

EXHIBIT

A

IN THE SUPREME COURT OF OHIO

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

Petitioners,

v.

Ohio Redistricting Commission, *et al.*,

Respondents.

Case No. 2021-1193

Bria Bennett, *et al.*,

Petitioners,

v.

Ohio Redistricting Commission, *et al.*,

Respondents.

Case No. 2021-1198

Ohio Organizing Collaborative, *et al.*,

Petitioners,

v.

Ohio Redistricting Commission, *et al.*,

Respondents.

Case No. 2021-1210

AFFIDAVIT OF DR. DOUGLAS JOHNSON

1. I am over the age of eighteen (18) and am competent to testify to the matters set forth herein. The following is true of my own personal knowledge and I otherwise believe it to be true.

2. I am the President of National Demographics corporation and have consulted on redistricting nationally. A copy of my CV is attached.

3. I was hired by the Ohio Redistricting Commission on March 21, 2022 to serve as an independent mapmaker to draft a fourth General Assembly districting plan along with Dr. Michael McDonald.

4. The primary six requirements applied to our work:

- a. Equal Population (state and federal requirement)
- b. Meet the geographic requirements of Ohio Constitution Sections 2, 3, 4, and 7
- c. Meet the Section 5 Senate drawing and assignment requirements of the Ohio Constitution
- d. Meet the Section 6 requirement of the Ohio Constitution to not favor a political party
- e. Meet the Section 6 requirement of the Ohio Constitution for partisan proportionality
- f. Meet the Section 6 requirement of the Ohio Constitution to draw compact maps

5. Ohio's complex geography and complex geographic requirements for redistricting mean that mapmakers must alternate back and forth between House and Senate maps until arriving at a map that meets the requirements for both House and Senate districts. No House map is complete until the Senate map is complete, and vice versa.

6. The intricate boundaries of Ohio villages, cities and townships also require a thorough review after a set of General Assembly maps are drawn to ensure that all of the Section 2, 3, 4, 5 and 7 geographic requirements are met. As the various Ohio Supreme Court rulings note, drafters of a number of earlier map proposals thought they have satisfied the Constitutional requirements of sections 2, 3, 4, 5 and 7 but were later determined to be unconstitutional.

7. We used the software Maptitude for Redistricting, which is customarily used for redistricting work across the county. It has been used by all the various mappers in Ohio redistricting, and it includes a number of reports that are handy in identifying inadvertent and potentially unconstitutional splits of counties, townships, cities and villages. Because the Maptitude reports are not tailored to the specific requirements of Ohio, the reports require a line-by-line review once they are generated to identify what are, and are not, constitutional divisions of the various jurisdictions. For example, a Maptitude report will identify a city split but the mappers must review the split to identify whether it is across a county boundary (and thus constitutional) or if it is unconstitutional.

8. As independent mapmakers, Dr. McDonald and I met with the Commission on Wednesday, March 23, 2022 and began our mapping work on Thursday, March 24, 2022.

9. Dr. McDonald and I suggested to the Commission that we would consult with the staff of the Republican and Democratic commissioners. If we asked for guidance on an issue and both sides agreed we would incorporate that into our maps, but if there was disagreement we would bring it to the Commission for direction. The Commission did not formally approve that direction, but there was no objection and I proceeded using that approach through Sunday.

10. On Thursday, Friday, Saturday and Sunday, I believe Dr. McDonald and I generally operated as independent mapmakers: we would ask, and staff from the Republican and Democratic caucuses would tell us, if an option we were considering was sure to run into a violation of Sections 2, 3, 4 and/or 7 (the Constitutional geographic requirements for redistricting). But otherwise I, and I believe Dr. McDonald as well, generally made the mapmaking decisions on our own for our separate maps. (I am sure some exceptions to this have been noted from the video and transcripts, but as a general rule this was true through Saturday and for most or all of Sunday).

11. On Monday, March 28, 2022, it was clear that we were not going to finish a map before the Court's midnight deadline without more direct guidance from Commission members' staff.

