



Feb. 16, 2022

To: Ohio Redistricting Commissioners

Dear Commissioners,

We write today to share with you our updated state legislative map versions and to again ask for your feedback on our map proposals. Last week, we presented our state legislative maps – which we filed with the Ohio Supreme Court on January 28 – to the press, shared the map proposals with several of your staff, and we uploaded them to the Ohio Redistricting Commission website for the public to review. We wrote to you again on Friday requesting your feedback on our state and congressional maps. As of the date of this letter, we have yet to receive any feedback from any Commissioner’s office and none of your offices have directly communicated to us any way in which you believe our maps violate the Ohio Constitution.

Despite this lack of input, we have performed additional quality checks on our maps over the past several days. We found eight census blocks that were inadvertently split from their political subdivision and have addressed those minor, and easily fixed, issues in our revised maps. These maps comply with the line-drawing rules and proportionality rules in the Constitution and the Court’s orders. We urge you to give serious consideration to these map proposals and we would like to hear from you by 9:00 a.m. on Feb. 17, 2022. Responding in this timeframe will allow us to evaluate and potentially incorporate your feedback into the maps before the Court’s deadline of Feb. 17, 2022.

As stated above, the enclosed maps, “Sykes Russo State House 2-15-2022”¹ and “Sykes Russo State Senate 2-15-2022”² (see Block Assignment files sent with this letter) move eight census

¹ <https://davesredistricting.org/join/cbcf3f71-6971-4183-80f6-a9aa0279af86>

² <https://davesredistricting.org/join/058a0ab4-ddfd-4a33-9925-8b127e158cd4>

blocks from one district to another. These changes do not affect proportionality and were easily addressed. The changes are as follows:

Sykes/Russo Revised Map Changes:

- Unpopulated Census Block 391535326002006 moves from HD 33 to HD 32
- Unpopulated Census Block 391535310011031 moves from HD 35 to HD 34 and from SD 18 to SD 28
- Census Block 390170013002011 containing 6 people moves from HD 47 to HD 45
- Census Block 391517135013020 containing 6 people moves from HD 50 to HD 49
- Unpopulated Census Block 391517108004062 moves from HD 51 to HD 52 and from SD 29 to SD 33
- Unpopulated Census Block 390450302002076 moves from HD 70 to HD 73
- Census Block 390110403002002 containing 72 people moves from HD 80 to HD 81 and from SD 12 to SD 5
- Unpopulated Census Block 390110405004020 moves from HD 80 to HD 81 and from SD 12 to SD 5

We have also reviewed the affidavit of Ray DiRossi submitted to the Court on January 28, 2022 and examined the list of errors that he identified in the maps passed by the majority on January 22, 2022. We attest that the maps we submit to you today do not contain any of the errors that the Commission-adopted maps contained.

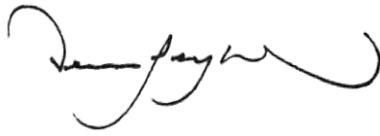
Since the Court rejected the Commission's state legislative maps for a second time, there have been no Commission map drawing sessions with staff despite our repeated offers to do so. On Thursday, Feb. 10, staff from Auditor Faber's office and Secretary LaRose's office requested and received a presentation on our proposed maps from our staff. The meeting lasted roughly an hour. We directed our staff to offer the same presentation to the Governor's office. On Friday afternoon, Secretary LaRose and his staff requested and received a presentation of our proposed maps. Sen. Sykes was present as well. The meeting lasted roughly an hour. Last night, the Governor's staff accepted our offer to go over our map proposal and our staff are scheduled to meet with the Governor's office staff today for a similar briefing. Despite the briefings held so far, we have not received any feedback on the maps themselves.

It is possible for us to draw constitutional maps and for us to work together as the Court has directed us to do. In fact, our proposal before the Commission has created constitutional state legislative maps. The Court has soundly rejected legal arguments that Ohio's political geography is an obstacle because it does not match the proportionality of the statewide vote. In fact, the Court held "that the extreme partisan skew of the original plan was not due to Ohio's political geography but, rather, to the commission's carrying out its intent to favor the Republican Party at the expense of

the Democratic Party.”³ We cannot submit maps based on the same failed legal arguments to the Court again.

The Court has given the Redistricting Commission clear orders to adopt constitutional maps. If you have map proposals, we urge you to release those as soon as possible so the public and Commissioners will be able to provide feedback. We request any potential proposals be released by 9:00 a.m. tomorrow. We and our staff continue to stand at the ready and are available to meet at any time to get to work to adopt constitutional maps.

Respectfully,



Senator Vernon Sykes
Co-Chair, Ohio Redistricting Commission
Senate District 28



C. Allison Russo
House Minority Leader
Commissioner, Ohio Redistricting Commission
House District 24

³ *League of Women Voters of Ohio v. Ohio Redistricting Commission.*, Slip Opinion No. 2022-Ohio-342, P 33.