infrastructure in fiber optics, in helping farmers," Ronan said. "There are many jobs out there, not all of them labor intensive, that are in desperate need of

trades and saying that they aren't as worthy as the bachelor's degrees and the master's and doctorate degrees."

The America Works Program is not just limited to American citizens. Ronan said he wants to allot a percentage of this program to immigrants who are working in America as well.

"We do have a border crisis. It's a humanitarian one. Our foreign policy has disrupted so many Latin American, Central American and South American nations, that they are fleeing their homes; traveling months, weeks, days across treacherous territory to make it to America for the simple hope that maybe they can survive and take care of their loved ones," Ronan said. "Of course, we can't just open our borders. Not everyone has good intentions, but what we can do is treat it as a humanitarian crisis rather than a criminal one," Ronan continued. "We can streamline the process: if you work in America and apply to the America Works program and agree to go to wherever America needs you with the skills that you provide and that you showcase, you can earn your path to citizenship, much like enlisting in the military."

Another policy Ronan feels strongly about is his . He said he plans on eliminating taxes for people who make under $100,000 a year, canceling all student and medical debt and taxing billionaires 99%.

"My goal is to eliminate any and all income taxes. All of them to include Social Security, to unfold Medicare and put paying for those things, on the wealthy on those who have 90% [and] control of all wealth in America," he said. "In so doing, we will dramatically improve the spending power of the average citizen. We will raise tens of thousands of millions of Americans out of poverty. We will be able to address the rising cost of living directly. We will be able to fully fund all of our federal and state projects and works directly by making those with the resources pay for it," Ronan continued.

He said his policy for taxing billionaires 99% comes from Former President

"In my tax vision, billionaires will not exist. If you make a billion dollars, either as an

Eisenhower, a Republican president and war hero from World War II, when he himself implemented a 94% upper percent tax rate for the $400,000 and above bracket," Ronan continued. "Meaning if you made at least $400,000 as an individual or a business, you paid 94% in taxes."

Ronan said he also plans to once he becomes President. He said police brutality in America has been a problem for many years. However, in recent years, it has escalated significantly.

"It's because policing is an institution, and our country is directly derived from the slave patrol. Our country has had such a long and insidious history of slavery and cruelty against people of other that we have always had some sort of agency in place to prevent them, the other, from prospering," Ronan said.

He said the police budget in every state can range anywhere from 30% to 60% of the state's entire budget. However, despite the high amount of money, Ronan said the police and other law enforcements do not protect citizens. He said defunding the police by half is necessary to have a more functional police system in America.

"When I talk about police reform, I'm talking about that history and our current reality, needing to be fundamentally changed. First, we defund the police. As it is, that 50% should be put toward different social programs. That'll adjust crime and drug addiction, poverty, homelessness," Ronan said. "Police shouldn't be responsible for all of that anyway, even if they weren't a corrupt institution. It's entirely too many hats to wear for one institution. There's no way you could effectively train one person to handle a psychotic break, a medical emergency, homelessness, poverty," he continued. "There's no way to address all of that in one. So, first, we take those funds and redistribute it into other programs. We then address the real issues in our communities and in our state."

Ronan said along with defunding the police, he would also enforce federal standards to ensure law enforcement is protecting citizens.

"Enforcement of federal standards and enforcement of duties is how we reform our policing in America," he explained. "But it will require some significant changes to the

continued. "Those that do not comply, the officers who resist and refuse to change and be better, will be arrested. They will suffer the consequences of their actions. Because accountability is the primary missing element in our government in our society."

Ronan said his police reform policy is also related to America's apparent

"The border crisis is simply a continuation of all these atrocities in leading into today and the actions that have been committed by the American federal government and the administration's directive them," he said. "These are human beings like you and me, who lived lives like you and me, who had jobs like you and me. Hopes, dreams and aspirations like you and me and had been torn from them because of the actions of American foreign policy," Ronan said.

Ronan said treating the border as a would allow Americans to have more empathy for immigrants.

"I think treating [the border] as a humanitarian crisis is not only the ethical and moral thing to do, but it serves all of our interests," he explained. "As Americans, as immigrants wanting to come to America and embracing the American dream, we are a nation of immigrants. We are the melting pot nation of the world. We are the social experiment. So, why would we stop that now? We should be embracing this opportunity to bring these people into our country. To help build it and rebuild it and reform it in an image that we can all participate in," he continued.

Ronan said people should vote for him because he understands the problems of today's America better than the other candidates do. He said the other candidates do not understand the plight of the American people because they have not had to live the experiences of the average American citizen.

"Why take a chance and Samuel Ronan to become the next president of the United States? Look around you. Look at the candidates that are running: Joe Biden, Donald Trump, Nikki Haley, DeSantis, Rebecca, Vivek Ramaswamy, Governor Christie, even RFK Jr," he said. "Why would you trust them to have your best interests in mind when

go through. They only see the social issues these domestic problems these foreign policies as polling numbers," Ronan continued. "They don't care, nor do they understand the absolute suffering and pain that go through with all these steps and these lots of opportunity to get into the workforce to engage in their government."

Ronan also gave his predictions for the Republican candidates and how the 2024 election will go.

"Vivek will be the first to drop out. DeSantis will be the second to drop out, and what we will see is that Nikki Haley will either close the gap between Donald Trump or she will end up becoming his running mate," he said. "I do not believe Governor Christie will end up being the nominee for the simple fact that he doesn't offer much different to the American people. His policies and views are Bush Jr., Bush Sr.-esque, and the American people are not interested in that. What they want is some sort of , and right now, the only person delivering that is Trump."

Ronan said if America's political climate remains the same, there is a chance that the nation will see a second Donald Trump presidency.

"It's not that he's popular because he's a good leader, or a viable candidate, if he's popular, because the other guy, the other person, is so detestable, so unliked and unpopular, that Trump seems like the lesser of two evils," Ronan said. "Now, on top of that, he keeps getting free media presence by being brazen. If the media treated his brazen behavior with the immaturity that it deserves, then he would not have nearly as much airtime as much presence in people's lives to be seen as viable," he continued. "The fact that he did try or allegedly tried to facilitate an , that he has so many charges and criminal indictments against him currently, this should be disqualifying outright, and yet, it isn't."

Ronan said he thinks that in Florida, from a strict abortion law to to to less restrictive gun legislation, would not hold up on a national level if DeSantis became President of the United States.

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explained. "No leader in history who burned or banned books has ever been on the right side of history, and Americans are aware of that. So, that wouldn't work," he explained. "Strict immigration policy is flying in the face of our nation's history and our core ethos in the first place. When you have so many immigrants in America regardless, that's just not going to work. And with the Don't Say Gay [law], gay people, transgender people, and everything in between, have existed for as long as humans have existed."

Ronan also said he does not believe that current President will remain in office for another four years.

"There is no national or international event that could galvanize him into remaining in the White House," he said "There is there is not a future in the entire multiverse where Joe Biden wins a second term, and it is because of his lack of agency. It is because of his will lack of inspiration It is because of his blatant corruption in violation of international law by aiding and abetting Israel's genocide and ethnic cleansing of Palestinians," he continued. "And never mind, the scandal with his son. Never mind his failure to fulfill his promises during the campaign of debt forgiveness. He has done nothing to fundamentally improve the lives of American citizens, and people are not going to be forgiving."

Ronan said he believes that Biden should retire from politics entirely.

"[Biden] is probably on his way to a nursing home, and I don't even say that derogatorily. We are seeing the early signs of dementia with the man, and I feel like it's elder abuse at this point to allow him to run into stay in office," Ronan explained. "It's only going to detrimentally impact our own national stability and standing in the world if we can't even trust the agency of our own president."

Ronan also said that while he does not know who Trump's Vice President will be if he wins the election, Nikki Haley would be the best.

"For all of his bluster, and for all of his poor views, and how horrifically his administration went... is covering the domestic issues platform solidly and that's what people like about him. He says the things that they want to hear, and then

Nikki Haley, being an ambassador and having been in the United Nations and having actually engaged with all of these foreign leaders, would be the stability."

Ronan said overall, if American politics remain the same, there will be another Trump administration which is concerning due to the age of the former president.

To learn more about Ronan's policies, visit his website

Tags

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Exhibit C

1 FRANKLIN COUNTY BOARD OF ELECTIONS
2 CANDIDATE PROTEST HEARING
3 SAMUEL RONAN
4 1700 Morse Road
5 Columbus, Ohio 43229
6
7 - - -
8
9 Friday, March 6, 2026
10 12:20 p.m.
11 - - -
12
13 BEFORE:
14 Douglas J. Preisse, Chairman
15 Meredith Freedhoff
16 Michael E. Sexton
17 Jamie Shumaker
18 Antone White, Director
19 David Payne, Deputy Director
20 Erin Gibbons, Executive Manager
21 - - -
22 Higgins & Associates
Court Reporting - Legal Video - Videoconference
23 4889 Sinclair Road, Suite 102
Columbus, Ohio 43229
24 *614.985.DEPO (3376) *888.244.1211

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18 - - -

19

20

21

22

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24

1 I N D E X

2 - - -

		Page
3		
4	Opening statements	6
5	MARC SCHARE	
6	Direct examination by Ms. Richardson	15
7	Cross-examination by Mr. Brown	20
8	SAMUEL RONAN	
9	Direct examination by Mr. Brown	45
10	Cross-examination by Ms. Richardson	57
11	Redirect examination by Mr. Brown	72
12	Recross-examination by Ms. Richardson	80
13	Further direct examination by Mr. Brown	85
14	Closing statements	95

15 INDEX TO EXHIBITS

16	P2 -	19
17	Facebook post	
18	P3 -	67
	Declaration for Candidacy	
19	P4 -	80
20	Facebook post Ana Aleida-March	
21	P5 -	83
	Facebook post Ana Aleida-March	
22	C1 -	
23	Two-page document	

24

(Exhibits Cont'd)

C1 - 2 page document 49

C2 - Alabama Public Radio 53

C3 - not admitted Letter to the Board 75

C4 - not admitted Letter to the Board 75

P-R-O-C-E-E-D-I-N-G-S

DEPUTY DIRECTOR PAYNE: The next item on the agenda is the protest hearing brought to us by Samuel -- or Samuel Peter Ronan.

CHAIRMAN PREISSE: May I say that there was an effort to disqualify Board Member Meredith Freedhoff from participating in the next matter.

Do you have anything to say about that?

MEMBER FREEDHOFF: I will not recuse myself from this matter. There's no statutory binding legal authority requiring me to do so under the facts alleged.

CHAIRMAN PREISSE: Thank you. There was also an effort or a request to dismiss. However, there was no expressed authority permitting dismissal of today's hearing. We will proceed.

Okay. We'll move on to the protest hearing of the candidacy of Samuel Peter Ronan.

Just as we conducted the previous hearing, we begin this hearing. We will allow both sides to make opening statements and we ask,

1 respectively, that both sides limit their opening
2 statements to about five minutes, and then move on
3 to the presentation of witnesses, if there are any,
4 examination, cross-examination and
5 recross-examination -- or reexamination, and so
6 we'll proceed.
7 Good morning again -- or good
8 afternoon.
9 MS. RICHARDSON: Good afternoon.
10 Thank you again for your time today. Again, I am
11 Ryan Richardson from Bricker Graydon Wyatt.
12 I am here in connection with the
13 protest of Mr. Sam Ronan as candidate. I am here
14 on behalf of the protester Marc Schare who is here
15 today, and will be testifying.
16 This presents a theme similar to
17 what we've already been talking about today. There
18 is no dispute and no question that Ohio law allows
19 candidates to change party affiliations, but again,
20 it does not allow candidates to lie.
21 Here, we have a case where the
22 candidate has very clearly been affiliated in the
23 past with the Democratic Party, and has run for
24 office as a Democrat, and has even run as a

1 candidate for the DNC Chair.
2 He has been involved with
3 associations that include socialist organizations
4 like Antifa. He is an avid and prolific poster of
5 antirepublican sentiment, and frequent criticizer
6 of the President of the United States and the
7 Administration and the Party in general.
8 But here it's not even necessary to
9 speculate as to what the motivations might be
10 because the candidate himself has expressly
11 admitted that the reason he is running for office
12 as a Republican is to game the system.
13 Back in 2017, when he was running to
14 be the DNC Chair, he openly acknowledged that it
15 was his view that the best strategy to get
16 Democrats ahead would be to have them run in
17 Republican primaries as Republican. In other
18 words, he openly stated that his strategy was to
19 have Democrats pretend to be Republicans to trick
20 voters into believing that they were voting for a
21 Republican when, in fact, they were voting for a
22 Democrat.
23 I would like to just briefly play,
24 if it's okay, a little clip of a video that is

cited and linked in its entirety in our protest. I think, if it's okay with the Board, that the easiest way would be to just allow the audio as opposed to trying to play it on the system, but I'm happy to do whatever is --

MS. HUMMER: This is only your opening statement.

MS. RICHARDSON: Correct. Okay. I will play it later, but in this video, Mr. Ronan, unequivocally states his strategy, and now we hear him repeating that strategy openly, recently and after he signed the declaration saying that he was running as a Republican and would support the Republican Party.

Ohio law does not allow that type of deception and opportunistic gamesmanship. Mr. Schare will describe his concerns about this. And ultimately, we would ask the Board to disqualify Mr. Ronan as a Republican candidate because the clear and convincing evidence demonstrates that he is not, in fact, a Republican.

And with that, I'll wait until we can present our evidence. Thank you.

CHAIRMAN PREISSE: Okay. We'll hear

from Mr. Brown.

MR. BROWN: Thank you for having me here this afternoon. It's been a long day for everyone, Mr. Chair and Board.

My name is Mark Brown, and I represent Mr. Ronan in this case. We did file a motion to dismiss. I know you procedurally ruled that was inappropriate, but part of the reason for the motion to dismiss was the protester did not sign the protest. And our argument is that for it to be a valid, timely protest, there has to be a signature on the protest. The reason for that is many fold.

In order to protest, a protester must be eligible to protest. And for this Board to determine whether he's eligible to protest or not, he needs a signature.

That's the only way they can -- the Board can decide whether or not he's even an eligible voter let alone a protester with standing to make a protest. So that is our reason to dismiss. We don't even have a valid protest here, Mr. Chair.

I would ask the Board and reiterate

1 my motion, to please dismiss this protest on that
2 ground alone. Should the Board decide to proceed
3 beyond a pretty evident procedural flaw, it's déjà
4 vu all over again because this argument was raised
5 in the last protest hearing in the Libertarian
6 matter.
7 The Ohio law is clear and the courts
8 have so ruled that there is no good faith
9 requirement. In Statute 3513.191(B) instead such a
10 -- 3513.19(B) of the Ohio Revised Code states the
11 plaintiff -- that any person may be a candidate for
12 nomination for any political party at a primary,
13 unquote. The case decided by the protester is an
14 ostensible protest, the Joe in that case in
15 particular.
16 Our case is involving party members
17 who are trying to run as independents, unaffiliated
18 candidates. Those are disassociation cases as
19 opposed to association cases. The present case is
20 an association case. It's a case where a candidate
21 wants to run as a party candidate not as an
22 independent candidate.
23 The Joe of that case, which was
24 cited by the protester, the federal district court,

1 over here, Judge Marbley -- I believe it was Judge
2 Marbley -- made it clear that the two,
3 disassociation and association standards are
4 completely different under Ohio law. For
5 disassociation, Judge Marbley ruled under this
6 statute good faith is required. The candidate must
7 make a good faith showing that she is
8 disassociating herself from her party to be an
9 independent.
10 When a candidate is simply running
11 for another party's primary, Judge -- I believe it
12 was Marbley -- stated there is no similar
13 requirement for a partisan candidate to show that
14 the change in party affiliation was made in good
15 faith. That's the law in Ohio and the United
16 States Court of Appeals of the Sixth Circuit
17 affirmed that ruling on that particular ground.
18 So there is really no doubt that
19 under Ohio law from 3513.191(B), the protester's
20 argument collapses. The entire argument is based
21 on a lack of good faith, claiming the candidate,
22 Mr. Ronan, is not a sincere candidate. That's good
23 faith. That's not required. Therefore, the
24 protest, again, should be dismissed out of hand.

1 The reason Ohio makes that
2 distinction, is extremely important. It's the
3 Constitution of the United States under the First
4 Amendment and under the Federal Elections Clause in
5 Article 1 Section 4. Because this is a
6 congressional election, The Supreme Court has said
7 that state procedures, including the procedures
8 before this Board, cannot be used to test the
9 ideology of a party candidate. The ideology of a
10 party candidate can only be tested by the voters in
11 the primary -- that's what primaries are for -- or
12 by the party itself.
13 There's no mechanism under Ohio law
14 for the party itself to do it. Instead Ohio is a
15 primary state. The Ohio Constitution requires
16 primaries. The voters are the ones to decide
17 whether Mr. Ronan is a Republican or not.
18 Therefore, should this Board decide
19 it wants to get into the credibility, the
20 sincerity, the good faith, the ideology of
21 Mr. Ronan, it's violating the Federal Constitution.
22 It's violating the First Amendment. It's violating
23 the Federal Elections Clause.
24 So for that ground too, we ask that

this protest be dismissed. Thank you.

CHAIRMAN PREISSE: Thank you. Okay. We will proceed to the next step, which is your evidence or witnesses.

MS. RICHARDSON: Do I have a rebuttal opportunity, or should I go ahead and move to the witnesses? I would like rebuttal if it's permitted.

MS. HUMMER: I believe they're not entertaining the motion to dismiss. So unless you just want to put more on the record, we are -- I believe the Board has already indicated that they are proceeding with the hearing.

CHAIRMAN PREISSE: Yeah, we did.

MS. RICHARDSON: Okay. Thank you. That -- that is fine. We certainly do have responses, and we agree --

CHAIRMAN PREISSE: It doesn't sound like we need it on that particular point.

MS. RICHARDSON: And I'm willing to rest on that, given that the Board has decided to deny the motion to dismiss. Thank you.

CHAIRMAN PREISSE: Okay.

MS. RICHARDSON: And with that then,

I would call Mr. Schare, and if it is okay with the Board, I will stand up here and allow him to be seated while I question him.

MS. HUMMER: Well, we need to have him on the mic so individuals can hear it on Zoom.

CHAIRMAN PREISSE: Can we -- can we move the mic and the chair?

MS. RICHARDSON: It does look like this maybe comes out of the...

MR. SCHARE: I may be able to lean on this.

CHAIRMAN PREISSE: It looks like we can get a chair there.

MR. SCHARE: I can stand answering questions. Getting old sucks, guys. I just can't stand for, like, more than two minutes at a time, so...

CHAIRMAN PREISSE: You make yourself as comfortable as you can -- we're fine as long as -- the audio is necessary. We can move the mic.

MR. SCHARE: Yes, sir.

MS. RICHARDSON: Is it best if I stand here so I'm not blocking? Everyone can hear me if I'm standing away from the podium? Okay.

Thank you.

MARC SCHARE

being first duly sworn, by me as hereinafter certified, testifies and says as follows:

DIRECT EXAMINATION

BY MS. RICHARDSON:

Q. Good afternoon, Mr. Schare. Mr. Schare, are you affiliated with a political party?

A. I am.

Q. What party are you affiliated with?

A. I am a Republican.

Q. And do you intend to vote in the upcoming May 2026 primary?

A. Yes, ma'am.

Q. Do you intend to ask for a partisan ballot at that primary?

A. Yes, ma'am.

Q. Which ballot do you intend to request?

A. A Republican ballot.

Q. Thank you. I am going to hand you what has been premarked as Exhibit 1, and this is the protest in this case. I do have extra copies

if the Board would like additional copies of the protest that was filed.

MEMBER FREEDHOFF: We have it.

MS. RICHARDSON: Thank you.

BY MS. RICHARDSON:

Q. Mr. Schare, have you seen that document before today?

A. Yes, I have.

Q. What is this document?

A. It's a protest filed against Sam Ronan's candidacy.

Q. And have you reviewed that protest prior to today?

A. Yes, ma'am.

Q. Does that protest in front of you represent your views and concerns about the candidacy of Mr. Ronan?

A. Yes.

Q. I would like for you to turn to page 4 of the exhibit, and near the bottom of the page, if you look to where the sentence starts with "If Ronan is permitted to appear." Do you see that?

A. Yes, ma'am.

Q. Would you mind reading that statement?

A. "If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to support and abide by the principles of the Republican Party is meaningless."

Q. Does that accurately represent your views standing here today?

A. Yes, it does.

Q. I would like to step back for just a moment and talk about the background that ultimately led you to being here in support of this protest today.

How did you find out that Mr. Ronan was running as a Republican candidate for this office?

A. Okay. So I'm on the Franklin County Republican Central Committee. Part of my responsibilities on that committee is to serve on the legislative screening committee. So the purpose of that committee is to screen candidates for potential endorsement.

As part of that job, I looked at the

filings. I saw that Mr. Ronan had filed as a Republican. I contacted the chairperson of the committee, and in fact, the chairperson of the Republican Party, and asked why Mr. Ronan was not screening. And I received a response along the lines of, "This guy, he's not a real Republican. He's a Democrat."

Q. I'm sorry. If I may. Were there specific things that you saw online with respect to Mr. Ronan that gave you concern?

A. Well, we're getting there. So, after I saw this, again, as part of the screening committee's responsibility, I did start looking online. And sure enough, I saw Mr. Ronan's own Facebook posts that essentially said that -- I guess I'm going to paraphrase. I apologize for that. But the path to success for Democrats in red districts is to run as Republicans in Republican primaries, and I did a Facebook post about this myself about three days ago -- three days ago.

Q. I'm going to hand you what has already been submitted to the Board as Exhibit A, which is a Facebook post; and I understand that online this may not be the exact post, but I'm

1 going to ask you if this is substantively similar
2 to what you saw?
3 Again, I do have copies of this, but
4 this is Exhibit --
5 DIRECTOR WHITE: Could you hand that
6 out to the Board? This is not in the packet.
7 MS. RICHARDSON: This is not in the
8 packet? Thank you.
9 DIRECTOR WHITE: This is not.
10 CHAIRMAN PREISSE: So is this
11 something new to us that she should mark?
12 MS. RICHARDSON: This was submitted
13 as an exhibit to the protest, but it sounds like
14 you may not have it before you.
15 DIRECTOR WHITE: It's not in your
16 packet. Why don't we mark it as an exhibit then
17 for this purpose, and then we can pass out copies
18 to the Board.
19 MS. RICHARDSON: I will mark this as
20 Exhibit 2.
21 (Exhibit P2 was marked for identification.)
22 BY MS. RICHARDSON:
23 Q. Mr. Schare, that Facebook post
24 that's in front of you, is that substantively

similar to what you saw that gave you concern?

A. Yes, it is.

Q. And would you mind reading to me from that post the part that gave you the concern specifically?

A. Okay. I'll quote slowly for the reporter. "I believe I very clearly mentioned in that very same DNC Chair race the Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door."

MS. RICHARDSON: Thank you. I have no further questions at this time.

Thank you, Mr. Schare.

MEMBER FREEDHOFF: Thank you.

CHAIRMAN PREISSE: Okay. We can move to cross-examination.

MR. BROWN: Is it okay for me to approach the witness?

THE WITNESS: I'll stand.

MR. BROWN: However you're comfortable, Mr. Schare, please.

CROSS-EXAMINATION

BY MR. BROWN:

Q. Good afternoon, Mr. Schare. My name is Mark Brown. I represent Mr. Ronan who is the candidate for the protest. Pleasure to meet you today.

If you can't understand me or have trouble with my questions, as I sometimes have troubles with answers, please, you know, let me know. I'll speak up or rephrase the question.

I believe counsel presented you with the protest, a copy of the protest, that you actually filed against Mr. Ronan in this case; is that correct? Do you still have that in front of you?

A. Yes, sir.

Q. Did you write this protest?

A. I did not.

Q. Who wrote this protest?

A. Counsel.

Q. Counsel. Did you sign this protest?

A. I did not.

Q. Did you deliver this protest to the Board of Elections?

A. I did not.

Q. Do you know how it was delivered to the Board of Elections?

A. I would assume email. I don't know. I don't.

Q. And one of the reasons I ask is because the address block is the wrong address. It says 22 North Fourth Street, which is not the proper address.

Are you certain this was timely delivered to the Board of Elections?

MS. RICHARDSON: I'm going to object. The motion to dismiss has already been ruled on, and this is not relevant. These are not requirements that are in the Revised Code; and, again, has already been resolved.

CHAIRMAN PREISSE: If that's what you're getting at, Counsel, maybe sounds like we could move past it.

MR. BROWN: Well, it's not like because the motion to dismiss was not granted, doesn't mean we couldn't get summary judgment at the end, Mr. Chair. This evidence is still relevant to your decision, especially the lack of a signature.

MS. RICHARDSON: If I may respond to that?

CHAIRMAN PREISSE: Yes.

MS. RICHARDSON: There is no requirement in the Revised Code there be a wet signature or that the protester, him or herself actually be the one to deliver.

The Revised Code clearly states that the protest needs to be in writing, timely submitted and by the protester who is a member of the same party. Those are satisfied here, and the Board has already correctly determined that there is no basis for a dismissal on any of those grounds.

CHAIRMAN PREISSE: We had been advised by counsel which led us to the dismissal.

MS. RICHARDSON: Thank you.

MR. BROWN: Thank you, Mr. Chair. I'll move on.

CHAIRMAN PREISSE: Okay. Thank you.

BY MR. BROWN:

Q. I believe, Mr. Schare, you testified on questions from counsel that you are a current member of the Franklin County Republican Party; is

that correct?

A. Yes, sir.

Q. You are a member of the central committee; is that correct?

A. Yes, sir.

Q. In that capacity, you stumbled upon the candidate's petition in this case and became concerned; is that correct?

A. I wouldn't say stumbled upon. We do look at all candidates.

Q. How did you receive -- if you didn't stumble upon it, how did you receive the petition, Mr. Ronan's petition?

A. I've never seen the petition.

Q. You've never seen the petition?

A. No, sir.

Q. And yet you're protesting the petition?

A. Yes, sir.

Q. I believe you testified that you contacted someone at the Franklin County Republican Party?

A. Yes, sir.

Q. Who did you contact?

A. Tim Rankin.

Q. Tim Rankin. And is Mr. Rankin -- what capacity is he joined with the FCRP?

A. He is the Chair of the Franklin County Republican Party Central Committee.

Q. Central committee. Did he give you advice on how to proceed in this matter?

A. He did not.

MS. RICHARDSON: Objection. This entire line of questioning is irrelevant to the issues before the Board today.

MR. BROWN: It's very relevant, Mr. Chair.

CHAIRMAN PREISSE: Maybe you can help us by getting to how it's relevant. Seems to me the matters as they lay before us were judged on the basis of the material before us not necessarily how they got to us, but please proceed.

MR. BROWN: I believe the motivation to the protester is extremely relevant in this case.

CHAIRMAN PREISSE: Maybe you can briefly back that up.

MR. BROWN: Sure. I'll proceed

1 directly to the motivation.
2 BY MR. BROWN:
3 Q. Do you know Mike Carey?
4 A. I do know Mike Carey, yes.
5 MS. RICHARDSON: I'm going to
6 restate my objection. There is no grounds for
7 going into the motivation of the protester. The
8 question is whether the protest itself that is
9 before you represents a basis for disqualification.
10 So we are here to talk about whether Mr. Ronan's
11 candidacy is valid, not about how the witness got
12 to his protest.
13 MS. HUMMER: If I may assist the
14 Board, this is a quasi judicial hearing; however,
15 the rules of evidence are relaxed as indicated in
16 previously asked questions. Some of those
17 motivation questions were asked previously. I
18 think giving both sides the opportunity and some
19 flexibility in their presentation is permitted.
20 MS. RICHARDSON: Thank you.
21 CHAIRMAN PREISSE: Thank you.
22 Please proceed in the environment we're working in.
23 MR. BROWN: I'll be -- I'll be
24 quick, I'm sure, Mr. Chair.

CHAIRMAN PREISSE: Thank you.

BY MR. BROWN:

Q. I think my last question is, do you know Mr. Mike Carey?

A. Yes, sir.

Q. Are you personal friends with Mr. Mike Carey?

A. No, sir.

Q. I'm sorry?

A. No, sir.

Q. Did you talk to Mr. Mike Carey about filing this protest?

A. No, sir.

Q. I'm sorry. One time?

A. No.

Q. No. Are your lawyers here by chance?

A. Yes, sir. Yes.

Q. Did you hire these lawyers?

A. I did not.

MS. RICHARDSON: Again, I'm going to object on the relevancy grounds.

MR. BROWN: This is extremely relevant, Your Honor.

MS. RICHARDSON: I'm not sure how the relationship we have indicated today and the witness has confirmed that we are here as his counsel, I'm not sure where this is going; but it doesn't seem to have any relevance to the protest.

MS. HUMMER: Historically, the Board has never allowed questions regarding who was paying what lawyer.

CHAIRMAN PREISSE: That is the first I can recall that we've delved into those depths.

MS. HUMMER: To the question at hand, it is not relevant.

MR. BROWN: Mr. Chair, we've raised the constitutional defense here under the First Amendment to the United States Constitution and under the Federal Elections Clause.

CHAIRMAN PREISSE: What does that have to do with who's paying what lawyer?

MR. BROWN: It's in the constitutional issues. Your Honor, in order to establish a constitutional violation, we have to establish state action. So whose behind this could very well establish state action. This has been thoroughly litigated in Ohio in a line of cases and

1 the Libertarian Party back in 2014 through 2018.
2 CHAIRMAN PREISSE: Do you wish to
3 summarize your objection, and then we'll ask you to
4 proceed in the environment that we're interested
5 in?
6 MR. BROWN: Certainly.
7 CHAIRMAN PREISSE: In the economy of
8 time and brevity to the point.
9 MS. RICHARDSON: Initially, my
10 understanding of the question was about, again,
11 whether we are here as his counsel, which we
12 already indicated we are. It sounds like as the
13 back and forth has gone on that it is an actual
14 question of details that may relate to the
15 attorney-client privilege. So we would add that
16 objection as well to the extent that there are
17 going to be any questions that go into our
18 discussions or advice or conversations that we have
19 had that would be protected by attorney-client
20 privilege.
21 MR. BROWN: I would not inquire of
22 any conversations, but the money paid to a lawyer
23 and the fact of representation is not protected by
24 the attorney-client privilege, and I can -- I

1 brought the cases with me if you want me to share
2 them with you.
3 MS. RICHARDSON: I --
4 CHAIRMAN PREISSE: Yeah. Go ahead.
5 MS. RICHARDSON: I would just again
6 reiterate that there is -- we can go back and forth
7 and talk about the privilege and the scope of the
8 privilege, but I do think that entire exercise is a
9 waste of this Board's time, if I may respectfully
10 state, because none of this is relevant; and I
11 respectfully -- counsel has not sited to any theory
12 or authority that would suggest that this has any
13 bearing on the validity or merits of the protest.
14 CHAIRMAN PREISSE: How much more
15 time do you think is sufficiently required to
16 finish your cross-examination?
17 MR. BROWN: Two minutes.
18 CHAIRMAN PREISSE: Okay. Why don't
19 you proceed?
20 BY MR. BROWN:
21 Q. I think the question was, did you
22 hire your lawyers?
23 A. Did I hire them initially?
24 Q. Initially, yes?

A. Not initially, no.
Q. Are you paying your lawyers?
MS. RICHARDSON: Again, same objection.
MS. HUMMER: I think it's already been determined that the Board is not interested in the payment process.
CHAIRMAN PREISSE: That's true.
MR. BROWN: Again, this is extremely important to my constitutional defenses.
CHAIRMAN PREISSE: Is it required that Marc answer those questions, or could you just proceed?
I don't know that Marc has to -- Mr. Schare has to answer your question. You can proceed when you've determined he hasn't said anything.
BY MR. BROWN:
Q. Please, Mr. Schare.
A. I'm confused. Should I answer the question?
Q. Are you paying your lawyers?
MS. HUMMER: I think he already indicated he has not, and his counsel has advised

him not to answer that question.

MEMBER FREEDHOFF: Let's move on.

BY MR. BROWN:

Q. Do you know who is paying your lawyers?

A. I do not.

Q. Are you familiar with the Ohio Rules of Professional Conduct? Are you a lawyer?

A. I am not.

Q. Are you familiar with 1.18(F) of the Ohio Rules of Professional Conduct?

MS. RICHARDSON: Objection.

MR. BROWN: Those rules require that lawyers inform their clients who's paying the bill.

CHAIRMAN PREISSE: Go ahead, please.

MS. RICHARDSON: Again, we are going down a very off-track path here; and certainly, if there is any question about the ethics and the appropriateness of our representation, we would happily have a conversation with counsel offline, but that does not seem appropriate to take up this Board's time or this witness' time and has no bearing on the protest.

CHAIRMAN PREISSE: That makes sense

to us.

MR. BROWN: It's important for the Board to know this information, Mr. Chair.

CHAIRMAN PREISSE: I think you, perhaps, established what you were trying to, right? Maybe?

MR. BROWN: I'm getting closer. I'm trying to establish the full record, frankly, Mr. Chair.

CHAIRMAN PREISSE: Can you finish in a minute?

MR. BROWN: I can finish in a minute.

CHAIRMAN PREISSE: Okay. Thanks.

