

## Exhibit 2

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

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

Plaintiffs,

vs.

Case No.  
24-cv-00430-KFW

WILLIAM J. SCHNEIDER, in his  
official capacity as  
Chairman of the Maine  
Commission on Governmental  
Ethics and Election  
Practices; DAVID R. HASTINGS  
III, in his official  
capacity as a Member of the  
Main Commission on  
Governmental Ethics and  
Election Practices; SARAH E.  
LECLAIRE, in her official  
capacity as a Member of the  
Maine Commission on  
Governmental Ethics and  
Election Practices; DENNIS  
MARBLE, in his official  
capacity as a Member of the  
Maine Commission on  
Governmental Ethics and  
Election Practices; BETH N.  
AHEARN, in her official  
capacity as a Member of the  
Maine Commission on  
Governmental Ethics and  
Election Practices; and  
AARON M. FREY, in his  
official capacity as  
Attorney General of Maine,

Defendants.

REMOTE VIDEOCONFERENCE DEPOSITION OF  
JONATHAN WAYNE

April 15, 2025  
9:59 a.m. EDT

1 Remote videoconference deposition of  
2 Jonathan Wayne, a witness herein, called by the  
3 Plaintiffs for examination under the applicable  
4 rules of Federal Civil Court Procedure, taken  
5 before me, Linda D. Riffle, Registered Diplomat  
6 Reporter, Certified Realtime Reporter, and  
7 Certified Realtime Captioner, pursuant to notice  
8 and stipulations of counsel hereinafter set  
9 forth, on Tuesday, April 15, 2025, beginning at  
10 9:59 a.m. EDT and concluding on the same day.

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1 APPEARANCES:

2 ON BEHALF OF THE PLAINTIFFS:

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S T I P U L A T I O N S

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It is stipulated by and among counsel for the respective parties that the remote videoconference deposition of Jonathan Wayne, a witness herein, called by the Plaintiffs for examination under the applicable rules of Federal Civil Court Procedure, may be taken at this time by the Court Reporter pursuant to notice; that said remote videoconference deposition may be reduced to writing in stenotype by the Court Reporter, whose notes may thereafter be transcribed out of the presence of the witness; that proof of the official character and qualification of the Court Reporter is waived; that the witness may sign the transcript of his remote videoconference deposition before a Court Reporter other than the Court Reporter taking his remote videoconference deposition; said remote videoconference deposition to have the same force and effect as though the witness had signed the transcript of his remote videoconference deposition before the Court Reporter taking it.

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I N D E X

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WITNESS	PAGE
Jonathan Wayne Examination by Mr. Miller	6

- - -

WAYNE DEPOSITION EXHIBIT	MARKED
Exhibit 1 Declaration of Jonathan Wayne	10

- - -

1 JONATHAN WAYNE,  
2 of lawful age, being by me first duly placed  
3 under oath, as prescribed by law, was examined  
4 and testified as follows:

5 EXAMINATION

6 BY MR. MILLER:

7 Q. Good morning, Mr. Wayne. I'm Charles  
8 Miller. I am counsel for the plaintiffs in this  
9 matter. And we requested your deposition because  
10 you filed a declaration in this matter.

11 I think that this deposition will be  
12 pretty short today. It's probably what I would  
13 consider sort of more of an informational  
14 deposition, I guess, just for -- I just want to  
15 make sure I understand everything that you've put  
16 in here. So this may be less, if you will,  
17 adversarial than some depositions you've had in  
18 your past experience.

19 A. Great.

20 Q. Yeah. And I assume you've been deposed  
21 before?

22 A. Yes.

23 Q. Okay. All right. So you know the  
24 general process. Even though we're not in  
25 person, you know, we still are here to help our



1 stenographer, Lin, take down a good record. So  
2 we try not to speak over one another and also try  
3 to speak slowly enough that she's able to take  
4 everything down.

5 Also, we have to answer with words, not  
6 nods or shakes of the head or other utterances.

7 And with that, are you ready to get  
8 started?

9 A. Yes, I am.

10 Q. All right. Can you just briefly kind of  
11 describe for me your current role, how long that  
12 you've been doing it, and your duties and  
13 responsibilities?

14 A. Sure. I am the executive director of  
15 the Maine Commission on Governmental Ethics and  
16 Election Practices. I oversee a staff of six  
17 employees at the commission, six including  
18 myself. I have had the job since May of 2003, so  
19 I've been in the position 22 years -- or -- well,  
20 soon it will be 22 years.

21 And I report to a board of five  
22 commissioners who are private citizens who  
23 contribute some of their time. They generally  
24 meet monthly. So along with an assistant  
25 manager, I comanage the day-to-day activities of



1 the office.

2 Q. Okay. The board you mentioned, you  
3 described them as private citizens. Are they  
4 sort of -- are they politicians, are they kind of  
5 lawyers, or are they just truly sort of public  
6 servant private citizens?