12. As the deadline loomed, Mr. Chris Glassburn, of Democratic staff, provided us a "seven counties" map he had previously drawn. This map cleaned up the Section 5 concerns in the seven northeast counties of the state, covering seven senate districts and twenty-one house districts. If Dr. McDonald and I had drawn this area on our own, we would never have come close to finishing a map in time for the midnight deadline. No Republican staff member or Commission member gave approval of the use of Mr. Glassburn's districts.¹

13. Dr. McDonald and I reviewed the partisan lean of Mr. Glassburn's "seven counties" districts and we made small changes to a handful of the districts in Cuyahoga County to maintain the partisan symmetry of our previous map. We did not – as Senator Huffman asked us to do when the map was first presented to the Commission with a split of Cleveland Heights – do a thorough review of every change that the "seven counties" map made to the previous House and Senate maps Dr. McDonald and I had drawn.

14. Given the time crunch of the midnight deadline, map revisions/alternatives requested by the State Auditor were never drawn. Also, per the policy mentioned above, the final map that was drafted included a configuration of Mahoning County that Dr. McDonald and I drew into the map on the condition that it would be run past the commission members' staff or the Commission. Mr. Blake Springhetti, Majority Director of Finance for the Ohio House of Representatives and Commission staffer for Speaker Robert R. Cupp, later conveyed the Republican commissioners' objection to that configuration of the districts in Mahoning County,

¹ That said, I was informed that Ray DiRossi, budget director for the Ohio Senate, was very sick that day and unable to attend.

but I ran out of time to change it (at that point in the timeline Dr. McDonald had been required to leave due to his teaching commitment the next day).

15. So the final House map that was drafted included the Mahoning County configuration that should have been redrawn if there had been sufficient time, and essentially all of the "seven counties" map drawn by Mr. Glassburn was incorporated despite a lack of sign-off on those districts by the Commissioners or their representatives.

16. All of these issues arose from the very challenging timeline. Here is the rough breakdown of independent mapmaker activity on Monday. These are from my memory and the "created" dates on the data handover demographic summary and block assignment files. If there is disagreement between my recollections and what is shown on the available videos, the video should be the controlling source.

Monday, March 28 timeline	
11:30 am	Excel file with list of House and Senate incumbents received
Roughly 12pm	List of House and Senate incumbents geocoded and imported into independent mapmakers' House maps
7:20pm	House map drawn addressing House pairings ("House Merged 5")
9:04pm	Senate map built from the pm House map hit a "brick wall" and failed (This was "Senate Merged 5", which has two House districts unassigned to Senate districts and completely surrounded by House districts already assigned to Senate districts, and thus was never provided to Commission staff or posted online)
10:23pm	House map redrawn in the hopes of creating pathways around those "brick walls" without creating new problems ("House Merged 6")
11:25pm	Senate map drawn based on the 10:23pm House map drawn ("Senate Merged 6"); House and Senate "Merged 6" maps provided to Democratic Commission staff

17. While Dr. McDonald had to leave at 5pm on Monday, March 28, 2022, he called me from the airport to say that he recognized a population problem in one of the House districts in Wood County. Dr. McDonald also said Mr. Glassburn knew how to fix the population problem while preserving the competitive nature of that district. I took an initial shot at fixing the district

on my own, but it was getting clear at that point (6:07pm) that there was no way to complete an "independent" map by the midnight deadline. Thus I relied on Mr. Glassburn to identify the township that could be shifted to population balance the district while keeping the district competitive.

18. After drawing the 10:23pm House map, I am confident that I could have eventually found the way to a Senate map that worked with the 10:23pm House map but not by the deadline. Thus I relied on Mr. Glassburn guiding me to at least one of the pathways to a Senate and House map that could work. I handed that Senate map off to Democratic Commission staff at 11:25pm, simultaneously confirming that (as far as I know) it worked with the 10:23pm draft House map. While it seemed to work, for the reasons listed below, I cannot say it was a final constitutional map.

19. As noted above, the Maptitude software has a number of reports that measure compactness and that are handy in identifying whether a map complies with the Section 2, 3, 4 and 7 requirements of the Ohio Constitution. Unfortunately I did not have any time to run those reports before the midnight deadline. In drawing the maps I believe I can speak for Dr. McDonald and myself in saying we made every effort to ensure they followed all federal, state constitution and Ohio Supreme Court direction. But we did not have time to run and review the reports that would have confirmed that.

