

Exhibit 3

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MAINE

3 -----

4 DINNER TABLE ACTION, FOR OUR FUTURE, and ALEX
5 TITCOMB,

6
7 Plaintiffs,

8
9 vs. Case No. 24-cv-00430-KFW

10
11 WILLIAM J. SCHNEIDER, et al.,

12
13 Defendants.

14 -----

15 Deposition of
16 HILARY BRASETH

17 April 9, 2025
18 10:04 a.m.

19
20 Taken remotely via Zoom videoconference

21 Eva Petrone, RPR
22
23
24
25

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EXAMINATION OF HILARY BRASETH

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Exhibit A 12

(All exhibits were electronically sent to the stenographer.)

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1 HILARY BRASETH, of lawful age, called for
2 examination, being by me first duly sworn, as
3 hereinafter certified, deposed and said as
4 follows:

5 EXAMINATION OF HILARY BRASETH

6 BY MR. MILLER:

7 Q. Good morning, Hilary. As you just
8 briefly heard, I'm Chip Miller. It's says
9 Charles on there but I go by Chip, and I'm the
10 attorney for the Plaintiffs in this matter.
11 And, you know, we are obviously doing this
12 meeting by Zoom. I'm sure you are quite
13 familiar with Zoom meetings but you may not be
14 as familiar with depositions.

15 Have you ever been involved in a
16 deposition before?

17 A. No.

18 Q. All right. So one thing that we
19 are doing here is, you know, law likes to do
20 things the old way. So we still mainly like to
21 work on written transcripts that we produce
22 using stenographers.

23 And so Eva here is our stenographer
24 and so it's important that we speak in a way
25 that allows her to create a good transcript.

1 And so the main thing there is we try not to
2 speak over one another and speak slowly enough
3 that she can take everything down. With that,
4 that's sort of the preliminaries that I have
5 here.

6 And do you happen to have your
7 declarations with you handy?

8 A. I can pull it up.

9 Q. Why don't you do that, if this
10 works for you; otherwise, I can share it on the
11 screen.

12 A. It's no issue. Okay.

13 Q. And then you have both the
14 declaration and then the exhibit, your actual
15 report?

16 A. I do.

17 Q. That's great. All right. So
18 first, just can you tell me a little bit about
19 yourself, who you are, the organization you are
20 affiliated with and what you do?

21 A. Sure. I am the executive director
22 of OpenSecrets. OpenSecrets is a nonprofit
23 organization. We are almost entirely fully
24 funded by large philanthropic foundations and
25 individual donors. We don't take any

1 government funding.

2 We have been around for about four
3 decades and our mission is to follow the money
4 in U.S. politics. We do that at both the state
5 and the federal levels. We don't take any
6 position in an advocacy sense, unless it
7 involves transparency.

8 So when it comes to policy change
9 around specific, how would I say it,
10 perspectives, I would say, on whether or not
11 money should be unlimited or limited. In
12 elections we don't advocate ourselves, but we
13 will be involved in the transparency sense.
14 Our mission and purpose is to have our data be
15 used in public debate and public forum.

16 My background is mostly in the
17 private sector. Prior to working at
18 OpenSecrets, I spent a little more than a
19 decade in both a consulting capacity and also
20 in-house building products, digital products.

21 So I would sit between engineering
22 teams and design teams and build a digital
23 product for an organization or a company, and
24 some of my work related to U.S. elections, and
25 so that's in some ways how I found my path to

1 OpenSecrets.

2 I had done some time at the Kennedy
3 School and was ready to take what I learned in
4 the private sector back into the public sector.
5 And so I've been executive director for this
6 organization for a little more than a year.