BY MR. BROWN:

Q. Is the Mike Carey campaign paying your lawyer?

A. I have no idea.

Q. Is it possible?

A. Anything is possible.

Q. Well, is the --

MS. RICHARDSON: Objection. He's asking for speculation. And, again, from our standpoint, we are very comfortable that we have

1 followed all ethical rules; and we would be happy
2 to discuss further Mr. Brown's concerns in that
3 regard; but we don't think this is the appropriate
4 forum to do that.
5 CHAIRMAN PREISSE: Okay. Thank you.
6 I would ask you to summarize it, if you can, sir.
7 MS. HUMMER: I think the Board has
8 already indicated that they are not going to
9 entertain any further questions regarding the issue
10 of payment for lawyers' services and the
11 representation.
12 If there is a concern, that -- those
13 questions can be directed to disciplinary counsel,
14 which is the proper forum. This forum is going to
15 the issue of whether this protest should be denied
16 or approved, and any issues regarding that should
17 be those questions which are what the Board is
18 interested in.
19 MR. BROWN: Fair enough. My summary
20 is just as likely that the Carey campaign is
21 financing this protest as given the evidence we've
22 uncovered.
23 CHAIRMAN PREISSE: Okay.
24 MS. RICHARDSON: I would just

1 restate for the record, whether or not any
2 particular person is paying has absolutely no
3 bearing on the validity of this protest and would
4 not be problematic.
5 Mr. Brown has not indicated any
6 authority or reason that that would be relevant to
7 the issues before this Board today.
8 MR. BROWN: I'm trying to establish
9 the authority and the reasons, but she keeps
10 objecting.
11 CHAIRMAN PREISSE: Perhaps, in other
12 forums, those matters could be -- I tried to say
13 several minutes ago -- irrespective of how the
14 material came to us or who paid for it or not,
15 we're certainly welcome to accept as we have all
16 day so far, new evidence.
17 I think the Board will likely judge
18 these matters based upon the evidence given and
19 before us.
20 MR. BROWN: Fair enough. I'll move
21 on, Mr. Chairman.
22 CHAIRMAN PREISSE: Thank you.
23 BY MR. BROWN:
24 Q. Mr. Schare, did counsel give you an

exhibit marked as number 2? And I think I see it still there on your desk.

A. Yes, sir.

Q. Do you have that?

A. Yes, sir.

Q. I believe you read the first paragraph following the name Samuel Ronan. I think you read that into the record?

A. Yes, sir.

Q. Could you skip down to the third paragraph and the fourth paragraph and read those, please?

A. It says, quote, "That said, I am not fighting on behalf of the traitorous Democrats who JUST crossed the party line to vote for MORE ICE funding.

I'm not a grifter. I'm running for the office in the party of the dominant district fighting for the working class."

Q. Who wrote that?

A. Ostensibly Sam Ronan.

Q. Ostensibly, but you weren't communicating with him?

A. No. This is on a -- on an unrelated

page.

Q. I'm sorry. This was what?

A. He posted this to the Grove City Area Progressive page. It's, you know, a liberal page in Grove City. I found it. I copied it.

Q. Oh, so you don't know if any of this was actually --

A. I'm assuming that it was. I -- I -- I look at Facebook, so you don't know.

Q. But you read the first paragraph --

A. Yes, sir.

Q. -- at counsel's direction and indicated that was something Mr. Ronan said?

A. I indicated that there was something that was on Facebook attributed to him.

Q. But you have no idea if he said that or not?

A. I have no idea if on Facebook if anything can be attributed to that.

Q. But you use Facebook?

A. Say again, please.

Q. You use Facebook?

A. Yes, I do.

Q. On a regular basis; is that true?

A. Yes, it is.

Q. Did you ever say on Facebook, "I don't blame Ronan or Democrats for doing this? They are playing the game according to the rules. I blame the rules. Ohio's open primary system allows for this kind of thing"?

Do you remember saying that?

A. Yes, sir.

Q. So you, yourself, have recognized that Mr. Ronan's candidacy is consistent with Ohio's rules?

A. So at the time that I wrote that, yes. Subsequent to that, I had what we in the software business refer to as an "aha moment." I'll explain that.

I remembered the declaration of candidacy, and I remembered that because I had to sign it, I think only on six or seven times now to get certified to the ballot for the Republican Party Central Committee. And I got to wondering, you know, how can this be? Because his statement would be inconsistent with what he's --

Q. Which statement?

A. Sorry. His declaration of candidacy

stating that he agrees to abide by the principles of the Republican Party would be inconsistent with virtually everything that he's ever written.

So I started -- I started down that road. I started doing research, and here we are.

Q. So you changed your mind?

A. With new information.

Q. With new information?

A. Yes, sir.

Q. At one time, you did recognize that everything he did was proper?

MS. RICHARDSON: Objection. That's mischaracterizing his testimony.

THE WITNESS: I'll answer the question. I incorrectly thought -- I mean, that statement was erroneous.

BY MR. BROWN:

Q. Are you a student of history? Especially in the American political system?

A. I wouldn't characterize myself as that.

Q. Isn't it very common for American politicians to change parties?

MS. RICHARDSON: Objection.

BY MR. BROWN:

Q. Do you know?

CHAIRMAN PREISSE: Go ahead, Counsel. What are you objecting on?

MS. RICHARDSON: I'm objecting on the fact that the question is vague and also irrelevant, again, to the issues before this Board.

CHAIRMAN PREISSE: You laid that out in your response to the protest, so...

MR. BROWN: I filed with the Board, and I hope you have it, the history of changing party --

CHAIRMAN PREISSE: You have.

MR. BROWN: Do you have copies of that?

CHAIRMAN PREISSE: Yes, we do.

MR. BROWN: And the Board recognizes the pro/cons?

CHAIRMAN PREISSE: It's common that people change their mind. Please proceed.

MR. BROWN: Bear with me, Mr. Chair.

CHAIRMAN PREISSE: Sure.

MR. BROWN: Just a couple more questions, Mr. Chair.

BY MR. BROWN:

Q. You've been in politics how long now?

A. I've been a member of the central committee for 12 years. I made my first run at public office in 2001, and proudly served on the Worthington School Board.

Q. So over 20 years in some official capacity; is that correct?

A. Give or take.

Q. You've seen the Republican Party change quite a bit?

A. I've seen both parties change quite a bit.

Q. The two major parties have evolved; isn't that true?

A. I guess it depends on the definition of evolved, but I wouldn't contest that statement.

Q. The Republican Party today is not the same party it was in 2001, is it?

MS. RICHARDSON: Objection.

CHAIRMAN PREISSE: Yeah. Go ahead.

MS. RICHARDSON: And so, again, I'm not sure what is meant by that question. It is

1 vague and ambiguous, and Mr. Schare's views, the
2 views of the party as a whole, are not before this
3 Court today. The issue is Mr. Ronan's candidacy.
4 CHAIRMAN PREISSE: Yeah, I think
5 you're still getting a motivation or some --
6 MR. BROWN: I mean, the principles
7 of the Republican Party are before this Board
8 because she is asking this Board to find that
9 Mr. Ronan is not in step with the principles of the
10 Republican Party. So we need to figure out what
11 those are in order to figure out if he's in step.
12 MS. RICHARDSON: That is -- that is
13 not the basis of our protest. We have never
14 questioned Mr. Ronan's particular issues or
15 suggested that his issues should be evaluated.
16 The basis of the protest and what
17 Mr. Schare has testified here today is that
18 Mr. Ronan has openly, publicly stated that he is
19 strategically trying to game the system, and I
20 believe that's improper.
21 CHAIRMAN PREISSE: I think the back
22 and forth, it's getting to be what ought to be
23 examination and cross-examination falling on your
24 protest. So, again, I guess we would ask you,

Counsel, to move it on.

MR. BROWN: Move on.

MS. RICHARDSON: Thank you.

MR. BROWN: I think that's all for now. Thank you very much, Mr. Chair.

CHAIRMAN PREISSE: Thank you. And sorry, Marc. I think -- do you wish to reexamine?

MS. RICHARDSON: I have no redirect.

CHAIRMAN PREISSE: Okay.

MS. RICHARDSON: Thank you, Mr. Schare.

CHAIRMAN PREISSE: Thank you, Marc. Thank you, Mr. Schare.

MEMBER SHUMAKER: Thank you.

CHAIRMAN PREISSE: Okay. Where are we? Are we at candidates?

MS. HUMMER: It's the protest. Call your next witness.

MS. RICHARDSON: We have no further questions and no further witnesses. It is our understanding that Mr. Ronan will be testifying. We do have questions for him, but we're fine to bring those up on cross if that is acceptable to all involved.

CHAIRMAN PREISSE: Yes.

MEMBER FREEDHOFF: When do we see the video you mentioned?

MS. RICHARDSON: I expect that I will play it while Mr. Ronan is on the stand.

MEMBER FREEDHOFF: Okay. Thank you.

CHAIRMAN PREISSE: Sounds appropriate.

MR. ZAGROCKI: And probably motion to admit the evidence.

CHAIRMAN PREISSE: So this document, Grove City Area Progress, we'll admit to evidence. I move.

MS. HUMMER: I think it should be all submitted documentation to the Board and current exhibits, move to admit those.

CHAIRMAN PREISSE: All current documentation which has been submitted to the Board pertinent to this case as well as the document I'm holding in my hand, Grove City Area Progress, which was already admitted, but let's mark it anew -- I think you have -- move to admit that as evidence.

MEMBER SEXTON: Michael -- Mr. Chairman, Michael Sexton, I'll second the

motion.

DEPUTY DIRECTOR PAYNE: All of those in favor of the motion, signify by saying aye.

(All members of the Board voted in favor by saying aye.)

DEPUTY DIRECTOR PAYNE: All opposed, same sign.

Motion carries.

MS. RICHARDSON: Thank you.

MS. HUMMER: For all of the parties, so that you understand, everything you have submitted to the Board is now in their evidence and for the record.

MS. RICHARDSON: Thank you.

MR. BROWN: Mr. Chair, I call Mr. Samuel Ronan.

CHAIRMAN PREISSE: Okay. Thank you.

MR. RONAN: So I also --

COURT REPORTER: I need to swear you in.

MR. RONAN: That too. Absolutely.

SAMUEL RONAN

being first duly sworn, by me as hereinafter certified, testifies and says as follows:

DIRECT EXAMINATION

BY MR. BROWN:

Q. I believe, Mr. Ronan, you wanted to make a statement?

A. Yes.

CHAIRMAN PREISSE: First, tell us who you are for the record.

THE WITNESS: I am so sorry. This is why I have counsel. So can you hear me? Perfect.

So my name is Samuel Ronan. Is that all I need to say? Can I say more?

CHAIRMAN PREISSE: What's your address?

THE WITNESS: 1574 River Bend Road, Columbus, Ohio 43223.

CHAIRMAN PREISSE: Thanks.

Counsel, you were saying you wanted to make a statement before making a statement?

MR. BROWN: He wants to make a statement before.

CHAIRMAN PREISSE: Frame it as a direct.

MS. HUMMER: I would -- you need to

1 frame it. You're in direct examination of the
2 witness you called. You've already given an
3 opening statement. So if you want to open --
4 THE WITNESS: I mean, this can be a
5 closing statement too.
6 MR. BROWN: Just hold on to it.
7 BY MR. BROWN:
8 Q. You already stated your name for the
9 Board, Mr. Ronan; is that correct?
10 A. Yes, sir.
11 Q. Mr. Ronan, did you file a nominating
12 petition with the Board of Elections?
13 A. Yes, sir.
14 Q. Did you sign the nominating
15 petition?
16 A. I believe there were seven that I
17 signed, yes, sir.
18 Q. Was the nominating petition in the
19 proper order?
20 A. I believe so, yes, sir.
21 Q. Did you have a sufficient number of
22 signatures?
23 A. Thanks to the Franklin County Board
24 who sent me that wonderful letter that I was

1 looking forward to.
2 The Franklin County Board of
3 Elections conducted a meeting at 3:00 p.m. on
4 Tuesday, February 17, 2026 and certified my name
5 for placement on the May 6, 2025 [sic] Primary
6 Election ballot for the office of Representative to
7 Congress 15th Congressional District.
8 So I hung this on my fridge
9 actually, so...
10 Q. I believe the Board has copies of
11 that, of that document.
12 MS. HUMMER: So you need to mark it
13 as an exhibit if you want to have it as part of the
14 record.
15 MR. BROWN: It should already be
16 part of the record.
17 MS. HUMMER: Okay. I just wanted to
18 make sure.
19 MR. BROWN: I don't want to be too
20 redundant.
21 MS. HUMMER: Okay.
22 CHAIRMAN PREISSE: Okay.
23 BY MR. BROWN:
24 Q. In your petition, did you declare

that you are prepared to support and abide by the principles as enunciated by the Republican Party?

A. I did. I also prepared -- I don't know how to phrase it, but I went and compared my personal beliefs to the ratified Republican Committee platform of 2024, and I did a one for one of those platform positions and where I stand on those issues. And it turns out, I'm 80 plus, 85 percent in agreement with the platform. A majority of the platform is very highly economic focused on working class.

Republican Trump also enumerated as much, focusing on populus idealism with a bit of conservative slant, and I have no qualms against that.

So I can read them into the record, but I also have four copies for the Board.

MR. BROWN: Yes. I just handed to Mr. Ronan a document that he had prepared summarizing his position, his political positions consistent with the Republican Party, and I've given counsel copies.

I didn't bring enough copies unfortunately for everyone. So if you could make

copies of this and distribute to the Board, and I'm going to move that be introduced into evidence.

MS. HUMMER: You can proceed with questioning. We can go back to it.

THE WITNESS: So hold on to this.

(Exhibit C1 was marked for identification.)

BY MR. BROWN:

Q. Mr. Ronan, look at it in front of you. How many -- count the number of agreements you have with the Republican Party.

CHAIRMAN PREISSE: What's the document in front of him again?

MS. HUMMER: They're making a copy for the Board.

CHAIRMAN PREISSE: Right. But what is it?

THE WITNESS: Just a one for one comparison to the Republican platform and my personal views on it, as in I agree with it.

CHAIRMAN PREISSE: Where is the material from?

THE WITNESS: To prove that --

CHAIRMAN PREISSE: This is material you drew from a website that is RNC or the

Republican National platform, is that what --

THE WITNESS: Yes, sir. I Googled -- just to be on -- above board as possible, I went to the RNC's committee website, their home page, scrolled down, I think it's the second thing, the second link on there. It says to go to the 2024 ratified platform, and it opened up a PDF file.

And it had 20 major platform issues as statements, and that is what I'm basing all of my arguments on that I'm more than happy to compare myself as a Republican. And to your point, sire, it is 18 agrees, two disagrees, which would be actually 90 percent.

BY MR. BROWN:

Q. So you agree with the current principles of the Republican Party?

A. And I'm happy to enumerate them as written, why I would or would not.

Q. No. We don't need to go that far.

When you signed the declaration that you would abide by the principles of the Ohio Republican Party --

A. Yeah.

Q. -- was that true?
A. It was. It was -- I also wanted to make doubly triply sure I wasn't remembering a different platform.
Q. Is it still true?
A. Still true, absolutely.
Q. Have you been in the past affiliated with the Democrat Party?
A. Yes, I have, in the past.
Q. How about the Green Party?
A. I did offer some advice from having ran for office before, but I never voted as a Green. I never ran as a Green.
Q. How about a Libertarian?
A. I don't believe so.
Q. Those are the only parties in Ohio. Have you voted in any primaries in Ohio since 2020?
A. No, sir, not since 2020.
Q. Have you voted in any state's primaries in 2020?
A. No, sir, I did not.
Q. Are you presently domiciled here in Ohio?
A. I am.

Q. Are you registered in Ohio to vote?
A. I am.
Q. Are you going to vote, and do you intend to vote in the Ohio Republican Primary?
A. Absolutely.
Q. Have you ever before run for a Republican office?
A. I have. I ran for US House of Representatives in 2018 in the First Congressional District against Steve Chabot for much of the same reasons I'm running against Mike Carey.
Q. Did you ever run for President?
A. Yes, I did. I ran a protest campaign against Donald Trump because although I do agree with the populism and the mandate that was espoused, I felt there were different ways of approaching that and felt that my voice could have been linked to the American people who may or may not have agreed.
Q. Mr. Ronan, I'm going to hand you a news article.
MR. BROWN: Again, I apologize. I did not get copies for everyone, but I would like to have copies. I'll have that moved into

evidence. There are nine pages.

DIRECTOR WHITE: Do you have anything else you need copied?

MR. BROWN: That's it. I swear.

DIRECTOR WHITE: Thank you.

MR. BROWN: I'm sorry.

DIRECTOR WHITE: That's okay.

(Exhibit C2 was marked for identification.)

BY MR. BROWN:

Q. Were you, in fact, interviewed for this article? And I'll hand you a copy.

A. Yes. This was one of many interviews that I conducted during that time.

Q. Did you in that interview disclose the reasons for your running as a Republican?

A. Yes.

Q. If you flip the page there, I think you'll see -- could you read the relevant language into the record?

A. So the question was Ronan said he chose to run on the GOP ballot for this election because his policies and values align more with that party.

And then quote, "I believe my values

are actually better received in the Republican Party. So, I am choosing to run as a Republican. Now, taking it step further, I'm choosing to run as a Republican because the current cadre of candidates do not represent the needs and the ideals of the American people. And, in fact, the frontrunner Donald Trump is offering -- and in those words a the time -- despotism dictatorship and worse, whereas the four candidates are offering watered-down versions of some or all of this policies."

I would like to, again, reiterate that I was extremely critical of Trump but stood by the populus message that what he espoused as MAGA. So I too wanted to represent populism and did not believe that the direction of his populism was in line with the populism that I felt for my country.

I can read the next paragraph as well.

Q. Yes, please. Go right ahead.

A. "Another reason that he said he chose to run on the Republican ballot is because the party is open to hearing new ideas from their candidates."

The Republican Party -- I'm sorry. This is the quote, my quote, "'The Republican Party for all of the faults or all of its good is open to varying ideas,' he explained," "'They do not close their primaries, and they do not deny the winner their victory so they can have their preferred candidate in place. My values match the Republican Party of yesterday. I feel that I represent the history of the Republican Party, the true value of where the Republican Party thrived back during the Dwight D. Eisenhower years.'"

Q. Those are your words?

A. Those are my words.

Q. And when was that article published?

A. January 9, 2024.

Q. So you said that in 2024?

A. Yes, sir.

Q. That's been your position ever since?

A. It's been my position for quite some time.

MR. BROWN: I have no further questions. I move into evidence the two exhibits when the other one comes back.

MR. ZAGROCKI: We can revisit that at the end.

CHAIRMAN PREISSE: Okay. When we have it in hand. Now, we'll move on to cross, please.

CROSS-EXAMINATION

BY MS. RICHARDSON:

Q. Hi, Mr. Ronan.

A. I'm sorry.

Q. No. You're fine. Thank you for bearing with me. I'm the delay here.

CHAIRMAN PREISSE: Do we have the two documents?

THE WITNESS: Is there another one that kind of looks like this, double sided?

CHAIRMAN PREISSE: All right. All of those moved to accept Mr. Brown's suggestions that these two documents be added to the record. One is the Alabama Public Radio transcript or report, and the other document he provided which begins with Seal the Border Number 1.

MEMBER SEXTON: I will also second the motion.

DEPUTY DIRECTOR PAYNE: It's been

1 properly moved and seconded. All of those in favor
2 of the motion, signify by saying aye.
3 (All members of the Board voted in favor by saying
4 aye.)
5 DEPUTY DIRECTOR PAYNE: All opposed,
6 same sign.
7 Motion carries.
8 MS. RICHARDSON: May I proceed?
9 CHAIRMAN PREISSE: Yes, please.
10 BY MS. RICHARDSON:
11 Q. Thank you. Good afternoon,
12 Mr. Ronan. As you've heard, my name is Ryan
13 Richardson; and I'm here on behalf of the
14 protester.
15 I have just a few questions for you
16 this afternoon.
17 A. Sure.
18 Q. And to start, I'm going to ask that
19 you bear with me because I can just about guarantee
20 that this is going to be clunky, but I would like
21 to show you a video.
22 Are you familiar with something
23 called Rebel Headquarters?
24 A. That sounds familiar, yes.

Q. Can you tell us what that is?

A. It's a YouTube podcast. They -- I don't know what their particular affiliation is. I know a lot of them have gone left, right, center, and changed throughout the years.

Q. And do you recall giving an interview with Rebel Headquarters in 2018?

A. In fact, I watched that same video from the protest. So I do, yes.

MS. RICHARDSON: And I will apologize to the Board that I don't have that up on the screen. This is cited in our protest with a link to the full video. And if I may approach with the my computer?

BY MS. RICHARDSON:

Q. So before I actually play the video -- and can you see there?

A. Uh-huh.

Q. The description here, and I assume this is probably a description from Rebel Headquarters; is that correct?

A. Sure, yes.

Q. It says, "Sam Ronan running for Ohio's First District says if he was the DNC Chair,

he would run Democrats as Republicans in deep red states because that's the only way to make it through.

A. I do remember saying that in 2017 when I was, in fact, running for DNC Chair.

Q. Okay. Thank you. And then I just hopefully play this video. We will see.

A. Yep. I think you need two minutes and 20 seconds into it.

(Playing audio.)

INTERVIEWER: First up we have Sam Ronan who is going to be running in Ohio's First District.

Sam, do we have you there?

MR. RONAN: Absolutely. Nice to meet you. Thanks for having me on here.

INTERVIEWER: Awesome. We're so glad to have you here. I sort of tased this early on, but there is something unique about your candidacy.

MR. BROWN: I'm sorry. I can't hear.

INTERVIEWER: You are running as the only Republican, I believe, that profile -- I could

be wrong, it's the first (inaudible) here, but you are running to replace Steve Chabot as a Republican, but you are a progressive?

MR. RONAN: Yes, sir. And, actually, there are a couple others that I personally know. Lindsay Brown is running as well. I don't know if (inaudible) there is a gentleman in Arkansas. But suffice it to say, yes, I put my money where my mouth is.

Last year I ran for the DNC Chair, and I said, "If I were the Chair, we would still have to run Democrats as Republicans in deep red states because that's the only way you're going to make it through; and here I am putting, I guess, the rubber to the road.

INTERVIEWER: Okay. Well, it's going to be an amazing test case. I mean, what --

(Stopped playing audio.)

BY MS. RICHARDSON:

Q. Is that a fair characterization of what you testified? In other words, you don't disagree that this is you here, and those were your characterizations of your campaign; is that correct?

A. I would actually disagree. That is the opening statement, and you need to question the rest of that interview, and the context of that statement will be made extremely clear later on in that video. But if the purpose is to state, "Is that me and are those my words," then, sure.

Q. Okay. So you would agree with me that at least in this clip -- and certainly, again, we have connected links to the entire video -- but you don't disagree that what you were saying there, is that the strategy that you supported was having Democrats run as Republicans?

A. Without any additional context or discussion or any other clarifying reasoning for that, your statement is true.

Q. Thank you. I will set this down. If you'll bear with me.

Mr. Ronan, did you see the exhibit that we just marked a little bit ago, the Facebook link?

A. I specifically pointed out that he should read the second paragraph as well.

Q. And so, I can pull it back, if you would like to look at it, but it sounds like you're

pretty familiar with it?

A. Uh-huh.

Q. There were some questions about whether or not we could tell if this was you or not. Is that, in fact, your Facebook post?

A. If I may just -- I do believe it is. Yes, Samuel Ronan is my handle, and that does look like my profile picture.

Q. I have another copy, but thank you very much.

A. And, I don't know, just to add again, Grove City Area Progress is actually a multi -- what's the word -- like, Republican, Democrat, Green, Libertarian.

Grove City Area Progress specifically told me that they're not going to endorse anyone because they don't want to make any sort of partisan decisions, and that their group is open to all people who are interested in politics in Grove City community's efforts, and that's the reason why I joined there and one of the reasons why I ended up posting in there.

Q. And it's a little bit difficult, at least for me --

A. Yes.
Q. -- to tell exactly when that Facebook post was posted.
A. Yeah.
Q. It seems like it's in January of 2026. Can you verify that?
A. I can't from this, and I would have to pull up my phone, maybe, and find it; but January 2026 sounds about right.
Q. So based off of your recollection of when you had posted that --
A. Yes. I don't deny posting this if this is what you're getting at.
Q. -- and it would have been somewhere around January of 2026; is that fair?
A. Yes. And it would have been prior to Marc Schare's statements that -- he even agreed that I was doing nothing wrong.
Q. And -- so back in 2018, you ran as a Republican?
A. Sure did.
Q. And you gave an interview saying that this was part of a strategy that you had been endorsing for at least a year prior to that; is

that right?

A. That is limited in its correctness. I explained that later on in the interview that I have spoken of leaving the Democrat Party and that progressivism was my main issue, which has evolved into the word populism in modern vernacular for politics instead of progressivism or some other type language.

Q. And, so then, in 2026, you're going back to that same strategy, right?

A. I am not.

Q. And you -- or you put in this Facebook post as an answer to an accusation that you are moving around --

A. Correct.

Q. That you are doing exactly what you said you would do; is that fair?

A. I responded in kind. And if I may read in context?

Q. Sure.

A. Mark Gavin, Sr., "Samuel Ronan didn't you run for DNC Chair a few years ago? Now you're running for congress as a Republican? Stop grifting."

1 And I responded, Mark Gavin, Sr., "I
2 believe I very clearly mentioned in that very same
3 DNC Chair race that Democrats, if they wanted to
4 govern and regain the trust of Americans, would
5 have to primary Republicans in deep red districts,
6 as Republicans, just to get a foot in the door."
7 And then, yes, contextually, I said,
8 so if I'm doing anything, it's following the
9 argument I made on that stage. That said, and it
10 must be in -- the context has to be the whole
11 post -- "that said, I am NOT fighting on behalf of
12 the traitorous Democrats who just crossed the party
13 line to vote for MORE ICE funding."
14 I am vehemently against ICE funding,
15 and what they were doing, they murdered two
16 Americans to include a veteran and that was around
17 that time where I was very involved in making my
18 statements clear on that particular issue.
19 So, to -- to take one part of my
20 posts and disregard the latter half is disingenuous
21 at best and misrepresenting my intent.
22 Q. And we did submit that entire post,
23 correct, in its complete form?
24 A. Sure. But your focus is on the

1 context -- or rather the statement without context,
2 and I just want to clarify that in my capacity.
3 Q. Thank you. And, again, we talked
4 about that, that was around January 2026?
5 A. Yep.
6 Q. I am going to hand you what I will
7 mark -- I think we're up to 3, Exhibit 3.
8 (Exhibit P3 was marked for identification.)
9 BY MS. RICHARDSON:
10 Q. And I will hand this one to you.
11 A. Are those my petitions?
12 Q. They are your petitions.
13 A. Perfect.
14 CHAIRMAN PREISSE: Will you have
15 additional material to add to the record?
16 MS. RICHARDSON: In addition to this
17 one, I have two more exhibits.
18 CHAIRMAN PREISSE: Okay. We'll wait
19 to admit all of them at the end, I think, if that
20 makes sense.
21 MS. RICHARDSON: I was going to say,
22 did I give you a copy?
23 CHAIRMAN PREISSE: No.
24 MS. RICHARDSON: Mr. Brown, do you

need a copy as well? Okay.

BY MS. RICHARDSON:

Q. And I will direct you -- I know there's a lot of duplication here, but we'll just look at the first page. And if you look about midway through the page, is there a declaration there that you will abide by the principles of the Republican Party?

A. Yes, it is. "I further declare if elected to this office or position, I will qualify, therefor, and that I will support and abide by the principles enunciated by the -- in that case, I typed it in -- Republican Party, dated on this date, 28th day of October, 2025, which is when I printed them off the website.

Q. And so this signature was around October of '25; is that correct?

A. No. I mean, probably closer to January after I got my signatures.

Q. And so somewhere either after or right around the time that you signed that petition, would be the same time that that Facebook post that we just looked at was --

A. Absolutely. On or around that time,

absolutely.

CHAIRMAN PREISSE: I'm sorry to interrupt. Mr. Ronan, did you just suggest that you signed that line signature of candidate, right, I think you did just say, but I want to quote you correctly, "After I got my signatures," end quote.

THE WITNESS: No. No.

CHAIRMAN PREISSE: Is that --

THE WITNESS: No. I did misstate there what I meant there. I signed the document at -- before gathering the signatures themselves. I apologize.

I didn't sign them on the 28th day of October, but I definitely signed them before I started gathering. So thank you for correcting me on that.

BY MS. RICHARDSON:

Q. So what was the date that you actually signed the document?

A. This document, I generally don't know, but it would have been -- again, I signed all of these petitions before actually gathering signatures. So in this case, it would have been on or before the 17th; on or before January 26; on or

before December 20; on or before January 6; on or before December 27; on or before the 3rd of January; on or before December 31.

Q. Why does the date reflect October of '25 if that was not the date you actually signed --

MR. BROWN: Objection.

BY MS. RICHARDSON:

Q. -- the petition?

MR. BROWN: Mr. Chair, we're here to discuss whether Mr. Ronan is a Republican. She is wandering off looking for other reasons to support her case not filed with the protest.

MS. RICHARDSON: May I respond?

CHAIRMAN PREISSE: Yes, please.

MS. RICHARDSON: The question is validity of the candidacy and whether or not it is, in fact, a valid candidacy.

If, in fact, there are additional discrepancies that were not clear prior to this testimony, we certainly have a legitimate reason to go into those.

MR. BROWN: You're fishing.

MS. RICHARDSON: I am not fishing. I am responding to the -- to the information that

the candidate has provided while testifying.

THE WITNESS: Well, I would further argue that the validity of the protest itself matters.

CHAIRMAN PREISSE: Go ahead.

MR. BROWN: Mr. Chair, she's looking for another reason. She's already objected to my questions she says raised beyond reasons of this hearing. She's doing the same thing.

CHAIRMAN PREISSE: Which illegitimizes all of your previous evidence.

MR. BROWN: No.

CHAIRMAN PREISSE: Okay. Please proceed.

MS. RICHARDSON: Thank you.

BY MS. RICHARDSON:

Q. So, Mr. Ronan, I just want to make sure that I understand. So on this page, and you have signed under penalty of election falsification, correct?

A. Mm-hmm.

Q. What date did you actually sign that document?

A. As I said before, I signed before I

actually petitioned them.

Q. But not on the date that is reflected on the document itself?

A. I don't believe I did, no.

MS. RICHARDSON: Okay. Excuse me for just a moment.

I have no further questions at this time.

CHAIRMAN PREISSE: Thank you.

MR. BROWN: Redirect, Mr. Chair?

CHAIRMAN PREISSE: Yes, please.

REDIRECT EXAMINATION

BY MR. BROWN:

Q. Mr. Ronan, you were asked questions about a chat box, and a -- was it a YouTube? Do you remember the dates on those chat box and YouTube? I think they were 2017 and 2018; does that sound about right?

A. Yeah. I mean, that's eight years ago, yeah.

Q. And the article that -- where quotes were given to the public radio news reporter, that article -- those statements were made in 2024; is that correct?

A. Yes. Yes.
Q. So those clearly represent your current -- the article that we have submitted into evidence clearly represents your -- your current views?
A. Absolutely.
Q. And 2017, 2018, or whatever views were there, those are no longer your present views; is that correct?
A. That is correct.
Q. Are you a veteran --
A. I am.
Q. -- Mr. Ronan?
A. Yes, sir.
Q. How long did you serve?
A. I served six years in the active duty and six years in the Reserves.
Q. Do you have Republican support, Mr. Ronan, who would like to vote for you?
A. I do have Republican supporters who would like to see me on the ballot; and, of course, I have the required signatures from people in the district that would like to see me on the ballot too, many of whom were at committee meetings that I

also attended participating in the Republican primary process.

In fact, I would have had more to submit, but in my case to get from work to that meeting, I forgot to bring my declaration of candidacy documents with me, which was -- I want to say in November, if I remember correctly.

Suffice to say, there are at least dozens of people that would like to see me on the ballot.

Q. Did you bring a couple of those voters' statements with you?

A. I did.

MR. BROWN: I would like to introduce these into evidence. I have two statements from voters who -- Republican voters who claim they want to vote for Mr. Ronan.

I would like to introduce that into evidence. Again, even though I thought I had enough copies there, I do not.

I have no further questions, but I would like to move those statements into evidence.

CHAIRMAN PREISSE: You would like to move what?

MR. BROWN: Those two statements, two voters' statements, Republican voters who say they want to vote for Mr. -- Mr. Ronan.

MS. HUMMER: Well, the first thing is, we should have it marked so everyone knows what they're --

CHAIRMAN PREISSE: Do you have a copy of it?

MR. BROWN: I have a copy. She's going to copy those.

CHAIRMAN PREISSE: We'll do that when it comes back.

MS. HUMMER: I think there's going to be an objection because I see counsel standing up; and in order for the objection to be thoroughly listened to, you need to have those documents in front of you.

CHAIRMAN PREISSE: Okay.

MR. BROWN: Can you mark it for me? Mark it as an exhibit for me?

CHAIRMAN PREISSE: Yeah.

(Exhibits C3 and C4 were marked for identification.)

MS. RICHARDSON: I do have an

1 objection for the admission of these documents. I
2 have these for the --
3 MS. HUMMER: Let's wait until they
4 have them.
5 MS. RICHARDSON: Sorry. Yes. Thank
6 you.
7 CHAIRMAN PREISSE: Can she object to
8 the admission of the document after we mark them
9 but before we admit them?
10 MS. HUMMER: I just think you want
11 to have the document in front of you so you can --
12 CHAIRMAN PREISSE: I agree.
13 MS. HUMMER: -- hear and look.
14 CHAIRMAN PREISSE: We're dealing
15 with the law and with nature.
16 (Off the record.)
17 MS. HUMMER: Now, we proceed.
18 There's an objection that is being made.
19 MS. RICHARDSON: Thank you. And I
20 would object to admission of these documents.
21 CHAIRMAN PREISSE: Which documents?
22 MS. RICHARDSON: These are now
23 marked as exhibit -- these are the two
24 statements -- been represented to be two

statements --

MS. HUMMER: Have they been given to the court reporter?

MS. RICHARDSON: -- by -- I'm not sure I can even read the writing here of the names of the purported voters that are submitted here, but there's a serious foundation issue because we have not seen who these individuals are. It looks like it does say that they're Republican, but I don't see any documentation to demonstrate that and that they actually are affiliated with the party.

Most of what is reflected in these letters are legal arguments that these folks presumably would have no basis to present, but also as lay witnesses who would not be in a position to offer legal argument anyway.

MR. BROWN: They're in the same situation as Mr Schare, only they signed theirs.