7 A. It's a mix. Some of them have political  
8 backgrounds, and some do not.

9 Q. There are, you know, some governmental  
10 organizations that are sort of, you know, what I  
11 describe as board run where they kind of are  
12 detailedly involved. There are others where a  
13 board provides more oversight and the staff sort  
14 of runs everything day-to-day. How would you  
15 describe your organization?

16 A. I would say the second model.

17 Q. Okay. All right. And, you know, as you  
18 mentioned -- 2003 is longer ago than I care to  
19 admit. And so you've been here in this role for  
20 quite some time, but -- I guess it's not too  
21 significant now, but I'm sort of curious. What  
22 was your background prior to that?

23 A. I had worked as a staff attorney for the  
24 New York City Campaign Finance Board for three  
25 years. And prior to that, I had -- was a junior

1 associate at a commercial litigation firm. And  
2 then prior to that -- that was for two years.  
3 Prior to that, I did a clerkship, a one-year  
4 clerkship. And prior to that, I did a one-year  
5 position with a criminal defense attorney.

6 Q. Okay. Was the clerkship appellate or  
7 trial?

8 A. It was a state court, trial. Trial  
9 court.

10 Q. Okay. All right. And were all of those  
11 activities in New York?

12 A. Well, actually, no. The -- the only  
13 position that was in New York of the ones I  
14 mentioned was The New York City Campaign Finance  
15 Board. The other three positions were in  
16 New Jersey.

17 Q. Okay. All right. And then you moved to  
18 Maine and, wisely, never looked back?

19 A. Yes.

20 Q. Okay. All right. So what were you  
21 asked to do for -- for this case?

22 A. For the case generally?

23 Q. Yes.

24 A. Well, our counsel made us aware that a  
25 motion for a --

1 Q. I'm sorry. Let me stop you. I don't --  
2 I'm sorry. I guess I do not mean generally  
3 because, you know, you're the client in the  
4 matter. So I'm not going to ask about any sort  
5 of litigation strategy or anything.

6 So, I guess, let's just focus on the  
7 declaration. So do you happen to have the  
8 declaration in front of you?

9 A. I do.

10 Q. Okay. All right. And so we'll just  
11 designate that, you know, as Exhibit 1 for this  
12 deposition.

13 - - -

14 Thereupon, Wayne Deposition Exhibit 1  
15 was marked for purposes of  
16 identification.

17 - - -

18 BY MR. MILLER:

19 Q. And so I guess what were you asked to do  
20 vis-à-vis the declaration?

21 A. Well, our -- it was a collaborative  
22 process between me and our counsel. He wrote the  
23 first draft, and then we talked about the content  
24 of the declaration and the language in the  
25 declaration.

1 Q. Okay. Go ahead.

2 A. Well, you may want to get this in a  
3 subsequent question, but also I worked with a  
4 colleague of mine here at the commission on the  
5 data that is included in the declaration.

6 Q. Yeah. That was actually going to be my  
7 next question as far as the data. Counsel did  
8 not prepare that; you did that internally?

9 A. Correct. Counsel gave us a general idea  
10 of what he was interested in. And I assigned it  
11 to a colleague of mine to get the raw data, and I  
12 supervised her on that and -- well, I'll pause  
13 there.

14 Q. Okay. All right. Let's see. As sort  
15 of the administrator, you know, of the campaign  
16 finance process, do -- as -- are you taking a  
17 position sort of on whether this particular, you  
18 know, law that was enacted, you know, by a ballot  
19 measure is wise, necessary, anything like that?  
20 Are you agnostic to that and just say it's the  
21 law and we are charged with enforcing the law?

22 A. Well, when we have been sued in the past  
23 in a constitutional challenge and our office is  
24 named as a defendant, the attorney general's  
25 office takes the -- determines the position of

1 the agency. So, you know, generally, you know,  
2 my understanding is when a law is duly enacted by  
3 the legislature or a citizen initiative, it's our  
4 job to administer the law. And part of that  
5 is -- usually, in the past, it's sort of being  
6 cooperative in the defense of the statute.

7 Does that answer your question, or have  
8 I left anything out unaddressed?

9 Q. I think that's fair.

10 A. Okay.

11 Q. All right. And prior to the enactment  
12 of this -- well, in the case we just call it "the  
13 act," but I think you know what I'm talking  
14 about. But prior to that, my understanding is is  
15 that the threshold for reporting contributions  
16 has been \$50; is that accurate?

17 A. By PACs?

18 Q. Yes.

19 A. Yes.

20 Q. To PACs.

21 A. Yes. The reporting by PACs of their  
22 contributions they have received means they have  
23 to be itemized if the amount of the contributions  
24 are above \$50.

25 Q. All right. And what's the rule for --



1 for candidates, candidate committees?

2 A. That's the same for candidates.

3 Q. All right. Is there any itemized  
4 reporting threshold in the state that is lower  
5 than \$50?

6 A. I can't think of anything.

7 Q. All right. So in your declaration here,  
8 you start reporting trends starting in 2010. Do  
9 you know why you went back that far?