7 Q. All right. Great. Thank you. So
8 your, I guess professional background, then, is
9 largely on the technical side?

10 A. It's in product development. So
11 I'm not a coder, but I will sit between
12 engineers and designers.

13 Q. And what type of degree do you
14 have?

15 A. My bachelor's is in economics and
16 political science. I got my master's in public
17 administration.

18 Q. And how long have you been with
19 OpenSecrets?

20 A. A little more than a year.

21 Q. And you mentioned OpenSecrets will
22 take positions on transparency issues. Can you
23 please explain what positions you take with
24 those issues?

25 A. Yes. So in a case where disclosure

1 might be threatened. For example, for part of
2 last year, the FEC was deliberating, making it
3 easier for donors in elections cycles to be
4 exempt from disclosing their identity.

5 We will take a position that we do
6 believe open data is very important to the
7 integrity of democracy. So we will, in that
8 case, submit our own opinion to the FEC for
9 supporting disclosure.

10 Q. All right. And that was on the,
11 not the small dollar issue, but that was on the
12 sort of identity privacy for by personal reason
13 issue?

14 A. Correct.

15 Q. And did you take a position on the
16 small dollar issue?

17 A. We did not.

18 Q. All right. And can you explain to
19 me what you were asked to do in this case?

20 A. We were asked to submit a report
21 summarizing data on independent expenditures
22 over the last 13 to 15 years, and so that's
23 what we submitted.

24 Q. Okay. And were you compensated at
25 all for this?

1 A. No.

2 Q. Was there any discussion of
3 compensation?

4 A. None.

5 Q. Is there a reason that you would do
6 this uncompensated?

7 A. We, as part of our mission, believe
8 that our data is critical to public debate and
9 discussion. So we don't take a specific side
10 in this specific case, but believe that the
11 transparency around our data, and the summary
12 around our data, is useful to this debate.

13 Q. What do you understand the debate
14 to be in the case?

15 A. My understanding is there was a
16 ballot measure that passed late last year
17 around -- with I believe 74 percent of --
18 should I pause?

19 Q. I'm sorry.

20 A. No. It's all good. I just wanted
21 to make sure you were able to hear me.

22 There was a ballot measure that
23 passed last year in the State of Maine
24 requiring a limit on donations to Super PACs to
25 be a \$5,000 threshold, and that ballot measure

1 passed with, I believe, 74 percent of the vote,
2 and it's now being challenged in the court. So
3 that's the heart of the debate, to limit or not
4 to limit.

5 Q. All right. And putting together
6 from what you said earlier, OpenSecrets does
7 not take a position on the merits of this case,
8 correct?

9 A. When you say "the merits of the
10 case," what would you -- how would you define
11 that?

12 Q. Whether or not those limits should
13 exist.

14 A. We do not take a position.

15 Q. Can you tell me a little bit about
16 the report that you prepared here?

17 A. We pulled from our federal data the
18 trends and numbers and percent changes around
19 independent expenditures, and we put that data
20 in context, we sliced it up in different ways.

21 We do believe that when examining
22 data, it's best to slice it in many different
23 ways to try to understand whether or not there
24 are patterns that are not worthy. So that
25 involved looking at whether a Super PAC

1 supported one candidate, or multiple
2 candidates.

3 We look at whether the donations to
4 Super PACs were donations to Super PACs that
5 spent either on conservative candidates or
6 liberal candidates that could be cast
7 conservative or liberal.

8 We also looked at the numbers of
9 registered Super PACs over time, as well as the
10 amount that they spent on elections over time.
11 And we looked at what percent of those
12 contributions to Super PACs were considered as
13 dark versus disclosed.

14 We also looked at donor
15 demographics when it comes to those who have
16 given \$1,000 or more in elections, as well as
17 \$1 million or more in elections.

18 Q. All right. And who was involved in
19 determining what categories that you would
20 place in this report?

21 A. I was. And I worked with two of
22 our researchers, our director of insights and
23 our lead researcher on committees.

