

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

<p>RANDY SMITH, <i>et al.</i>,</p> <p style="padding-left: 40px;">Plaintiffs,</p> <p style="padding-left: 80px;">v.</p> <p>JON HUSTED, individually and in his official capacity as Secretary of State of the State of Ohio,</p> <p style="padding-left: 40px;">Defendant.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>Case No. 2:16-CV-212</p> <p>Judge George C. Smith</p>
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AFFIDAVIT OF MATTHEW M. DAMSCHRODER

I, Matthew M. Damschroder, having been duly cautioned and sworn, hereby attest to the following:

1. My name is Matthew M. Damschroder and 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. I am currently the Chief of Staff and Assistant Secretary of State to Ohio Secretary of State Jon Husted. I have held this position since approximately January of 2015.
3. From January 2011 until January 2015 I held the position of Deputy Assistant Secretary of State and State Elections Director for Ohio Secretary of State Jon Husted.
4. In these positions, I am responsible for all aspects of state administration of elections, including advising the Secretary on the issuance of instructions to county boards of elections through Directives, coordinating all aspects of the Elections Division including developing forms (e.g., the official form of ballot for all elections), procedures (e.g., the Election Official Manual and statewide training materials for precinct election officials), voter registration activities, administration of the Statewide Voter Registration Database, receipt of candidate nominating petitions, declarations of candidacy, and the issuance of certificates of

nomination or certificates of election. I am also responsible for overseeing the human resources division of the office.

5. From June 2003 until March 2008 I held the position of Director for the Franklin County Board of Elections. From March 2008 until January 2011 I held the position of Deputy Director for the Franklin County Board of Elections.
6. In these positions, I was responsible for the local administration of elections, including ballot layout and tabulation (including ballots for use by 17-year old voters in primary elections), reviewing and implementing directives issued by the secretary of state's office, precinct election official recruitment and training, in person and by mail absentee balloting operations, election day operations, voter registration activities, and administration of the county voter registration database.
7. I hold an undergraduate degree in Business Administration and a graduate degree in public policy and management from The Ohio State University.
8. I earned the designation Certified Elections and Registration Administrator through the Election Center and Auburn University.
9. Antoinette Wilson, who submitted an affidavit in both the above-captioned case and the state court case, *Schwerdtfeger v. Husted*, Franklin County Court of Common Pleas, Case Number 16-CV-002345, was hired as Secretary of State Jennifer Brunner's Chief of Policy on March 10, 2008. Ms. Wilson did not hold any positions with the Secretary of State's Office prior to March 10, 2008.
10. Ms. Wilson was not an employee of the Secretary of State's Office when Secretary Brunner issued Directive 2008-22 on February 5, 2008.
11. Ms. Wilson was not an employee of the Secretary of State's Office during the March 4, 2008 presidential primary election.

FURTHER AFFIANT SAYETH NAUGHT.



Matthew M. Damschroder

Sworn to and subscribed before me, a Notary Public, on this 11th day of March, 2016.



Notary Public

JACK L. CHRISTOPHER, Notary Public
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San Diego, California 92121
San Diego, CA