20. And there was no time for any of the following:

- a. Balancing the compactness and partisan symmetry requirements of Section 6 as directed by the Ohio Supreme Court;

- b. Addressing any of the Commission's requested revisions to the map (the change in Mahoning County and the Auditor's requested alternative map with redrawn House districts in Toledo and Cincinnati);
- c. Delivering the map for any substantive review by Commission staff, much less by the Commissioners themselves, such as the review that led to Senator Huffman's note in the afternoon meeting that the House map at the time unconstitutionally split Cleveland Heights;
- d. Reviewing the maps to determine if there was a way to eliminate any relevant pairings among the three House districts and four Senate districts that contained pairings.

21. I also had no time to analyze, much less to present to the Commission, the challenges involved in balancing the partisan symmetry requirements of the Supreme Court rulings on Section 6 with the compactness requirements of Section 6. Nor was there any time to incorporate or even attempt any significant Commission requests for amendments other than Mr. Glassburn's "seven counties" map idea included by Mr. Glassburn.

22. The work of Dr. McDonald and I was highly constrained by the combination of (1) the state's extremely complex geographic features; (2) the state's extremely complex rules for pairing and uniting those geographic features; and (3) the extremely limited window of time to draw the maps. I hope that the final maps submitted by me (and on behalf of Dr. McDonald) met the constitutional requirements of Sections 2, 3, 4, 5 and 7, and Dr. McDonald and I made every effort as we were drawing the maps to follow those requirements, but I did not have the time to conduct the detailed review to confirm whether that is the case.

FURTHER THE AFFIANT SAYETH NAUGHT.

This the 3rd day of April, 2022.

By:

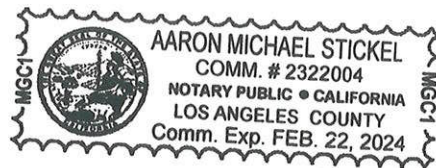

Dr. Douglas Johnson

SWORN TO AND SUBSCRIBED BEFORE ME

This the 3rd day of April, 2022.

AARON MICHAEL STICKEL
Notary Public





My Commission Expires:

02-22-2024



National Demographics Corporation

SEARCH...



Douglas Johnson

Current Employment

President, National Demographics Corporation, *2006 – present*

Research

Research Affiliate, Rose Institute of State and Local Government at Claremont McKenna College, *2001 – present*

Past Employment

Senior Analyst, National Demographics Corporation, *2001 – 2006*

Project Manager and Senior Manager at three internet startup companies, *1999 – 2001*

U.S. Representative Stephen Horn, Legislative Director and System Manager, *1993 – 1997*

Coro Foundation, Fellowship in Public Affairs, *1992 – 1993*

Rose Institute for State and Local Government, Student Manager, *1989 – 1992*

Education

Ph.D.: Claremont Graduate University, Political Science, 2015, Dissertation: "*Independent Redistricting Commissions: Hopes and Lessons Learned*."

MBA: UCLA Anderson Graduate School of Management, 1999

BA: Claremont McKenna College, 1992

Graduated Cum Laude and Phi Beta Kappa from Claremont McKenna College, with the Philip Roland Prize for Excellence in Public Policy

Publications and Articles

- Quiet Revolution in California Local Government Gains Momentum, Rose Institute of State and Local Government White Paper on California Voting Rights Act, November 3, 2016.
- Visalia Times, "How to draw new city council districts," September 19, 2014.
- Christian Science Monitor, "Let the public help draw voting districts," October 25, 2013.
- Redistricting in America, Rose Institute of State and Local Government, 2010.
- New York Times, "The Case for Open Primaries," February 19, 2009.
- Los Angeles Times Opinion Articles:
 - "A neighbor's help on redistricting" June 24, 2007.
 - "A Trojan horse primary for the GOP" February 25, 2007.
 - "Where a porn palace stood" (article on redevelopment in Long Beach, California), July 30, 2006.

- Restoring the Competitive Edge: California's Need for Redistricting Reform and the Likely Impact of Proposition 77. Rose Institute of State and Local Government, 2005.
- Competitive Districts in California, Rose Institute of State and Local Government, 2005.
- Fresno Bee Opinion Article: "The Poison Handshake" June 15, 2004.
- Latinos and Redistricting: "Californios For Fair Representation" and California Redistricting in the 1980s. Rose Institute of State and Local Government, 1991.
- Quoted hundreds of times in newspaper, radio and television, including interviews on CNN, the Los Angeles PBS Affiliate, Fox, and in the 2010 documentary "Gerrymandering."