MS. RICHARDSON: Mr. Schare is a protester who is here today giving sworn testimony under oath about his views.

These individuals -- these documents aren't even attested to or notarized.

MR. BROWN: Neither was his protest.

CHAIRMAN PREISSE: In as much as you're suggesting these two documents reflect, they already signed and attested, I wonder if you would withdraw?

MR. BROWN: No. I do not withdraw them.

CHAIRMAN PREISSE: This is a redundant assertation you won't withdraw?

MR. BROWN: It's more.

MS. HUMMER: If I may at least provide -- if you want, I can provide some guidance.

CHAIRMAN PREISSE: Yes.

MS. HUMMER: So what you have traditionally done in these quasi judicial hearings is, you have admitted affidavits when the person has been here to testify as to what is contained in the affidavit.

Historically, you have not permitted documents where there isn't a witness here that can be cross-examined or at least testify as to a document being presented.

You do have the authority. You make the evidentiary rules, but I'm providing you --

1 this would be an out of hearing statement with no
2 ability for anyone to ask questions to a witness.
3 CHAIRMAN PREISSE: These do not
4 appear to be affidavits.
5 MS. HUMMER: That's correct.
6 CHAIRMAN PREISSE: I'm not going to
7 move to accept these. Is any other Board member
8 going to move to accept these two documents which,
9 again, I'm confident were drawn from already
10 attested signatures of voters. Okay.
11 MEMBER FREEDHOFF: Okay. I second.
12 CHAIRMAN PREISSE: I don't think we
13 have to --
14 MS. HUMMER: You can make a ruling
15 by vote if there's any -- you want -- if there's
16 anyone who wants to put them into evidence, you
17 would have --
18 CHAIRMAN PREISSE: I asked for them,
19 and don't see any. So, move on.
20 MS. RICHARDSON: Thank you.
21 MR. BROWN: No further questions,
22 Your Honor.
23 CHAIRMAN PREISSE: I think there --
24 did we still have material before us that we need

to enter? Did we enter --

MS. HUMMER: You have not entered all of the other material that has been presented since the last.

CHAIRMAN PREISSE: Is there going to be more material presented?

MS. RICHARDSON: Yes.

CHAIRMAN PREISSE: We'll still wait. Okay.

MS. HUMMER: And just keep in mind that when you -- that you would not be entering those particular exhibits, so you should name them.

CHAIRMAN PREISSE: Okay.

MS. RICHARDSON: Just a brief cross, if I may recross?

CHAIRMAN PREISSE: Yes, please.

RECROSS-EXAMINATION

BY MS. RICHARDSON:

Q. Mr. Ronan, I'm going to bother you with one more document here, if you'll bear with me.

(Exhibit P4 was marked for identification.)

BY MS. RICHARDSON:

Q. Feel free to take a moment to just

look at that document.

A. Okay.

Q. Are you familiar with -- I'm probably going to mispronounce this. I apologize -- is it Ana Aleida-March? Am I pronouncing that correctly?

A. That's not her actual name. That is obviously a pseudo name on Facebook. My question, though, is what's the relevancy of this person?

CHAIRMAN PREISSE: Are you finished asking the question?

MS. RICHARDSON: That was -- yes. I was finished with that question. And the question was, is he familiar with her? And I think he said, "Yes."

MR. BROWN: I object based on relevance.

THE WITNESS: Sorry. I don't know the --

MS. RICHARDSON: This person represents herself online as a part of the campaign for Mr. Ronan. I believe -- I believe at one point even suggests that she is a manager but, certainly, part of the campaign. So I do think that's

1 directly relevant.
2 THE WITNESS: If --
3 MR. BROWN: Wait. Wait. Wait a
4 minute. Ruling.
5 CHAIRMAN PREISSE: Okay. Have you
6 asked your question and had your response?
7 MS. HUMMER: She -- they're waiting
8 for the Board to rule on the objection to the
9 question being asked.
10 CHAIRMAN PREISSE: Go ahead and
11 proceed, please.
12 BY MS. RICHARDSON:
13 Q. Who is this individual?
14 A. A long-time friend of mine who has
15 been in similar political circles as me.
16 Q. Is she affiliated with your
17 campaign?
18 A. Yes. She is helping me out.
19 Q. What is her role within your
20 campaign?
21 A. She doesn't have an official title
22 listed anywhere. She helps me with whatever I need
23 help with.
24 MS. RICHARDSON: Okay. And then I'm

1 going to mark what, hopefully, will be my last
2 exhibit.
3 I'm sorry. I apologize. We ran out
4 of copies.
5 (Exhibit P5 was marked for identification.)
6 MR. BROWN: Sure.
7 BY MS. RICHARDSON:
8 Q. Feel free to take a moment to look
9 at that document.
10 A. Okay.
11 Q. And is it fair to say this is a
12 social media post from Ms. March; is that --
13 A. Yes. It does seem to coincide.
14 Q. Okay. Can -- can you read to me
15 what her post says there at the beginning, the top
16 of that page?
17 A. "IT'S OFFICIAL! Samuel Ronan is on
18 the ballot! Woot, woot!" And then a picture of
19 getting submitted.
20 Q. And just for the record, she's
21 talking about this particular campaign that we're
22 here today about --
23 A. Yes.
24 Q. -- right?

A. Yes. Representative to Congress 15.

Q. Okay. And then, later in that same page, there's what appears to be a comment?

A. Yeah.

Q. From someone named Paul Ryan?

A. "I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems. As long as progressive was labeled republican, I feel like the Republican voters would be like "oh, hell yeah! good policies!"

Q. And did Ms. March respond to that?

A. She does. And without additional context, Paul Ryan, and "yup! And we're testing out theory."

My context here from reading this is I feel like the Republican voters would be like, oh, hell, yeah. Good policies with progressive and/or populus ideology.

Q. It does appear, though, that this poster thought it would be a good way to quote, "torpedo" the Republican Party, right?

A. In that poster's opinion, which has nothing to do with my campaign.

Q. Ms. March, who is involved in your campaign, as you testified, says, "Yup. And we're testing that theory," correct?

A. That a progressive ideology would be met by Republican voters with "oh, hell, yeah. Good policies."

Q. And she's responding, again, to "we're testing the theory that" --

A. We can go in circles.

Q. Sure.

A. But I want to highlight the context.

Q. That's totally fair. Again, this was probably in the last couple of weeks; is that fair, in terms of timing?

A. That's fair.

Q. Okay.

MS. RICHARDSON: No further questions. Thank you.

THE WITNESS: So, I have --

MR. BROWN: Redirect following the recross?

THE WITNESS: Or he does.

CHAIRMAN PREISSE: Yeah, sure.

FURTHER DIRECT EXAMINATION

BY MR. BROWN:

Q. Do you know who Paul Ryan is?

A. I -- I -- he's probably a Facebook friend, one of 5,000.

Q. But you have no direct knowledge?

A. No, I have no direct knowledge.

Q. Basically, this post is reemphasizing your commitment to your Republican principles; is that correct?

A. Yes. As I understand Republican -- how I want to embody Republican principles.

Q. And can you describe briefly your Republican principles?

A. I can. Without reiterating what's already in front of the group, my -- I would like to say things -- point out a couple of them -- number 6, large tax cuts for workers and no tax on tips. I agree. Workers pay the majority of the taxes in America, and the large tax cuts for workers was also the standard before World War II. Income taxes were not a thing for the majority of our history -- our nation's history, and Social Security being taxed wasn't a thing until, I believe, the late '80s or early '90s.

Q. And so those are Republican principles?

A. Those are 100 percent Republican principles. Under defend our constitution, our Bill of Rights and fundamental freedoms, including freedom of speech, freedom of religion, and the right and keep bear arms.

I served my country. The oath I swore no less than four times was to protect and defend the constitution. Maybe my constitutional focus and implementation on literally taking the constitution offends some Republican voters, especially the protester; but, again, I believe that as we are seeing on the signatures and in other case examples that it's fundamentally up to voters to decide what is or what is not Republican, who is and who will not represent them in the general.

And populism focusing on making America great again, historically, we've had universal healthcare. We've had no income taxes. We fully funded our military without extra taxes. We've had a strong and robust military. We've had the most dominant education that was incredibly

1 affordable. Even in the '60s, it would take an
2 average 160 hours, working at minimum wage, to get
3 a full college education. That is no longer the
4 case. These are principles that Republicans have
5 embodied and espoused since the time of Lincoln.
6 So for anyone to argue that my
7 beliefs, my politics, as presented aren't
8 Republican, that is truly incorrect. In both
9 history and in the context of an upcoming primary.
10 I'm sorry if I pundit it here, but...
11 MR. BROWN: Very good. I have no
12 further questions.
13 CHAIRMAN PREISSE: Okay. I think
14 we've concluded our evidence and cross-examination.
15 MS. RICHARDSON: That's right. And
16 just to close the loop, I would now officially move
17 for admission of all additional documents that have
18 been submitted to the Board today.
19 MR. BROWN: And I would ask the
20 same. Just make sure all of that documents.
21 CHAIRMAN PREISSE: Okay. Do we
22 believe that --
23 MS. HUMMER: I think you can move
24 all with the exception --

CHAIRMAN PREISSE: Did we indeed already admit the copies of petition?

Okay. Do you feel like you've received everything and marked the materials for admission?

I'm moving to admit all the other -- all of the materials presented today for the record. Excepting the two documents presented by Counsel Brown, right, purportedly from the signatories to the candidate's petition.

MS. HUMMER: If you can reference the exhibit number.

CHAIRMAN PREISSE: Namely C3 and C4.

Is there a second on that?

MEMBER SEXTON: I'll second the motion.

DEPUTY DIRECTOR PAYNE: It's been properly moved and seconded.

All of those in favor of the motion, signify by saying aye.

(All members of the Board voted in favor by saying aye.)

DEPUTY DIRECTOR PAYNE: All opposed, same sign.

Motion carries.

CHAIRMAN PREISSE: Thank you everyone. Continued for your patience, we'll deliberate.

MR. ZAGROCKI: Closing.

CHAIRMAN PREISSE: Oh, we didn't get that. I felt like we had closing. We'll move on to closing arguments.

As stated at the beginning, if you can keep it at five minutes or less.

MEMBER FREEDHOFF: Are there questions after closing arguments?

CHAIRMAN PREISSE: Sure. Thank you, Meredith. We can question the witness like counsel, right?

MS. HUMMER: You may ask any clarifying questions of any witness that has testified as well as ask any clarifying questions or any arguments that have been presented by legal counsel.

CHAIRMAN PREISSE: Thank you.

MEMBER FREEDHOFF: Thank you. I have a question for Mr. Ronan.

THE WITNESS: Yes, ma'am.

MEMBER FREEDHOFF: The document that your attorney gave us dated March 6, 2026, you were interviewed with Alabama Public Radio. So this is very recent?

THE WITNESS: Very recent.

MEMBER FREEDHOFF: I just want to read some quotes to you.

THE WITNESS: Sure.

MEMBER FREEDHOFF: "Trump is offering a despotism dictatorship and worse."

"That's cruel and oppressive leadership."

You want to cancel all student and medical debt and tax billionaires 99 percent.

You want to unfold Medicare and put paying for anything like that on the wealthy. Those who have 90 percent more.

You want to tax billionaires 99 percent again.

You said you would -- police brutality, you want to reform the police.

You want to defund the police by half.

And police and other law

1 enforcements do not protect citizens.
2 Why would you trust Republicans such
3 as Donald Trump, Nikki Haley, DeSantis, Vivek,
4 Christie -- Chris Christie, "Why would you trust
5 them to have your best interests in mind?"
6 You talk about the insurrection on
7 January 6 and all of the indictments on the
8 President.
9 I mean, it's quite clear, your
10 opinions in what you gave us yourself as of March
11 [sic], which are opposite of the things you're
12 saying from up there.
13 THE WITNESS: I would disagree,
14 respectfully, that they are opposite of
15 representing the Republican Party and Republican
16 voters.
17 I stand against what this
18 Administration is doing. I stand against the way
19 that they are doing it, say for maybe a couple of
20 examples, but waging war with Iran unprovoked.
21 Allowing ICE to be not just untrained, but without
22 any accountability after murdering people in
23 Minnesota; taking so long to get rid of Secretary
24 Noem; the fact that there has been rampant

1 corruption in either term.
2 There has been many different things
3 that happened within the Republican Party that
4 Republican voters have pulled avidly against.
5 Republicans are avidly against war. That was one
6 of the major reasons why MAGA won is because Kamala
7 Harris was advocating for more weapons and supplies
8 to Gaza, and Trump said, "We will not do war. We
9 will do no more forever wars."
10 That was one of the things I agreed
11 with him --
12 MEMBER FREEDHOFF: In the sense of
13 brevity, I just want to say that many of these
14 values, you know, taxing people 100 percent --
15 THE WITNESS: Eisenhower.
16 MEMBER FREEDHOFF: -- billionaires.
17 You know, unfolding Medicare, these are not
18 Republican talking points. And calling him a cruel
19 and unusual dictator when he's the leader of the
20 Party, I just want to bring that to your attention
21 because this is the document you gave us.
22 THE WITNESS: And I -- to your
23 point, Eisenhower taxed the wealthiest Americans at
24 97 percent and the highest tax rate in America was

70 percent until the Reagan Administration.

MEMBER FREEDHOFF: I don't know about that one, but calling our police a slave patrol.

THE WITNESS: There was direct --

MEMBER FREEDHOFF: I mean, I don't -- I don't see these as being things that the Republican Party would agree on, and that's why I wanted to ask you what you thought.

You've been very clear about how you feel about all of these Republican positions. So I appreciate what you just said up there. Thank you. That's all I have. Thank you.

Any other questions?

CHAIRMAN PREISSE: Anybody else have any questions for any of the counsel or witnesses?

MR. ZAGROCKI: Closing.

CHAIRMAN PREISSE: Okay. Anything? Okay. Thank you.

Now, we'll move into deliberations.

MR. ZAGROCKI: Closing.

CHAIRMAN PREISSE: I keep forgetting about that. Tried to get to closing before, you stopped me.

We're going to do closing, closing and then an opportunity for closing, right?

MEMBER SHUMAKER: Rebuttal.

CHAIRMAN PREISSE: Rebuttal closing. Three final bites at the apple, right? Okay.

MS. RICHARDSON: Thank you very much. Just very briefly, I would reiterate that this protest is not about an issues test or evaluating ideology.

This is a straight-forward case where a candidate has been open about what he is doing here, and he admits it. He admitted in 2018. He admitted it as recently as January. His campaign admits it.

He is trying to torpedo, sabotage the Party by pretending to be a Republican when he clearly is not.

Under Ohio law, that is not permitted, and we would ask the Board to disqualify Mr. Ronan from appearing as a Republican in the primary.

Thank you.

CHAIRMAN PREISSE: Thank you.

MR. BROWN: May it please the Board,

1 counsel repeatedly says that under Ohio law
2 Mr. Ronan's candidacy is not permitted, but she has
3 not cited authority for that proposition.
4 There is nothing in Ohio that
5 imposes ideology test or a good-faith requirement
6 or sincerity requirement on candidates in primary
7 parties.
8 Instead, as long as the candidate is
9 not an elected official, Ohio law says that
10 candidate can run in any primary; and the federal
11 courts have told us that is different from
12 disassociation, where a candidate is trying to run
13 as an unaffiliated candidate.
14 The reason for the difference for
15 the requirement, one is a sore loser law. We don't
16 want candidates -- party candidates to run
17 unaffiliated. So Ohio includes a good-faith test.
18 There's no sore loser application in this
19 particular instance where you've got a candidate
20 running for a primary.
21 Another big difference is the First
22 Amendment. The First Amendment protects parties.
23 It does not protect independent candidates in the
24 same way. Because the First Amendment protects

1 parties, the Supreme Court and the local courts
2 have told us it's up to the parties to decide
3 whether a candidate's ideology is pure.
4 So if Ohio had a law that delegated
5 the Ohio Republican Party the authority to remove
6 Mr. Ronan from the ballot, that's another matter.
7 That can very well survive the First Amendment.
8 But as the Ohio law is structured now, Ohio says
9 you don't need to be good faith. You don't need to
10 be sincere because if we were to impose that
11 requirement, a state government procedure that
12 enforces that requirement, it would violate the
13 First Amendment just like it would violate the
14 elections clause.
15 So with all due respect, this Board
16 doesn't have the authority to decide that Mr. Ronan
17 is not a Republican. This Board, if it were to
18 make that decision, is violating the Constitution
19 of the United States, both the elections clause and
20 Article 1 Section 4 and the First Amendment. Ohio
21 law too because Ohio law does not authorize that.
22 That is up to the voters in the primary. They
23 decide whether or not Mr. Ronan is Republican
24 enough for them. That's how Ohio does it under the

1 Ohio Constitution. We use the primaries to make
2 those party decisions.
3 So I respectfully request that the
4 Court dismiss the protest or reaches the merits
5 that denies the protest. Clear and convincing
6 evidence, there is no way that the protester has
7 presented clear and convincing evidence. It's just
8 as likely Mr. Carey is a stooge of -- I'm sorry --
9 Mr. Schare -- Freudian slip -- it's just as likely
10 that Mr. Schare is a stooge of Mike Carey's
11 campaign as anything else.
12 There's no clear and convincing
13 evidence that he's not. So that's the obvious
14 motivation behind removing Mr. Ronan from the
15 ballot because it helps Mr. Carey's campaign.
16 That's what Mr. Carey wants. That's improper.
17 Thank you, Mr. Chair. Thank you, Board.
18 CHAIRMAN PREISSE: Thank you.
19 Did you wish to...
20 MS. RICHARDSON: If I may, literally
21 just one very brief moment, I promise.
22 The only point that I did want to
23 respond to, Mr. Brown says that we have not cited
24 any authority for the proposition that you have to

make these statements in good faith.

I would simply point the Board back to the declaration you have in front of you, which very clearly states that Ohio law requires that you be honest and truthful, and that it is a -- a violation of criminal law in Ohio to lie on that document.

Thank you very much.

CHAIRMAN PREISSE: Thank you. Now I think we're ready to deliberate. I'm going to suggest without asking the Board that we deliberate. I'm trying to remember the word. We're not going into executive session.

MS. HUMMER: Just deliberate in closed session. Okay. Thank you.

(Off the record at 2:02 p.m.)

(On the record at 2:29 p.m.)

CHAIRMAN PREISSE: Thank you. We're back. We've had the opportunity -- the Board has had the opportunity to hear the evidence and had a brief but substantive deliberation, and we will proceed.

Do we have a motion?

MEMBER SHUMAKER: Mr. Chairman,

Jamie Shumaker. After conducting a hearing regarding the protest against the candidacy of Samuel Ronan, a Republican candidate for Representative to Congress in the 15th District, submitted by Marc Schare -- sorry if I said it wrong -- I move that the Franklin County Board of Elections determine that the candidate's declaration of candidacy and petition of Samuel Ronan are valid and deny the protest based on the evidence presented at this hearing.

I find that the protest failed to meet his burden by clear and convincing evidence to show that Samuel Ronan failed to comply with Chapter 3513 of the Ohio Revised Code, and I also request a roll call vote.

MEMBER SEXTON: Mr. Chairman, Michael Sexton, I'll second the motion.

DEPUTY DIRECTOR PAYNE: The motion has been properly moved and seconded. I will take a roll call vote.

Jamie Shumaker?

MEMBER SHUMAKER: Yes.

DEPUTY DIRECTOR PAYNE: Mike Sexton?

MEMBER SEXTON: Yes.

DEPUTY DIRECTOR PAYNE: Doug Preisse?

CHAIRMAN PREISSE: No.

DEPUTY DIRECTOR PAYNE: Meredith Freedhoff?

MEMBER FREEDHOFF: No.

DEPUTY DIRECTOR PAYNE: Motion fails on a 2-2 vote; therefore, this will go to the Secretary of State's Office to determine the issue.

CHAIRMAN PREISSE: Thank you for your patience today, and we have another order of business.

MS. HUMMER: Just so we're clear for the parties, that means that you remain on the ballot until such time that a different determination is made by the Secretary of State.

MR. BROWN: Do you know how long it will take to get the answer on that?

MS. HUMMER: Statutory time limit that's already there.

MR. BROWN: Thank you.

DIRECTOR WHITE: 14 days.

CHAIRMAN PREISSE: Our interest is ASAP because we have things to do as everyone does.

MR. BROWN: Thank you.

(Thereupon the hearing was adjourned at 2:31 p.m.)

1 C E R T I F I C A T E

2 - - -

3 THE STATE OF OHIO:

4 SS:

5 COUNTY OF FRANKLIN:

6

I, Jeanine Fansler, Professional
7 Reporter and Notary Public in and for the State of Ohio, do hereby certify that the foregoing is a
8 true and accurate transcript of the proceedings hereinbefore set forth, as reported in stenotype by
9 me and transcribed by me or under my supervision.

IN WITNESS WHEREOF, I have hereunto set
10 my hand and official seal of office at Columbus, Ohio, this 11th day of March, 2026.

11

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/s/Jeanine Fansler_____
18 Notary Public, State of Ohio

19

My Commission Expires: November 28, 2028.

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22

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24

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

_____

SAMUEL RONAN and ANA CORDERO,
Plaintiffs,
v. Case No.
FRANK LAROSE, in his official 2:26-CV-00343
capacity as Secretary of State
of Ohio; DOUGLAS J. PREISSE, in
his official capacity as Chair
of the Franklin County Board of
Elections; MEREDITH FREEDHOFF,
in her official capacity as
Member of the Franklin County
Board of Elections; JAMIE L.
SHUMAKER, in her official
capacity as Member of the
Franklin County Board of
Elections; and MICHAEL E.
SEXTON, in his official capacity
as Member of the Franklin County
Board of Elections,
Defendants.

_____

DEPOSITION OF
SAMUEL RONAN

DATE: Friday, March 27, 2026
TIME: 10:06 a.m.
LOCATION: Office of the Ohio Attorney General
30 East Broad Street, 20th Floor
Room 2001
Columbus, OH 43215
REPORTED BY: Asia Mays
JOB NO.: 7986054

A P P E A R A N C E S

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A P P E A R A N C E S (Cont'd)

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I N D E X

EXAMINATION:	PAGE
By Mr. Rustico	8
By Mr. Zagrocki	85

E X H I B I T S

NO.	DESCRIPTION	PAGE
Exhibit 1	Grove City Area Progress Facebook Post	58
Exhibit 2	Ana Aleida-March Facebook Post	61

P R O C E E D I N G S

THE REPORTER: Good morning. My name is Asia Mays. I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 10:06 a.m.

This is the deposition of Samuel Ronan, taken in the matter of Samuel Ronan, et al. vs. Frank LaRose, in his official capacity as Secretary of the State of Ohio, et al. on Friday, March 27, 2026, at the office of the Ohio Attorney General, 30 East Broad Street, 20th Floor, Room 2001, Columbus, Ohio 43215.

I am a notary authorized to take acknowledgements and administer oaths in Ohio.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and
- shall constitute written stipulation of such.

At this time, will everyone in attendance please identify yourself for the record. And we will be begin with my taking attorney.

MR. RUSTICO: Hi. I'm Greg Rustico from the Ohio Attorney General's Office. I'm here on behalf of Senate Secretary Frank LaRose.

MR. TABATOWSKI: Steve Tabatowski, also with the Ohio Attorney's General also on behalf of defendant LaRose.

MR. REDFERN: Eli Redfern, assistant Franklin County prosecuting attorney here on behalf of Defendants Douglas Preisse, Meredith Freedhoff, Jamie Shumaker, and Michael Sexton, in their official capacities as members of the Franklin County Board of Elections.

MR. ZAGROCKI: Brian Zagrocki, also from the Franklin County Prosecutor's Office, and also on behalf of the Franklin County Board of Election members.

MS. HUMMER: Jeanine Hummer on behalf of the Franklin County Prosecutor Shayla D. Favor, representing the members of the Board of Elections previously named by Mr. Redfern.

MR. BROWN: Mark Brown, representing the plaintiff, Samuel Ronan.

MR. RONAN: Samuel Ronan, the plaintiff.

THE REPORTER: Thank you.

Hearing no objection, I will now swear in the witness.

Mr. Ronan, please raise your right hand.

WHEREUPON,

SAMUEL RONAN,

called as a witness and having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

THE REPORTER: Thank you.

Counsel, you may proceed.

EXAMINATION

BY MR. RUSTICO:

Q Good morning.

A Good morning.

Q I know we already did it. But if you could start by just stating your name and spelling your last name for the record.

A Yeah. Samuel Ronan, spelled R-O-N, as in Nathan, A, as in apple, N as in Nathan.

Q Have you ever been deposed before?

A I -- I'm honestly not certain. I don't

think so.
Q Okay. Do you understand that you're under oath here today?
A Yes.
Q And so you must tell the truth.
A Yes.
Q So because you said you may or may not have done this before, I'm going to try to help you, walk you through this, explain a little bit of the process. So the first thing to keep in mind, this is being audio recorded, not video recorded. So please always give verbal answers.
A Yes, sir.
Q There's often a tendency to just nod or shake your head. We're going to need to get those audible yeses or nos.
The other thing is, because the stenographer's trying to, you know, get a clean record, we want to try not to talk over each other. So if you can, please let me finish my questions. And I'll try to do the same for you, let you finish your answers.
And I'm sure there'll be times we'll talk over each other. But we'll make sure to get everything clean for the record.

A All right.
Q If you don't understand one of my questions, please just let me know.
A All right.
Q But if you answer a question, I'll assume that you understood it.
A Yes, sir.
Q Everything you say is going to become part of the record in this case. There'll be a transcript that's created afterwards that you'll have a chance to review for any errors. Does that make sense?
A So for the sake of argument, if I say something that I thought in the moment was correct and then I find out later it was incorrect, I can correct the record?
Q There may be a means for you to do that through your attorney. But the things you say here today are under oath. And so the transcript can't be changed in that way. You'll get a chance to look at the transcript for, like, typographical errors or something like that.
A Yes, sir.
Q Your attorney may object from time to time. But after that objection, unless he says otherwise, you're still going to answer the question. So what we

do is we preserve objections for the record. But you'll actually answer the question.

So it's different than maybe what you've seen on TV where they yell, "Objection," "Sustained." There's no judge here to either sustain or overrule the objections.

A Okay.

Q If you need a break at any time, please just let us know. The only real rule is that you just can't take a break while a question is pending.

A Okay.

Q So you -- if you'll finish answering the -- the question that's open and then we would take a break.

A Okay.

Q Are you taking any medications that might affect your ability to answer the questions truthfully today?

A No, sir.

Q Okay. Have you done anything to prepare for this deposition?

A Other than take time off to be here, no.

Q Without telling me the content of any discussion, did you meet with your attorney to prepare for this deposition?

A No.
Q Have you spoken to anyone else about this deposition?
A The fact that it's happening.
Q But not the content?
A In so far as this deposition deals with my ballot access. But not -- I wouldn't have any internal information.
Q Okay. So who did you speak with about the deposition?
A My campaign manager.
Q Okay. And who's that?
A Ana Cordero.
Q Okay. So she's the other plaintiff in this case?
A Yes.
Q Okay. Did she give you any advice?
A No.
Q Did you review any documents in preparation for this deposition?
A No.
Q Did you bring any notes with you today?
A No.
Q So you're one of the plaintiffs in this case; correct?

A Yes, sir.
Q What do you understand the nature of your claims to be?
A My claims?
Q Yeah.
A That I am a Republican. That I am authorized to be on the ballot as a Republican under both Ohio Law and the previous Board of Elections determination. And that my values and stance within the Republican Party has been on the record. So --
Q What remedy are you seeking in this case?
A My attorney would be best able to answer that question. But as far as I understand it, it is a minimum of being on the ballot for the primary.
Q And that's the May 5th Republican Primary for the 15th Congressional District? Is that right?
A Yes, sir.
Q Have you spoken publicly about this case?
A I have posted on social media that the -- the facts -- that I had a hearing. And the -- the ruling was what it was. I have not said anything other than that.
Q And the hearing you're referring to was --
A The federal one that we did last week with the --

Q Okay. So you posted about the TRO hearing we had last Friday?

A Yeah. Simply that it was ruled that I am on the ballot as of that moment.

Q Okay. What was your understanding of that ruling? What did you say in your post?

A I literally only wrote that. I can pull it up, I suppose, if --

Q No, it's -- it's okay. It's --

A My understanding is that I am on the ballot pending whatever outcome from April 2nd.

Q Okay. How old are you?

A Thirty-six.

Q Have you lived in Ohio your whole life?

A Most of my life.

Q All right. Give me a little bit of your background, biographical sketch.

A I mean, I went to school here. I was raised here. But I -- in the military, I was stationed in Okinawa, Japan, Keesler Air Force Base for training, and Arkansas, Little Rock Air Force Base.

Q Have you been a resident -- when you were in Ohio, was it the Columbus area?

A No, it was Fairfield County, Lancaster.

Q Okay. When did you move to the Columbus

area?
A July 14th last year I bought a house.
Q Okay. What do you do for work?
A I'm a maintenance planner. So I guess in context of what an attorney would do is I manage the workflow of my department. So --
Q And what -- where's -- what department is that?
A The maintenance department.
Q For, sorry, what organization? Who do you work for?
THE WITNESS: Quick question. Is that something that is relevant?
MS. HUMMER: Yes.
THE WITNESS: Okay. Marzetti.
BY MR. RUSTICO:
Q Okay. Have you ever been employed by a political campaign?
A Employed?
Q Yeah.
A I have not received any sort of monetary compensation, official or otherwise, from a campaign, no.
Q Okay. Have you volunteered for any political campaigns before?

A I have attempted to, yes.
Q Okay. Can you tell me a little bit more about that?
A I think it was a couple years back. I offered advice to the Jill Stein campaign because their social media presence was abysmal. And I had just gone through my own social media rebuild. And I happened to be friends with a member of the Jill Stein campaign. And I reached out to them for that reason.
Q You mentioned it was a few years back. Was that likely her 2024 campaign?
A Probably, yeah.
Q Okay. And did you end up doing any work for her?
A No.
Q Were you given a reason why you weren't?
A Largely because, I believe -- well, let me -- let me think about that for a second. If I remember correctly, and I think I do, it was because of my political affiliation.
So in 2024, I also ran as a Republican trying to do a presidential dark horse campaign and -- against the current administration as -- as the front runner.
And it was during that time that I reached

out to them. So there was -- it was just more like friendly advice, "Hey, this is what I learned in what I experienced."

Q So you believe you were affiliated with the Republican Party at that time?

A I absolutely was.

Q Okay. And so they weren't interested in your advice because they saw you as a Republican?

A I -- I believe that was the gist of it. Or rather maybe they didn't have the means to follow up on it. Or I -- I don't remember. That was two years ago. But I -- I think that's the gist of the conversation.

Q I was planning to ask you a little bit more about that later. But since we -- the topic came up, tell me a little bit more about your 2024 presidential campaign. Did you ever file any paperwork? Did you collect any signatures? What kind of actions did you take as a candidate?

A So I did not -- I -- I might have filed with the FEC as in, like, the candidate thing that you're supposed to file. But I didn't collect signatures, nor did I -- I don't believe I even succeeded in fundraising.

What I did end up doing was spending a lot

of money to go on a lot of different talk shows and radio interviews, one of which was the Alabama thing. I was attempting to get 1-percent polling so that I could get onto the debate stage. That was the primary goal. That obviously did not happen.

Q So this was during the presidential primary. This was not the general election. This was during the primary stage?

A Yes.

Q Okay. Did you ever file any paperwork with the Secretary of State and do a similar declaration of candidacy like you did here?

A No, that was just -- no. Like I said, I was trying to do a dark horse protest type candidate. And it didn't get far enough to where I would have filed with multiple states, let alone Ohio.

Q Sure. What do you mean by a dark horse?

A My understanding of the term, it's colloquial as a very unlikely to win. But potentially an upset.

Q Okay. Is that distinct from -- you also said a protest. What would make --

A Oh, I -- I see what you're saying.

Q I'm just trying to understand your -- I'm just --

A I use those terms interchangeably. But I understand that there might be -- if it -- if it is easier to utilize one word, then it would be dark horse.

Q Okay. You're welcome to use multiple words. I was just trying to expound on what you said. What other steps did you take as part of that campaign? You mentioned you went on some talk shows?

A That -- yeah. I mean, I -- I tried to get as much, quote/unquote, publicity as possible by going on conservative talk shows and radio and news. And I -- I did succeed to a degree with that. But again, it didn't amount to what I was hoping.

Q Did you create a campaign website?

A I've had a campaign website since -- since I ran in 2015. Well, no. 2016.

Q Okay. And that's samronan.com?

A Yes, sir.

Q So have you just changed it as you've run for different offices?

A Yes, sir. I either updated policies as my own understanding of policies and platforms came to the office that I ran for. Obviously, State Representative versus House versus POTUS versus whatever. So --

Q Were there any other campaigns that you volunteered for over the years?

A I don't believe so.

Q Have you ever advocated for a particular candidate, maybe in an informal way? It sounds like you haven't formally volunteered for any candidates. Have you ever advocated for a candidate?

A In what way?

Q Expressing your support for them, encouraging others to vote for them. I'm just curious if you've been involved. You mentioned that you didn't -- you haven't been employed. You haven't volunteered except your attempt with Jill Stein.

I'm just trying to figure out what other interaction you've had with politicians in that way. Like, have you ever endorsed a candidate perhaps or posted about them in a positive light?

A I'm sure I have endorsed candidates because there was a time in 2018 where we were going out of our way to cross-endorse each other. Couldn't tell you their names off the top of my head.