24 Q. And are those both employees of --

25 A. Yes.

1 Q. All right. I'm going to start
2 going through your actual report here, Exhibit
3 A, and I'm going to get some questions from
4 here on. I will let you know specifically if
5 I'm asking about a particular thing, but
6 otherwise I will sort of go through.

7 - - - -

8 (Thereupon, Exhibit A was marked for purposes
9 of identification.)

10 - - - -

11 BY MR. MILLER:

12 So at the beginning you mentioned
13 that OpenSecrets gets data from federal
14 government agencies. Which agencies?

15 A. The FEC.

16 Q. And that's the only one?

17 A. Yes.

18 Q. Okay. All right. When I said
19 agencies, I wasn't sure if you were getting
20 from IRS or other groups as well.

21 A. No. With our contributions data,
22 it's exclusively FEC.

23 Q. And then getting into Section 1,
24 Independent Expenditures by Multi-Candidate and
25 Single-Candidate Super PACs. Can you explain

1 to me how you define a single-candidate Super
2 PAC?

3 A. Essentially, if all of a Super PAC
4 spending is on one candidate at a 95 percent
5 threshold or higher, we consider that a
6 single-candidate Super PAC.

7 Q. Okay. 95 percent. And why did you
8 delineate those for this report?

9 A. We think it's useful to break the
10 data down in this perspective, in order for
11 people to better study whether or not there
12 could be undue influence. We do believe that
13 if a Super PAC is set up for one candidate
14 only, that could lend itself to closer
15 collaboration between that candidate and that
16 one Super PAC.

17 And so we do think it's useful to
18 better understand our Super PACs in general
19 being set up to support one candidate or
20 multiple candidates.

21 Q. Okay. I guess moving forward to
22 your Figure 2, which is on page 3. And when
23 you -- I'm curious, in addition to sort of
24 breaking this money down by all PACs and
25 single-candidate PACs, have you ever broken it

1 down or do you break it down internally by
2 which -- how much money supports winning
3 candidates versus losing candidates?

4 A. We have done analyses -- we do an
5 analysis called "Did Money Win," which is on
6 our website. The website figure is not
7 exclusive to Super PACs. We have the
8 capability to do that, but we don't do that on
9 a regular basis.

10 Q. Do you do it on a regular basis
11 just in general for whatever you have in that
12 did-money-win category?

13 A. Yes. In that case, the
14 did-money-win analysis looks at, with all of
15 the candidates that ran, how often is it that
16 the candidate who spends the most money or
17 raises the most money also wins. In general,
18 on average, candidates that spend more money
19 win at about an 80 percent threshold.

20 Again, that doesn't necessarily
21 break down the figures as to whether the money
22 came from just a Super PAC. That's overall,
23 all money.

24 Q. Okay. All right. That's helpful.
25 Thank you.

1 A. You can find that on our website.

2 Q. Okay. And then, I guess just sort
3 of an administrative question about your
4 website. If I kind of go through there and
5 look at those pages, is the data I'm going to
6 see current or is there some stuff on there
7 that will be stale and would it be identified
8 as such?

9 A. Typically if it's stale, you will
10 see that, but by -- if it's a chart you will
11 see up until which year it's being displayed.
12 If it's an article, it will have a little
13 disclaimer saying this article is more than two
14 years old.

15 If it's looking up a specific, more
16 granular figure, it will have a time stamp at
17 the bottom of the page to show you the most
18 recent update to that data.

19 Our data is not necessarily in
20 realtime. For example, there's a big download
21 happening next week, and our team usually needs
22 about a handful of days to a week to do our own
23 internal coding, cleaning of the data in order
24 to get it on the website live.

25 Q. And I should say if you need a

1 break at any time to grab a glass of water.

2 A. Thank you. I'm going to chug this
3 while we are discussing.

4 Q. That's great.

5 Your next section is Dark Money By
6 Cycle, and I think you explained earlier why
7 you choose to highlight dark money. And I
8 guess my question for you is kind of breaking
9 down how you define dark money for the purposes
10 of Super PACs.