10 A. That was suggested to us by our counsel.

11 Q. Okay. And before we get to the data,  
12 I'm just sort of going through the paragraphs of  
13 the declaration. But in Paragraph 9, you  
14 indicate that you separated out the spending by  
15 candidates that are participating in the Maine  
16 Clean Election Act. And I'm a bit confused why  
17 you did that because they could also receive the  
18 benefit of spending by outside committees,  
19 independent expenditures, correct?

20 A. I don't have a clear recollection of why  
21 we did that, but I would expect that that was  
22 also a suggestion from our counsel.

23 Q. Okay. All right. Let me just -- I just  
24 want to make sure that I do understand the law.  
25 Like, independent committees can decide to spend

1 to support or oppose candidates that participate  
2 in the MCEA, correct?

3 A. That's correct.

4 Q. Okay. And, you know, with the data that  
5 you provide here, largely, this is a report that  
6 simply reports on data, this is what's happened,  
7 is what I see it. Is there -- is there anything  
8 in this report that is, you know, sort of  
9 qualitative versus quantitative?

10 A. Do you mind if I flip through the  
11 declaration?

12 Q. No, please do.

13 MR. BOLTON: Sorry. I was muted. I  
14 just object to form on that question.

15 THE WITNESS: I would say the last two  
16 paragraphs are not quantitative.

17 BY MR. MILLER:

18 Q. Okay. All right. That's helpful. All  
19 right. And then let's just sort of start kind of  
20 going through the charts that you have here in  
21 the declaration itself and just kind of let's  
22 just make sure I understand what those -- those  
23 are and then move on.

24 So the first chart that I see is on  
25 Page 3 beneath Paragraph 10. Can you just



1 explain what that is?

2 A. I'm sorry. I missed the end of your  
3 question.

4 Q. Yeah. Can you just explain what -- what  
5 is in that chart on the bottom of Page 3?

6 A. Sure. Well, the chart makes references  
7 to campaign expenditures in four election years  
8 where there were races for governor. And for  
9 each one of those years, there are two vertical  
10 bars. The left-hand vertical bar that is in  
11 orange shows total independent expenditures to  
12 influence the governor's race in that calendar  
13 year.

14 The right hand of the two columns, which  
15 is colored in yellow and blue, shows total  
16 expenditures by the candidates for governor that  
17 year. And the yellow portion of each bar refers  
18 to expenditures by candidates for governor who  
19 were participating in the Maine Clean Election  
20 Act. And then the blue parts of the bar refer to  
21 candidates who are financing their campaigns in  
22 the traditional way by accepting traditional  
23 campaign contributions.

24 Q. Okay. And are you attempting to make  
25 any linkage between the candidates that decide to

1 participate in the Maine Clean Election Act and  
2 the existence or the amount of independent  
3 expenditures?

4 A. No, I don't believe we're -- I'm not --  
5 that wasn't my intention, no.

6 Q. Okay. All right. And then the chart  
7 below Paragraph 11, that does the similar thing  
8 for legislative and county races as what just --  
9 you described for the gubernatorial race  
10 expenditures?

11 A. That's correct, except more election  
12 years are referred to there, but otherwise the  
13 same.

14 Q. All right. And then as you get into PAC  
15 spending, you delineate here between  
16 single-candidate PACs and other PACs. Can you  
17 explain why you're doing that?

18 A. If you'll forgive me, I just want to  
19 refer to the declaration. I'll be right with  
20 you.

21 Q. That's fine.

22 A. Well, you know, when our counsel talked  
23 to us about the kinds of data he was interested  
24 in, he asked us to look at how many different  
25 races the PACs were influencing, and so we

1 provided that data to him. And then he wrote  
2 Paragraph 14 as part of the first draft of the  
3 declaration. And when I reviewed it, it seemed  
4 accurate to me, but it -- I'd have to say that,  
5 for my part, I didn't have any particular purpose  
6 in making the reference to single-candidate PACs.  
7 I think that was part of the first draft that was  
8 presented to us by counsel.

9 Q. Okay. And if we flip back to, I guess,  
10 Exhibit B, I guess this is the data that was used  
11 to formulate that particular section of the  
12 declaration, correct?

13 A. That's correct.

14 If you will, I just want to make sure  
15 that your reporter can hear me okay.

16 THE COURT REPORTER: I can.

17 THE WITNESS: I sometimes can get a  
18 little soft, and there's a fan -- a ventilation  
19 fan in the background. And so just let me know  
20 if you can't hear anything.

21 THE COURT REPORTER: I will. Thank you.

22 BY MR. MILLER:

23 Q. Your computer and microphone are working  
24 great.

25 A. Great.

1 Q. It's like you're in a TV studio or  
2 something. We're good.

3 All right. Man, I wish it was 2003; I  
4 could read this page a little better. All right.

5 So looking at Exhibit B, so "Committee  
6 Name," I know what that means. "Year," "Total  
7 Contributions," "Total Spending."

