

IN THE COURT OF COMMON PLEAS
OF FRANKLIN COUNTY

RACHEL SCHWERDTFEGER, *et al.*,

Plaintiffs,

v.

JON HUSTED, in his official capacity as
the Secretary of State for the State of Ohio,
Office of the Ohio Secretary of State,

Defendant.

Case No. 16-CV-002346

Judge Richard A. Frye

AFFIDAVIT OF KEITH CUNNINGHAM


I, Keith Cunningham, having been duly cautioned and sworn, hereby attest to the following:

1. My name is Keith Cunningham and I reside at 1404 Winghaven Drive in Lima, Ohio. I am over eighteen years of age and am competent to testify to the matters contained in this Affidavit. The facts set forth in this Affidavit are based upon my personal knowledge.
2. From 1998 until 2011, I was the appointed Director of the Allen County Board of Elections.
3. I joined the office of Ohio Secretary of State Jon Husted in 2011 and served through the 2012 presidential general election.
4. I was elected by my peers to serve as President of the Ohio Association of Elections Officials (OAEI) during 2005. I am a Certified Elections and Registration Administrator through the Election Center and served on the board of directors of the Elections Center from 2007 until 2012. I was an appointed member of the Ohio Board of Voting Machine Examiners from 2007 until 2011.
5. During my tenure as Director of the Allen County Board of Elections, I managed the local administration of three presidential primary elections.

6. During my tenure with the Secretary of State's Office, I participated in the state-level administration of the 2012 presidential primary election.

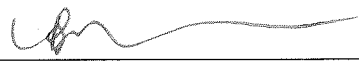
7. Based on my experience administering three presidential primary elections at the local level under two different Secretaries of State from opposite political parties, I viewed the 2012 directive issued by Secretary Husted that provided instructions to boards of elections for the proper processing of ballots cast by a 17-year old in that presidential primary, to be consistent with past practice.

FURTHER AFFIANT SAYETH NAUGHT.

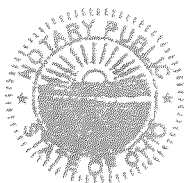


Keith Cunningham

Sworn to and subscribed before me, a Notary Public, on this 9th day of March, 2016.



Notary Public



BRANCH R. LASER SESKES, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date.
Sec. 147.03 R.C.