11 A. So in the case of a Super PAC -- so
12 you are looking at, I'm just clarifying, Figure
13 3?

14 Q. I guess I'm -- yeah, it would be
15 Figure 3. Specifically looking, I'm looking at
16 the paragraph above it.

17 A. Sure. So you are asking how we
18 define whether a source is dark?

19 Q. Yes.

20 A. We'll define a source that's dark
21 if it's a nonprofit that doesn't disclose its
22 donors or if it's a company that cannot be
23 linked to any other business activity, other
24 than giving political contributions.

25 Q. How do you go about tracking that

1 and determining that?

2 A. So in the case of a Super PAC, the
3 donors need to be disclosed, but of course the
4 Super PAC can receive donations from a myriad
5 of entities. So in the event that an entity
6 that is disclosed is giving to a Super PAC, we
7 cannot identify, if it's a nonprofit, their
8 original donors, we consider it dark.

9 And if it's a company that, when we
10 look into that company's activities, we cannot
11 identify any other LLC activity, or there's no
12 information on the Web about that company, or
13 from its registration documents that indicate
14 as such, we consider that source dark.

15 Q. So you do digging into each entity?

16 A. Yes.

17 Q. And make that --

18 A. Yes.

19 Q. I'm sorry. Just let me finish the
20 question.

21 A. I'm sorry.

22 Q. You do digging into each entity to
23 make individual determinations?

24 A. Correct.

25 Q. And then for the (c)(4), would you

1 look at its tax forms to see if it declares who
2 its donors are?

3 A. Yes.

4 Q. It seems like that would be a major
5 undertaking to do this for all the donations.

6 A. It's not an insignificant list.

7 Q. And then how often do you update
8 that? Confirm, you know, that information so
9 if there's an organization out there, do you
10 check every year or once you declare it as a
11 dark entity, it just remains dark?

12 A. That's a good question. I don't
13 know.

14 Q. Okay. And then do you classify a
15 group as simply dark or not dark? Or do you
16 have kind of a gray area that you would
17 classify them as partial disclosure or how is
18 that?

19 A. Yes. You can see on our website
20 there's a classification we either call it
21 fully disclosing, partially disclosing, or
22 completely dark. There's a little icon that
23 you can see next to the organization that it's
24 either a fully dark circle, a half dark circle
25 or no circle at all.

1 Q. And then how does that
2 categorization then filter into the results in
3 this report?

4 A. Whether in this chart -- I believe
5 I would have to verify this. I believe the
6 dark contributions are any organization that's
7 considered fully dark.

8 Q. Okay. All right. And as far as
9 your transparency advocacy goes, do you
10 advocate banning contributions to Super PACs
11 from dark-money entities?

12 A. We haven't overtly done advocacy in
13 that sense.

14 Q. And then again, here for Figure 3,
15 as you had mentioned earlier, all of the
16 receipts that we are looking at there, is
17 information that you culled from the FEC
18 reports, correct?

19 A. Correct.

20 Q. And then I guess this is sort of a
21 compilation here. If I looked at your site, I
22 could look by committee, by Super PAC
23 committee?

24 A. Yes.

25 Q. And be able to see their donors

1 that they have?

2 A. Yes.

3 Q. And I'm sorry, I typically don't
4 look at your website. So does your website
5 identify whether you consider a Super PAC to be
6 a dark money group or not?

7 A. We would identify whether the donor
8 to the Super PAC is a dark money group or not
9 and whether it's fully disclosing, partial
10 disclosing or dark.

11 Q. Okay. And you might have mentioned
12 this earlier, I just maybe I missed it, but
13 what is your threshold for between full and
14 partial?

15 A. That's a good question. I could
16 verify with one of our researchers. I don't
17 want to say the wrong threshold. I don't know
18 off the top of my head. We do have a percent
19 threshold, though. I know that.