8 So let me ask about that, then. So, you  
9 know, because I see that some of these, the total  
10 contributions are less than the total spending.  
11 So what time periods are we talking about there?  
12 Is that for a biennium or a particular individual  
13 year, or what is that?

14 A. Well, the -- the data was gathered by my  
15 colleague. And I -- as I look at this now, I  
16 believe that refers to -- actually, if you'll  
17 bear with me, I want to refer to the declaration  
18 for a second.

19 Q. Okay.

20 A. I believe that when Lorrie compiled this  
21 information, the -- the data in the "Total  
22 Contributions" column refers to contributions  
23 received in the calendar year 2022 and most  
24 likely does not include contributions received in  
25 2021.

1 Q. Okay. And that would be the same for  
2 all three of those columns, then, the "Total  
3 Contributions," "Total Spending," and "Total IE  
4 Spending"?

5 A. I believe so, yes.

6 Q. All right. And then the right two  
7 columns, then, that's the total number of  
8 contributions that exceeded \$5,000 and then the  
9 total number of races that they made an  
10 independent expenditure on?

11 A. Correct.

12 Q. Okay. And the "S/O" is probably support  
13 or oppose?

14 A. Yes.

15 Q. And, I guess -- all right. So your --  
16 your committees in Maine, they don't necessarily  
17 have to be independent expenditure only; is that  
18 correct?

19 A. No.

20 Q. That is not correct?

21 A. Oh, I'm sorry. That is correct.

22 Q. Okay. All right. Sorry about my  
23 unartfully worded question.

24 A. No, it's fine.

25 Q. And so the -- the "Total Spending"



1 column could include contributions to a  
2 candidate?

3 A. Yes.

4 Q. And then, therefore, the number of races  
5 supporting or opposing, you know, theoretically  
6 could it include independent expenditures as well  
7 as direct contributions?

8 A. I believe that the column of races  
9 supported or opposed refers only to independent  
10 expenditures.

11 Q. Okay. All right. So there are a few  
12 committees here, at least in 2022, that supported  
13 just one candidate, if I understand this  
14 correctly. So Better Maine, do you know who that  
15 supported?

16 A. I believe we said in the declaration,  
17 but I'll confirm, that they supported --

18 Q. Okay. Yeah, I see that.

19 A. -- the democratic candidate for  
20 governor.

21 Q. Okay. And who was that?

22 A. That was Janet Mills.

23 Q. All right. And then -- so in your  
24 general election, it's a -- is it simply -- is it  
25 still party nominated? Is that how this happens?

1 Or do you have a different form of doing general  
2 elections?

3 A. Candidates receive a party nomination in  
4 the primary election, and that party affiliation  
5 is -- well, actually, I don't want to say  
6 anything that I can't remember for sure. But  
7 they are -- there are candidates in the general  
8 election who have -- who are the nominees of  
9 their political party. There are also candidates  
10 who are not enrolled in any party.

11 Q. Okay.

12 A. Does that answer your question?

13 Q. Yeah. So you don't use one of those --  
14 I can't think what it's called now. You don't  
15 use one of the open primary systems and then  
16 with -- or a -- what's it called in the general  
17 where they do the cumulative voting?

18 Anyway, you just sort of use a  
19 traditional voting system there, right? In the  
20 general, just whatever vote you get, you get, and  
21 you don't kind of recount?

22 MR. BOLTON: I'm going to object to form  
23 and foundation.

24 Go ahead, Jonathan.

25 THE WITNESS: We do have -- in case this



1 is responsive to your question, some election  
2 races in Maine are affected by ranked-choice  
3 voting.

4 BY MR. MILLER:

5 Q. That was the term I couldn't think of.  
6 Yeah. Does that include the gubernatorial race?

7 A. I apologize. I'd rather not offer an  
8 opinion on that because some of our races are  
9 covered by ranked-choice voting and some are not,  
10 and I actually --

11 Q. You don't recall which?

12 A. Correct.

13 Q. Okay. All right. That's fine.

14 All right. So, then, that's -- and  
15 that's the the republican candidate. Okay.

16 All right. In addition to sort of  
17 receiving reports and publicly reporting  
18 information about the number of contributions,  
19 does your organization have any other roles that  
20 it plays in elections?

21 A. We administer the Maine Clean Election  
22 Act Program, which is our public financing  
23 program for certain state offices. We have some  
24 nonelection roles as well.

25 Q. With respect to elections, did you do

1 anything to -- to enforce compliance with the act  
2 with the fundraising limits?

3 A. Are you talking specifically -- when you  
4 refer to "the act," are you referring to the --  
5 the initiative that's being challenged here, or  
6 do you mean more generally laws relating to  
7 contribution?

8 Q. I'm sorry. I meant more generally the  
9 laws.

10 A. In general, we enforce contribution  
11 limits. I want to make sure I'm being responsive  
12 to your question. We also enforce disclaimer --  
13 you know, disclaimer requirements for political  
14 communications.