And there have been candidates that I have said good things about, and there are candidates that I have said bad things about. And depending on their trajectory in politics, I may have reversed some of

1 those opinions to the present. So is there anyone in
2 particular you're trying to ask about?
3 Q No.
4 A Okay.
5 Q No. Were some of them Democrats?
6 A Oh, I'm sure there were Democrats,
7 Republicans, Green, Libertarians.
8 Q Have you ever been affiliated with any other
9 political organizations? So we talked about parties.
10 But I could imagine something like a college group or,
11 you know, local groups of certain parties. Do you
12 have a -- are you a member of any or have you been a
13 member of any political organizations?
14 A I don't think I've been a card-carrying
15 member of political organizations. I think I've
16 advocated for some. Like, one of the ones was brand
17 new Congress back in 2017 or '18. They were trying to
18 help grassroots candidates like myself run for office.
19 So I advocated on that type of deal.
20 I've probably, at protests or as an
21 activist, worked with some for sure. I -- again,
22 unless you have a specific one, I -- I can't nail it
23 down.
24 Q Okay. When did you first get interested in
25 politics?

A Oh, October 1, 2013. Specifically because of the government shutdown that was led by Ted Cruz. And the fact that I was active duty at the time, and we were all brought into a room much like this. Maybe not like this, but you know what I mean.

And we were told by our chief that we weren't going to get paid. We were going to be expected to come to work and serve our country. And I'm okay with that. That's -- that's whatever. That's what you signed up for.

But at the time, I was -- I -- I believe I was a unit deployment monitor at that time. And you know what that is; right? You were in the Navy?

Q Yes, I -- yeah.

A So I had just sent people downstream, down range into the desert. And sure, my unit isn't exactly the 82nd Airborne. But my unit is still in the desert. It's still deployed. It is still a lawful target in times of war.

And we did have -- I've researched since. We had 26 fatalities during that shutdown. And that stood with me ever since, that we had elected officials who could so brazenly act on -- against the wellbeing and means of the American people so that they can win political points.

It filled me with such rage, contempt, and disgust that I immediately started looking into ways to get out of active duty sooner than my contract would allow, which allowed me to go into the reserves. And then I immediately started running for office as an anti-war candidate.

Q Okay. So anti-war, was that kind of the first animating political issue for you?

A I would say so, yes.

Q And what was it about the government shutdown that was particularly animating?

A It was the audacity. It was simply the audacity, the failure of democracy that our elected officials could not work together to deal with whatever issue it was. I think at the time it was the Affordable Care Act.

And rather than come up with some sort of -- of course naively thinking -- compromise, they just chose a nuclear option that -- that had dire consequences against our service members, not to mention civilians who furloughed, whatever else.

Q Were -- you mentioned you had contempt, anger, disgust, I think you said?

A Yeah.

Q Is that towards Republicans?

A No. That was towards politicians generally.
Q Okay. So Republicans and Democrats?
A Absolutely. That was a failure of democracy.
Q Are there any politicians that you idealize?
A Absolutely.
Q Who are some of those?
A Eisenhower is one of them. If we're talking American politicians, Eisenhower certainly. FDR certainly. I think those were two of our greatest back-to-back presidents in -- in our history.

As far as more modern politicians, not really. I would say there might have been a time -- a time, mind you, where I thought Bernie Sanders was a decent candidate.

But since then, he has proven to be not what I had envisioned and not what kind of leadership I was looking for in terms of, if you're going to support people and be against war, then don't support Israel and genocide. Again, something that I've stood by for a very long time.

Same thing with Eisenhower. You know, for all of his faults, he was the one that allowed the LGBTQ to remain in the military. He established don't ask don't tell. He was vehemently against it. But he

was a leader and made the right decision.

So -- and -- and again, taxing the highest income to build our -- like, the highest earners so that we could build roads, bridges, schools, hospitals, I mean, admirable.

I -- again, I would have to say my favorite president is by far Eisenhower. I know I said FDR as well. FDR did good things too. He did populism. He -- like, Social Security and Medicaid.

So those are things that helped. I -- I can't -- I'm not going to turn a blind eye to that just because he was a Democrat. So for me, my number one favorite American politician is by far Eisenhower.

Q Are there any politicians that come to mind that you dislike? I mean, you mentioned Ted Cruz, for instance.

A Yeah. And I -- I doubt I'm alone with that, even within the Republican Party. Hell, I would even say my dislike for Donald Trump is not alone in the Republican Party.

So again, knowing what I know and being involved in politics the way that I am, I know that Iran was on the verge of signing a nuclear peace deal, that -- that trade deal that was this big, long kerfuffle for decades.

Iran was on the verge, in fact went out of their way to tell this administration that they were not only willing to sign that document, that they were willing to move their nuclear material handling outside of their country. It was going to be the perfect win. It was actually going to be a diplomatic victory to define the century.

And instead of that, Israel, one could argue -- did argue -- actually they said it themselves. Israel convinced this administration to attack Iran instead.

And now we are mired in yet a -- potential, another never-ending war. So my criticism of Trump is both policy and practical and consistent with my longstanding anti-war stance.

Q What do you see as some of the key differences between the major political parties?

A Well, that's an interesting question because, objectively speaking, the only major differences are in their stated platforms. Their donor base is the same. The passage of bills is the same. And their willingness to comply with whatever is put before them is the same.

Where they also diverge is the Democrats argued in 2017, I believe, that they have the legal

right and imperative to choose who their primary candidates are, who wins their primaries.

And they argued further in court that democratic voters do not have a right and should not believe that they have a right to influence their primary elections.

And I believe the Court allowed that. I don't quite remember, but it was definitely in 2017 when that court case happened. And that was at the end of my DNC Chair race, and one of the primary reasons why I stopped associating with the Democratic Party.

I was filled with absolute contempt because, for one, that's election tampering. And that's voter fraud. If -- if you're going to have a primary and give the people a chance to vote but you are arguing that you can disregard that vote altogether, that, in my opinion, uneducated in law as it may be, is voter fraud.

And I found that reprehensible, which is immediate -- why I immediately ran for Congress in 2018 as a Republican. Now, I don't know if that answers the question. But --

Q Have your views of the parties changed over time?

A My understanding of the parties has changed over time. I always thought Republicans were more interested on, like, spending concerns. And Democrats were more concerned about, like, social justice issues.

But as it turns out, neither of those things are the case. Ever since Citizens United, public opinion has driven precisely less than 1 percent, so effectively 0 percent of all policy.

And therefore most of the policies that we get -- most of legislation we get has nothing to do with benefiting society, humanity, or our infrastructure.

And so, as far as I'm concerned, Democrats arguing that they can manipulate their elections is a non-starter. Republicans have been an open tent. In fact, the first party I reached out to after active duty was the Republican Party.

I didn't get ahold of them. I talked to the Democrats and shared my platform with them. And they said, "Sure. You can run with us." But as I ran, I discovered that the party system itself did not support people. And that's why I ran for DNC Chair, to argue that supporting people should be your primary focus.

And when that fell through and then they argued in court, I was like, "Okay. Then I'm going to go with the big tent Republican Party. I don't care how I have to find them, get ahold of them, or associate with them."

As it turns out, I never needed to call them in the first place. I wasn't aware of that. I didn't know I could have just ran as a Republican. I thought I had to get permission from the party.

So naivete, I -- I'll admit -- I'll admit. I know better now. It's one of the reasons why I didn't get permission from the Republican Party, which may have spared a bunch of this stuff; right?

But that's also not the law. The law does not require you to get permission from the Republican Party. The law does not require the Republican Party to even like you or want you or have any -- the party, as in the leadership of the party.

They have to -- the establishment, as the terminology goes, they can despise everything you stand on. But as long as the Republican voter, the 50 signatures plus 1 or however -- up to 150, like, what you have to say, then that's all that really matters.

And with my platform, my policies, my views, and my ability to reach voters, I was able to achieve

that. And I stand by it.

Q So if I understand you correctly, it was -- 2017 was -- you ran for Democratic National Committee Chair?

A Yeah.

Q And it was after losing that that you, in your mind at least, switched to being a Republican. Is that correct?

A I never considered -- so I see where you're going with that question. Thank you for that question. I never considered myself a Democrat to begin with.

I always thought that my views were conservative views: taking care of the country, taking care of our infrastructure, taking care of people, making sure we have healthcare right. I mean, it's in the preamble: life, liberty, and pursuit of happiness. So I've -- I've always considered conserving as my principle core values.

If -- if I had done anything in -- in context, it was using the Democrats because I got out of active duty to run for office. And I wasn't not about to do that and throw away my career for nothing.

What running for the DNC Chair did was reaffirm that the Democratic Party does not care about

1 people. And once I found out about their -- their
2 case, thereafter, I -- that is when I was like, "I'm
3 not even going to try to work with these people
4 anymore."
5 Q Okay. So if I understand you correctly, you
6 ran for -- to be the Chair of the Democratic National
7 Committee in 2017. But at that time, you did not
8 believe you were a Democrat?
9 A No -- no. I've always considered myself,
10 like I said -- well, I guess I didn't -- I haven't
11 said the word yet. Populist. And populism is not
12 limited to conservative, Republican, Democrat, or
13 liberal.
14 Q But you felt that you could run for that
15 position without actually being a member of that
16 party?
17 A Well, just like I'm a member of the
18 Republican Party now. All you have to do is be -- at
19 the time, which I was, I voted in the Democratic
20 primary. So at the time, I was a card-carrying member
21 of the Democratic Party. And at the time, that was
22 the only requirement.
23 So yes, I chose to bring my platform of
24 populism to the national level and I would dare say
25 succeeded within my first appearance.

The entire argument that was being made for the chair race had shifted from a 50-state strategy and a corporate-donor focus to a 3,760-county member focus, focusing on grassroots initiatives, which I'm sure the next couple of questions are infiltrating Republican Primary, so on and so forth.

In my naivete, I did say that. And I stood by it then. But I -- as I'm learning now, some states would have an issue with that. Some states do not have open primaries. So wouldn't work that way. And that's fine. I -- I can admit that. I was 27 years old and still learning about politics.

Q If you would, I'm -- I know you're trying to get ahead to some of these topics. I'm trying to ask you fairly targeted questions for everybody's sake.

A Oh, I'm --

Q No, you're -- listen, this is your deposition. You're welcome to talk. I'm just -- I'm not trying to trick you or trap you. But I'm trying to ask some particular questions. And we're going to kind of go in circles, I think, if we don't rein it in a little bit.

So if I understood you correctly, you used the term -- you were a card-carrying member of the Democratic Party. But then you also said that you

were not a Democrat when you ran. I'm just trying to understand what you were in 2017 from a party perspective.

A From a party perspective, in 2017, I was a Democrat as far as the party perspective.

Q Okay. But you didn't see yourself as a Democrat?

A I mean, how many people see themselves as a Democrat or a Republican when they hold different values? They see themselves as a person who either happens to align with Republicans at the time or Democrats at the time.

Q So after this break in 2017, did you immediately then consider yourself a Republican? Did you consider yourself an independent? I know you've used the term populous. What -- how would you have defined yourself, let's say, early 2018 when -- after this incident?

A I mean, as I said, in early 2018, I made the decision to run for Congress as a Republican. So I established myself as a Republican. I learned where my platform may have differed with local conservative views.

And then I addressed those local conservative views with my platform, which turns out

wasn't the platform itself. It was just the language of it; right?

At the time, things like universal healthcare weren't exactly accepted. So I made sure to, when I talked about healthcare reform, I talked about it from -- like it's an American healthcare program or things along those lines. If the -- the core of the question is identity, then my core identity has never shifted to populist.

Q Okay. So in 2017 you said you were a Democrat but didn't see yourself as a Democrat. And so you -- but you felt comfortable running for DNC Chair?

A Yes.

Q Okay. In 2018, did you see yourself as a Republican, or just you were a Republican? I'm trying to see -- figure out where your party affiliation was at that time.

A So again, if I'm understanding your question correctly -- and it's a big if -- have I been loyal to parties when I was in the party, as in, did I drink their Kool-Aid?

The answer is I have been a populist who has at times worked within the Democratic Party and with -- at times worked within the Republican Party

without any sort of compromise to my populist ideology.

I'm not going to sit here and -- and try and word salad that I was a true-blue Democrat when I was a Democrat and a true-red Republican when I was running as a Republican. I was a populist under the Democratic Party, and I was a populist under the Republican Party.

Q So we've talked a little bit about some of your previous candidacies. I'd like to walk through some of those. Let me know if I'm missing any. So is it correct that in 2016 you ran for House District 62?

A Yes.

Q As a Democrat?

A Yes.

Q Okay. Did you formally become a candidate in that case, in the sense that: did you collect the signatures, make the declaration, file?

A Yeah.

Q Okay. And what was the outcome?

A I made it through the primary, but I was the only one. And then the general, I lost.

Q Okay. And did you run against a Republican in that campaign?

A I did, yeah. It was a -- it was also an

extremely -- what do you call it -- packed primary in the Republican side. So --

Q So in 2017, you ran to be the Chair of the Democratic National Committee? We've talked about that a little bit.

A Yeah.

Q Were there any candidacies in between there? I just want to make sure I get them all.

A I don't --

Q Have you run for anything else?

A I don't believe so, no.

Q Okay. So then next was 2018, the Ohio First Congressional District; right?

A Yes. I ran against Steve Chabot in the primary.

Q Okay. And with that candidacy, you collected the signatures?

A Uh-huh.

Q Okay. You made the declarations?

A Did -- did all the Ps and Qs.

Q Next that I found was 2022. You ran for Ohio Senate. Is that accurate?

A It's accurate in so far as I was approached to do it, and nothing ever came of it. I never signed any paperwork. I never collected any signatures. I

never filed with the FEC. I never paid any money. So to say that I ran would be a stretch.

Q Okay. And then 2024, you ran as a dark horse protest candidate for president?

A Yes, sir.

Q Okay. And I -- you may have already answered this. Did you collect any of the signatures about --

A No -- no. Did not get far enough.

Q When did you decide that you were going to run for this current office, the 15th Congressional District?

A That's a great question. I think I made the decision to pull the trigger right around the time I bought my house, so after I bought my house, so July, last year.

Q Okay. And at some point you created a campaign. I know you mentioned you had an existing website. But do you remember when you started kind of taking steps towards your candidacy?

A Yeah, probably around August.

Q And you -- at some point you started collecting signatures?

A Yeah. That was in the winter.

Q I know there was some discussion at the

board meeting; the form has a date in October. Is that maybe when you started collecting the signatures or --

A That's when I printed out the form and was -- was trying to figure out with my schedule when I would go out and get the signatures and trying to plan out, like: where would be the best places to go? But work and life kind of got ahead of me from there.

Q And so when you filled out that form, you declared that you were, quote, a member of the Republican Party; right?

A Yes, sir.

Q Okay. And you further declared that "If elected to said officer position, I will qualify, therefore, and that I will support and abide by the principles annunciated by the Republican Party"; correct?

A Correct.

Q And you understood those statements were going to be made under penalty of election falsification?

A Yes, sir.

Q Did you read the declaration before you signed it?

A Yes, sir.

Q Do you always read the terms of service before you signed something?
A I try to. But I'll admit that I may have skipped a couple on the internet.
Q But you understood that this was important?
A Yeah. This had real legal consequences.
Q What did you understand that you were declaring?
A That I would abide by the RNC platform of 2024, the most recent platform. Not that I was taking a loyalty oath for this administration.
Q Did you sign it in good faith?
A I believe so.
Q You signed it honestly?
A Yes.
Q And at the time you signed it, you believed you were a Republican?
A Yes.
Q And at the time you signed it, you believed that you would abide by the principles annunciated by the Republican Party; right?
A Within my understanding, yes.
Q What was your source of understanding what the principles annunciated by the Republican Party were?

A The RNC 2024 platform.
Q And you had read and reviewed that before you signed that you were Republican?
A Yes, sir. There's -- there was a lot of, like, good economic policy on there. Good -- you know, like the military to -- you know, modernizing our military type stuff.
There were, I think, only two things that I vehemently disagreed with, and that was, you know, forced deportation and that kind of stuff, that I didn't really agree with that in terms of border policy.
But strengthening our economy, absolutely. Making things more affordable, absolutely. I mean, I -- I understood it as an economic -- a predominantly economic platform.
Q Would you agree that that platform, that document, was drafted in pretty broad terms?
A I mean, I would say that only strengthens my argument. But yes.
Q And that when something's drafted in really broad terms, it could be interpreted different ways?
A I suppose so, yes.
Q So for instance, I believe there was something on the platform -- and I'm just going to

paraphrase here -- something about keeping men out of women's sports?

A Uh-huh.

Q And so you felt you agreed with that because cis-gender men should be kept out of women's sports; correct?

A Right. You and I should not be competing with, like, Venus or Serena Williams or something like that. Right.

Q And did you honestly believe that's what the Republican Party platform was concerned with, cis-gender men playing women's sports?

A I think if we're going to argue about ideology rather than the platform and the reality of where I stand, then I think we're having a different conversation and not legality.

Q So I think what I'm trying to figure out though is: is it possible that you interpreted the Republican Party platform differently than they intended it?

A I'm sure we could ask everybody in this room where they stand on different conservative issues or even liberal issues and get that many different answers.

Q See, but I'm not asking about your position

on issues. I'm asking about your interpretation of a particular document. We can -- we can pull it out if we want to go line by line. I was hoping not to for everybody's time sake.

What I'm trying to figure out is: is it possible that you interpreted the platform differently than the people who drafted it?

A I mean, we interpret the Constitution differently every single day. That -- that's the whole point of law is interpretation of law. Otherwise we wouldn't be having this conversation.

Q Right. So I'll ask my question again. Is it possible that you interpreted this platform more broadly or differently than the authors intended?

A In so far as anything could be interpreted or misquoted or misrepresented or taken out of context?

Q Yes. If you could give me a yes or no to my yes-or-no question, I would appreciate it.

MR. BROWN: Objection. I think he answered your question.

BY MR. RUSTICO:

Q Okay. I'll ask one more time. If you could ask -- if you could give me a yes or a no. Do you -- if you recall, we discussed -- I know this is

new for you.
A I see.
Q -- discussed this before. If he tells you not to answer, we can deal with that separately. I'm just trying to get a yes-or-no answer. I know you have a lot of opinions. I understand that. I respect that. Is it possible that you interpreted the Republican Party platform differently than the authors intended it?
A Yes.
Q And that platform was your basis for determining that you could abide by the principles annunciated by the Republican Party? That was your key source?
A Not my key source. It was definitely one of the -- I -- again, Eisenhower is a Republican. Roosevelt, like not FDR, the other Roosevelt, was a Republican. Reagan was a Republican. Nixon was a Republican. Bush was a Republican. Bush Jr. was a Republican. Even Trump the first term was a different Republican than he is this term.
So again, my ideology is what allows me to think that I could be a Republican, both historically and in the present. So again, I'm not -- I'm not -- I don't understand the -- maybe I'm not understanding

the question.

Q And I apologize if that's the case. I'm always willing to rephrase or ask it again. You -- oh, go ahead.

A Let me -- let me try understanding it. Whether -- the -- the crux I think of the question is: do I only think I'm a Republican because I may have misunderstood the Republican platform? Is again trending towards an ideological and literal, like, political debate part of the question.

If I think I'm a Republican and I sign up to be a Republican, that's all that matters. Just like every single voter out there that thinks they align with a Republican, even if their values may not align with the as-intended platform.

There's also single-issue voters. I -- I mean, if we want to go down that road, I don't -- I don't think we're going to get to where we have any sort of clarity.

Q Would you agree that a document can be interpreted in bad faith?

A I mean, I -- I know that's a loaded question that I have to answer. But, I mean, for the record --

MR. BROWN: Answer if you can.

THE WITNESS: Ask me that question

again, please.
BY MR. RUSTICO:
Q Do you agree that a document can be interpreted in bad faith?
A I feel like that's what's happening right now with this deposition. So yes.
Q I know you're not a lawyer.
A I apologize if I --
Q But you mentioned that -- let me just strike that. I'll start over.
Do you think it's possible for someone to twist words to serve their purpose?
A I -- I don't know how to answer that without being cheeky. I -- I really don't.
MR. BROWN: Objection to it calls for speculation.
BY MR. RUSTICO:
Q Have you ever had an experience in your life where someone interpreted something that you said or something that you wrote differently than how you intended it?
A Sure. Or yes.
Q Have you ever had an experience where someone twisted your words in bad faith?
A Absolutely.

Q So you agree then that that's something that could happen?

A Yes, and it happened to me during the Board of Elections meeting.

Q Okay. So we've discussed a little bit of the declaration of candidacy. At that point, you went out and started collecting petition signatures. Is that right?

A I did.

Q Did anyone help you collect the signatures?

A No. I -- I did go the first day with Ana and her daughter as, like, a unit. But we decided against that in the future. So I was the sole person gathering signatures at that point.

Q Is Ana a Republican to your knowledge? Obviously you could say you don't know, I guess.

A I mean, I don't know.

Q All right. Have you ever talked with her about politics?

A I mean, we are working together on this campaign. So yes.

Q Has she ever suggested to you that she is a Republican?

A She has suggested to me that she is also a populist. I -- I think in terms of -- if you're

getting at core political identity, it would be populist.

Q Are you aware of whether she's voted in Republican primaries in the past?

A I don't know.

Q When you were collecting these signatures, did you ask the signers if they were Republicans?

A Oh, I made absolutely certain to verify they were Republicans.

Q And how did you confirm that?

A Either, A, asking them. So I'm sure everyone here's aware. But for the record, I went on the Secretary of State website, downloaded the -- the District 15 voter files. And then, I mean, my god, they're comprehensive and free, no less.

So I was able to partition those files to where I could get what I thought to be the most likely Republican voter who voted Republican in the last two primaries and the last two generals.

And I specifically went out of my way to ask them. But I obviously verified: "Hi. Samuel Ronan. Is this the whatever residence? I just want to make sure we've got a good strong Republican here. And I just want to talk to you for a bit about my platform and earn your signature."

Q Were people receptive to your platform?
A Oh, yeah, many times actually.
Q Do you have any other staff on your campaign?
A No.
Q Do you have any volunteers?
A Oh, I'm sorry. Interns, yes. I -- I apologize. That was --
Q That's fine. Yeah. No one's memory is perfect. So --
A Okay.
Q So let's talk a little bit about that. So who are these interns?
A Just that, I mean, students.
Q Students --
A From OSU.
Q How many interns do you have?
A Four that have been consistent.
Q What do you mean by consistent?
A Well, it's just like with anything volunteer. I'm sure you've had -- well, it might be different for you guys. In the grassroots community, there's a lot of people who want to be associated with something. And a whole lot less of them that are actually willing to do anything with it.

And the same has been true for volunteering, for an unpaid internship with a campaign. I think we originally had like 12 sign up. And only four have stuck it through.

Q How did you go about soliciting these volunteers or interns?

A Through the internship office and figuring out what their process was and what their requirements were. And --

Q This is an internship office at Ohio State?

A Uh-huh.

THE REPORTER: Is that a yes?

THE WITNESS: Yes. Sorry.

BY MR. RUSTICO:

Q And you -- have you ever asked these interns whether they're republicans?

A No. I was just happy to have the help.

Q What was the vetting process like? How did you end up with these interns? I understand you went to this office at Ohio State. But just educate me 'cause this is something I know nothing about.

A So there was no vetting process. I presented the internships that I needed, filled, the internship office put it out to the respective offices and departments, and students volunteered. And I was

grateful for it.

If there was any vetting done at all, it was to determine, like, "Are you certain this is the internship thing you want to do? Because this is your degree, and this may or may not align."

Q So did you create some kind of profile or request for volunteers that they then responded to?

A I created an internship packet that described the role and what was needed.

Q And what -- oh, sorry. You can keep going. But then what is that? Like, what do you ask your interns to do?

A Oh, some of them are doing social media. Some of them are doing, like, outreach. Just whatever that they signed up for and that would help the campaign.

Q Do they run their statements by you?

A Yes.

Q And so you get a chance to sign off on most or all of what they say on your behalf?

A Yeah, I encourage it. Just one, they're not used to working on a campaign. And so they usually ask me things like, "Hey, is this the right language? Is this the right formatting? Hey, if we're going to reach out to this people, do we need to phrase it

differently?" So --

Q Is that true for Ana as well?

A When it's official campaign correspondence, yes.

Q Okay. And that can include social media posts?

A That is from my official campaign page, yes. What she does with her own time is her own time.

Q And is her -- while we're talking about Ana, I'll jump ahead. Is her name on Facebook different than Ana? You said her name's Ana Cordero, at least it is in this case. Does she have a different name on Facebook?

A I would imagine so.

Q Okay. If I told you there's an Ana Aleida-March, is that her?

A That's probably her, yeah. She has multiple accounts. I -- I'd have to check to see which one we usually correspond on. She also got -- she got harassed on social media recently. So she had to change her name. So --

Q Got you. Okay. So is that at least a name you recognize?

A Yes.

Q Okay. As one that she's used?

A Yeah -- yeah.
Q Okay. If I may, I'd like to turn back the clock to 2017. When you were running for Democratic -- Chair of the Democratic National Committee, part of your platform was to run Democrats as Republicans; right?
A Yeah. So with my naive understanding of that, that was even allowed, which obviously now I know that that's not allowed everywhere.
Q Do you recall the interview you did with Rebel HQ in 2018?
A I remember. I re-watched part of that video. Yes. I don't -- if -- if you're asking me if I remember sitting there and talking to the guy, no.
Q Who is Rebel HQ?
A A person. I -- I genuinely -- I -- I -- what do you call him now? Independent journalist. Something like that.
Q Do you remember how you got in contact with him or how he got in contact with you?
A I do not. That was definitely a blur. I'm assuming they reached out to me. At the time I was popular.
Q And you were popular why?
A Because of my populist approach to arguably

bottom-up rebuilding the Democratic Party to actually serve the democratic voter base, which as we have already discussed, they argued in court they don't have to. So --

Q Okay. But this was 2018. And so by that time, you had become a Republican; right?

A By that time I was a populist running in the Republican Primary. Yes.

Q But you didn't consider yourself a Republican?

A I -- I mean we've gone through this one a few times too. I consider myself a populist; that is my identity.

Q I'd like to read a passage from that interview. And if you question its authenticity, I think it was in the record from the board below. That's where I pulled it from. I'll just tell you that.

So in response to a question, you said: "I put my money where my mouth is. Last year, I ran for DNC Chair. And I said, 'If I were the chair, we would still have to run Democrats as Republicans because that's the only way you're going to make it through.' And here I am, I guess, putting the rubber to the road." Does that sound familiar to you?

A I mean, I would say this is that example you brought up earlier about taking words out of context and using them against people, because that's not the full quote. That is a cherry-picked portion of that answer.

The very next bit of that is: "But that's not what I'm doing. What it turns out is being progressive," populist, the terminology, "has been very well received within the Republican community. And this is something that we should all embrace as progressives, populists.

"That we don't have to rely on one party or another. That we can in fact reach our brothers in the Republican Party because they do in fact like what we have to say."

Q What did you mean when you said "run Democrats as Republicans"?

A That's what I said in the DNC Chair race. That --

Q Oh, sorry. My question was what did you mean by "run Democrats as Republicans"?

MR. BROWN: Can you be specific as to the date?

MR. RUSTICO: This was back in -- well, I guess this is 2018. He's I think technically

quoting himself in 2017.

MR. BROWN: Yeah.

MR. RUSTICO: And he uses the term in 2018.

BY MR. RUSTICO:

Q I can read it back if you -- "We would still have to," quote, "'run Democrats as Republicans.'" I'm just curious what you meant by that.

A What I meant by that was, like you said, I was quoting myself probably in that regard. And I probably used -- I probably just used it as -- as that, as simply a quote to bring up to the next part of that very same segment, that it was about progressive ideology, populist ideology, actually resonating within conservative and Republican communities.

So again, since we so specifically spent 10 or 15 minutes talking about: do I believe in words, documents, and quotes being taken out of context, misrepresented or misunderstood? I think it's worth pointing out, this is one of those examples.

Q So when you said "run Democrats as Republicans," were you endorsing a strategy of Democrats pretending to be Republicans?

A No. As I just said and will continue to say

no matter how many different ways you ask me this question, the next thing I said is we don't have to do any of that because populist ideology resonates with Republican voters as much as it does with any other voter.

Q So when you said, "We need to run Democrats as Republicans," you meant to say that we need to run populists as Republicans?

A I didn't mean anything. I said that which led specifically into the -- the point that I was making. It's kind of like saying we used to have horse-and-buggy carriages. Now we have cars.

In the beginning, there were horse-and-buggy carriages. We really relied on horses to use transportation. And now we don't have to because we have cars. Is -- does that metaphor help? Because that's how I meant it.

Q So in that interview, you also mentioned something along the lines of calling yourself a Republican was, quote, "the trick to get people to listen to you." Do you recall saying something like that?

A Oh, I'm sure there was some language like that in there.

Q So do you think that in order to be listened

to by certain voters, you need to call yourself a Republican?

A I don't think so. No. Not anymore. I think I did at the time.

Q So at the time, this being 2018, you were calling yourself a Republican?

A In so far as we have established that I have always identified myself as a populist and ran within both parties, yes. To be clear, why are we litigating something from eight years ago?

Q I'm not the one being deposed. I'm just here to ask you some questions; okay?

A Okay.

Q So if you recall at the hearing there was also some discussion of a Facebook post that you made on the Grove City area progress page. Do you recall that?

A That one right there?

Q Yes. If you'd like, I can mark it as an exhibit. We can look at it.

A Oh, I'm sorry, what -- was that --

Q That's fine. If I may, I'd like --

A Yeah. Answer yes.

MR. RUSTICO: Yeah, we can mark this as an exhibit. And then we can talk about it more

easily.

MR. TABATOWSKI: I think they have copies.

MR. RUSTICO: Yeah.

THE REPORTER: Do you want 1?

MR. RUSTICO: Yeah. 1 is fine.

(Exhibit 1 was marked for identification.)

So for the record, I'm handing the deponent Exhibit 1 as well as a copy to Counsel.

You guys want a copy as well?

And this was the document that Deponent pointed to a moment ago.

BY MR. RUSTICO:

Q So if you want to take a look at this, do you -- and let me know if you recognize it.

A I recognize the document we are about to discuss.

Q Okay. And what is it?

A A Facebook post.

Q Do you remember the timeframe in which this post was from?

A Some, yeah. Probably February-ish, January-ish.

Q Okay. So certainly after your declaration

of candidacy in October?
A Yeah. This -- I -- I -- this was one of many Facebook groups I joined to get the word out.
Q So in this post, Mark Gavin Sr. said, quote: "Samuel Ronan, didn't you run for DNC Chair a few years ago? Now you're running for Congress as a Republican. Stop grifting." Do you recall responding to that?
A Yes.
Q Okay. If you could, could you read your response there?
A As long as I'm allowed to read it in full.
Q Everything on this document.
A Thank you: "Mark Gavin Sr., I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep-red districts as Republicans just to get a foot in the door.
"So if I'm doing anything, it's following the argument I made on that stage. That said, I am not fighting on behalf of the traitorous Democrats who just crossed the party line to vote for more ICE funding. I am not a grifter. I'm running for office in the party of the dominant district fighting for the

working class."

So if we need some clarity on that, as we have been doing in this entire deposition, is I quoted myself as myself from 2018 to clarify where that quote came from.

And then I brought it to the present, 2026, stating that I am not associated with the Democrats, have no desire to be with them, and in fact called them traitorous for crossing the party line.

Which if we're talking about party platform, I don't believe there is anything on the Democratic Party platform that has anything to do with supporting ICE funding.

So if we want to go down these different routes of parties being adherent to their own platform and that somehow being a justifying reason to say I am not adhering to the platform, then in this example alone there are parties that are not adhering to their platform.

And one could even argue that the Republicans aren't adhering to their own anti-war stance by literally declaring war against Iran.

Q So you would agree that in this post, in response to Mr. Gavin, you didn't state that you were a Republican?

A In that particular response, that very, very specific, isolated response, no. I did not say those words.

Q Instead you responded by talking about back when you were running for DNC Chair?

A Because that's the question that he raised.

Q Okay. And you distanced yourself from the Democratic Party in your response by calling them traitorous?

A I feel that that would be an accurate assessment.

Q You can put that aside.

MR. RUSTICO: I have just one more exhibit. We can mark this as Exhibit 2.

(Exhibit 2 was marked for identification.)

BY MR. RUSTICO:

Q Again, this should hopefully be familiar to you. Oh, yes. This is also, again, from the hearing. I wasn't at that hearing. You know, so I need a chance to kind of walk through some of these documents.

MR. RUSTICO: So I'm going to hand Deponent what's been marked as Exhibit 2. I've got copies for Counsel.

THE WITNESS: Should I give this to you when we're done with that?

THE REPORTER: Thank you.

BY MR. RUSTICO:

Q Do you recognize this document

A From the hearing, yes.

Q And what is it?

A A post, a Facebook post.

Q By?

A Ana Aleida-March.

Q And I know we talked a little bit about her name. Do you see her picture there?

A Uh-huh.

Q Does that appear to be Ana Cordero?

A It appears to be.

Q Do you have any reason to doubt whether this was actually Ana Cordero?

A I do not.

Q And this is a post of her saying, quote: "It's official. Samuel Ronan's on the ballot. Woo-hoo"; correct?

A Yeah. What she does on her own personal page is her business.

Q Okay. Would you agree that in response to that post, someone by the name of Paul Ryan said:

"I've always wondered if it might be easier to torpedo the Republican Party from within as opposed to trying to take on the Dems.

"As long as a progressive was labeled Republican, I feel like Republican voters would be like," quote, "'Oh, hell yeah. Good policies,'" end quote. And that Ana responded: "Paul Ryan, yeah. And we're testing out theory, LOL"

A If that's what she posted on her personal page, I can't argue that.

Q Did you agree with what she said?

A I don't control what she says on her social media post.

Q Did you agree with what she said?

A Did I agree with what she said? Did I put a like on it? No. I did not put a like on it. I did not react to it.

Q Would you agree with me that someone can agree with something without liking it on Facebook?

A I mean, sure. We can agree on a lot of things without it being on social media.

Q So I'm going to ask again, specific question. Did you agree with her statement?