20 Q. It seems like this is very
21 mathematical, so I'm sure you do.

22 All right. So I was going to ask
23 about some specific Super PACs, but I guess
24 what you are telling me is, if I go onto your
25 website, I can just look for myself and see how

1 you designate them?

2 A. Yes.

3 Q. So --

4 A. If you ever had a question, you
5 could always reach out to us and usually one of
6 our researchers will get back to you. Or if
7 you wanted data that is not on our website or
8 at a more granular level, we will, in some
9 cases, send the spoke datasets to folks.

10 Q. That's great. Thank you.

11 I guess I'm now looking at the next
12 section, which is your itemized Super PAC
13 individual donors. And I guess one question
14 has sort of crossed my mind when I was looking
15 at this, and maybe it doesn't specifically
16 apply to individuals, but it seems like that's
17 where it could most apply.

18 Do you have coding issues sometimes
19 as far as how to code donations as far as what
20 entity it goes to or individual?

21 A. Could you rephrase that question?

22 Q. Yes. So as you are going through
23 and coding individual donations, you know, like
24 I have a very common name. So you sometimes
25 have issues, you know, coding to individuals

1 and figuring out who a donation is from?

2 A. No.

3 Q. And can you explain why that is?

4 A. When we download data from the FEC,
5 the FEC data has the individual linked to the
6 donation.

7 Q. And so that would be the same thing
8 for entities?

9 A. Correct.

10 Q. All right. And then on the
11 corporate side, do you do things to tally up
12 donations within corporate families?

13 A. Families?

14 Q. Corporate families like, you know,
15 corporate subsidiaries?

16 A. Could you be a bit more specific?

17 Q. Yeah.

18 A. Or give an example?

19 Q. Yeah. I guess I'll give an actual
20 example. I don't know that this company makes
21 donations, per se, but Walmart owns Sam's Club,
22 so that could be separately incorporated. So
23 if there was a donation from Sam's Club, would
24 that be billed as double?

25 A. It's a fantastic question. We have

1 often heated internal debates on when to
2 establish a parent-child relationship versus
3 not. I don't know off the top of my head.

4 This is a question that our
5 research team spends a lot of time on, but you
6 could absolutely go to our website, to
7 Walmart's page and in an instant determine
8 whether or not Sam's Club is listed as a
9 subsidiary or if Sam's Club has their own
10 entity page as well.

11 Q. Because I guess these issues would
12 largely come up in sort of tallying unique
13 donors.

14 A. Is there a deeper question that you
15 are trying to get at?

16 Q. No, there's not.

17 A. Oh.

18 Q. I'm just trying to understand the
19 data in the reports in general.

20 A. I see. Okay.

21 Q. Yeah. I'm not thinking of anything
22 in particular.

23 A. Got it. I don't know if your
24 question is whether or not there could be
25 duplicates within our data. We spend a lot of

1 time making sure that the data is also
2 de-duplicated, which is something the FEC
3 doesn't do.

4 Q. Okay. Yeah. I mean that's the
5 other side of it. Basically I'm just trying to
6 understand your -- essentially your data
7 management practices.

8 A. Got it.

9 Q. As you said, the FEC data isn't as
10 nearly as cleanly presented as yours is.

11 All right. With the duplication
12 issue, I'm kind of curious, to the extent that
13 money would be donated from, let's say an LLC
14 that you consider dark. So money is donated
15 from a dark LLC to a Super PAC, that then makes
16 another donation to a second Super PAC. Then
17 let's say that the intermediary Super PAC --
18 well, let's not even talk about its
19 designation, whether you consider it dark or
20 not, but is that considered two donations or is
21 that considered one donation?

22 A. It's a good question. I don't know
23 the answer of how our research team classifies
24 that. I know they spend a lot of time having
25 defined that problem.

1 I do know on our website we will
2 show a case when a Super PAC gives to another
3 Super PAC. I believe we consider that one
4 donation.