15 Q. Okay. Do you conduct any investigations  
16 into whether donations that are made to  
17 independent expenditure committees were solicited  
18 by a candidate?

19 A. That's -- hasn't been part of our  
20 investigations in the past.

21 Q. Okay. Are you aware of any incidents  
22 where there's been -- in Maine there have been  
23 accusations or suggestions that donations to a  
24 political -- excuse me -- to an independent  
25 expenditure committee were made to receive a

1 quid pro quo from a candidate?

2 A. Well, if there are such quid pro quo  
3 arrangements occurring, those would be happening  
4 behind closed doors, and I wouldn't be aware of  
5 them.

6 Q. So is that answer no?

7 A. Could you repeat the question?

8 Q. Yeah. Are you aware of any instance or  
9 allegations of a contribution to an independent  
10 expenditure committee being made as a  
11 quid pro quo for a candidate?

12 A. In Maine?

13 Q. In Maine.

14 A. No.

15 Q. Okay. Turning back to your declaration,  
16 Paragraph 27, which is on Page 7, discusses party  
17 independent expenditures.

18 A. Yes.

19 Q. Is -- first, I guess, are you aware  
20 of -- actually, let me -- let me try this again.

21 Are contributions to parties for  
22 independent expenditures in any way limited under  
23 Maine law?

24 A. I'm sorry. Could you repeat the  
25 question?

1 Q. Yeah. Are contributions to party --  
2 political parties for independent expenditures  
3 limited in any way under Maine law?

4 A. No, they're not.

5 Q. From your perspective, is there any  
6 significant difference between a party  
7 independent expenditure and an independent  
8 expenditure from an outside committee?

9 MR. BOLTON: Object to form.

10 THE WITNESS: Could you repeat the  
11 question?

12 BY MR. MILLER:

13 Q. Yeah. So what is the difference between  
14 an independent expenditure from a party versus  
15 one from an outside committee?

16 A. Well, they both have the same general  
17 purpose, which is disclosure of a paid  
18 communication to voters to support or oppose  
19 candidates. The difference is the type of the  
20 organization doing the spending. In one case,  
21 it's a party committee, and in the other, it's  
22 another kind of political organization, such as a  
23 PAC.

24 Q. Okay. Do you view the likelihood of  
25 quid pro quo corruption to be greater or lesser

1 amongst those different organizations?

2 MR. BOLTON: Object to foundation.

3 THE WITNESS: I'm sorry, Mr. Miller.

4 It's just not something I would have an opinion  
5 on. I -- it's sort of about what is more  
6 probable in one case or the other, and I just  
7 don't have a basis for offering any kind of  
8 opinion on that.

9 BY MR. MILLER:

10 Q. Well, you've spent the past 20 years  
11 collecting this data, right?

12 A. That's correct.

13 Q. And you can either initiate or request  
14 investigations if you ever come across something  
15 that you would suspect would be a quid pro quo,  
16 correct?

17 A. Well, if -- if the situation involved a  
18 violation of our law, we -- we could -- the staff  
19 could propose an investigation to the commission.  
20 But, like I said, if there are quid pro quo  
21 arrangements that are happening, I would imagine  
22 behind closed doors, then we wouldn't know about  
23 them. So it's not something we would typically  
24 propose an investigation about.

25 Q. Yeah. But just -- just so I understand,



1 you have no reason to believe that an independent  
2 expenditure committee is more likely to be a  
3 source of quid pro quo corruption than a party  
4 committee, correct?

5 MR. BOLTON: Object to foundation.

6 THE WITNESS: I just don't -- I'm aware  
7 that there's always a potential for quid pro quo  
8 arrangements in which government officials are  
9 taking an official act in response for a -- in  
10 return for receiving some benefit, but I don't  
11 really have a basis for saying it's more likely  
12 to involve a party committee or a PAC. It's --  
13 there's sort of always some risk, but I don't  
14 know -- have any reason to believe one is  
15 likelier than the other. I guess I just don't  
16 have an opinion on it.

17 Q. Okay. All right. Well, I promised this  
18 would be short and relatively painless, and I  
19 hope I've accomplished that because I have no  
20 further questions.

21 MR. MILLER: Jonathan, do you have  
22 anything?

23 MR. BOLTON: Nothing from me.

24 MR. MILLER: Ezra, I assume you have  
25 nothing.

1                   So I would like a copy of this.

2                   THE COURT REPORTER: Is regular two  
3 weeks okay?

4                   MR. MILLER: I would like it sooner than  
5 that. I guess could I get a -- a rough copy at  
6 some point this week?