A Did I agree with her statement? I'm not entirely certain I saw her entire post chain, so I

can't answer about what I saw in the past.
Q That's fine. Do you agree with it now?
A Do I agree with it now? No because that's not what we're doing. And I would have corrected her on that.
Q If you had seen it, you would have corrected her?
A I would have corrected her.
Q Do you recall if she tagged you in this post? I know this is in black and white, so we can't tell. But she says: "It's official. Samuel Ronan is on the ballot." Did she tag you?
A She might have. That doesn't necessarily mean I saw it. You know how much I post and how much I get reacted on? It's easy for something to get buried.
Q Okay. All right. You can put that aside or give it to the court reporter.
A Okay.
Q Yeah, we're not going to -- I don't think we'll need it again. But in case, she can give it back to you if we do.
So -- do you believe that when you declare as a candidate for a party, you need to do so in good faith?

A Do I believe that?
Q Uh-huh.
A So that's a really good question because it's directly tying to: did I declare in good faith? And the answer is I felt I was declaring in good faith.
Do I think it's a necessity? Not according to Ohio Law. And besides, people change their party affiliation all the time with -- through whatever confines of the law allows them to.
Like, I know for instance, California -- or maybe I don't know. I assume -- I think -- I think California has closed primaries. So if you want to change your party affiliation, you have to sign real paperwork to do that.
And so it ends up having maybe stronger identity to say that "You know what? I'm officially going to be a Republican, or I'm officially going to be a Democrat."
But in an open primary, like Ohio has been for as long as I can remember, voters will flip flop every other election. I mean, that's historic within the US politics as well. For Republicans in office by the midterms, it -- the -- the Congress flips to the other color.

I -- so I -- it's a difficult one for me to answer because I thought I was doing it in good faith. But do I think it has to be in good faith? I -- I don't think that's -- one, I -- I don't think that's the right question. And, two, even if I agree with the law that it doesn't have to be in good faith doesn't mean that I wouldn't have acted in good faith.

I think that it is certainly possible people could take advantage of that and not be in good faith. I -- I think that's the best way I can answer your question.

Q So you've voted in primaries before. So you've done that process that you just described where you picked one ballot or the other; right?

A Yes, sir.

Q How did you know which ballot to pick?

A By asking for it.

Q Sorry. No. How did you decide which ballot to pick?

A Can you be a little bit more clear on that question?

Q Sure. So let's say it was the past election, last primary that you voted in. You walked to the polls. They asked you which ballot would you like after they checked your ID probably; right?

A Right.
Q How did you determine which ballot you were going to pick? Did you flip a coin, for instance?
A No.
Q Did you ask your sister? Like, I'm trying --
A Yeah. Okay.
Q -- to figure out how you -- yeah, and I apologize again.
A Yeah.
Q It's my job to make these questions clear. I'm trying to figure out: how did you determine which ballot to pick?
A In the past, it -- it was probably because of one candidate or another, whether I wanted to vote for them or vote against them. So very -- yeah, if -- if there happened to be a Republican that I wanted to vote for, that I really, really wanted to vote for, I would have picked the Republican ballot and then voted for them.
If there was a Republican that I really, really, really didn't want to see get elected, I would also pick a Republican ballot and then vote against whoever was primarying them or the person that I thought would be a better option that was primarying

them.

Q Do you think that voters are typically adequately informed when --

A Absolute -- absolutely not. And that is empirical fact.

Q Tell me more about that.

A The -- if you ask -- if we go out right now and stop 20 people in the street and ask them about an economic issue, a domestic policy, like a different domestic policy issue, a trade issue, and a foreign policy issue; I guarantee they would not have the adequate understanding to make a confident -- or what -- what's the word -- informed answer on those things.

And we can go a little further. We can blame social media. We can blame regular media. We can blame any number of things.

But I think our country, unfortunately, has drifted away from ensuring the masses have a clear understanding of what the issues are, which goes back to the aforementioned money in politics and how corporations get involved with politics and legislation and how public opinion no longer really applies.

I think what people are the most informed on

are their one or two topics that they care about most, which right now seems to be the Iran war, the Epstein files, and cost of living.

Q So if voters are not always adequately informed, as you seem to agree quite wholeheartedly, would you agree that party labels then are a helpful guide for voters about which ballot to choose?

A Not always.

Q So your conception is that when someone walks into a primary ballot -- or excuse me -- a poll -- primary polling place, they should not rely on party labels when they decide which ballot to pick?

A I think party labels doesn't do as much help as you are suggesting it does. It has not been my personal experience. I think, in primaries especially, both parties throughout every district, by the way, have voted consistently: 50,000 voters in the Republican, 50,000 in the Democratic primary voters.

I think a lot of primary voters might associate with that party strongly more often than not. But I don't think that in and of itself is informative. And it's indicative of the turnout for primaries as well.

Q Do you think that someone could declare candidacy for a different party in bad faith?

A As we discussed, yes, I do believe it is possible.

Q Do you think that that could cause any voter confusion?

A It -- I would -- I would argue against it because, for instance, Donald Trump was a Democrat for most of his life. And then he ran as a Republican in 2017 and ultimately won.

So if that argument was valid, then Trump himself would have been a bad-faith Republican who then managed to take over the Republican Party over the course of eight years of being in politics.

So if we're arguing that a politician could infiltrate another party and then take over its identity, then we'd have to make the argument that that's already happened at the highest levels.

Q So is it your view that the party labels are essentially meaningless?

A It's my view that the party labels have meaning when they have meaning to the individual. And for me, being a Republican is not my primary identity. My primary identity is populist.

But I feel that some of our greatest leadership came from the Republican Party. And I try to emulate and espouse those values and ideals. And

that person for me is Republican President Dwight D. Eisenhower.

Q In your opinion, what does it mean to be a Republican?

A Whatever it means to the individual. What does it mean to be a Christian? We can't have that conversation. That's -- that's a -- I don't think that's a -- I don't think we're going to get anywhere with that line of questioning.

Q What does it mean to be a Democrat?

A What does it mean to be a Muslim?

Q So you believe these labels are fluid?

A I think these labels are defined by the individual. Hence why parties evolve. Hence why we have primaries. If labels were the 10 Commandments, the Bible, we wouldn't have primaries. So I -- I -- again, I don't understand this line of questioning.

Q So would you prefer that we have a single primary ballot then?

A As in, like, anybody that was running under any party label would just get voted on all at once?

Q Well, I guess what I'm trying to understand is you seem to have expressed a general distrust in the party labels, that the labels -- maybe they're not

meaningless, but they're fluid. They're hard to pin down.

And so again, I'm back to the situation. If someone walks into a polling place in Ohio at a primary election, they have to pick which ballot to choose. And I'm trying to figure out how they would do that.

So in your case, you mentioned that you researched the candidates. I'm trying to figure out: how is someone -- let's say another voter. How are they supposed to choose which ballot to take if the labels are, if not meaningless, of low value, I guess maybe? And I apologize. That was a long question.

A Yeah.

MR. BROWN: I'm going to object. I think it's all been asked and answered, actually. So I think this is kind of redundant.

BY MR. RUSTICO:

Q You can go ahead and give it a shot.

A I -- I mean, what does it mean to be an American? What do you think about being an American? What do you think about being an American? Let's take it even further. You're a veteran. What does your service mean to you? Those are the same exact questions with different labels.

Even better. We're all lawyers here, except for me. What does it mean to --

THE WITNESS: Wait. Are you a lawyer? I'm sorry.

All of us except for -- what does it mean to be a lawyer for you -- a lawyer for you? We can -- we can play this game any -- many different ways.

BY MR. RUSTICO:

Q But you would agree someone could assume a label disingenuously?

A Yeah. I mean, don't people have bad opinions of lawyers?

Q Oh, no. Sorry. I think my question was unclear. I'm saying someone could assume a label. So I could say, for instance, I'm a Supreme Court Justice but that not actually be true. That's something I can do; right?

A I can lie about being the Pope.

Q And so someone could also lie about being a republican?

A Which we've established. I didn't.

Q I know. But that's not my question. I'm just trying to figure out if that's -- under your view of what the political parties are, someone can claim

to be one even when they're another.
A And I think we've given several examples of that being presently the case.
Q Okay. What are some of your core political beliefs?
A Anti-war is -- so -- and I know that's going to be interesting that I'm a veteran. And you're a veteran too. We both signed up for the same thing: to fight for our country. And I would still fight for my country.
That being said, we're not fighting for our country in Iran. We are not fighting for our country by blowing up boats in the Caribbean. We're not fighting for our country by blockading Cuba and starving them to death. Those aren't wars. Those are actually war crimes.
So by being against war, what I guess would be a more clarifying answer is I'm against war crimes. That being said, core issue.
I -- I want to provide actually the same benefits that you and I got to enjoy while we were active duty: free healthcare, free education, housing assistance, food assistance, transportation support. I mean, my goodness, if ever there was a populist wet dream, it would be what the military does.

If we could expand that to the American people, there would be no housing crisis. There would be no food scarcity. There would be no transportation crisis or utility crisis or access to healthcare, access to education.

So if anything, I would expand the policies. Mind you, I'm not going to force everybody to enlist. But I would expand the benefits that our service members enjoy to as many of our population as I could.

Q We talked about this a little bit before. You have a campaign website; correct?

A samronan.com.

Q And do you manage that website?

A I do.

Q Do you create the content on there?

A I do.

Q Okay. So everything on your website is from you?

A I have touched at some point, yes.

Q Okay. And you have some pretty extensive political views on that website; right?

A Oh, and aggressive ones. I've toned down my language on a few. And if I missed a couple, I probably need to edit those.

Q Oh, no. That's fine. I'm not planning to

go through all of them. I'm just trying to get a sense of what the -- if the website -- you would say the website is a reliable source of your political views.

A I hope so. That's why I built it.

Q So I'm just going to run through just a handful of these. I'm not going to belabor the point, but just to make sure that I understand. So you believe there should be a minimum wage of 26.50?

A Yes.

Q You want to abolish the Federal Reserve?

A That's one of my cheekier positions. Yes.

Q You support statehood for Puerto Rico, D.C., the territories, and Native American reservations?

A I do.

Q You support the exoneration of all Antifa members?

A I don't think that's the phrasing. I think, if I remember that correctly, Antifa isn't an organization that exists. It's anti-fascism. And yes, prosecuting people for being anti-fascist and protesting their government is something that needs to be exonerated.

Q Okay. You support a complete divestment from fossil fuels by 2035?

A Or sooner.
Q You support full decriminalization of all drugs -- drug offenses. Excuse me.
A The nuance there is, like, the -- the position in the user, like possession and using. Don't treat that as criminality; treat it as healthcare. To be clear on that.
Q And you believe that drug -- past drug offenders should be released and compensated?
A If they were drug offenders for possession or use in -- in the context of it -- it being a healthcare crisis, yes.
Q You'd like to federalize public utilities?
A Absolutely.
Q You want to federalize all forms of banking and merge them with the postal service?
A Yes.
Q You want to federalize all airlines and airports?
A As it was for many years, yes.
Q You want to federalize most private housing?
A That's -- it's accurate to say that. But the -- the principle would be to take corporations out of the housing market and, by -- by extension, private banks, like forcing people into -- into really bad

loans.
Q And you would -- if -- if I understood your website correctly, any real estate that's not a primary residence would be taken away or confiscated from people. Like, people can't have more than one residence; right?
A Yes. Which goes right back into the corporations owning, like, hundreds if not thousands or hundreds of thousands of residencies.
Q You'd like to privatize -- or excuse me -- federalize agriculture, private agriculture?
A Uh-huh.
Q You'd like to federalize all police forces?
A Yes. Which seems to be happening anyway.
Q You support universal healthcare?
A Yes.
Q You support universal basic income?
A Yes.
Q You support the use of price controls?
A Absolutely.
Q Specifically the cost of all goods, services, and products specific to women's health and hygiene shall be universally reduced by 50 percent and frozen in price for a period of ten years?
A I think that would be a great start.

Q You believe that all rents should be reduced by 50 percent.
A At the very least,
Q You believe that food, clothing, beverages, and other cost-of-living goods should be reset to January 1, 2000, prices?
A That's one of my cheekier ones. Yes.
Q In the banking sector, all loans should be set to 1 interest -- or 1-percent interest? Excuse me.
A Yes.
Q You think we should abolish all credit scores?
A Yes.
Q Immediately erase all medical and student debt?
A Absolutely.
Q You're pro-choice; right?
A Yes -- yes.
Q And your view is that you should actually require doctors to perform abortions. Is that right? You said there should be no ability to opt out for religious reasons?
A Yes.
Q I think the language -- yeah, it's --

A I think that's about right.
Q Religious exemption shall not be tolerated. A doctor or medical professional shall not deny one, in this case we're talking about an abortion, for their own political beliefs. You agree with that?
A Yeah.
Q That's on your website.
A Yeah.
Q Okay. You support a 12-month grace period for immigration?
A Yes.
Q And that all persons admitted to the United States shall be afforded 12-month visa and become eligible citizens upon its expiration?
A One of the ways to deal with our immigration, yes.
Q You would like to convert all current power plants to solar arrays by 2035?
A That would be the dream.
Q And you consider those beliefs to be consistent with the Republican Party platform that you cited?
A It would achieve every single -- except -- well, it wouldn't achieve the -- the immigration reform 'cause they wanted to do

deportation. But it would achieve a vast majority of the remaining platform. Yes.

Q Okay. And we talked a little bit earlier about how you label your political beliefs, that you consider yourself a populist; right?

A Yes, sir.

Q Do you also consider yourself a conservative?

A In some -- some specific policies, yeah.

Q Do you consider yourself a liberal?

A In some specific policies.

Q Do you consider yourself a progressive?

A In so far as that's interchangeable with populist, yes.

Q Would you consider yourself a socialist?

A No.

Q A democratic socialist?

A No.

Q A communist?

A No.

Q A Marxist?

A No.

Q A Libertarian?

A No.

Q Populist?

A Yes.
Q Okay. I'd like to take a break, five, ten minutes.
A Okay.
THE REPORTER: All right. One moment. The time is 11:34 a.m. We're now off the record.
(Off the record.)
THE REPORTER: We are back on the record. The time is 11:50 a.m.
BY MR. RUSTICO:
Q Mr. Ronan, you understand you're still under oath?
A Yes, sir. I do now.
Q Yes. I have just a few follow-up questions for you. In your view, how is someone to determine which primary ballot they should pick when they go to the polls?
A I would abstain from telling anybody how to choose how they want to vote. I know in the past people do single issues. So do that if that's what you feel.
If it's a moral compass, do that, what you feel. If it's a candidate that you like, do that. I am not going to sit here and say, "People should vote this way because of that reason."

Q Do you think someone could identify with a particular party and just pick that ballot?

A Do I think people have identity with a party? Absolutely.

Q And so would you agree that there are voters who rely on those party labels as a shortcut to understanding some of what those candidates believe?

A In the same regard that people stick to religious texts for moral guidelines. So, I mean, I think it's more cultural and social rather than necessarily identity.

But if they choose to identify, like, I am a Republican and that label means this to me, and they don't know otherwise, or they don't think otherwise; then I don't see a problem with that.

Q So would you agree that, when a voter selects a particular ballot, whether it be a Democratic ballot, Republican ballot, Libertarian ballot, that there's certain assumptions that go with what that -- the people on that ballot believe?

A I -- that's up to the person. Again, if they are picking a ballot based on those assumptions, then yes. If they're picking a ballot based on any of the other criteria, then no.

Q I had just one other question about one of

your beliefs, if you'll indulge me.

A I'll indulge.

Q This is from your website. And I just -- I want to know if you stand by this. This is from your website, that the headline is the American Nuremberg Trials.

I'm going to quote here. And then just let me know if you still agree with this position on your website:

"Every single member of ICE, every agent, every leader, every administrator, every support personnel, every single individual who receives, has received, or contributed to ICE activities since 2003; shall be arrested, charged with war crimes, crimes against humanity, terrorism, instilling public fear, violation of the Constitution, and treason with a mandatory life sentence without the possibility of parole for those with indirect involvement and a mandatory death penalty for those with direct involvement."

A Yes.

MR. RUSTICO: All right. Those are my only questions.

We can switch places if that -- sorry. I know we're still on record. Yeah. We can go off

the record if that's --

THE REPORTER: Okay. One moment.

MR. RUSTICO: Thank you. Sorry, I should have said that.

THE REPORTER: The time is 11:53 a.m. We're now off the record.

(Off the record.)

THE REPORTER: We are back on the record. The time is 12:01 p.m.

EXAMINATION

BY MR. ZAGROCKI:

Q Good afternoon, Mr. Ronan. It's officially good afternoon since we've been -- to twelve o'clock. My name is Brian Zagrocki. I represent the Franklin County Board of Election members that are defendants in this action.

I'm going to go over some preliminary stuff. It's going to be the same stuff you already heard. But just for our efforts, if you can just help me. And we'll walk through it. So you understand that you remain under oath today?

A I do.

Q You understand that you must answer all questions truthfully, to the best of your knowledge?

A Yes, sir.

Q And if you do not understand a question, you will let me know?
A Yes, sir.
Q If you need a question repeated or clarified, you will ask?
A Yes, sir.
Q And you understand that, again, because there's no video recording, you can't use gestures, meaning you need to answer verbally yes or no; correct?
A Yes, sir.
Q Okay. And you will allow me to finish my question before answering, just like I'll allow you to answer fully the question before I move on?
A Yes, sir.
Q Okay. Last thing, and I know this is because it's been long, you may request a break at any time so long as a question is not pending. Do you understand that?
A Yes, sir.
Q Okay. We're going to focus our questions today specifically on the March 6th protest hearing, 2026 protest hearing --
A Okay.
Q -- of your candidacy. You attended the

March 6, 2026, protest hearing of your candidacy before the Franklin County Board of Elections; correct?

A Yes.

Q You were present for the entirety of that hearing?

A Yeah. From the very beginning, I'd say.

Q You testified under oath at that hearing; correct?

A Yes.

Q And you were represented by counsel at that hearing?

A Yes.

Q Your counsel had the opportunity to present arguments on your behalf?

A Yes. Well, for the most part, yes.

Q We can accept that. Your counsel also had the opportunity to cross-examine the protester. Is that correct?

A For the most part, yes.

Q And you personally answered questions from members of the board, including Defendant Freedhoff; correct?

A For the most part, yes.

Q When you say for the most part, can you

explain that for me?
A I was not allowed to answer contextually or completely to some of her questions where she was specifically challenging my views and my platform.
Q When you say you weren't allowed contextually, what do you mean by that?
A She said -- I mean, she -- she made it very clear that that was the end of the hearing and I was not to speak further.
Q Okay. We'll visit later on about the question.
A I'm just trying to answer.
Q I appreciate that. You -- at the hearing, you were given the opportunity to explain your qualifications and political positions; correct?
A My qualifications?
Q Your qualifications as a candidate.
A As in the signatures? 'Cause that's the only qualifications.
Q We can back up. What is your understanding of why there was a protest against your candidacy?
A Ideological differences.
Q When you say ideological differences, were they claiming that there was a law that you violated? Or was it purely just a difference of opinion?

A Purely a difference of opinion. I don't believe there was any argument made that I violated the law.

Q Okay. At the hearing, no one prevented you from -- excuse me -- from presenting your testimony though; correct?

A Yes.

Q Okay. I want to move on a little bit specifically to Ms. Freedhoff. When did you become aware that Ms. Freedhoff was Chair of the Franklin County Republican Party?

A At some point before the hearing,

Q Can you tell me, you know, was it a few days before the hearing? Was it a few weeks? Be a little more specific, please.

A I would have to defer to my attorney 'cause he was the one that kind of let me know.

Q And again, I'm asking you specifically. So if you can just estimate?

A Days.

Q Days?

A Days maybe.

Q Okay. What specific facts did you rely on in concluding that her role created a conflict of interest?

A Well, in my capacity as a not-lawyer, someone who is on an official capacity of, say, in this case the Republican Party, the chair, the committee, and the person filing a grievance against me is also an official member of that particular committee; then that would be a conflict of interest because she would supersede him.

And therefore, they would have the same argument or the same -- I don't know the legal words. But that to me screams as a conflict of interest.

Q Okay. We're going to unpack everything there. Right now, I'm focusing on the Franklin County Republican Party; okay?

A Yeah.

Q Now, when you say that there was a conflict of interest with the Republican Party, are you referring to the Ohio Republican Party or the Franklin County Republican Party?

A Based on your question that you just asked, I'm -- I was answering it from the understanding of the Franklin County Party, like the -- the committee, the organization.

Q Okay. Based on your understanding, what was the Franklin County Republican Party's involvement with the protest?

A That the chairman was sitting on the Board of Elections, which that -- and, I mean, that's -- that's the reason, the chair is -- that would be -- I mean, isn't that why judges have to recuse themselves in general, because they have a vested interest in whatever the thing was? I mean, that --

Q I'm not being deposed here. So, Ms. Freedhoff is the Chair of the Franking County Republican Party. Beyond that allegation, what specifically about her being the Chair of the Franklin County Republican Party speaks to bias or why she should refuse -- excuse me -- recuse herself from the protest?

A I -- either I'm not saying it right. That is the primary reason. Which the -- the -- I guess, again, without my legal knowledge, the only way I can answer that is with yet another metaphor.

If a judge was presiding over a trial between Company X and a victim from Company X, but the judge had a vested interest in Company X; then that judge would have a conflict of interest in that whole trial.

So by -- by the comparison of the metaphor, Freedhoff was the judge. The -- the Republican Party

being Company X and me being the victim. So clear conflict of interest.

Q I want to speak a little bit more, I guess, about specifically now the Franklin County Republican Party's interest in the protest. What was the Franklin County Republican Party's interest in the protest?

A Given that the chair is on the board and the protestor was also in the committee, it would be a direct interest of putting their thumb on the scale of who they felt ideologically could or could not be on the ballot.

Q And you're saying that the protestor was a member of the Franklin County Republican Party?

A Yes. Like, with -- not -- not just the party, but like the -- the literal organization, the -- the committee that makes decisions on behalf of the -- like, that does motions and whatever. So --

Q Okay. Besides this allegation that the protestor is associated with the Franklin County Republican Party, anything else involving the Franklin County Republican Party that you think could have created an issue because Ms. Freedhoff was the Chair of the Franklin County Republican Party?

A I don't -- maybe I'm not equipped to answer

that question further. I -- I'm -- I'm -- I think I've answered that question to the best of my ability.

Q Okay. Do you have any information about the financial relationship between the Franklin County Republican Party and Mike Carey?

A Yes. Mike Carey donated $10,000 to the Franklin County Committee. And then at some point, either before or after that, I don't remember quite, the Franklin County Committee also donated $500 to Mike Carey.

And they have already endorsed him in this race. Which that's the other reason. They've already made a decision for Mike Carey. I'm sorry. I --

Q At the time that you filed -- or excuse me -- your counsel filed your recusal motion, were you aware of any involvement by the Ohio Republican Party in the protest?

A No.

Q Okay. Let's just take a step back. Can you -- we'll go back to the Franklin County Republican Party and the Ohio Republican Party shortly.

Just broad strokes, can you identify all facts that you contend demonstrate that Ms. Freedhoff was biased against you during the protest?

A So specifically in the hearing or generally?

Q Specifically that it would show that she should have recused herself and that it was not a fair hearing because she decided ultimately not to recuse herself. What facts do you claim demonstrate that she should have recused herself because she was biased?

A So the -- the money, for one. The fact that the endorsement already occurred, for two. The fact that they then also didn't put me on their own website 'cause they did put primary candidates on the website, but they did not put me on it at any point in time, not even prior to this -- the -- the hearing that was occurred.

So the -- the money going both ways, for one. And then the fact that she was, in fact, the chair. And the fact that the -- the protestor was in -- was in direct communication with her in the capacity as chair and whatever his role was. I mean, there was direct -- I mean, I don't --

Q Yeah. I'll follow up on that. So when you say the protestor was in direct communication with Ms. Freedhoff, what do you mean?

A In the hearing, he specifically said that he was part of the -- I -- I want to say legislative committee. But it was probably like the endorsement committee or something.

Either way, he was a part of the committee. And he saw my name. And he brought that up to her after he dug into my platform. And then they had conversation. And then that led to this protest, which led us to here.

Q So it's your testimony that the protestor communicated directly with Ms. Freedhoff about the merits of the protest.

A It's actually the protester's testimony that he talked to her about the merits of the protest.

Q And what specifically did he talk to her about the merits of the protest?

A That should I even be allowed on the ballot that? Or what should we do about him? And that's when she communicated. That's in the -- the hearing. As far -- as far as I understood, that's how that went.

Q Do you have any other reason to believe other than your recollection of the hearing that there was any conversations between Ms. Freedhoff and the protestor?

A I mean, are you asking if I have a smoking gun? I guess I'm really not understanding.

Q No.

A I've -- I've been very clear. I think they

1 were caught in communication. I think money was
2 exchanged between Mike Carey, the campaign -- Mike
3 Carey campaign and the Franklin County Board of
4 Elections. That's definitive; that's in the FEC
5 filings.
6 And it's also definitive that the Franklin
7 County Board of Elections gave money to the Mike Carey
8 campaign. So that in of itself, she was chair during
9 both of those periods, both of those exchanges, which
10 is, as far as my legal understanding goes, more than
11 enough reason to say a conflict of interest.
12 When you add the fact that Mark Share was a
13 committee member in the Franklin County Board
14 of -- for the GOP, and that they were in direct
15 communication about me, and that that resulted in the
16 protest happening itself, which was -- wasn't even
17 filed correctly because the man didn't know it was
18 written, didn't see the document in the first place,
19 didn't know who was hiring counsel on his behalf, and
20 effectively showed up with his name being affiliated
21 and agreeing to it by the implication.
22 Now sure. Fine. We can argue that and
23 debate that in other ways. But I'm just saying my
24 understanding is that there is a excessive amount of
25 conflict of interest. Whether I am articulating that

well or not is apparently up for question.

Q Okay. And I'm just going to repeat something I think you probably heard from the prior deposition. But just please try to focus on answering the specific question.

You know, I think I am also trying to whittle down and be very precise and direct with my question. So if it's a yes or no, just say yes or no. If I'm asking about something specifically, if you would just try to focus on that specific question and answer.

You mentioned that there was a financial donation between Mike Carey or his campaign and the Franklin County Board of Elections. Can you tell me what facts you have in support of that?

A I have the FEC filing record. I mean, obviously I didn't print it out or anything to bring to the deposition. But you can go on the FEC website. You can go to the Mike Carey campaign. And you can go through his filing records.

And there is one record that's about eleven or twelve thousand dollars that is an expense that is going directly into the Franklin County Republican Party Committee as shown by the FEC.

Q Okay. And I just want to stop you. You

said two different things there. So you said on one hand $10,000, the Franklin County Republican Party. On other hand, it was a donation specifically to the Franklin County Board of Elections. Which one was it?

A I'm sorry. I did misspeak. I meant the County Party. I'm -- we're talking about a lot of different things that have Franklin County in it. My apologies. I specifically, for the record, mean that $12,000 went to the Franklin County Republican Party, not the Board of Elections.

Q Okay. And you don't have any reason to believe that there was any direct financial exchange between the Franklin County Board of Elections and the Mike Carey campaign; correct?

A Are you saying I don't have reason to believe that?

Q Yes. I'm just trying to clarify because initially you said that there was money donated to the Franklin County Board of Elections. And so I'm just clarifying.

A Okay.

Q You have no reason to believe that that's the case; correct?

A Correct. I don't think the Board of Elections is compromised.

Q Okay. When you say you don't think the Board of Elections is compromised, can you just elaborate on that? Why do you think it's not compromised?

A In the regard of the money exchange, just answering and following up to your question.

Q Okay. Do you have any -- are you aware of any statement by Ms. Freedhoff expressing a personal animus towards you?

A Personal animus? No.

Q Do you have any evidence that Ms. Freedhoff had a direct financial interest in the outcome of your protest?

A Do I have evidence? No.

Q Let's go back to the hearing. At the March 6th hearing, did Ms. Freedhoff prevent you from presenting evidence or testimony?

A The last question she asked me when she read about the -- the interview, she didn't let me follow up and rebut. So that would be the only time where I was, I think, denied.

Q Okay. Do you contend that any actions by Ms. Freedhoff at the hearing were improper?

A Can you clarify that please?

Q Sure. So part of the issue that we're

dealing with here is whether or not there was a due-process violation specifically at the hearing. So do you contend that any actions by Ms. Freedhoff at the hearing were improper? Is there anything that she did at the hearing that you claim was improper?

A Aside from her being present when she should have been recused, do I think she did anything improper? Is that what I'm understanding?

Q You can take it however you want.

A Okay. So outside of her being present when I feel she should have been recused and counsel felt that she should have been recused, she was also extremely friendly with the -- the protestor themselves.

And it made it seem like there was a favorite outcome or a perceived favorite outcome for the sake of argument in context.

Q In what ways was she friendly with the protestor?

A Engaging in small talk, saying how handsome he looked, "Nice to see you again. Can't wait to see you," whatever. And then they stepped out. And then I don't know what conversation occurred after that. But I would say preferential treatment was certainly visible and present.

Q What -- beyond the small talk that you've described, what other evidence do you have of preferential treatment towards the protestor on the day of the hearing?

A The fact that they -- every time my counsel objected, it was completely and dismissively overruled. Whereas when my counsel was trying to do the same and establish a specific line of questioning, it was constantly interrupted by Protestor Counsel and constantly reinforced by Board of Election members, either -- either Freedhoff or the other guy.

I don't -- I can't remember which ones kept doing the interrupting. But suffice to say there was this "antsiness" that, after I got the third degree and they were given free rein to speak and establish whatever they wanted to establish, there was this sense of urgency to get me out the door.

Q And it's your -- you understand that Ms. Freedhoff is not the chair of the Board of Elections; correct?

A In so far as I understand any of what the Board of Elections does, yes.

Q Okay. So I'll represent to you she's not the Chair of the Franklin County Board of Elections. At what point did Ms. Freedhoff ever issue a direct

ruling on any of the objections that you mentioned from your counsel?

A Again, I don't remember who was doing the objections. I just know that there was a lot of it going on.

Q So if you can't remember who was doing the objections, how can you tell me that specifically Ms. Freedhoff was the one that was biased?

A By --

MR. BROWN: Objection. Argumentative.

BY MR. ZAGROCKI:

Q Go ahead and answer the question please.

A By the fact that she was there despite the overwhelming, in my unprofessional opinion, evidence that she should have recused herself. And there was a significant and severe conflict of interest of her being there, period.

Q Right. And I'm talking outside of her being there.

A Isn't that ex post facto?

Q Well --

A I get pulled over for speeding, and then I get arrested for having, I don't know, my seatbelt off. They found that out after the fact. So the fact that she may have shown bias or not shown bias is

irrelevant to the fact that she was there. And that's the problem. And that's my answer.

Q Well, we'll -- okay. We'll get to the recusal issue in a second. Right now, I'm focusing on after the decision that she made to not recuse herself, and I'm focusing on: what evidence of bias do you have in the way that she carried out at the hearing?

A And I have to reiterate, the fact that she was participating, that is the bias.

Q Okay. Yes or no? Do you have any evidence of bias outside of her decision not to recuse herself?

A As far as I know, do we?

Q Again, I'm going to ask you to answer the question.

A I mean, again, in my limited capacity, no. I don't know if there's any evidence.

Q Okay. The same day of your protest, so this is March 6, 2026, are you aware of a protest involving a Libertarian candidate in the same congressional race that was decided the same day?

A I was.

Q Were you in attendance for that hearing?

A I was.

Q Were you in attendance for the entirety of

that hearing?
A Yes, I was.
Q Do you understand how Ms. Freedhoff voted in that matter?
A Yes. Or I'm sorry. Do I understand how she voted for it?
Q Yes.
A I -- I know that she voted in favor. I don't know how she came to that conclusion.
Q When you say in favor, it's -- you're understanding Ms. Freedhoff voted to deny that protest; correct?
A I -- hold on. Let me -- let me understand the language here. By denying the protest, it allowed the Libertarian to be on the ballot. Is -- is that my understanding?
Q So again, I -- you know, I'm not the one being opposed here. I'll try to clarify the question.
A Yeah, that's -- I'm asking --
Q I can do a better job of this. So you understand that there was a protest filed against a Libertarian candidate?
A Yes.
Q And that protest sought for the Libertarian candidate to be removed from the ballot; correct?

A Correct.
Q And part -- or the main reason that the protestor was arguing that the Libertarian candidate should not be on the ballot is because they were arguing that the Libertarian candidate was in fact not a Libertarian; correct?
A Yes, I remember that argument.
Q Okay. And ultimately, every board member voted against the protest and for the Libertarian candidate to remain on the ballot; correct?
A Yes.
Q And that includes Ms. Freedhoff. She also voted to deny the protest and for the candidate to remain on the ballot. Is that correct?
A That is correct.
Q Okay. Do you think that it -- a Libertarian candidate would pose a threat to Mike Carey in the Republican Primary?
A No.
Q Why would a Libertarian candidate not pose a threat to Mike Carey in the Republican Primary?
A Because a Libertarian is running in the Libertarian Primary, not the Republican.
Q I'm -- again, I'm not talking about the -- sorry. I should specify. In the general, if

there was in general -- Mike Carey, let's say that he is the Republican nominee. Do you think that a Libertarian candidate could pose a threat to Mike Carey in the Republican general election for the 15th Congressional race?

A No.

Q Why is that?

A Because, one, the Libertarian Party is small. And it's a question of: can that candidate, outside of him being a Libertarian, get his name out there enough?

So I -- I think the -- the question is implying: could the Libertarian candidate by his existence be an upset candidate? And I think it's certainly possible.

But that's -- we can make the same argument that there's a Democrat that could beat Mike Carey. I mean, isn't that the whole point of elections? So let me -- I'm sorry. Ask the question again because maybe I'm just not understanding. I'm -- I'm so sorry.

Q So is it your position that it's not likely a Libertarian candidate would pose a threat to whoever wins the general election for the 15th Congressional -- or excuse me -- whoever wins the Republican Primary for the 15th Congressional race?