Speaker or Panelist

- California School Board Association, Panelist: "Voter Districts: The Link Between Strong Community Engagement and a Successful Process," November 30, 2018 (upcoming).
- California League of Cities, Mayors and Councilmembers Executive Forum, Moderator, "The California Voting Rights Act and the District-Drawing Process," June 29, 2018.
- League of Women Voters of Burbank and Glendale, Keynote Speaker, "Town Hall meeting on SB415" (The California Voter Participation Rights Act), May 8, 2018.
- California League of Cities, City Attorney Department, panelist, "The California Voting Rights Act: Recent Legislation & Litigation Outcomes," May 3, 2018.
- California League of Cities, City Clerk Department, keynote, "California Voting Rights Act – Transitioning From At-Large To By-District Elections: A Practical Guide For City Clerks," April 19, 2018.
- California School Board Association, Panelist: "15 Years Later: The California Voting Rights Act & Lessons Learned," December 1, 2017.
- California League of Cities, City Clerk Department, Panelist: "California Voting Rights Act: Putting the 2016 Legislation into Practice," April 13, 2017.
- California League of Cities, Riverside County Chapter, presenter: "The California Voting Rights Act and Redistricting: The Demographer's Perspective," May 9, 2016.
- California League of Cities, Inland Empire Chapter, presenter: "The California Voting Rights Act and Redistricting: The Demographer's Perspective," April 14, 2016.
- California School Board Association, Panelist: "The California Voting Rights Act: What Board Members Must Know," December 4, 2015.
- National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2011 Winter Forum, "Citizen Voting Age Data from a line-drawer's viewpoint."
- Luncheon Keynote Speaker, Santa Barbara's Channel Cities Club, "California's next experiment: independent, public redistricting," January 18, 2011.
- Annual Conference, Arizona League of Cities and Towns, Presenter at "Redistricting Law and the Voting Rights Act: What It Means for Your City or Town in 2011," August 25, 2010.
- National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2010 Spring Forum, "Communities of Interest in Redistricting: A key to drawing 2011 plans (and for their defense)."
- Arizona Election Law 2010 Continuing Legal Education Conference, "Communities of interest and technology in redistricting," sponsored by the Arizona State Bar Association, March 2010
- Redistricting, The 2010 Census, and Your Budget, Sponsored by the Rose Institute of State and Local Government, California League of Cities, October 15, 2009.
- California's New Independent Redistricting Commission, sponsored by the Irvine Foundation and the California Redistricting Collaborative, December 15, 2009
- Tribal Association of Sovereign Indian Nations (TASIN) Legislative Day 2009, "The 2010 Census and 2011 Redistricting in California," December 2, 2009.
- California School Board Association, "Litigation Issues and the California Voting Rights Act," December 4, 2009.

- National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2009 Fall Forum, "The Key to Successful Redistricting."
- California Latino School Boards Association, "Introduction to the California Voting Rights Act," August 20, 2009.
- National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2008 Spring Forum, "Communities of Interest In Redistricting: A Practical Guide."
- Voices of Reform, a project of the Commonwealth Club of San Francisco: multiple forums on redistricting and / or term limits, 2006 – 2007
- National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2007 Spring Forum, "The Arizona Independent Redistricting Commission's experiences with the first-ever independent redistricting."
- "Building a National Reform Movement," Salt Lake City, Utah, conference on redistricting reform hosted by the League of Women Voters, Campaign Legal Center, and The Council for Excellence in Government, 2006
- Texas Tech University, "A Symposium on Redistricting," May, 2006
- California League of Cities, "Introduction to the California Voting Rights Act."
- Classroom speaker at Pepperdine University, the University of La Verne, Pomona College, Claremont McKenna College, and Bellflower High School.

Independent and Advisory Commission Redistricting Projects

- City of Menlo Park Advisory Districting Commission, lead technical consultant, 2018
- Arizona Independent Redistricting Commission, lead technical consultant, 2001-2008
- San Diego City Council Independent Redistricting Commission, lead technical consultant, 2011
- City of Surprise Advisory Commission on Redistricting, 2011
- Pasadena City Council Advisory Commission on Redistricting, co-lead technical consultant, 2011
- Pasadena Unified School Board Advisory Commission on Redistricting, co-lead technical consultant, 2011
- City of Modesto Independent Redistricting Commission, lead technical consultant, 2011
- City of Modesto Independent Districting Commission, lead technical consultant, 2008

Traditional Districting and Redistricting Projects

- Initial as Senior Analyst and later as President, Dr. Johnson led NDC's work on **over 250** districting and redistricting projects across California, Nevada and Arizona between 2001 and today. Many are listed on NDC's [sample client list page](#).