7                   THE COURT REPORTER: Yeah. I can get  
8 that to you today, sure.

9                   MR. MILLER: Okay. That would be great.

10                  THE COURT REPORTER: And then just  
11 regular on the final?

12                  MR. MILLER: Can I do a one-week on  
13 that?

14                  THE COURT REPORTER: Sure. And did  
15 anybody need a copy of the transcript or the  
16 rough?

17                  MR. BOLTON: I'd like a copy of the  
18 final transcript. I don't need the rough.

19                  THE COURT REPORTER: Okay.

20                  MR. LOUVIS: Sorry. I cut out for a  
21 second. I'd also like a copy of the final.

22                  (Signature not waived.)

23                  (Thereupon, the remote videoconference  
24 deposition concluded at 10:33 a.m. EDT  
25 on Tuesday, April 15, 2025.)



C E R T I F I C A T E

- - -

State of Ohio, :  
County of Franklin, : SS:

- - -

I, Linda D. Riffle, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, and Notary Public in and for the State of Ohio, hereby certify that the foregoing is a true and accurate transcript of the remote videoconference deposition testimony, taken under oath on the date hereinbefore set forth, of Jonathan Wayne.

I further certify that I am neither attorney or counsel for, nor related to or employed by any of the parties to the action in which the remote videoconference deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in the action; and further that I am not under a contract as defined in Ohio Civil Rule 28(D).

Linda D. Riffle,  
Registered Diplomate  
Reporter, Certified  
Realtime Reporter,  
Certified Realtime  
Captioner, and Notary  
Public in and for the  
State of Ohio

My Commission Expires: July 26, 2026

- - -

1 DEPOSITION ERRATA SHEET

2 Date Taken: April 15, 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  
10 the same is true and accurate, save and  
11 except for changes and/or corrections, if  
12 any, as indicated by me on the DEPOSITION  
13 ERRATA SHEET hereof, with the understanding  
14 that I offer these changes as if still under  
15 oath.

16 Signed on the \_\_\_\_\_ day of

17 \_\_\_\_\_, 20\_\_\_\_.

18 \_\_\_\_\_  
19 JONATHAN WAYNE  
20  
21  
22  
23  
24  
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2 DEPOSITION ERRATA SHEET