A Okay. I think I understand the question now. I'm sorry. I did misunderstand it. Do I think a Libertarian candidate specifically poses a threat to a Republican candidate in the general?

Q Yes.

A No.

Q And why is that?

A Because they're two different parties. Just like a Democrat doesn't pose a threat to a Republican either. That's -- that's not how that works. It's -- it's politics; it's elections. It's: who do people want to vote for?

Saying one person is a threat to another, we could turn that on its head. Mike Carey is a threat to the -- to the Democrat, or Mike Carey is a threat to the Libertarian. That doesn't make sense.

Q I'll clarify what I mean by threat. Do you think that by having a Libertarian on the ballot in the general election for the 15th Congressional race, that some people will vote for the Libertarian candidate that otherwise would have voted for the Republican candidate?

A That's very speculative. I couldn't answer that.

Q You don't think it's possible that there's

at least one person that would have voted for the Republican candidate in the 15th Congressional race?

A Are you -- are you asking me if people have more options will they embrace those other options? Because that's the whole premise of our country's constitution and democracy.

Q Yes. I'm just asking yes or no. Is it likely that there will be some people that will vote for the Libertarian candidate that otherwise would have voted for the Republican candidate?

MR. BROWN: Objection. That's calling for speculation. He can answer if he knows.

THE WITNESS: Yeah, I don't know.

BY MR. ZAGROCKI:

Q Okay. You understand that there is no other Libertarian candidate that is running in the 15th Congressional race; correct?

A Correct.

Q Okay. Therefore, you understand that the Libertarian candidate will be on the general election ballot running against the Republican candidate in the 15th Congressional race?

A False. He is running against both or however many candidates, Independent, Republican, Democrat, or otherwise. He is one of many.

Q Okay. We're parsing my question. I'm just asking, again, that the Libertarian candidate will be on the general election ballot running against the Republican candidate in addition to the other candidates that will be on the general election ballot.

A Correct. He's running against them all, not just one.

Q Okay. How do you reconcile your claim of bias in favor of Mr. Carey regarding Ms. Freedhoff's vote to allow another opposing candidate to remain on the ballot?

A The fact that she's on the Republican Franklin County Chair in charge of making final decisions with regards to both, I'm assuming, money being received and/or dispensed as well as endorsements.

I wasn't interviewed for an endorsement. It doesn't matter if I would have been interviewed and then not endorsed. What matters is I was ignored outright.

And the fact that there's money exchange between that campaign and the fact that all of this stuff occurred within the establishment, Franklin County Committee.

So the bias is real because she is putting her thumb on the scale, trying to litigate the primary, which should be up to the people and which should have already been laid to rest by the simple fact that I submitted and got approved 50-plus signatures from Republican voters per the rules of the same Board of Elections that is now with her as part of it and being chair of the Republican Party -- is trying to influence the outcome of an election, the Republican Primary election, by removing me from the ballot after authorizing it or certifying it.

Q You mentioned that you were ignored outright by the Republican Party. Did you make attempts to contact the Franklin County Republican Party about your congressional run?

A I made attempts to every county party for regards to my Republican run. And only a couple ever really responded, London being one of them. Well, I guess that's not the county.

But London -- oh, no. I'm sorry. It is the county. But I just remember it as London, Ohio. They invited me out. I got to speak there. But no, the Franklin County did not respond. And I did reach out to them.

Q And when you say that the Franklin County

Republican Party did not respond, do you blame Ms. Freedhoff as the Chair of the Franklin County Republican Party for not responding to --

A That would be too speculative.

Q Okay. Do you think that Ms. Freedhoff had a role in deciding not to respond to you on behalf of the Franklin County Republican Party?

A Yes. In -- in the -- in the scope of this -- oh, wait. No. Hold on. When I reached out to her in the -- or not to her, but reached out to the Franklin Party in the first place, do I think she put a thumb on the scale in not responding?

Q No.

A Sorry. I misunderstood the question.

Q I want to go back just briefly to this issue. We were talking about the Libertarian candidate. There was a protest. Libertarian candidate, ultimately the Board of Elections decided to remain on the ballot. You mentioned that you don't think that the Libertarian candidate could take votes away from --

A I said that would be speculative. I mean, a Green Party candidate could take away from Republican votes if the Republican that chose to vote Green would have otherwise voted Republican without a Green Party.

I mean, that's like saying if the Republican ran unopposed completely, like, not even a Democrat, would voters otherwise have voted for that? Like, that doesn't -- that doesn't make sense. I'm sorry. I -- I don't think that's a line of questioning that gets us to any sort of answer.

Q What -- I want to go back to this question. What evidence do you have that Ms. Freedhoff treated your case differently from any of the other protest cases that day?

A Well, she's not a Libertarian. So she didn't have a chicken in the fight, as it were, metaphorically speaking, of course. I'm not accusing her of cock fighting or anything.

But she didn't have skin in the game. That's a better metaphor. I'm sorry. She didn't have skin in the game with the Libertarian beyond the fact that it's alleged that the same counsel was paid by the same primary party of interest, the Ohio Republican Party.

That being said, they -- her decision to side with the -- the Libertarian wouldn't have been biased or would have -- I don't know. I -- I would have been much harder to argue for bias one way or the other because, again, it's the Libertarian Party, not

the Republican Party.

Whereas this is the Republican Party. And she should have recused herself because of the conflict of interests, which you keep trying to not discuss. And you keep trying to ask questions to circumvent that fact and my belief and in my defense. So can we move past that?

Q And again, a couple more questions on this. But I'm the one that's going to be asking the questions and narrowing the scope of what the questions are. So do you think that the -- sorry. Strike that.

Let me -- can you identify any case where a board member was required to recuse solely due to party leadership status?

A I'm not a lawyer, nor do I have the skill set to even begin to understand how to even go against that question.

Q I -- again, I'm not asking for your opinion as a non-lawyer or lawyer. I'm asking are you just aware of any protests, any cases before Franklin County, or any Board of Election member was required to recuse solely because of their party leadership status?

A I don't even think I'm qualified to answer

that question. My -- I'm -- I'm ignorant to the legal system. So I -- I couldn't answer. I'm -- I guess the short of it is, by the fact that I'm ignorant, yes. I was definitely -- I have no way of knowing one way or the other. I am not capable of knowing that answer.

Q Okay. So you're not aware of any other board members that have recused themselves solely because of party leadership status; right?

A I am not aware.

Q Okay. Are you aware of the political party involvements of other members of the Franklin County Board of Elections?

A Am I aware of their involvement? I know that Board of Elections have usually an even split of party affiliation. To what degree that affiliation is, no.

Q Are you aware of any leadership roles that they might have in any of the party offices, whether that's county or state?

A I am not personally aware, no.

Q Okay. But you didn't ask any other board members to recuse here; correct?

A Correct.

Q Okay. If they -- if the other board members

held leadership positions in political parties, would that be cause for a recusal, do you think, in a protest hearing?

A In my opinion, yes.

Q Do you contend that every board member affiliated with a political party must recuse from all primary-related protests involving that party?

A If they are in leadership positions of that party, yes.

Q Last thing, I want to talk about briefly the Ohio Republican Party's involvement with the protest or alleged involvement with the protest. So you alleged that the Ohio Republican Party was involved. And this was disclosed after the hearing. What role do you believe that played in Ms. Freedhoff's decision making at the time of the vote?

A Well, she's the vice chair. So again, the same bias, the same conflict of interest.

Q Do you have any evidence that Ms. Freedhoff knew prior to voting that the Ohio Republican Party -- excuse me -- was funding or directing the protest?

A I don't have evidence. But I absolutely would assume so, being she is the vice chair,

Q If she didn't have any knowledge that the

Ohio Republican Party was funding the protest, would that change your opinion of whether or not Ms. Freedhoff was biased?

A No.

Q Why?

A Because she's still a part of the organization and would therefore still have a vested interest in following whatever the decision is of that organization or the intent of the -- that organization's interest.

Q How would she have a vested interest if she wasn't aware that -- of the fact that the Republican Party was funding the protest?

A So now we're going in circles again with -- it's speculative. It -- it doesn't matter whether or not she was aware.

The fact that she was vice chair of the Ohio GOP makes it a conflict of interest to talk about a Republican candidate being eligible for anything under any circumstances, any argument made for any reason at all. It is a conflict of interest. That is my opinion. It doesn't matter how much she did or didn't know.

Q You just want to take five minutes? Is that okay?

A Yeah.
MR. ZAGROCKI: Off the record.
THE REPORTER: All right. One moment. The time is 12:36. We're now off the record.
(Off the record.)
THE REPORTER: We are back on the record. The time is 12:40 p.m.
MR. ZAGROCKI: And we have no additional questions for Plaintiff.
MR. BROWN: I have no questions.
THE WITNESS: Okay. You sure?
MR. BROWN: I'm sure.
THE REPORTER: Okay. And then read and sign?
MR. BROWN: We'd like to read.
THE REPORTER: Okay. All right. And then, Counsel Rustico, will you be ordering the transcript?
MR. RUSTICO: Yes. Expedited please.
THE REPORTER: Okay. All right. And do you have a particular day that you want?
MR. RUSTICO: Well, we have a brief do on Monday. So I don't know what it costs, but as fast as possible is what I would say.
MR. TABATOWSKI: This afternoon.

THE REPORTER: Okay. And then, Counsel Brown, will you be ordering the transcript?

MR. BROWN: Not expedited. I'm going to have to get back with you; okay?

THE REPORTER: Okay. And then, Counsel --

MR. BROWN: I got your card.

THE REPORTER: Okay. And then, Counsel Zagrocki, will you --

MR. ZAGROCKI: Yes, I believe so. I probably need to confirm that with Jeanine, who was unfortunately not here.

MR. REDFERN: Let's get back to you.

THE REPORTER: Very well.

MR. REDFERN: Let's get back to you in an expedited fashion.

THE REPORTER: Yes, sir. All right. One moment.

The time is 12:41 p.m. We're now off the record.

(Signature reserved.)

(Whereupon, at 12:41 p.m., the proceeding was concluded.)

CERTIFICATE OF DEPOSITION OFFICER

I, ASIA MAYS, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Asia Mays

ASIA MAYS
Notary Public in and for the
State of Ohio

[X] Review of the transcript was requested.

CERTIFICATE OF TRANSCRIBER

I, ANDREW TINGLEY-BARRAZA, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Andrew Tingley

ANDREW TINGLEY-BARRAZA

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

March 30, 2026

To: MARK R. BROWN

Case Name: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.

Veritext Reference Number: 7986054

Witness: Samuel Ronan Deposition Date: 3/27/2026

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS
2
ASSIGNMENT REFERENCE NO: 7986054
3 CASE NAME: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.
DATE OF DEPOSITION: 3/27/2026
4 WITNESS' NAME: Samuel Ronan
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have made no changes to the testimony
as transcribed by the court reporter.
8
_____ _____
9 Date Samuel Ronan
10 Sworn to and subscribed before me, a
Notary Public in and for the State and County,
11 the referenced witness did personally appear
and acknowledge that:
12
They have read the transcript;
13 They signed the foregoing Sworn
Statement; and
14 Their execution of this Statement is of
their free act and deed.
15
I have affixed my name and official seal
16
this _____ day of_____, 20____.
17
_____
18 Notary Public
19 _____
Commission Expiration Date
20
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1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS
2
ASSIGNMENT REFERENCE NO: 7986054
3 CASE NAME: Ronan, Samuel, et al. v. Larose, Frank, etc., et al.
DATE OF DEPOSITION: 3/27/2026
4 WITNESS' NAME: Samuel Ronan
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 well as the reason(s) for the change(s).
9 I request that these changes be entered
as part of the record of my testimony.
10
I have executed the Errata Sheet, as well
11 as this Certificate, and request and authorize
that both be appended to the transcript of my
12 testimony and be incorporated therein.
13 _____ _____
Date Samuel Ronan
14
Sworn to and subscribed before me, a
15 Notary Public in and for the State and County,
the referenced witness did personally appear
16 and acknowledge that:
17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and
Their execution of this Statement is of
20 their free act and deed.
21 I have affixed my name and official seal
22 this _____ day of_____, 20____.
23 _____
Notary Public
24
_____
25 Commission Expiration Date

1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
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3 PAGE/LINE(S) / CHANGE /REASON
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_____ _____
20 Date Samuel Ronan
21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
22 DAY OF _____, 20_____ .
23 _____
Notary Public
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25 Commission Expiration Date

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0 28:9
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1

1 5:8 18:3 22:1 28:8 29:22 58:5,6,7,10 79:6,9,9
10 55:17 71:15
10,000 93:6 98:2
10:06 2:4 6:5
1100 121:1
11:34 82:6
11:50 82:9
11:53 85:5
12 49:3 80:9,13
12,000 98:9
12:01 85:9
12:36 117:4
12:40 117:7
12:41 118:19 118:22
14th 15:2
15 47:14 55:18
150 29:22
15th 13:16 37:11 106:4,23 106:25 107:19 108:2,16,22
16th 3:13,20
18 21:17
1820 121:2

2

2 5:10 61:14,15 61:24
20 68:8 122:16 123:22 124:22
2000 79:6
2001 2:7 6:11
2003 84:13
2013 22:1
2015 19:16
2016 19:16 35:12
2017 21:17 26:25 27:8 30:3 31:7 33:2 33:4,13 34:10 36:3 52:3 55:1 70:8
2018 20:19 27:22 33:17,19 34:15 36:12 52:11 53:5 54:25 55:4 57:5 60:4
2022 36:21
2024 16:11,21 17:16 37:3 39:10 40:1
2026 2:3 6:9 60:6 86:23 87:1 103:19 121:4
2035 76:25 80:18
20th 2:6 6:11
216-523-1313 121:3
236-6500 3:8
26 22:21
26.50 76:9
27 2:3 6:9 32:11
2:26 1:7
2nd 14:11

3

3,760 32:3
3/27/2026 121:8 122:3 123:3
30 2:6 3:13,20 6:10 121:4
303 3:5
32278 120:14
33838 119:16
373 4:6,13,20

4

43215 2:8 3:6 3:14,21 4:7,14 4:21 6:11
44114 121:2
466-2872 3:16 3:23

5

50 29:21 32:2 78:23 79:2 110:5
50,000 69:17,18
500 93:9
525-3269 4:16
525-3520 4:9
525-3658 4:23
58 5:9
5th 13:15

6

6 87:1 103:19
61 5:10
614 3:8,16,23 4:9,16,23
62 35:12
6th 86:22 99:16

7

7986054 2:10 121:7 122:2 123:2 124:2

8

8 5:3
82nd 22:17
85 5:4

a

a.m. 2:4 6:5 82:6,9 85:5
abide 38:15 39:9,20 43:12

ability 11:17 29:25 79:22 93:2 119:10 120:7
able 13:12 29:25 47:16
abolish 76:11 79:12
abortion 80:4
abortions 79:21
above 121:17
absent 6:14
absolute 27:13 68:4
absolutely 17:6 24:3,6 40:13 40:14 45:25 47:8 68:4 77:14 78:20 79:17 83:4 115:23
abstain 82:18
abysmal 16:6
accept 87:17
accepted 34:4
access 12:7 75:4,5
accordance 122:5 123:5
accounts 51:18
accurate 36:22 36:23 61:10 77:22 119:9 120:5
accusing 112:13
achieve 29:25 80:23,24 81:1
acknowledge 122:11 123:16
acknowledge... 6:13
act 22:23 23:16 122:14 123:20
acted 66:7
action 85:16 119:12,16 120:8,12
actions 17:18 99:22 100:3
active 22:3 23:3 28:17 30:22 74:22
activist 21:21
activities 84:13
actually 11:2 26:6,9 31:15 48:2,25 53:1 55:14 62:17 72:16 73:17 74:16,20 79:20 95:9
add 96:12
addition 109:4
additional 117:9
additionally 6:14
address 121:15
addressed 33:24
adequate 68:12
adequately 68:3 69:4
adherent 60:15
adhering 60:17 60:18,21
administer 6:13
administration 16:23 26:2,10 39:11
administrator 84:11
admirable 25:5
admit 29:10,10 32:11 39:3
admitted 80:12
advantage 66:9
advice 12:17 16:5 17:2,8
advocated 20:4 20:7 21:16,19
affect 11:17
affiliated 17:4 21:8 96:20 115:6
affiliation 16:20 34:17 65:9,14 114:16
affixed 122:15 123:21
affordable 23:16 40:14
afforded 80:13
aforemention... 68:21
afternoon 85:12,13 117:25
agent 84:10
aggressive 75:22
ago 17:12 57:10 58:13 59:6
agree 6:16 40:11,17 44:20 45:3 46:1 60:23 62:24 63:11,14,15,18 63:19,20,23,24 64:2,3 66:5 69:5,6 73:10 80:5 83:5,16 84:8
agreed 41:4
agreeing 96:21
agriculture 78:11,11
ahead 32:14 38:8 44:4 51:10 72:19

102:12
ahold 28:19 29:4
aid 34:22
air 14:20,21
airborne 22:17
airlines 77:18
airports 77:19
al 6:7,9 121:6,6 122:3,3 123:3 123:3
alabama 18:2
aleida 5:10 51:16 62:10
align 33:11 44:13,14 50:5
allegation 91:10 92:19
alleged 112:18 115:12,13
allow 23:4 86:12,13 109:11
allowed 23:4 24:23 27:7 52:8,9 59:12 88:2,5 95:13 104:14
allows 43:22 65:10
altogether 27:17
american 22:24 24:9 25:13 34:6 72:21,21 72:22 75:1 76:14 84:5
americans 59:17
amount 19:13 96:24
ana 1:4 5:10 12:13 46:11,15 51:2,9,11,11,15 62:10,14,17 63:7
andrew 120:2 120:15
anger 23:23
animating 23:8 23:11
animus 99:9,10
annunciated 38:16 39:20,24 43:13
answer 10:5,25 11:2,17 13:12 34:23 43:4,5 44:23,24 45:13 54:5 57:23 64:1 65:5 66:2 66:10 68:13 74:18 85:23 86:9,14 88:2 88:12 91:18 92:25 97:11 102:12 103:2 103:14 107:23 108:12 112:6 113:25 114:2,6
answered 37:7 42:21 72:16 87:21 93:2
answering 11:12 86:13 90:20 97:4 99:6
answers 9:12 9:22 27:23 41:24
anti 23:6,7 26:15 60:21 74:6 76:20,21
antifa 76:16,19
antsiness 101:14
anybody 71:21 82:18
anymore 31:4 57:3
anyway 78:14
apologies 98:8
apologize 44:2 45:8 48:8 67:9 72:13
apparently 97:1
appear 62:14 122:11 123:15
appearance 31:25
appears 62:15
appended 123:11,18
apple 8:23
applicable 6:20
applies 68:24
appreciate 42:19 88:13
approach 52:25
approached 36:23
approved 110:5
april 14:11
area 5:8 14:23 15:1 57:16
arguably 52:25
argue 26:9,9 28:24 41:13 60:20 63:10 70:5 96:22 112:24
argued 26:25 27:3 29:2 53:3
arguing 27:16 28:15 70:13 105:3,5
argument 10:12 32:1 40:20 59:21 70:9,15 89:2 90:9 100:17 105:7 106:16

116:20
argumentative 102:10
arguments 87:15
arkansas 14:21
arrays 80:18
arrested 84:14 102:23
articulating 96:25
asia 2:9 6:3 119:2,17
aside 61:12 64:17 100:6
asked 49:15 66:24 72:16 90:19 99:18
asking 41:25 42:1 47:11 52:13 66:17 89:18 95:22 97:9 104:19 108:3,7 109:2 113:9,19,20
assessment 61:11
assigned 6:3
assignment 122:2 123:2 124:2
assistance 74:23,23
assistant 7:10
associate 29:5 69:20
associated 48:23 60:7 92:20
associating 27:11
assume 10:5 65:12 73:10,15 115:24
assuming 52:22 109:15
assumptions 83:19,22
attached 123:7
attack 26:11
attempt 20:13
attempted 16:1
attempting 18:3
attempts 110:13,16
attendance 7:2 103:23,25
attended 86:25
attorney 2:5 3:12,19 4:5,12 4:19 6:10 7:3,5 7:11 10:17,23 11:24 13:12 15:5 89:16 119:14 120:10
attorney's 7:8
audacity 23:12 23:13
audible 9:16
audio 9:11 119:8 120:4
august 37:21
authenticity 53:15
authorize 123:11
authorized 6:12 13:7
authorizing 110:11
authors 42:14 43:8
ave 121:1
aware 29:7 47:3,12 89:10 93:16 99:7 103:19 113:21 114:7,10,11,14 114:18,21 116:12,16

b

b 5:6
back 16:4,10 21:17 24:11,11 52:2 54:24 55:6 61:4 64:22 68:20 72:3 78:7 82:8 85:8 88:20 93:19,20 99:15 111:15 112:7 117:6 118:4,13 118:15 121:15
background 14:17
bad 20:24 44:21 45:4,24 69:25 70:10 73:12 77:25
ballot 12:7 13:7 13:14 14:4,10 62:20 64:12 66:14,16,18,24 67:2,13,19,23 69:7,10,12 71:20 72:5,11 82:16 83:2,17 83:18,18,19,20 83:22,23 92:12 95:13 104:15 104:25 105:4 105:10,14 107:18 108:21 109:3,6,12 110:11 111:19
banking 77:15 79:8
banks 77:25
barraza 120:2 120:15
base 14:20,21 26:21 53:2

based 83:22,23 90:19,23
basic 78:17
basis 43:11
beat 106:17
beginning 56:13 87:7
behalf 3:2,10 4:2 7:6,8,11,18 7:20 50:20 59:22 87:15 92:17 96:19 111:6
belabor 76:7
belief 113:6
beliefs 74:5 80:5,20 81:4 84:1
believe 16:17 17:4,9,23 20:3 22:11 26:25 27:5,7 31:8 36:11 39:13 40:24 41:10 55:18 59:14 60:11 64:23 65:1 70:1 71:12 76:9 77:8 79:1,4 83:7,20 89:2 95:18 98:12,16 98:22 115:15 118:10
believed 39:16 39:19
benefiting 28:12
benefits 74:21 75:8
bernie 24:14
best 13:12 38:7 66:10 85:24 93:2 119:9 120:6
better 29:11 67:25 73:1 104:20 112:16
beverages 79:4
beyond 91:10 101:1 112:17
bias 91:12 102:25,25 103:6,10,12 109:10 110:1 112:24 115:18
biased 93:24 94:5 102:8 112:23 116:3
bible 71:16
big 25:24 29:3 34:20
bills 26:21
biographical 14:17
bit 9:9 14:16 16:2 17:14,16 32:22 35:9 36:5 46:5 47:24 48:12 54:6 62:11 66:20 75:10 81:3 89:8 92:3
black 64:10
blame 68:16,16 68:17 111:1
blind 25:11
blockading 74:14
blowing 74:13
blue 35:4
blur 52:21
board 1:11,15 1:18,22 7:14 7:18,22 13:8 38:1 46:3 53:16 85:15 87:2,22 91:1 92:8 96:3,7,13 97:14 98:4,10 98:13,19,24 99:2 101:10,19 101:22,24 105:8 110:7 111:18 113:14 113:22 114:8 114:13,15,22 114:25 115:5
boats 74:13
border 40:11
bottom 53:1
bought 15:2 37:15,15
brand 21:16
brazenly 22:23
break 11:8,10 11:14 33:13 82:2 86:17
brian 4:4 7:16 85:14
bridges 25:4
brief 117:22
briefly 111:15 115:10
bring 12:22 31:23 55:12 97:17
broad 2:6 3:5 3:13,20 6:10 40:18,22 93:22
broadly 42:14
brothers 54:13
brought 22:4 54:2 60:6 95:2
brown 3:3 7:24 7:24 42:20 44:24 45:15 54:22 55:2 72:15 102:10 108:11 117:10 117:12,15 118:2,3,7 121:5
buggy 56:12,13

build 25:3,4
built 76:5
bunch 29:13
buried 64:16
bush 43:19,19
business 62:23
bzagrocki 4:8

c

c 3:1 4:1 6:1
ca 121:25
california 65:11,13
call 29:6 36:1 52:17 57:1
called 8:10 60:8
calling 56:19 57:6 61:8 108:11
calls 45:15
campaign 12:11 15:18,22 16:5,9,11,22 17:17 19:7,14 19:15 35:24 37:18 46:21 48:4 49:2 50:16,22 51:3 51:7 75:11 96:2,3,8 97:13 97:19 98:14 109:23
campaigns 15:25 20:1
candidacies 35:10 36:7
candidacy 18:12 36:16 37:20 46:6 59:1 69:25 86:25 87:1 88:21
candidate 17:19,21 18:14 20:5,7,16 23:6 24:15 35:16 37:4 64:24 67:15 82:23 88:17 103:20 104:22,25 105:3,5,10,13 105:17,20 106:3,9,13,14 106:22 107:3,4 107:21,22 108:2,9,10,16 108:20,21 109:2,4,11 111:17,18,20 111:23 116:19
candidates 20:6,18,22,23 21:18 27:2 72:9 83:7 94:9 108:24 109:5
capable 114:5
capacities 7:14
capacity 1:8,10 1:13,17,20 6:8 90:1,2 94:17 103:16
capital 3:4
card 21:14 31:20 32:24 118:7
care 23:16 29:3 30:14,15,15,25 69:1
career 30:23
carey 93:5,6,10 93:13 96:2,3,7 97:13,19 98:14 105:17,21 106:1,4,17 107:14,15 109:10
caribbean 74:13
carriages 56:12 56:14
carried 103:7
carrying 21:14 31:20 32:24
cars 56:12,16
case 1:6 10:9 12:15,25 13:11 13:18 27:9 28:7 31:2 35:17 44:2 51:12 64:21 72:8 74:3 80:4 90:3 98:23 112:9 113:13 121:6 122:3 123:3
cases 112:10 113:21
caught 96:1
cause 49:21 70:3 80:25 88:18 89:16 94:9 115:2
century 26:7
certain 8:25 21:11 47:8 50:3 57:1 63:25 83:19
certainly 24:9 24:10 58:25 66:8 100:24 106:15
certificate 119:1 120:1 123:11
certification 122:1 123:1
certified 6:17
certify 119:3 120:2
certifying 110:11
chabot 36:14
chain 63:25
chair 1:10 27:10 28:23

30:4,24 31:6 32:2 34:13 36:3 52:4 53:21,21 54:18 59:5,15 61:5 89:10 90:3 91:3,9,11 92:8 92:23 94:15,17 96:8 101:19,24 109:14 110:8 111:2 115:17 115:24 116:17
chairman 91:1
challenging 88:4
chance 10:10 10:19 27:16 50:19 61:21
change 51:21 65:8,14 116:2 121:13,14 123:8 124:3
changed 10:19 19:19 27:24 28:1
changes 121:12 122:7 123:7,9
charge 109:14
charged 84:14
check 51:18
checked 66:25
cheekier 76:12 79:7
cheeky 45:14
cherry 54:4
chicken 112:12
chief 22:6
choice 79:18
choose 27:1 69:7 72:6,11 82:19 83:12
chose 23:19 31:23 111:24
christian 71:6
circles 32:21 116:14
circumstances 116:20
circumvent 113:6
cis 41:5,12
cited 80:22
citizens 28:7 80:14
city 5:8 57:16
civil 122:5 123:5
civilians 23:21
claim 73:25 94:4 100:5 109:9
claiming 88:24
claims 13:3,4
clarified 86:5
clarify 60:4 98:17 99:24 104:18 107:17
clarifying 74:18 98:20
clarity 44:19 60:2
class 60:1
clean 9:18,25
clear 57:9 66:20 67:11 68:19 77:7 88:8 92:1 95:25
clearly 59:15
cleveland 121:2
clock 52:3
closed 65:13
clothing 79:4
cock 112:14
coin 67:3
collect 17:18,22 35:17 37:7 46:10
collected 36:17 36:25
collecting 37:23 38:2 46:7 47:6
college 21:10
colloquial 18:19
color 65:25
columbus 2:8 3:6,14,21 4:7 4:14,21 6:11 14:23,25
come 22:8 23:17 25:14
comfortable 34:12
commandme... 71:15
commission 122:19 123:25 124:25
committee 30:4 31:7 36:4 52:5 90:4,6,21 92:9 92:17 93:7,9 94:24,25 95:1 96:13 97:24 109:25
communicated 95:7,15
communication 94:16,20 96:1 96:15
communist 81:19
communities 55:16
community 48:22 54:9
company 91:20 91:20,21 92:1
comparison 91:24
compass 82:22
compensated 77:9

compensation 15:22
competing 41:7
complete 76:24
completed 121:15
completely 88:3 101:6 112:2
comply 26:22
comprehensive 47:15
compromise 23:18 35:1
compromised 98:25 99:2,4
conception 69:9
concerned 28:4 28:14 41:11
concerns 28:3
concluded 118:23
concluding 89:24
conclusion 104:9
confident 68:12
confines 65:10
confirm 47:10 118:11
confiscated 78:4
conflict 89:24 90:6,10,15 91:22 92:2 96:11,25 102:16 113:4 115:18 116:18 116:21
confusion 70:4
congress 21:17 27:21 33:20 59:6 65:24
congressional 13:16 36:13 37:11 103:20 106:5,24,25 107:19 108:2 108:17,22 110:15
consequences 23:20 39:6
conservative 19:11 30:14 31:12 33:22,25 41:22 55:15 81:8
conserving 30:18
consider 33:14 33:15 53:9,12 80:20 81:5,7 81:10,12,15
considered 30:9,11,18 31:9
consistent 26:14 48:18,19 80:21
consistently 69:17
constantly 101:9,10
constitute 6:24
constitution 42:8 84:16 108:6
cont'd 4:1
contact 52:19 52:20 110:14
contempt 23:1 23:22 27:13
contend 93:23 99:22 100:3 115:5
content 11:23 12:5 75:15
context 15:5 30:21 42:17 54:2 55:19 77:11 100:17
contextually 88:2,6
continue 55:25
contract 23:3
contributed 84:13
control 63:12
controls 78:19
conversation 17:13 41:16 42:11 71:7 95:4 100:23
conversations 95:20
convert 80:17
convinced 26:10
copies 58:3 61:25
copy 58:10,11
cordero 1:4 12:13 51:11 62:14,17
core 30:19 34:8 34:8 47:1 74:4 74:19
corporate 32:3
corporations 68:22 77:23 78:8
correct 10:13 10:14 12:25 30:8 35:12 38:17,18 41:6 62:21 75:11 86:10 87:3,9 87:19,23 88:15 89:6 98:14,23 98:24 101:20 104:12,25 105:1,6,10,14 105:15 108:17

108:18 109:7 114:23,24
corrected 64:4 64:6,8
corrections 121:12 123:17
correctly 16:19 30:2 31:5 32:23 34:20 76:19 78:3 96:17
correspond 51:19
corresponden... 51:3
cost 69:3 78:21 79:5
costs 117:23
counsel 8:14 58:10 61:25 87:11,14,17 93:15 96:19 100:11 101:5,7 101:9 102:2 112:18 117:17 118:1,6,8 119:10,13 120:7,10
country 22:8 26:5 30:14 68:18 74:9,10 74:12,12,14
country's 108:5
county 1:11,14 1:18,21 4:5,12 4:19 7:11,14 7:17,18,21 14:24 32:3 85:15 87:2 89:11 90:12,18 90:21,24 91:9 91:12 92:4,6 92:14,20,22,24 93:4,7,9,20 96:3,7,13 97:14,23 98:2 98:4,6,7,9,13 98:19 101:24 109:14,25 110:14,16,19 110:21,23,25 111:2,7 113:22 114:12,20 122:10 123:15
couple 16:4 32:5 39:4 75:23 110:17 113:8
course 23:18 70:12 112:13
court 1:1 27:3 27:7,9 29:2 53:3 64:18 73:16 122:7
create 19:14 50:6 75:15
created 10:10 37:17 50:8 89:24 92:23
credit 79:12
crimes 74:16 74:18 84:14,14
criminality 77:6
crisis 75:2,4,4 77:12
criteria 83:24
criticism 26:13
cross 20:20 87:18
crossed 59:23
crossing 60:9
crux 44:6
cruz 22:2 25:15
cuba 74:14
cultural 83:10
curious 20:10 55:8
current 16:23 37:11 80:17
cv 1:7

d

d 4:4 5:1 6:1 7:21 71:1
d.c. 76:13
dare 31:24
dark 16:22 18:14,17 19:3 37:3
date 2:3 38:1 54:23 121:8 122:3,9,19 123:3,13,25 124:20,25
daughter 46:12
day 42:9 46:11 101:4 103:18 103:21 112:10 117:21 122:16 123:22 124:22
days 89:13,20 89:21,22 121:18
deal 21:19 23:14 25:23,24 43:4 80:15
dealing 100:1
deals 12:6
dear 121:10
death 74:15 84:19
debate 18:4 44:10 96:23
debt 79:16
decades 25:25
decent 24:15
decide 37:10 66:18 69:12
decided 46:12 94:3 103:21 111:18
deciding 111:6

decision 25:1 33:20 37:14 93:13 103:5,12 112:21 115:15 116:8
decisions 92:17 109:15
declaration 18:11 35:18 38:23 46:6 58:25
declarations 36:19
declare 64:23 65:4 69:24
declared 38:10 38:13
declaring 39:8 60:22 65:5
decriminaliza... 77:2
deed 122:14 123:20
deemed 121:19
deep 59:18
defendant 3:10 7:9 87:22
defendants 1:23 4:2 7:12 85:15
defense 113:6
defer 89:16
define 26:7
defined 33:17 71:13
definitely 27:8 43:15 52:21 114:4
definitive 96:4 96:6
degree 19:12 50:5 101:14 114:16
democracy 23:13 24:4 108:6
democrat 25:12 30:11 31:8,12 33:1,5,7,9 34:11,11 35:4 35:5,14 65:19 70:6 71:10 106:17 107:9 107:15 108:25 112:2
democratic 27:4,11 30:3 30:25 31:6,19 31:21 32:25 34:24 35:7 36:4 52:4,4 53:1,2 60:11 61:8 69:18 81:17 83:18
democrats 21:5 21:6 24:2 26:24 28:3,14 28:20 30:21 33:12 52:5 53:22 54:17,21 55:7,22,24 56:6 59:16,22 60:7
demonstrate 93:23 94:4
dems 63:3
denied 99:21
deny 80:3 104:11 105:13
denying 104:14
department 15:6,7,9 121:22
departments 49:25
depending 20:24
deployed 22:18
deployment 22:12
deponent 58:10 58:12 61:24
deportation 40:10 81:1
deposed 8:24 57:11 91:8
deposition 2:1 6:6,22 11:21 11:25 12:3,6 12:10,20 32:18 45:6 60:3 97:4 97:18 119:1 121:8,11 122:1 122:3 123:1,3
described 50:9 66:13 101:2
description 5:7
desert 22:16,18
desire 60:8
despise 29:20
despite 102:13
determination 13:9
determine 50:3 67:2,12 82:15
determining 43:12
differed 33:22
difference 88:25 89:1
differences 26:17,20 88:22 88:23
different 11:3 18:1 19:20 33:9 40:22 41:15,22,23 43:20 48:22 51:10,12 56:1 60:14 68:9 69:25 72:25 73:7 98:1,7 107:8
differently 41:19 42:6,9