5 I have to verify, but I know this
6 only because we get, regularly, questions from
7 journalists about this, and that's a big piece
8 of our de-duplication effort.

9 Q. So you are largely trying to track
10 money as it enters the system and not
11 necessarily --

12 A. Exactly, enters and exits.

13 Q. Not necessarily --

14 A. I didn't mean to talk over you
15 again.

16 Q. That's fine. In life we are
17 conversational, and that's fine. Okay.

18 Is there any way that you track
19 earmarked donations for pass-through purposes?

20 A. I would have to check with the
21 team. Could you say more about that?

22 Q. Yeah. So this may not matter if
23 you are simply tracking money as it enters and
24 exits the system, but if you didn't, I would be
25 curious to know if you tracked money that is

1 earmarked.

2 So A donates to B with the express
3 purpose of having that money donated to C. I
4 wasn't sure if there was any separate tracking
5 for that. Now your organization is a (c)(3)
6 not a (c)(4), correct?

7 A. Correct.

8 Q. But just -- do you disclose your
9 donors?

10 A. We do.

11 Q. Where are those disclosed?

12 A. On our website.

13 Q. Do you have a mission statement for
14 your organization?

15 A. We do.

16 Q. Do you know what that is or could I
17 look at the website?

18 A. You could also look at the website,
19 but our mission is to serve as the trusted
20 authority on money in American politics.

21 Q. I thought you would probably have
22 it memorized.

23 A. There is -- (crosstalk) -- on how
24 we do that on our website.

25 Q. -- submissions and details and how

1 many should be included and all of those great
2 discussions.

3 All right. Is there anything
4 that's ever done to sort of go back and true-up
5 data with the FEC, if the FEC gets updated
6 reports from committees?

7 A. Is there ever? What was the first
8 part of that question?

9 Q. Like a true-up activity where you
10 go back and kind of confirm that you are making
11 all of the changes that they are making?

12 A. I would have to check with the
13 team. It depends on the nature of our download
14 cycles. We have a pretty set download cycle.
15 I believe it's monthly. And so my
16 understanding is if the FEC does any edits or
17 updates, that data would be included in the
18 subsequent download.

19 Q. So you prepared this report and you
20 broke out the figures in this way, and I assume
21 you did so for specific reasons. So I think
22 that you -- I assume that you broke out single
23 candidate versus multiple candidate, because
24 you think that is a significant potential
25 source of corruption of having single-candidate

1 Super PACs, is that accurate?

2 A. It doesn't automatically indicate
3 that. We think it could be a potential source,
4 and so that's why we break down the data in
5 those ways.

6 Q. So that would also indicate that
7 you think that multi-candidate Super PACs are
8 less of a potential source?

9 A. Potentially.

10 Q. And I take it you break out the
11 dark money groups because you think that the
12 lack of transparency from dark money donations
13 is problematic to democracy, is that fair?

14 A. Yes. We believe that transparency
15 is inherently essential in democracy.

16 Q. I guess along those lines, I'm
17 curious if you have had requests for
18 information, or independently done work into
19 attempting to determine if there are any dark
20 money sources coming from foreign sources?

21 A. Could you repeat the question?

22 Q. Yes. I'll do it in plain English.
23 Has there been a recent increase in interest in
24 whether dark money is coming from foreign
25 sources?

1 A. We have been asked those questions.

2 Q. And are those largely coming from
3 the right or the left or both?

4 A. I don't know the political
5 affiliations of those questions.

6 Q. And have those questions increased
7 in recent years?

8 A. I have only been there for a year,
9 so I don't know but I can find out.

10 Q. That's true. I forgot about that.
11 I'm sorry.

12 A. That's okay.

13 Q. All right. And I guess your last
14 charts deal with ideology. Is there kind of a
15 story behind the numbers you can explain to me,
16 as far as what's happening ideologically?