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

JONATHAN WAYNE

3 DEPOSITION ERRATA SHEET

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

Reason for change: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

JONATHAN WAYNE

# WORD INDEX

<\$>

\$5,000 19:8

\$50 12:16, 24 13:5

<0>

04333-0006 3:10

<1>

1 5:4 10:11, 14 30:1

10 5:4 14:25

10:33 28:24

11 16:7

1100 3:14

1150 3:4

14 17:2

15 1:24 2:9 28:25  
30:2

1850 3:14

<2>

2 31:1

20 26:10 30:17

20006 3:15

2003 7:18 8:18 18:3

20036 3:5

2010 13:8

202 3:5, 15

2021 18:25

2022 18:23 20:12

2025 1:24 2:9 28:25  
30:2

2026 29:20

207 3:10

22 7:19, 20

24-cv-00430-KFW 1:5

26 29:20

27 24:16

28(D 29:14

<3>

3 14:25 15:5 32:1

301-9800 3:5

<6>

6 3:9 5:4

626-8551 3:10

<7>

7 24:16

<8>

801 3:4

835-7584 3:15

<9>

9 13:13

9:59 1:24 2:10

<A>

a.m 1:24 2:10 28:24

AARON 1:19

able 7:3

accepting 15:22

accomplished 27:19

accurate 12:16 17:4  
29:8 30:10

accusations 23:23

act 12:13 13:16

15:20 16:1 22:22

23:1, 4 27:9

ACTION 1:1 29:11,  
13 30:3

activities 7:25 9:11

addition 22:16

administer 12:4

22:21

administrator 11:15

admit 8:19

adversarial 6:17

affiliation 21:4

age 6:2

agency 12:1

agnostic 11:20

ago 8:18

ahead 11:1 21:24

AHEARN 1:16

al 30:4

ALEX 1:3

allegations 24:9

amount 12:23 16:2

and/or 30:11

answer 7:5 12:7

21:12 24:6

anybody 28:15

Anyway 21:18

apologize 22:7

APPEARANCES 3:1

appellate 9:6

applicable 2:3 4:7

April 1:24 2:9

28:25 30:2

arrangements 24:3

26:21 27:8

asked 9:21 10:19

16:24

assigned 11:10

assistant 7:24

associate 9:1

assume 6:20 27:24

attempting 15:24

Attorney 1:20 3:9

8:23 9:5 11:24

29:10, 12

Augusta 3:10

Avenue 3:4

aware 9:24 23:21

24:4, 8, 19 27:6

<B>

back 9:18 13:9 17:9  
24:15

background 8:22

17:19

backgrounds 8:8

ballot 11:18

bar 15:10, 17, 20

bars 15:10

basis 26:7 27:11

bear 18:17

beginning 2:9

BEHALF 3:1, 6, 11

believe 16:4 18:16,

20 19:5 20:8, 16

27:1, 14

beneath 14:25

benefit 13:18 27:10

BETH 1:16

better 18:4 20:14

biennium 18:12

bit 13:16

blue 15:15, 20

board 7:21 8:2, 11,

13, 24 9:15

Bolton 3:6 14:13

21:22 25:9 26:2

27:5, 23 28:17

bottom 15:5

briefly 7:10

<C>

calendar 15:12 18:23

call 12:12

called 2:2 4:6 21:14,  
16

Campaign 8:24 9:14

11:15 15:7, 23

campaigns 15:21

candidate 13:1 20:2,

13, 19 22:15 23:18

24:1, 11

candidates 13:1, 2, 15

14:1 15:16, 18, 21, 25

21:3, 7, 9 25:19

capacity 1:6, 9, 12, 14,

17, 19

Caption 30:3

captioned 30:8

Captioner 2:7 29:7,  
19

care 8:18

Case 1:5 9:21, 22

12:12 21:25 25:20

26:6 29:13 30:3

certain 22:23

Certified 2:6, 7 29:6,

18, 19

certify 29:7, 10

Chairman 1:7

challenge 11:23

challenged 23:5

change 31:4, 7, 10, 13,

16, 19, 22 32:4, 7, 10,

13, 16, 19, 22

changes 30:11, 14

character 4:14

charged 11:21

Charles 3:1 6:7

chart 14:24 15:5, 6

16:6

charts 14:20

citizen 12:3

citizens 7:22 8:3, 6

City 8:24 9:14

Civil 2:4 4:8 29:14



Clean 13:16 15:19  
16:1 22:21  
clear 13:20  
clerkship 9:3, 4, 6  
client 10:3  
closed 24:4 26:22  
cmiller@ifs.org 3:6  
collaborative 10:21  
colleague 11:4, 11  
18:15  
collecting 26:11  
colored 15:15  
column 18:22 20:1, 8  
columns 15:14 19:2,  
7  
comanage 7:25  
come 26:14  
commercial 9:1  
Commission 1:7, 10,  
12, 15, 17 7:15, 17  
11:4 26:19 29:20  
commissioners 7:22  
Committee 18:5  
23:25 24:10 25:8, 15,  
21 27:2, 4, 12  
committees 13:1, 18,  
25 19:16 20:12  
23:17  
communication 25:18  
communications  
23:14  
compiled 18:20  
compliance 23:1  
computer 17:23  
concluded 28:24  
concluding 2:10  
conduct 23:15  
confirm 20:17  
confused 13:16  
Connecticut 3:4  
consider 6:13  
constitutional 11:23  
content 10:23  
contract 29:14  
contribute 7:23  
contribution 23:7, 10  
24:9  
contributions 12:15,  
22, 23 15:23 18:7, 10,

22, 24 19:3, 8 20:1, 7  
22:18 24:21 25:1  
cooperative 12:6  
copy 28:1, 5, 15, 17,  
21  
Correct 11:9 13:19  
14:2, 3 16:11 17:12,  
13 19:11, 18, 20, 21  
22:12 26:12, 16 27:4  
corrections 30:11  
correctly 20:14  
corruption 25:25  
27:3  
counsel 2:8 4:3 6:8  
9:24 10:22 11:7, 9  
13:10, 22 16:22 17:8  
29:10, 12  
county 16:8 29:4  
COURT 1:1 2:4  
4:8, 9, 11, 15, 17, 18,  
23 9:8, 9 17:16, 21  
28:2, 7, 10, 14, 19  
covered 22:9  
criminal 9:5  
cumulative 21:17  
curious 8:21  
current 7:11  
cut 28:20

#### < D >

D.C 3:5, 15  
data 11:5, 7, 11  
13:11 14:4, 6 16:23  
17:1, 10 18:14, 21  
26:11  
date 29:9 30:2  
DAVID 1:8  
day 2:10 30:16  
day-to-day 7:25 8:14  
decide 13:25 15:25  
Declaration 5:4 6:10  
10:7, 8, 20, 24, 25  
11:5 13:7, 13 14:11,  
21 16:19 17:3, 12  
18:17 20:16 24:15  
30:5  
declare 30:6  
defendant 11:24  
Defendants 1:21 3:6,

11  
defense 9:5 12:6  
defined 29:14  
delineate 16:15  
democratic 20:19  
DENNIS 1:13  
deposed 6:20  
DEPOSITION 1:21  
2:1 4:5, 10, 17, 19, 20,  
23 5:4 6:9, 11, 14  
10:12, 14 28:24 29:8,  
11 30:1, 8, 12 31:1  
32:1  
depositions 6:17  
describe 7:11 8:11,  
15  
described 8:3 16:9  
designate 10:11  
detailedly 8:12  
determines 11:25  
difference 25:6, 13, 19  
different 16:24 21:1  
26:1  
DINNER 1:1 30:3  
Diplomate 2:5 29:6,  
17  
direct 20:7  
director 7:14  
disclaimer 23:12, 13  
disclosure 25:17  
discusses 24:16  
DISTRICT 1:1  
doing 7:12 16:17  
21:1 25:20  
donations 23:16, 23  
doors 24:4 26:22  
draft 10:23 17:2, 7  
duly 6:2 12:2  
duties 7:12