42:14 43:8 45:20 51:1 112:9
difficult 66:1
digital 119:8 120:3
diplomatic 26:6
dire 23:19
direct 84:19 92:10 94:16,18 94:20 96:14 97:7 98:12 99:12 101:25
directing 115:21
directly 65:4 95:7 97:23
disagreed 40:9
disclosed 115:14
discovered 28:22
discuss 58:18 113:5
discussed 42:25 43:3 46:5 53:3 70:1
discussion 11:24 37:25 57:15
disgust 23:2,23
disingenuously 73:11
dislike 25:15,19
dismissively 101:6
dispensed 109:16
disregard 27:17
distanced 61:7
distinct 18:21
district 1:1,2 13:16 35:12 36:13 37:12 47:14 59:25 69:16
districts 59:18
distrust 71:24
diverge 26:24
divestment 76:24
dnc 27:10 28:23 30:24 34:12 53:21 54:18 59:5,15 61:5
doctor 80:3
doctors 79:21
document 26:3 40:18 42:2 44:20 45:3 58:12,17 59:13 62:5 96:18
documents 12:19 55:19 61:22
doing 16:13 17:25 50:13,14 54:7 59:20 60:3 64:4 66:2 101:13 102:3,6
dollars 97:22
domestic 68:9 68:10
dominant 59:25
donald 25:19 70:6
donated 93:6,9 98:18
donation 97:13 98:3
donor 26:21 32:3
door 59:19 101:17
doubt 25:17 62:16
douglas 1:9 4:2 7:12
downloaded 47:13
downstream 22:15
drafted 40:18 40:21 42:7
dream 74:25 80:19
drifted 68:19
drink 34:21
driven 28:8
drug 77:3,8,8 77:10
drugs 77:3
due 100:2 113:14
dug 95:3
duly 8:10 119:5
duty 22:3 23:3 28:18 30:22 74:22
dwight 71:1

e

e 1:19 3:1,1 4:1 4:1,3 5:1,6 6:1 6:1
earlier 54:2 81:3
early 33:17,19
earn 47:25
earners 25:3
easier 19:3 63:1
easily 58:1
east 2:6 3:5,13 3:20 6:10
easy 64:15
economic 40:5 40:15,16 68:9
economy 40:13
edit 75:24
educate 49:20

education 74:22 75:5
effectively 28:9 96:20
efforts 85:19
eight 57:10 70:12
eisenhower 24:8,9,22 25:7 25:13 43:16 71:2
either 11:5 19:21 33:10 47:11 91:15 93:8 95:1 101:11,11 107:10
elaborate 99:3
elected 22:22 23:13 38:14 67:22
election 7:18 18:7 27:14 38:20 65:22 66:23 72:5 85:15 101:10 106:4,23 107:19 108:20 109:3,5 110:9 110:10 113:22
elections 1:12 1:15,19,22 7:15,22 13:8 27:6 28:15 46:4 87:2 91:2 96:4,7 97:14 98:4,10,13,19 98:25 99:2 101:19,22,24 106:18 107:11 110:7 111:18 114:13,15
eleven 97:21
eli 4:18 7:10
eligible 80:14 116:19
email 121:17
embrace 54:10 108:4
empirical 68:5
employed 15:17,19 20:12 119:11,14 120:8,11
employee 119:13 120:10
emulate 70:25
enclosed 121:11
encourage 50:21
encouraging 20:10
endorse 20:20
endorsed 20:16 20:18 93:11 109:20
endorsement 94:7,24 109:18
endorsements 109:17
endorsing 55:23
ends 65:16
engaging 100:20
enjoy 74:21 75:9
enlist 75:7
ensuring 68:19
entered 123:9
entire 32:1 60:3 63:25 122:5 123:5
entirely 63:25
entirety 87:5 103:25
envisioned 24:17
epstein 69:2
equipped 92:25
erase 79:15
eredfern 4:22
errata 121:13 121:18 123:7 123:10,18 124:1
errors 10:11,20
es 119:4
especially 69:16
espouse 70:25
esquire 3:3,11 3:18 4:4,11,18
essentially 70:18
establish 101:8 101:15,16
established 24:24 33:21 57:7 73:22
establishment 29:19 109:24
estate 78:3
estimate 89:19
et 6:7,9 121:6,6 122:3,3 123:3 123:3
everybody 41:21 75:7
everybody's 32:15 42:4
evidence 99:11 99:14,17 101:2 102:14 103:6 103:11,17 112:8 115:19 115:23
evidentiary 6:21
evolve 71:14
ex 102:20
exact 72:24
exactly 22:17 34:4

examination 5:2 8:15 85:10
examine 87:18
examined 8:12
example 54:1 60:17
examples 55:21 74:2
except 20:13 73:1,5 80:24
excessive 96:24
exchange 98:12 99:5 109:22
exchanged 96:2
exchanges 96:9
excuse 69:10 77:3 78:10 79:9 89:5 91:13 93:14 106:24 115:21
executed 123:10
execution 122:14 123:19
exemption 80:2
exhibit 5:8,10 57:20,25 58:7 58:10 61:14,14 61:15,24
existence 106:14
existing 37:18
exists 76:20
exonerated 76:23
exoneration 76:16
expand 75:1,6 75:8
expected 22:8
expedited 117:19 118:3 118:16
expense 97:22
experience 45:18,23 69:15
experienced 17:3
expiration 80:14 122:19 123:25 124:25
explain 9:9 88:1,14
expound 19:6
expressed 71:24
expressing 20:9 99:8
extension 77:24
extensive 75:20
extremely 36:1 100:13
eye 25:11

f

f 4:18
facebook 5:8 5:10 51:10,13 57:15 58:20 59:3 62:8 63:19
fact 12:4 22:3 26:1 28:17 54:13,14 60:8 68:5 94:6,7,14 94:14,15 96:12 101:5 102:13 102:24,24 103:1,9 105:5 109:13,22,23 110:5 112:17 113:6 114:3 116:12,17
facto 102:20
facts 13:20 89:23 93:23 94:4 97:15
failure 23:13 24:3
fair 94:2
fairfield 14:24
fairly 32:15
faith 39:12 44:21 45:4,24 64:25 65:4,6 66:2,3,6,7,9 69:25 70:10
false 108:23
falsification 38:21
familiar 53:25 61:18
far 12:6 13:13 18:15 24:12 25:7,13 28:14 33:5 36:23 37:9 42:15 57:7 81:13 95:16,16 96:10 101:21 103:13
fascism 76:20
fascist 76:21
fashion 118:16
fast 117:23
fatalities 22:21
faults 24:23
favor 7:21 104:8,10 109:10
favorite 25:6 25:13 100:16 100:16
fdr 24:9 25:7,8 43:17
fear 84:15
february 58:23
fec 17:21 37:1 96:4 97:16,18 97:24
federal 13:24 76:11
federalize 77:13,15,18,21 78:11,13

feel 45:5 61:10 63:5 70:23 82:21,23 100:11
fell 29:1
felt 31:14 34:12 41:4 65:5 92:11 100:11
fight 74:9,9 112:12
fighting 59:22 59:25 74:11,12 74:14 112:14
figure 20:14 34:17 38:5 41:17 42:5 67:8,12 72:6,9 73:24
figuring 49:7
file 17:17,22 18:10 35:18
filed 17:20 18:15 37:1 93:14,15 96:17 104:21
files 47:14,16 69:3
filing 90:4 97:16,20
filings 96:5
filled 23:1 27:13 38:9 49:23
final 109:14
financial 93:4 97:12 98:12 99:12
financially 119:15 120:11
find 10:14 29:4 121:11
fine 32:11 48:9 57:22 58:6 64:2 75:25 96:22
finish 9:20,21 11:12 86:12
first 8:10 9:10 21:24 23:8 28:17 29:7 31:25 36:12 43:20 46:11 96:18 111:11
five 82:2 116:24
flip 65:21 67:3
flips 65:24
floor 2:6 3:13 3:20 6:11
flop 65:21
fluid 71:12 72:1
focus 28:25 32:3,4 86:21 97:4,10
focusing 32:4 90:12 103:4,6
follow 17:10 82:14 94:19 99:19
following 59:20 99:6 116:8
follows 8:12
food 74:23 75:3 79:4
foot 59:19
force 14:20,21 75:7
forced 40:10
forces 78:13
forcing 77:25
foregoing 119:3,4 120:4 122:13 123:18
foreign 68:10
form 38:1,4,9
formally 20:6 35:16
formatting 50:24
forms 77:15
forth 32:6
forward 121:15
fossil 76:25
found 27:20 31:1 36:21 102:24
four 48:18 49:3
frank 1:7 3:10 6:7 7:6 121:6 122:3 123:3
franking 91:9
franklin 1:11 1:14,18,21 4:5 4:12,19 7:11 7:14,17,18,21 85:14 87:2 89:10 90:12,17 90:21,24 91:11 92:4,6,14,20,21 92:24 93:4,7,9 93:20 96:3,6 96:13 97:14,23 98:2,4,7,9,13 98:19 101:24 109:14,24 110:14,23,25 111:2,7,11 113:21 114:12
franklincount... 4:8,15,22
fraud 27:15,19
free 47:15 74:22,22 101:15 122:14 123:20
freedhoff 1:12 4:3 7:12 87:22 89:9,10 91:9 91:25 92:23 93:23 94:21 95:7,20 99:8 99:11,16,23 100:3 101:11 101:19,25

102:8 104:3,11 105:12 111:2,5 112:8 115:19 116:3
freedhoff's 109:10 115:15
friday 2:3 6:9 14:2
friendly 17:2 100:13,18
friends 16:8
front 16:24
frozen 78:24
fuels 76:25
full 54:4 59:12 77:2
fully 86:14
funding 59:24 60:13 115:21 116:1,13
fundraising 17:24
furloughed 23:21
further 27:3 38:13 68:15 72:23 88:9 93:1 119:12 120:9
future 46:13

g

g 6:1
game 73:7 112:15,17
gathering 46:14
gavin 59:4,14 60:24
gender 41:5,12
general 2:5 3:12,19 6:10 7:8 18:7 35:22 71:24 91:5 105:25 106:1,4 106:23 107:4 107:19 108:20 109:3,5
general's 7:5
generally 24:1 93:25
generals 47:19
genocide 24:20
genuinely 52:17
gestures 86:8
getting 47:1
gist 17:9,12
give 9:12 12:17 14:16 27:16 42:18,24 62:1 64:18,21 72:19
given 16:16 74:2 88:14 92:8 101:15
go 18:1 23:4 29:3 32:21 38:6,7 42:3 44:4,17 46:11 49:5 60:14 68:7,15 72:19 76:1 82:16 83:19 84:25 85:17 93:20 97:18,19,19 99:15 102:12 111:15 112:7 113:17
goal 18:5
god 47:14
goes 29:20 68:20 78:7 96:10
going 9:8,15 10:8,25 19:10 20:19 22:7,7 24:18 25:11 26:5,6 27:15 29:2 30:10 31:3 32:20 35:3 37:10 38:20 40:25 41:13 44:18 50:10,24 53:23 61:23 63:22 64:20 65:18,18 67:3 71:8 72:15 74:6 75:7 76:6,7 82:24 84:7 85:17,18 86:21 90:11 94:13 97:2,23 102:5 103:14 113:9 116:14 118:3
good 6:2 8:17 8:18 20:23 25:8 39:12 40:5,5 47:23 63:6 64:24 65:3,4,5 66:2,3 66:6,7,9 85:12 85:13
goodness 74:24
goods 78:21 79:5
gop 96:14 116:18
govern 59:16
government 22:2 23:10 76:22
grace 80:9
grassroots 21:18 32:4 48:22
grateful 50:1
great 37:13 78:25
greatest 24:10 70:23
green 21:7 111:23,24,25
greg 7:4

gregory 3:11
gregory.rustico 3:15
grievance 90:4
grifter 59:24
grifting 59:7
group 21:10
groups 21:11 59:3
grove 5:8 57:16
guarantee 68:11
guess 15:4 31:10 46:16 53:24 54:25 71:23 72:12 74:17 91:16 92:3 95:23 110:19 114:2
guide 69:7
guidelines 83:9
gun 95:23
guy 52:14 101:11
guys 48:22 58:11

h

h 5:6
hand 8:7 61:23 98:2,3
handful 76:7
handing 58:9
handling 26:4
handsome 100:20
happen 18:5 46:2
happened 16:8 27:9 46:3 67:17 70:16
happening 12:4 45:5 78:14 96:16
happens 33:11
happiness 30:17
happy 49:17
harassed 51:20
hard 72:1
harder 112:24
head 9:15 20:21 107:14
headline 84:5
health 78:22
healthcare 30:16 34:4,5,6 74:22 75:4 77:7,12 78:15
heard 85:18 97:3
hearing 8:4 13:20,23 14:1 57:14 61:19,20 62:6 86:22,23 87:1,6,8,12 88:8,13 89:4 89:12,14 93:25 94:3,11,22 95:15,19 99:15 99:16,23 100:2 100:4,5 101:4 103:8,23 104:1 115:3,14
held 115:1
hell 25:18 63:6
help 9:8 21:18 46:10 49:17 50:15 56:16 69:13 85:19
helped 25:10
helpful 69:6
hereto 119:14 120:11
hey 17:2 50:23 50:24
hi 7:4 47:21
high 4:6,13,20
highest 25:2,3 70:16
hiring 96:19
historic 65:22
historically 43:23
history 24:11
hold 33:9 104:13 111:9
honestly 8:25 39:14 41:10
hoo 62:21
hope 76:5
hopefully 61:18
hoping 19:13 42:3
horse 16:22 18:14,17 19:4 37:4 56:12,13
horses 56:14
hospitals 25:5
house 15:2 19:24 35:12 37:15,15
housing 74:22 75:2 77:21,24
hq 52:11,15
huh 36:18 41:3 49:11 62:13 65:2 78:12
humanity 28:12 84:15
hummer 4:11 7:20,20 15:14
hundreds 78:8 78:9
hygiene 78:23

i

ice 59:23 60:13 84:10,13
idealize 24:5
ideals 70:25
identification 58:8 61:16

identified 57:8
identify 7:2 83:1,12 93:22 113:13
identity 34:8,9 47:1 53:13 65:17 70:15,21 70:22 83:3,11
ideological 44:9 88:22,23
ideologically 92:11
ideology 35:2 41:14 43:22 55:14,14 56:3
ignorant 114:1 114:3
ignored 109:20 110:12
imagine 21:10 51:14
immediate 27:21
immediately 23:2,5 27:21 33:14 79:15
immigration 80:10,16,25
imperative 27:1
implication 96:21
implying 106:13
important 39:5
improper 99:23 100:4,5,8
incident 33:18
include 51:5
included 121:13
includes 105:12
including 87:22
income 25:3 78:17
incorporated 123:12
incorrect 10:14
independent 33:15 52:18 108:24
indicating 121:13
indicative 69:22
indirect 84:18
individual 70:20 71:5,14 84:12
indulge 84:1,2
infiltrate 70:14
infiltrating 32:5
influence 27:5 110:9
informal 20:5
information 12:8 93:3
informative 69:22
informed 68:3 68:13,25 69:5
infrastructure 28:13 30:15
initially 98:18
initiatives 32:4
instance 25:16 40:24 65:11 67:3 70:6 73:16
instilling 84:15
intended 6:19 41:20 42:14 43:9 44:15 45:21
intent 116:9
interaction 20:15
interchangea... 81:13
interchangea... 19:1
interest 79:9,9 89:25 90:6,10 90:16 91:6,21 91:22 92:2,5,6 92:10 96:11,25 99:12 102:16 112:19 115:18 116:8,10,11,18 116:21
interested 17:7 21:24 28:3 119:15 120:12
interesting 26:18 74:7
interests 113:4
internal 12:8
internet 39:4
interns 48:7,13 48:17 49:6,15 49:19 50:12
internship 49:2 49:7,10,24 50:4,8
internships 49:23
interpret 42:8
interpretation 42:1,10
interpreted 40:22 41:18 42:6,13,15 43:7 44:21 45:4,19
interrupted 101:9
interrupting 101:13
interview 52:10 53:15 56:18 99:19
interviewed 109:18,19

interviews 18:2
invited 110:22
involved 20:11 25:22 68:22 115:13
involvement 84:18,20 90:24 93:16 114:14 115:11,12
involvements 114:12
involving 92:21 103:19 115:7
iran 25:23 26:1 26:11 60:22 69:2 74:12
irrelevant 103:1
ish 58:23,24
isolated 61:2
israel 24:19 26:8,10
issue 23:8,15 32:9 44:16 68:9,10,10,11 74:19 92:23 99:25 101:25 103:4 111:16
issues 28:5 41:22,23 42:1 68:20 82:20

j

j 1:9 4:2
jamie 1:15 4:3 7:12
january 58:24 79:6
japan 14:20
jeanine 4:11 7:20 118:11
jhummer 4:15
jill 16:5,8 20:13
job 2:10 67:11 104:20
joined 59:3
journalist 52:18
jr 43:19
judge 11:5 91:19,21,22,25
judges 91:4
july 15:2 37:15
jump 51:10
justice 28:4 73:16
justifying 60:16

k

keep 9:10 50:10 113:4,5
keeping 41:1
keesler 14:20
kept 41:5 101:12
kerfuffle 25:25
key 26:16 43:14 43:15
kind 17:18 23:7 24:17 32:21 37:19 38:8 40:10 50:6 56:11 61:21 72:17 89:17
knew 115:20
know 8:19 9:18 10:3 11:9 21:11 22:5,13 24:22 25:7,21 25:22 27:22 29:8,11 32:13 33:15 35:11 37:18,25 40:6 40:6,9 42:25 43:5 44:22 45:7,13 46:16 46:17 47:5 49:21 52:9 58:16 61:20 62:11 64:10,14 65:11,12,17 66:16 73:23 74:6 82:19 83:14 84:4,8 84:25 86:2,16 89:13,17 90:9 96:17,19 97:6 100:23 102:4 102:23 103:13 103:17 104:8,9 104:17 108:13 112:23 114:14 116:23 117:23
knowing 25:21 114:4,5
knowledge 46:15 85:24 91:17 115:25 119:9 120:6
knows 108:12
kool 34:22

l

l 1:15 4:3
label 71:22 73:11,15 81:4 83:13
labeled 63:4
labels 69:6,12 69:13 70:17,19 71:12,13,15,25 71:25 72:12,25 83:6
laid 110:4
lancaster 14:24
language 34:1 50:23 56:23 75:23 79:25 104:14
largely 16:17
larose 1:7 3:10 6:8 7:6,9 121:6 122:3 123:3

law 3:4 13:8 27:18 29:14,14 29:16 42:10,10 65:8,10 66:6 88:24 89:3
law.capital.edu 3:7
lawful 22:19
laws 6:21
lawyer 45:7 73:3,6,6 90:1 113:16,20,20
lawyers 73:1 73:13
leader 25:1 84:11
leadership 24:17 29:18 70:24 113:15 113:23 114:9 114:18 115:1,8
learned 17:2 33:21
learning 32:8 32:12
led 22:2 56:10 95:4,5
legal 26:25 39:6 90:9 91:17 96:10 114:1 121:1 124:1
legality 41:16
legislation 28:11 68:23
legislative 94:23
letter 121:19
level 31:24
levels 70:16
lgbtq 24:24
liberal 31:13 41:23 81:10
libertarian 81:23 83:18 103:20 104:15 104:22,24 105:3,5,6,9,16 105:20,22,23 106:3,8,10,13 106:22 107:3 107:16,18,20 108:9,16,20 109:2 111:16 111:17,20 112:11,17,22 112:25
libertarians 21:7
liberty 30:17
lie 73:19,20
life 14:14,15 30:17 38:8 45:18 70:7 84:17
light 20:17
likely 16:11 47:17 106:21 108:8
liking 63:19
limited 31:12 103:16
line 42:3,3 59:23 60:9 71:9,17 101:8 112:5 121:13 123:7 124:3
lines 34:7 56:19
listed 123:7,17
listen 32:17 56:21
listened 56:25
listing 123:7
literal 44:9 92:16
literally 14:7 60:22
litigate 110:2
litigating 57:9
little 9:9 14:16 14:21 16:2 17:14,16 32:22 35:9 36:5 46:5 48:12 62:11 66:20 68:15 75:10 81:3 89:8,14 92:3
lived 14:14
living 69:3 79:5
loaded 44:22
loans 78:1 79:8
local 21:11 33:22,24
location 2:5
lol 63:8
london 110:18 110:20,21
long 24:21 25:24 29:21 59:12 63:4 65:21 72:13 86:17,18
longer 68:23
longstanding 26:15
look 10:19 57:20 58:15
looked 100:21
looking 23:2 24:18
losing 30:6
lost 35:22
lot 17:25 18:1 40:4 43:6 48:23,24 63:20 69:19 98:6 102:4
low 72:12
loyal 34:20
loyalty 39:11

m

madam 121:10
made 25:1 32:1 33:19 34:4 35:21 36:19 37:13 38:20 47:8 57:15 59:21 88:7 89:2 93:13 100:15 103:5 110:16 116:20 122:7
main 105:2
maintenance 15:4,9
major 26:17,19
majority 81:1
make 9:24 10:11 18:22 35:18 36:8 47:22 53:23 67:11 68:12 70:15 76:8 106:16 107:16 110:13 112:4
makes 92:17 116:18
making 30:16 40:14 56:11 109:14 115:16
man 96:17
manage 15:5 75:13
managed 70:11
manager 12:11
mandatory 84:17,19
manipulate 28:15
manner 6:22
march 2:3 5:10 6:9 51:16 62:10 86:22 87:1 99:15 103:19 121:4
mark 3:3 7:24 57:19,24 59:4 59:14 61:14 96:12 121:5
marked 58:7 61:15,24
market 77:24
marxist 81:21
marzetti 15:15
masses 68:19
material 26:4
matter 6:7 56:1 104:4 109:19 116:15,22
matters 29:23 44:12 109:20
mays 2:9 6:3 119:2,17
mbrown 3:7
mean 14:18 18:17 19:9 22:5 25:5,15 30:16 33:8,19 40:14,19 42:8 44:17,22,23 46:17,20 47:14 48:14,19 53:11 54:1,16,21 56:9 63:20 64:14 65:22 66:7 71:3,6,10 71:11 72:20,20 72:24 73:2,6 73:12 74:24 83:9 88:6,7 91:2,4,6 94:17 94:18,21 95:22 97:16 98:8 103:16 106:18 107:17 111:22 112:1
meaning 70:20 70:20 86:9
meaningless 70:18 72:1,12
means 6:23 10:16 17:10 22:24 71:5 83:13
meant 55:8,9 56:7,17 98:5
media 13:19 16:6,7 50:13 51:5,20 63:13 63:21 68:16,16
medicaid 25:9
medical 79:15 80:3
medications 11:16
meet 11:24
meeting 38:1 46:4
member 1:14 1:17,21 16:8 21:12,13,15 31:15,17,20 32:3,24 38:10 84:10 90:5 92:14 96:13 105:8 113:14 113:22 115:5
members 7:14 7:19,22 23:20 75:9 76:17 85:15 87:22 101:10 114:8 114:12,23,25
memory 48:9
men 41:1,5,12
mention 23:21
mentioned 16:10 19:8 20:11 23:22 25:15 37:18 45:9 56:18 59:15 72:8 97:12 102:1 110:12 111:19

meredith 1:12 4:2 7:12
merge 77:16
merits 95:8,10 95:12
metaphor 56:16 91:18,24 112:16
metaphorically 112:13
michael 1:19 4:3 7:13
midterms 65:24
midwest 121:17 124:1
mike 93:5,6,10 93:13 96:2,2,7 97:13,19 98:14 105:17,21 106:1,3,17 107:14,15
military 14:19 24:24 40:6,7 74:25
mind 9:10 24:14 25:14 30:7 75:7
minimum 13:14 76:9
minutes 55:18 82:3 116:24
mired 26:12
misquoted 42:16
misrepresented 42:16 55:20
missed 75:23
missing 35:11
misspeak 98:5
misunderstand 107:2
misunderstood 44:8 55:20 111:14
modern 24:12
modernizing 40:6
moment 10:13 14:4 58:13 82:5 85:2 117:3 118:18
monday 117:23
monetary 15:21
money 18:1 37:1 53:20 68:21 94:6,13 96:1,7 98:18 99:5 109:15,22
monitor 22:12
month 80:9,13
moral 82:22 83:9
morning 6:2 8:17,18
motion 93:15
motions 92:18
mouth 53:20
move 14:25 26:4 86:14 89:8 113:7
multiple 18:16 19:5 51:17
muslim 71:11

n

n 3:1 4:1 5:1 6:1 8:22,23
nail 21:22
naive 52:7
naively 23:18
naivete 29:10 32:7
name 6:2 8:20 8:21 51:10,12 51:21,22 62:12 62:25 85:14 95:2 96:20 106:10 121:6 122:3,4,15 123:3,4,21
name's 51:11
named 7:23
names 20:21
narrowing 113:10
nathan 8:23,23
national 30:3 31:6,24 36:4 52:4
native 76:14
nature 13:2
navy 22:13
necessarily 64:13 83:11
necessity 65:7
need 9:15 11:8 50:25 56:6,7 57:1 60:2 61:20 64:21,24 75:24 86:4,9 118:11
needed 29:6 49:23 50:9
needs 76:22
neither 28:6 119:10 120:7
never 26:13 29:6 30:9,11 34:9 36:24,25 37:1,1
new 21:17 43:1
news 19:11
nice 100:21
nixon 43:18
nod 9:14
nominee 106:2
non 28:16 113:20
nos 9:16
notarized 121:14

notary 6:12 119:18 121:25 122:10,18 123:15,23 124:23
note 121:12
notes 12:22
nuance 77:4
nuclear 23:19 25:23 26:4
number 25:12 68:17 121:7,13
numbers 123:7
nuremberg 84:5

o

o 6:1 8:22
o'clock 85:13
oath 9:3 10:18 39:11 82:12 85:21 87:8
oaths 6:13
object 10:23 72:15
objected 101:6
objection 6:14 8:4 10:24 11:4 42:20 45:15 102:10 108:11
objections 11:1 11:6 102:1,4,7
objectively 26:19
obviously 18:5 19:23 46:16 47:21 52:8 97:17
occurred 94:7 94:12 100:23 109:24
october 22:1 38:1 59:1
offenders 77:9 77:10
offenses 77:3
offered 16:5
office 2:5 6:10 7:5,17 19:23 21:18 23:5 30:22 37:11 49:7,10,20,24 59:24 65:23
officer 38:14 119:1,2
offices 19:20 49:24 114:19
official 1:7,10 1:13,16,20 6:8 7:13 15:22 51:3,7 62:20 64:11 90:2,5 122:15 123:21
officially 65:17 65:18 85:12
officials 22:23 23:14
oh 2:8 3:6,14 3:21 4:5,7,12 4:14,19,21 18:23 21:6 22:1 32:16 44:4 47:8 48:2 48:7 50:10,13 54:20 56:23 57:21 61:19 63:6 73:14 75:22,25 110:20 111:9
ohio 1:2,9 2:5 3:12,19 6:9,10 6:11,13 7:5,8 13:8 14:14,23 18:16 36:12,22 49:10,20 65:8 65:20 72:4 90:17 93:16,21 110:21 112:19 115:11,13,20 116:1,17 119:19 121:2
ohioago.gov 3:15,22
okay 9:2 11:7 11:11,15,20 12:9,12,14,17 14:1,5,9,12,25 15:3,15,17,24 16:2,13 17:7 18:10,21 19:5 19:17 21:4,24 22:9 23:7 24:2 29:2 31:5 33:6 34:10,15 35:16 35:20,23 36:12 36:16,19 37:3 37:6,17 38:13 42:23 46:5 48:11 51:5,15 51:22,25 52:2 53:5 57:12,13 58:19,25 59:10 61:7 62:24 64:17,19 67:7 74:4 75:17,20 76:24 80:9 81:3 82:2,4 85:2 86:12,16 86:21,24 88:10 89:4,8,23 90:11,13,23 92:19 93:3,19 97:2,25 98:11 98:21 99:1,7 99:22 100:10 101:23 103:3 103:11,18 105:8,16 107:1 108:15,19 109:1,9 111:5 114:7,11,22,25 116:25 117:11 117:13,16,20 118:1,4,5,8

okinawa 14:20
old 14:12 32:12
once 31:1 71:22
one's 48:9
ones 21:16 75:22 79:7 101:12
open 11:13 28:16 32:10 65:20
opinion 27:18 28:8 68:23 71:3 88:25 89:1 102:14 113:19 115:4 116:2,22
opinions 21:1 43:6 73:13
opportunity 87:14,18 88:14
opposed 63:2 104:18
opposing 109:11
opt 79:22
option 23:19 67:25
options 108:4,4
order 56:25
ordering 117:17 118:2
organization 15:10 76:20 90:22 92:16 116:7,9
organization's 116:10
organizations 21:9,13,15
originally 49:3
osu 48:16
outcome 14:11 35:20 99:12 100:16,16 110:9 119:15 120:12
outreach 50:14
outright 109:21 110:12
outside 26:5 100:10 102:18 103:12 106:10
overrule 11:5
overruled 101:7
overwhelming 102:14
own 16:7 19:22 51:8,8 60:15 60:21 62:22 80:5 94:8
owning 78:8

p

p 3:1,1,18 4:1,1 6:1
p.m. 85:9 117:7 118:19,22
packed 36:1
packet 50:8
page 5:2,7 51:7 57:16 62:23 63:10 121:13 121:15 123:7 124:3
paid 22:7 37:1 112:18
paperwork 17:17 18:10 36:25 65:15
paraphrase 41:1
parole 84:18
parsing 109:1
part 10:8 19:7 44:10 52:5,12 55:12 87:16,20 87:24,25 94:23 95:1 99:25 105:2 110:7 116:6 123:9
participating 103:10
particular 20:4 21:2 32:20 42:2 61:1 83:2 83:17 90:5 117:21
particularly 23:11
parties 6:15 21:9,11 26:17 27:24 28:1 34:21 57:9 60:15,18 69:16 71:14 73:25 107:8 115:1 119:11,14 120:8,11
partition 47:16
party 13:10 17:5 25:18,20 27:12 28:17,18 28:22 29:3,9 29:12,16,16,17 29:18 30:25 31:16,18,21 32:25 33:2,4,5 34:17,21,24,25 35:7,8 38:11 38:16 39:21,24 41:11,19 43:8 43:13 53:1 54:12,14 59:23 59:25 60:9,10 60:12 61:8 63:2 64:24 65:8,14 69:6 69:12,13,20,25 70:11,14,17,19 70:24 71:22,25 80:21 83:2,4,6 89:11 90:3,13 90:16,17,18,21 91:10,12,25 92:14,16,21,22