Expert Witness Testimony and other Litigation Experience

- Expert witness declaration for the City of Redondo Beach, California, in *City of Redondo Beach vs State of California*, Los Angeles County Superior Court Case No. BS172218, litigation regarding the California Voter Participation Act (currently pending).
- Expert witness declaration for West Contra Costa Unified School District in *Ruiz-Lozito vs West Contra Costa Unified School District* litigation under the California Voting Rights Act, Contra Costa Superior Court Case Number C18-00570 (currently pending).
- Expert witness declaration, deposition and testimony for Kern County, California, in *Luna v County of Kern* litigation under the Federal Voting Rights Act.
- Expert witness declaration and testimony for North Carolina in *Covington v State of North Carolina* litigation under the Federal Voting Rights Act.
- Expert witness declaration for City of Fullerton in *Jamarillo v City of Fullerton* litigation under the California Voting Rights Act.

- Expert witness declaration for City of Whittier in *Diego v City of Whittier* litigation under the California Voting Rights Act.
- Expert witness declaration and deposition for plaintiff in *Harris vs Arizona Independent Redistricting Commission* litigation.
- Expert witness declaration and deposition for Santa Clarita Community College District in *Solis v Santa Clarita Community College District* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Highland in *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Expert witness declaration, deposition and testimony for City of Palmdale in *Jauregui et al vs City of Palmdale* and *Garrett v City of Highland* litigation under the California Voting Rights Act.
- Testified as 30(b)(6) "Most Knowledgeable" witness for Arizona Independent Redistricting Commission in *Arizona Minority Coalition v Arizona Independent Redistricting Commission*, including seven days of direct testimony and cross-examination in the state court case. Also testified in the related federal court case.
- Consulting expert for the following jurisdictions on their California Voting Rights Act-related cases, including preparing analysis and assisting with witness and attorney preparation:
 - City of Anaheim
 - City of Compton
 - City of Modesto
 - City of Poway
 - City of Santa Clara
 - City of Santa Clarita
 - City of Whittier
 - Santa Clarita Community College District
 - Tulare Health Care District.

Charter and/or Ballot Language Consultant

- City of **El Cajon**: consulted on writing of charter revision and public education campaign for ballot measure changing from at-large to by-district City Council elections. (2016)
- **Castaic Lake Water Agency and Newhall County Water District** consultant advising on process, rules and legislation language for merger of the two districts including changing from at-large to by-district election system. (2015-2016)
- City of **Corona**: consultant for City Council on a potential city charter and a move to by-district elections. (2015-2016)
- City of **Pasadena** (on behalf of Pasadena Unified School District): advised commission that successfully developed a city charter change moving Pasadena Unified from at-large to by-district elections and created a redistricting commission. (2011 – 2012)
- City of **Menifee**: advised commission considering language on by-district elections. (2009 – 2010)
- City of **Modesto**: advised commission that successfully developed a city charter change moving Pasadena Unified from at-large to by-district elections and created an independent redistricting commission. (2006 – 2008)
- City of **Goleta**: consulted on development of ordinances and ballot language asking voters what election system they preferred. (2003 – 2004)

Racial Bloc Voting Analysis

Extensive experience with all racial bloc voting statistical methods: homogeneous precinct analysis, Ordinary Least Squares (OLS) regression, Weighted OLS, Seemingly Unrelated Regression (SUR) and EZI ecological inference analysis.

Attorney-client privilege bars the listing of most of NDC's specific clients, but NDC has performed racial bloc voting analysis for clients of the following law firms: Nielsen, Merksamer, Parrinello, Gross & Leoni; Lozano, Smith; Atkinson, Andelson, Loya, Ruud & Romo; Dooley, Herr & Peltzer; Fagen Friedman & Fulfroost; Rutan & Tucker; among others.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following counsel of record
on this 4th day of April, 2022, via electronic mail:

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