17 A. Yeah. As stated in the summary
18 comments -- I'm sorry. Are you looking at
19 table 7?

20 Q. Yes.

21 A. And table 6?

22 Q. Correct.

23 A. Yes. So we broke the data out by
24 \$1,000 donations or more by ideology. And of
25 course the ideology is not the ideology of the

1 donors, it's the ideology of the Super PAC,
2 based on the candidates that they spend on.

3 So I think what's interesting here
4 in the first table, is that there was a flip
5 that happened when it comes to the number of
6 unique individual donors. So up until 2018,
7 the number of unique individual donors that
8 gave to conservative leaning Super PACs,
9 outnumbered those who gave to liberal leaning.

10 And then that switched in 2018
11 where the number of individual donors to
12 liberal leaning Super PACs, began to outnumber
13 conservative Super PACs. And overall what we
14 are seeing from these two charts, is that this
15 activity happens on both sides of the aisle.

16 Q. Okay. And also in this data, is
17 there any significance that you've called --
18 and by significance I mean to you -- anything
19 material about differences in donations and use
20 of Super PACs in presidential cycles versus
21 non-presidential cycles?

22 A. Well, in presidential cycles, the
23 use of Super PACs is much greater and the
24 amount of money spent is much greater.

25 Q. Right, but other than simply

1 increasing the amount, is there anything
2 materially different?

3 A. Materially different in what sense?

4 Q. I guess since you care about
5 transparency, in a transparency sense.

6 A. I would say that the trends are
7 relatively materially similar between cycles.

8 Q. All right.

9 A. I think the scale is much greater
10 in presidential years, especially when you
11 break down the number of donors.

12 Q. There are more donors interested in
13 those cycles?

14 A. Yes.

15 Q. And is it correct to presume, or I
16 guess does your data show, I guess is a better
17 way to say, does you data show that most of
18 those donors then donate to PACs that are
19 concerned with the presidential election
20 exclusively?

21 A. I'm sure we could find that out.

22 Q. All right. I don't have any
23 further questions, but the other counsel may.

24 MR. BOLTON: No questions for me.

25 MR. LOUVIS: Nothing for me either.

1 MR. MILLER: I think this is going
2 to conclude pretty rapidly here and you'll be
3 done by 8:00 p.m.

4 THE STENOGRAPHER: Would you like
5 this written up?

6 MR. MILLER: I would, please.

7 THE STENOGRAPHER: Would you like a
8 copy?

9 MR. BOLTON: I would like a copy as
10 well, yes.

11 MR. LOUVIS: I would, too.

12
13 (The deposition concluded at 10:42 a.m.)

14 - - - - -
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CERTIFICATE

I, Eva Petrone, do hereby certify
that as such Reporter I took down in Stenotypy
all of the proceedings had in the foregoing
transcript; that I have transcribed my said
Stenotype notes into typewritten form as
appears in the foregoing transcript; that said
transcript is the complete form of the
proceedings had in said cause and constitutes a
true and correct transcript therein.

Eva Petrone, Notary Public
within and for the State of Ohio

My commission expires February 1, 2028.

1 DEPOSITION ERRATA SHEET

2 Date Taken: April 9, 2025

3 Case Caption: DINNER TABLE ACTION, FOR OUR FUTURE

4 vs. WILLIAM J. SCHNEIDER, et al.

5 DECLARATION UNDER PENALTY OF PERJURY

6 I declare under penalty of perjury

7 that I have read the entire transcript of

8 my Deposition taken in the captioned matter

9 or the same has been read to me, and

the same is true and accurate, save and

1 except for changes and/or corrections, if

2 any, as indicated by me on the DEPOSITION

3 ERRATA SHEET hereof, with the understanding

4 that I offer these changes as if still under

5 oath.

6 Signed on the _____ day of

7 _____, 20____.

8 _____

9 HILARY BRASETH

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HILARY BRASETH

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