92:24 93:5,16 93:21,21 97:24 98:2,6,9 106:8 110:8,13,14,16 111:1,3,7,11,23 111:25 112:19 112:20,25 113:1,2,15,23 114:9,11,16,19 115:6,7,9,13,21 116:1,13
party's 90:24 92:5,6 115:11
passage 26:21 53:14
past 47:4 64:1 66:22 67:14 77:8 82:19 113:7
paul 62:25 63:7
peace 25:23
penalty 38:20 84:19
pending 11:10 14:11 86:18
people 22:15,24 24:19 27:16 28:23,24 30:15 31:1,3 33:8 42:7 48:1,23 50:25 54:3 56:20 65:8 66:8 68:8,25 73:12 75:2 76:21 77:25 78:5,5 82:20 82:24 83:3,8 83:20 107:12 107:20 108:3,8 110:3
perceived 100:16
percent 18:3 28:8,9 78:23 79:2,9
perfect 26:6 48:10
perform 79:21
period 78:24 80:9 102:17
periods 96:9
permission 29:9,12,15
permitted 6:19
person 33:10 46:13 52:16 67:24 71:1 83:21 90:4 107:13 108:1
personal 62:22 63:9 69:15 99:8,10
personally 87:21 114:21 122:11 123:15
personnel 84:12
persons 80:12
perspective 33:3,4,5
petition 46:7
phone 121:3
phrase 50:25
phrasing 76:18
pick 66:16,19 67:3,13,23 69:12 72:5 82:16 83:2
picked 54:4 66:14 67:19
picking 83:22 83:23
picture 62:12
pin 72:1
place 29:7 69:11 72:4 96:18 111:11
places 38:7 84:24
plaintiff 3:2 7:25 8:2 12:14 117:9
plaintiffs 1:5 12:24
plan 38:7
planner 15:4
planning 17:14 75:25
plants 80:18
platform 28:20 29:24 31:23 33:22,25 34:1 39:9,10 40:1 40:16,17,25 41:11,14,19 42:6,13 43:8 43:11 44:8,15 47:24 48:1 52:5 60:10,12 60:15,17,19 80:21 81:2 88:4 95:3
platforms 19:22 26:20
play 73:7
played 115:15
playing 41:12
please 7:2 8:6 9:11,20 10:3 11:8 45:1 89:15 97:4 99:24 102:12 117:19 121:11 121:11
plus 29:22 110:5
point 37:17,22 42:10 46:6,14 56:10 75:19 76:7 89:12 93:7 94:10 101:25 106:18
pointed 58:13
pointing 55:21

points 22:25
police 78:13
policies 19:21 19:22 28:10 29:24 63:6 75:6 81:9,11
policy 26:14 28:9 40:5,12 68:9,10,11
political 15:18 15:25 16:20 21:9,13,15 22:25 23:8 26:17 44:10 47:1 73:25 74:4 75:21 76:3 80:5 81:4 88:15 114:11 115:1,6
politician 25:13 70:13
politicians 20:15 24:1,5,9 24:12 25:14
politics 20:25 21:25 25:22 32:12 46:19 65:23 68:21,22 70:12 107:11
poll 69:11
polling 18:3 69:11 72:4
polls 66:24 82:17
pope 73:19
popular 52:23 52:24
population 75:9
populism 25:8 31:11,24
populist 31:11 34:9,23 35:1,6 35:7 46:25 47:2 52:25 53:7,12 54:8 55:14 56:3 57:8 70:22 74:24 81:5,14 81:25
populists 54:11 56:8
populous 33:16
portion 54:4
pose 105:17,20 106:3,22 107:9
poses 107:3
position 31:15 38:14 41:25 77:5 84:8 106:21
positions 76:12 88:15 115:1,8
positive 20:17
possession 77:5 77:10
possibility 84:17
possible 19:10 41:18 42:6,13 43:7 45:11 66:8 70:2 106:15 107:25 117:24
post 5:9,10 14:6 57:15 58:20,22 59:4 60:23 62:8,8 62:19,25 63:13 63:25 64:10,14 102:20
postal 77:16
posted 13:19 14:1 20:17 63:9
posts 51:6
potential 26:12
potentially 18:19
potus 19:24
power 80:17
practical 26:14
preamble 30:17
precise 97:7
precisely 28:8
predominantly 40:15
prefer 71:19
preferential 100:24 101:3
preisse 1:9 4:2 7:12
preliminary 85:17
premise 108:5
preparation 12:19
prepare 11:20 11:24
prepared 120:3
presence 16:6
present 21:1 43:24 60:6 87:5,14 100:6 100:10,25
presented 49:23
presenting 89:5 99:17
presently 74:3
preserve 11:1
president 25:7 37:4 71:1
presidential 16:22 17:16 18:6
presidents 24:11
presiding 91:19
pretending 55:24
pretty 40:18 75:20
prevent 99:16
prevented 89:4

previous 13:8 35:10
previously 7:23
price 78:19,24
prices 79:6
primaries 27:2 32:10 47:4,19 65:13 66:12 69:15,23 71:15 71:16
primary 13:14 13:15 18:4,6,8 27:1,6,10,15 28:24 31:20 32:6 35:21 36:1,15 53:8 59:17 65:20 66:23 69:10,11 69:18,19 70:21 70:22 71:20 72:5 78:4 82:16 91:16 94:9 105:18,21 105:23 106:25 110:3,10 112:19 115:7
primarying 67:24,25
principle 30:19 77:23
principles 38:16 39:20,24 43:12
print 97:17
printed 38:4
prior 94:11 97:3 115:20 119:5
private 77:21 77:24 78:11
privatize 78:10
pro 79:18
probably 16:12 21:20 37:21 51:17 55:10,11 55:11 58:23 66:25 67:14 75:24 94:24 97:3 118:11
problem 83:15 103:2
procedural 6:20
procedure 122:5 123:5
proceed 8:14
proceeding 6:4 6:18 118:23 120:4
proceedings 119:3,4,6,8 120:6
process 9:9 49:8,18,22 66:13 100:2
produced 6:17
production 121:15,17,22
products 78:22
professional 80:3
profile 50:6
program 34:7
progress 5:8 57:16
progressive 54:8 55:14 63:4 81:12
progressives 54:11
prosecuting 4:5 4:12,19 7:11 76:21
prosecutor 7:21
prosecutor's 7:17
protest 18:14 18:22 37:4 86:22,23 87:1 88:21 90:25 91:14 92:5,7 93:17,24 95:4 95:8,10,12 96:16 99:13 103:18,19 104:12,14,21 104:24 105:9 105:13 111:17 112:9 115:3,11 115:12,22 116:1,13
protester 87:18
protester's 95:9
protesting 76:22
protestor 92:9 92:13,20 94:15 94:20 95:6,21 100:13,19 101:3,9 105:3
protests 21:20 113:21 115:7
proven 24:16
provide 74:20
ps 36:20
public 28:7 68:23 77:13 84:15 119:18 122:10,18 123:15,23 124:23
publicity 19:10
publicly 13:18
puerto 76:13
pull 14:7 37:14 42:2
pulled 53:17 102:22
purely 88:25 89:1
purpose 45:12

pursuit 30:17
put 26:23 49:24 53:20 61:12 63:15,16 64:17 94:8,9,10 111:11
putting 53:24 92:10 110:1

q

qs 36:20
qualifications 88:15,16,17,19
qualified 113:25 119:7
qualify 38:14
question 10:5 10:25 11:2,10 11:13 13:13 15:12 26:18 27:23 30:10,11 34:8,19 37:13 42:12,19,21 44:1,6,10,22,25 53:15,19 54:20 56:2 61:6 63:23 65:3 66:5,11,21 72:13 73:14,23 83:25 86:1,4 86:13,14,18 88:11 90:19 93:1,2 97:1,5,8 97:10 99:6,18 102:12 103:15 104:18 106:9 106:12,19 107:1 109:1 111:14 112:7 113:18 114:1
questioning 71:9,18 101:8 112:5
questions 9:20 10:2 11:17 32:5,15,20 57:12 67:11 72:25 82:14 84:23 85:24 86:21 87:21 88:3 113:5,8 113:10,11 117:9,10
quick 15:12
quite 27:8 69:5 93:8
quote 19:10 38:10 54:4 55:7,12 56:20 59:4 60:4 62:19 63:6,7 84:7
quoted 60:3
quotes 55:19
quoting 55:1 55:10

r

r 3:1,3 4:1 6:1 8:22 121:5
race 27:10 32:2 54:18 59:16 93:12 103:20 106:5,25 107:19 108:2 108:17,22
radio 18:2 19:11
rage 23:1
raise 8:6
raised 14:18 61:6
ran 16:21 19:16,23 27:21 28:21,23 29:8 30:3 31:6 33:1 35:12 36:3,14 36:21 37:2,3 53:20 57:8 70:7 112:2
range 22:16
rather 17:10 23:17 41:14 83:10
reach 29:25 50:25 54:13 110:23
reached 16:9 16:25 28:17 52:22 111:9,10
react 63:17
reacted 64:15
read 38:23 39:1 40:2 53:14 55:6 59:10,12 99:18 117:13 117:15 122:5,6 122:12 123:5,6 123:17
reading 121:19
reaffirm 30:25
reagan 43:18
real 11:9 39:6 65:14 78:3 110:1
reality 41:14
really 24:13 29:23 40:11,21 45:14 56:14 65:3 67:18,18 67:21,22,22 68:23 77:25 95:23 110:18
reason 16:9,16 60:16 62:16 82:25 91:3,16 93:12 95:18 96:11 98:11,15 98:22 105:2 116:20 121:14 123:8 124:3
reasons 27:11 29:11 79:23

rebel 52:11,15
rebuild 16:7
rebuilding 53:1
rebut 99:20
recall 42:25 52:10 56:21 57:14,16 59:7 64:9
receipt 121:18
received 15:21 54:9 84:13 109:16
receives 84:12
recent 39:10
recently 51:20
receptive 48:1
recognize 51:23 58:16,17 62:5
recollection 95:19
reconcile 109:9
record 6:4,5,15 7:2 8:21 9:19 9:25 10:9,15 11:1 13:10 44:23 47:12 53:16 58:9 82:6,7,9 84:25 85:1,6,7,9 97:16,21 98:8 117:2,4,5,7 118:20 119:9 120:5 123:9
recorded 6:22 9:11,11 119:6
recording 6:17 86:8 119:8 120:4
records 97:20
recusal 93:15 103:4 115:2
recuse 91:5,13 94:3 103:5,12 113:14,23 114:23 115:6
recused 94:2,5 100:7,11,12 102:15 113:3 114:8
red 35:5 59:18
redfern 4:18 7:10,10,23 118:13,15
reduced 78:23 79:1 119:6
redundant 72:17
reference 121:7 122:2 123:2
referenced 122:11 123:15
referring 13:23 90:17
reform 34:5 80:25
refuse 91:13
regain 59:17
regard 55:10 83:8 99:5
regarding 109:10
regards 109:15 110:17
regular 68:16
rein 32:21 101:15
reinforced 101:10
reiterate 103:9
related 115:7 119:11 120:7
relationship 93:4
relative 119:13 120:10
released 77:9
relevant 15:13
reliable 76:3
relied 56:14
religious 79:23 80:2 83:9
rely 54:12 69:11 83:6 89:23
remain 24:24 85:21 105:10 105:14 109:11 111:19
remaining 81:2
remedy 13:11
remember 16:19 17:11 27:8 37:19 52:12,14,19 58:21 65:21 76:19 93:8 101:12 102:3,6 105:7 110:21
removed 104:25
removing 110:10
rents 79:1
repeat 97:2
repeated 86:4
rephrase 44:3
reported 2:9
reporter 6:2,3 8:3,13 49:12 58:5 62:3 64:18 82:5,8 85:2,5,8 117:3 117:6,13,16,20 118:1,5,8,14,17 122:7
reprehensible 27:20
represent 85:14 101:23
representative 19:24
represented 87:11

representing 7:22,24
republican 13:6,7,10,15 16:21 17:5,8 25:18,20 27:22 28:18 29:3,8 29:12,15,16,21 30:7 31:12,18 32:6 33:9,14 33:20,21 34:16 34:16,25 35:5 35:6,8,23 36:2 38:11,16 39:17 39:21,24 40:3 41:11,19 43:8 43:13,16,18,18 43:19,19,20,21 43:23 44:7,8 44:11,12,14 46:15,23 47:4 47:18,18,23 53:6,8,10 54:9 54:14 55:15 56:4,20 57:2,6 59:7 60:25 63:2,5,5 65:18 67:17,19,21,23 69:18 70:7,10 70:11,21,24 71:1,4 73:21 80:21 83:13,18 89:11 90:3,13 90:16,17,18,24 91:10,12,25 92:4,6,14,21,22 92:24 93:5,16 93:20,21 97:23 98:2,9 105:18 105:21,23 106:2,4,25 107:4,9,22 108:2,10,21,24 109:4,13 110:6 110:8,10,13,14 110:17 111:1,3 111:7,23,24,25 112:1,20 113:1 113:2 115:11 115:13,20 116:1,12,19
republicans 21:7 23:25 24:2 28:2,16 33:11 47:7,9 49:16 52:6 53:22 54:17,21 55:7,23,24 56:7,8 59:18 59:18 60:21 65:23
request 50:7 86:17 123:9,11
requested 119:21
require 29:15 29:16 79:21
required 113:14,22 121:25
requirement 31:22
requirements 49:8
researched 22:20 72:9
reservations 76:14
reserve 76:11
reserved 118:21
reserves 23:4
reset 79:5
residence 47:22 78:4,6
residencies 78:9
resident 14:22
resonates 56:3
resonating 55:15
respect 43:6
respective 49:24
respond 110:23 111:1,6
responded 50:7 61:4 63:7 110:18
responding 59:7 111:3,12
response 53:19 59:11 60:24 61:1,2,8 62:24
rest 110:4
resulted 96:15
returned 121:18
reversed 20:25
review 10:11 12:19 119:21 121:12 122:1 123:1
reviewed 40:2
rico 76:13
right 8:6 10:1,4 13:16 14:16 22:13 25:1 27:1,4,5 29:13 30:16 34:2 36:13 37:14 38:11 39:21 41:7,9 42:12 45:5 46:8,18 50:23,24 52:6 53:6 57:18 64:17 66:5,14 66:25 67:1 68:7 69:2 73:18 75:21 78:6,7 79:18 79:21 80:1 81:5 82:5 84:22 90:12 91:15 102:18

103:4 114:9 117:3,16,20 118:17
rnc 39:9 40:1
road 44:17 53:25
roads 25:4
rock 14:21
role 50:9 89:24 94:17 111:6 115:14
roles 114:18
ronan 1:4 2:2 3:2 6:6,7 7:25 8:1,1,6,9,22 47:21 59:5 64:11 82:11 85:12 121:6,8 122:3,4,9 123:3,4,13 124:20
ronan's 62:20
room 2:7 6:11 22:4 41:21
roosevelt 43:17 43:17
routes 60:15
rubber 53:24
rule 11:9
ruled 14:3
rules 6:21 110:6 122:5 123:5
ruling 13:21 14:6 102:1
run 19:19 21:18 28:21 30:22 31:14 33:20 35:23 36:10 37:11 50:17 52:5 53:22 54:16,21 55:7,22 56:6,7 59:5 76:6 110:15,17
runner 16:24
running 23:5 30:24 34:12 35:6 52:3 53:7 59:6,24 61:5 71:21 105:22 108:16,21,23 109:3,7
rustico 3:11 5:3 7:4,4 8:16 15:16 42:22 45:2,17 49:14 54:24 55:3,5 57:24 58:4,6 58:14 61:13,17 61:23 62:4 72:18 73:9 82:10 84:22 85:3 117:17,19 117:22
ryan 62:25 63:7

s

s 3:1 4:1 5:6 6:1 121:15 123:8,8 124:3
sake 10:12 32:15 42:4 100:17
salad 35:4
samronan.com 19:17
samronan.com. 75:12
samuel 1:4 2:2 3:2 6:6,7 7:25 8:1,9,22 47:21 59:5 62:20 64:11 121:6,8 122:3,4,9 123:3,4,13 124:20
sanders 24:14
saw 17:8 63:25 64:1,14 95:2
saying 18:23 56:11,21 62:19 73:15 91:15 92:13 96:23 98:15 100:20 107:13 112:1
says 10:24 63:12 64:11
scale 92:10 110:2 111:12
scarcity 75:3
schedule 38:5
school 3:4 14:18
schools 25:4
scope 111:8 113:10
scores 79:13
screams 90:10
seal 122:15 123:21
seatbelt 102:23
second 16:18 103:4
secretary 1:8 6:8 7:6 18:11 47:13
sector 79:8
security 25:9
see 18:23 26:16 30:9 33:6,8,10 34:11,15,17 41:25 43:2 51:18 62:12 67:22 83:15 96:18 100:21 100:21
seeking 13:11
seem 69:5 71:24 100:15
seems 69:2 78:14
seen 11:4 64:6

segment 55:13
selects 83:17
senate 7:6 36:22
sense 10:11 35:17 76:2 101:17 107:16 112:4
sent 22:15
sentence 84:17
separately 43:4
serena 41:8
serve 22:8 45:12 53:2
service 23:20 39:1 72:24 75:8 77:16
services 78:22
set 79:9 113:17
several 74:2
severe 102:16
sexton 1:20 4:3 7:13
shake 9:15
share 96:12
shared 28:20
shayla 7:21
sheet 121:13 123:7,10,18 124:1
shifted 32:2 34:9
short 114:3
shortcut 83:6
shortly 93:21
shot 72:19
show 94:1
showed 96:20
shown 97:24 102:25,25 121:16
shows 18:1 19:8,11
shumaker 1:16 4:3 7:13
shutdown 22:2 22:21 23:11
side 36:2 112:22
sign 26:3 39:12 44:11 49:3 50:19 65:14 117:14
signature 47:25 118:21 119:16 120:14 121:14
signatures 17:18,22 29:22 35:18 36:17,25 37:7,23 38:2,6 46:7,10,14 47:6 88:18 110:6
signed 22:10 36:24 38:24 39:2,14,16,19 40:3 50:15 74:8 122:13 123:18
signers 47:7
significant 102:16
signing 25:23 121:19
similar 18:11
simple 110:4
simply 14:3 23:12 55:12
sincerely 121:21
single 42:9 44:13,16 71:19 80:24 82:20 84:10,12
sir 9:13 10:7,22 11:19 13:1,17 19:18,21 37:5 38:12,22,25 40:4 66:15 81:6 82:13 85:25 86:3,6 86:11,15,20 118:17 121:10
sister 67:5
sit 35:3 82:24
sitting 52:14 91:1
situation 72:3
six 14:13
sketch 14:17
skill 113:16
skills 119:10 120:6
skin 112:15,17
skipped 39:4
small 100:20 101:1 106:9
smoking 95:22
social 13:19 16:6,7 25:9 28:4 50:13 51:5,20 63:12 63:21 68:16 83:10
socialist 81:15 81:17
society 28:12
solar 80:18
sole 46:13
solely 113:14 113:23 114:8
soliciting 49:5
solutions 121:1 124:1
something's 40:21
sooner 23:3 77:1
sorry 15:10 48:7 49:13 50:10 54:20 57:21 66:18 73:4,14 84:24 85:3 93:13

98:5 104:5 105:25 106:19 106:20 107:2 110:20 111:14 112:4,16 113:11
sort 15:21 23:17 35:1 44:19 112:6
sought 104:24
sound 53:25
sounds 20:5
source 39:23 43:14,15 76:3
south 4:6,13,20
southern 1:2
spared 29:13
speak 12:9 88:9 92:3 101:15 110:22
speaking 26:19 112:13
speaks 91:12
specific 21:22 54:22 61:2 63:22 78:22 81:9,11 89:15 89:23 97:5,10 101:8
specifically 22:1 47:20 55:17 56:10 78:21 86:22 88:4 89:9,18 91:11 92:4 93:25 94:1,22 95:11 97:9 98:3,8 100:2 102:7 107:3
specify 105:25
speculation 45:16 108:12
speculative 107:23 111:4 111:22 116:15
speeding 102:22
spelled 8:22
spelling 8:20
spending 17:25 28:3
spent 55:17
split 114:15
spoken 12:2 13:18
sports 41:2,5 41:12
sr 59:4,14
staff 48:3
stage 18:4,8 59:21
stance 13:9 26:15 60:22
stand 29:21 30:1 41:15,22 84:4
start 8:20 45:10 78:25
started 23:2,5 37:19,22 38:2 46:7
starter 28:16
starving 74:15
state 1:8 6:9 18:11 19:23 32:2 47:13 49:10,20 60:24 114:20 119:19 122:10 123:15
stated 26:20
statehood 76:13
statement 63:23,24 99:8 122:13,14 123:19,19
statements 38:19 50:17
states 1:1 18:16 32:8,9 80:13
stating 8:20 60:7
stationed 14:19
status 113:15 113:24 114:9
stein 16:5,8 20:13
stenographer's 9:18
stenographic 6:23
step 93:19
stephen 3:18
stephen.tabat... 3:22
stepped 100:22
steps 19:7 37:20
steve 7:7 36:14
stick 83:8
stipulation 6:24
stood 22:22 24:20 32:7
stop 59:7 68:8 97:25
stopped 27:11
strategy 32:2 55:23
street 2:6 3:5 3:13,20 4:6,13 4:20 6:11 68:8
strengthening 40:13
strengthens 40:19
stretch 37:2
strike 45:9 113:12
strokes 93:22
strong 47:23
stronger 65:16
strongly 69:20
stuck 49:4

student 79:15
students 48:14 48:15 49:25
stuff 29:13 40:7 40:10 85:17,18 109:24
submitted 110:5
subscribed 122:10 123:14 124:21
succeed 19:12
succeeded 17:23 31:25
suffice 101:13
suggested 46:22,24
suggesting 69:14
suite 121:2
superior 121:1
supersede 90:7
support 20:9 24:18,19 28:23 38:15 74:23 76:13,16,24 77:2 78:15,17 78:19 80:9 84:11 97:15
supporting 28:24 60:12
suppose 14:8 40:23
supposed 17:22 72:11
supreme 73:16
sure 9:23,24 18:17 20:18 21:6,21 22:16 28:21 30:16 32:5 34:4 36:8 41:21 45:22 47:11,23 48:21 56:23 63:20 66:22 76:8 96:22 99:25 117:11,12
sustain 11:5
sustained 11:4
swear 8:4
switch 84:24
switched 30:7
sworn 6:15 8:10 119:5 122:10,13 123:14,18 124:21
system 28:22 114:2

t

t 5:6
tabatowski 3:18 7:7,7 58:2 117:25
tag 64:12
tagged 64:9
take 6:4,12 11:10,13,22 17:19 19:7 58:15 63:3 66:9 70:11,14 72:11,22 77:23 82:2 93:19 100:9 111:20 111:23 116:24
taken 6:7 42:16 55:19 78:4 119:3,12 120:9
talk 9:19,23 18:1 19:8,11 32:18 47:24 48:12 57:25 95:11 100:20 101:1 115:10 116:18
talked 21:9 28:19 34:5,5 35:9 36:4 46:18 62:11 75:10 81:3 95:10
talking 24:8 51:9 52:14 55:18 60:10 61:4 80:4 98:6 102:18 105:24 111:16
tampering 27:14
target 22:19
targeted 32:15
taxing 25:2
technically 54:25
ted 22:2 25:15
tell 8:11 9:5 16:2 17:16 20:20 24:25 26:2 53:17 64:11 68:6 89:13 97:14 102:7
telling 11:23 82:18
tells 43:3
ten 78:24 82:2
tendency 9:14
tent 28:16 29:3
term 18:18 32:24 33:16 43:20,21 55:3
terminology 29:20 54:8
terms 19:1 24:18 39:1 40:11,18,22 46:25
territories 76:14
terrorism 84:15
testified 8:12 87:8

testifying 119:5
testimony 89:5 95:6,9 99:17 122:6,7 123:6 123:9,12
testing 63:8
texts 83:9
thank 8:3,13 30:10 59:14 62:3 85:3
theory 63:8
thing 9:10,17 17:21 18:2 24:22 50:4 56:2 74:8 86:16 91:6 115:10
things 10:17 20:23,24 25:8 25:10 28:6 34:3,7 40:8,14 50:23 63:21 68:14,17 98:1 98:7
think 9:1 16:4 16:18,19 17:12 21:14,15 23:15 23:23 24:10 32:21 37:13 40:8 41:13,15 41:17 42:20 43:23 44:6,7 44:11,18 45:11 46:25 49:2 53:16 54:25 55:20 56:25 57:3,4 58:2 64:20 65:7,12 65:12 66:3,4,4 66:8,10 68:2 68:18,25 69:13 69:15,19,21,24 70:3 71:7,8,13 72:16,17,21,22 73:14 74:2 76:18,18 78:25 79:12,25 80:1 83:1,3,10,14 92:22 93:1 95:25 96:1 97:3,6 98:24 99:1,3,21 100:7 105:16 106:2,12,14 107:1,2,18,25 111:5,11,20 112:5 113:11 113:25 115:2
thinking 23:18
thinks 44:13
third 101:14
thirty 14:13 121:18
thought 10:13 24:14 28:2 29:8 30:13 47:17 66:2 67:25
thousand 97:22
thousands 78:8 78:9
threat 105:17 105:21 106:3 106:22 107:3,9 107:13,14,15 107:17
throw 30:23
thumb 92:10 110:2 111:12
time 2:4 7:1 10:23,23 11:8 11:22 16:25 17:5 20:19 22:3,11,12 23:15 24:13,14 24:21 27:25 28:2 31:7,19 31:20,21 33:11 33:12 34:3,18 37:14 39:16,19 42:4,23 51:8,8 52:22 53:6,7 57:4,5 65:9 82:6,9 85:5,9 86:18 93:14 94:10 99:20 101:5 115:16 117:4,7 118:19
timeframe 58:21
times 9:23 22:19 34:24,25 48:2 53:12
tingley 120:2 120:15
today 9:3 10:18 11:18 12:22 85:21 86:22
together 23:14 46:20
told 22:6 51:15
tolerated 80:2
toned 75:22
top 20:21
topic 17:15
topics 32:14 69:1
torpedo 63:1
touched 75:19
towards 23:25 24:1 37:20 44:9 99:9 101:3
trade 25:24 68:10
training 14:20
traitorous 59:22 60:9 61:9
trajectory 20:25
transcribed 122:7
transcriber 120:1

transcript 6:17 10:9,18,20 117:18 118:2 119:21 120:3,5 121:11,12 122:5,12 123:5 123:11,17
transcriptionist 119:7
transportation 56:15 74:23 75:3
trap 32:19
treason 84:16
treat 77:6,6
treated 112:8
treatment 100:24 101:3
trending 44:9
trial 91:19,23
trials 84:6
trick 32:19 56:20
tried 19:9
trigger 37:14
tro 14:1
true 35:4,5 49:1 51:2 73:17 119:9 120:5
trump 25:19 26:13 43:20 70:6,9
trust 59:17
truth 8:11,11 8:12 9:5
truthfully 11:17 85:24
try 9:8,19,21 31:3 35:3 39:3 44:5 70:24 97:4,10 104:18
trying 9:18 16:22 18:14,24 19:6 20:14 21:2,17 32:13 32:14,19,19 33:1 34:16 38:5,6 41:17 42:5 43:5 63:2 67:6,12 71:23 72:6,9 73:24 76:1 88:12 97:6 98:17 101:7 110:2,9 113:4,5
turn 25:11 52:2 107:14
turnout 69:22
turns 28:6 29:6 33:25 54:7
tv 11:4
twelve 85:13 97:22
twist 45:12
twisted 45:24
two 17:11 24:10 40:8 47:18,19 66:5 69:1 94:7 98:1 107:8
tying 65:4
type 18:14 21:19 40:7
typewriting 119:7
typically 68:2
typographical 10:20

u

uh 36:18 41:3 49:11 62:13 65:2 78:12
ultimately 70:8 94:3 105:8 111:18
unclear 73:15
under 6:20 9:2 10:18 13:7 35:6,7 38:20 71:21 73:24 82:11 85:21 87:8 116:19
understand 6:16 9:2 10:2 13:2,13 18:24 19:2 30:2 31:5 33:2 39:7 43:6 43:25 49:19 71:17,23 76:8 82:11 85:20,23 86:1,7,19 101:18,21 104:3,5,13,21 107:1 108:15 108:19 113:17
understanding 14:5,10 18:18 19:22 28:1 34:19 39:22,23 43:25 44:5 52:7 68:12,20 83:7 88:20 90:20,23 95:23 96:10,24 100:8 104:11,16 106:20
understood 10:6 32:23 38:19 39:5 40:15 78:2 95:16
uneducated 27:18
unfortunately 68:18 118:12
unit 22:12,16 22:17 46:12
united 1:1 28:7 80:12
universal 34:3 78:15,17

universally 78:23
university 3:4
unopposed 112:2
unpack 90:11
unpaid 49:2
unprofessional 102:14
unquote 19:10
updated 19:21
upset 18:20 106:14
urgency 101:17
use 19:1,5 56:14 77:11 78:19 86:8
used 32:23 33:16 50:22 51:25 55:11,11 56:11
user 77:5
uses 6:19 55:3
using 30:21 54:3 77:5
usually 50:22 51:19 114:15
utilities 77:13
utility 75:4
utilize 19:3

v

v 1:6 121:6 122:3 123:3
valid 70:9
value 72:12
values 13:9 30:19 33:10 44:14 70:25
vast 81:1
vehemently 24:25 40:9
venus 41:8
verbal 9:12
verbally 86:9
verge 25:23 26:1
verified 47:21
verify 47:8
veritext 6:3 121:1,7 124:1
veritext.com. 121:17
versus 19:24,24 19:24
vested 91:6,21 116:7,11
veteran 72:23 74:7,8
vetting 49:18 49:22 50:2
vice 115:17,24 116:17
victim 91:20 92:1
victory 26:7
video 9:11 52:13 86:8
view 70:17,19 73:24 79:20 82:15
views 27:24 29:24 30:13,14 33:23,25 75:21 76:4 88:4
violated 88:24 89:2
violation 84:16 100:2
visa 80:13
visible 100:25
visit 88:10
volunteer 48:21
volunteered 15:24 20:2,6 20:13 49:25
volunteering 49:1
volunteers 48:6 49:6 50:7
vote 20:10 27:16,17 59:23 67:15,16,18,19 67:23 82:19,24 107:12,20 108:8 109:11 111:24 115:16
voted 31:19 47:3,18 66:12 66:23 67:20 69:17 71:22 104:3,6,8,11 105:9,13 107:21 108:1 108:10 111:25 112:3
voter 27:14,18 29:21 44:13 47:14,18 53:2 56:5 70:3 72:10 83:16
voters 27:4 29:25 44:16 56:4 57:1 63:5 65:21 68:2 69:4,7,17,18,19 83:5 110:6 112:3
votes 111:20,24
voting 115:20
vs 6:7

w

wage 76:9
wait 73:3 100:21 111:9
waived 121:19
walk 9:8 35:10 61:21 85:20
walked 66:23
walks 69:10 72:4
want 9:19 29:17 36:8 42:3 44:17

47:22,24 48:23 50:4 58:5,11 58:15 60:14 65:13 67:22 74:20 76:11 77:15,18,21 82:19 84:4 89:8 92:3 94:23 97:25 100:9 107:12 111:15 112:7 115:10 116:24 117:21
wanted 59:16 67:15,18,18 80:25 101:16
war 22:19 23:6 23:7 24:19 26:13,15 60:21 60:22 69:2 74:6,16,17,18 84:14
wars 74:15
watched 52:12
way 10:19 20:5 20:8,15,20 25:22 26:2 32:10 47:20 53:23 66:10 69:17 82:25 91:17 95:1 103:7 112:24 114:4,5
ways 23:2 40:22 56:1 73:8 80:15 94:13 96:23 100:18
we've 35:9 36:4 46:5 47:23 53:11 73:22 74:2 85:13
website 19:14 19:15 37:19 47:13 75:11,13 75:17,21 76:2 76:3 78:3 80:7 84:3,5,9 94:8,9 97:18
week 13:24
weeks 89:14
welcome 19:5 32:18
wellbeing 22:24
went 14:18 19:8 26:1 46:6 47:12,20 49:19 95:17 98:9
wet 74:24
white 64:10
whittle 97:7
wholeheartedly 69:5
williams 41:8
willing 26:3,4 44:3 48:25
willingness 26:22
win 18:19 22:25 26:6
wins 27:2 106:23,24
winter 37:24
witness 6:15,16 8:5,10 15:12 15:15 44:25 49:13 62:1 73:3 108:13 117:11 119:4 121:8,11 122:1 122:4,11 123:1 123:4,15
witness' 121:14
women's 41:2,5 41:12 78:22
won 70:8
wondered 63:1
woo 62:21
word 19:3 31:11 35:4 59:3 68:13
words 19:5 45:12,24 54:2 55:18 61:3 90:9
work 15:3,11 16:13 22:8 23:14 31:3 32:10 38:8
worked 21:21 34:24,25
workflow 15:6
working 46:20 50:22 60:1
works 107:10
worth 55:20
written 6:24 96:18
wrote 14:7 45:20

x

x 5:1,6 91:20 91:20,21 92:1 119:21

y

yeah 8:22 13:5 14:3 15:20 16:12 19:9 22:14 23:24 25:17 30:5 35:19,25 36:6 37:21,24 39:6 48:2,9 50:21 51:17 52:1,1,7 55:2 57:23,24 58:4,6,23 59:2 62:22 63:6,7 64:20 67:7,8 67:10,16 72:14 73:12 79:25 80:6,8 81:9 84:25 87:7

90:14 94:19
104:19 108:13
117:1
year 15:2 37:16
53:20
years 16:4,10
17:11 20:2
32:11 57:10
59:6 70:12
77:20 78:24
yell 11:4
yeses 9:16

z

zagrocki 4:4
5:4 7:16,16
85:11,14
102:11 108:14
117:2,8 118:9
118:10

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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EXHIBIT
tabbies
P2
Ronan

4:09

Grove City Area Progress · Join
Admin · Steve Church · 1d

RONAN samuelronan.com

Reply 1

Mark Gavin Sr. 20h
Samuel Ronan didn't you run for DNC chair a few years ago? Now you're running for congress as a Republican? Stop grifting.
Reply

Samuel Ronan 19h · Follow
Mark Gavin Sr. I believe i very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of Americans, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door.

So, if I am doing anything, it's following the argument I made on that stage.

That said, I am NOT fighting on behalf of the traitorous Democrats who JUST crossed the party line to vote for MORE ICE funding.

I'm not a grifter. Im running for office in the party of the dominant district fighting for the working class.
Reply

Katie Beth 19h
Samuel Ronan so you're an anti ice republican?
Reply

Comment publicly as Henry Mo...

PENGAD 800-631-6989
EXHIBIT
Ronan 1 3/27/24

EXHIBIT
Plaintiff's
P5
Ronan

3:33

Ana Aleida-March
5d

IT'S OFFICIAL! Samuel Ronan is on the ballot! Woot, woot!

https://vote.franklincountyohio.gov/getmedia/9486ba44-ea96-4de7-9143-238a3f82c006/2026-Primary-Candidates-Filed-List-4

Republican	COUNTY COMMISSIONER
Republican	JUDGE OF THE COURT OF COMMON
Republican	REPRESENTATIVE TO CONGRESS - 03
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	REPRESENTATIVE TO CONGRESS - 15
Republican	STATE CENTRAL COMMITTEE - Man
Republican	STATE CENTRAL COMMITTEE - Man
Republican	STATE CENTRAL COMMITTEE - Man

26 12

Most relevant

Garrett Roberts 5d by Author
That's fucking awesome.
2

Paul Ryan 5d by Author
I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems. As long as a progressive was labeled republican, I feel like the republican voters would be like "oh hell yeah! good policies!"
4

Ana Aleida-March 5d
Paul Ryan yup! And we're testing out theory lol
2

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EXHIBIT A.M.
2
Ronan
3/27/26