#### < E >

EDT 1:24 2:10  
28:24  
effect 4:21  
either 26:13  
Election 1:8, 11, 13,  
16, 18 7:16 13:16  
15:7, 19 16:1, 11  
20:24 21:4, 8 22:1,  
21

elections 21:2 22:20,  
25  
elouvis@milbank.com  
3:16  
employed 29:11, 12  
employee 29:12  
employees 7:17  
enacted 11:18 12:2  
enactment 12:11  
enforce 23:1, 10, 12  
enforcing 11:21  
enrolled 21:10  
entire 30:7  
ERRATA 30:1, 13  
31:1 32:1  
Esq 3:1, 6, 11  
et 30:4  
Ethics 1:8, 10, 13, 15,  
18 7:15  
examination 2:3 4:7  
5:4 6:5  
examined 6:3  
exceeded 19:8  
excuse 23:24  
executive 7:14  
EXHIBIT 5:4 10:11,  
14 17:10 18:5  
existence 16:2  
expect 13:21  
expenditure 19:10, 17  
23:17, 25 24:10 25:7,  
8, 14 27:2  
expenditures 13:19  
15:7, 11, 16, 18 16:3,  
10 20:6, 10 24:17, 22  
25:2  
experience 6:18  
Expires 29:20  
explain 15:1, 4 16:17  
Ezra 3:11 27:24

#### < F >

fair 12:9  
fan 17:18, 19  
far 11:7 13:9  
Federal 2:4 4:7  
filed 6:10  
final 28:11, 18, 21  
Finance 8:24 9:14

11:16  
 financially 29:13  
 financing 15:21  
 22:22  
 fine 16:21 19:24  
 22:13  
 firm 9:1  
 first 6:2 10:23  
 14:24 17:2,7 24:19  
 five 7:21  
 flip 14:10 17:9  
 focus 10:6  
 follows 6:4  
 force 4:20  
 foregoing 29:8  
 forgive 16:18  
 form 14:14 21:1,22  
 25:9  
 formulate 17:11  
 forth 2:9 29:9  
 foundation 21:23  
 26:2 27:5  
 four 15:7  
 Franklin 29:4  
 Free 3:4  
 FREY 1:19  
 front 10:8  
 fundraising 23:2  
 further 27:20 29:10,  
 12,13  
 FUTURE 1:3 30:3

<G>

gathered 18:14  
 General 1:20 3:9  
 6:24 11:9 20:24  
 21:1,7,16,20 23:10  
 25:16  
 generally 7:23 9:22  
 10:2 12:1 23:6,8  
 general's 11:24  
 Go 11:1 21:24  
 going 10:4 11:6  
 13:12 14:20 21:22  
 Good 6:7 7:1 18:2  
 government 27:8  
 Governmental 1:7,  
 10,13,15,18 7:15  
 8:9

governor 15:8,16,18  
 20:20  
 governor's 15:12  
 Great 6:19 17:24,25  
 28:9  
 greater 25:25  
 gubernatorial 16:9  
 22:6  
 guess 6:14 8:20  
 10:2,6,19 17:9,10  
 19:15 24:19 27:15  
 28:5

<H>

hand 15:14  
 happen 10:7  
 happened 14:6  
 happening 24:3  
 26:21  
 happens 20:25  
 HASTINGS 1:8  
 head 7:6  
 hear 17:15,20  
 help 6:25  
 helpful 14:18  
 hereinafter 2:8  
 hereinbefore 29:9  
 hereof 30:13  
 hope 27:19  
 House 3:9

<I>

idea 11:9  
 identification 10:16  
 III 1:9  
 imagine 26:21  
 incidents 23:21  
 include 18:24 20:1,  
 6 22:6  
 included 11:5  
 including 7:17  
 independent 13:19,  
 25 15:11 16:2 19:10,  
 17 20:6,9 23:17,24  
 24:9,17,22 25:2,7,  
 14 27:1  
 indicate 13:14  
 indicated 30:12  
 individual 18:12

influence 15:12  
 influencing 16:25  
 information 18:21  
 22:18  
 informational 6:13  
 initiate 26:13  
 initiative 12:3 23:5  
 instance 24:8  
 Institute 3:4  
 intention 16:5  
 interested 11:10  
 16:23 29:13  
 internally 11:8  
 INTERVENOR 3:11  
 investigation 26:19,  
 24  
 investigations 23:15,  
 20 26:14  
 involve 27:12  
 involved 8:12 26:17  
 itemized 12:23 13:3

<J>

Janet 20:22  
 Jersey 9:16  
 job 7:18 12:4  
 JONATHAN 1:23  
 2:2 3:6 4:5 5:4 6:1  
 21:24 27:21 29:9  
 30:19 31:24 32:24  
 jonathan.bolton@main  
 e.gov 3:11  
 July 29:20  
 junior 8:25

<K>

kind 7:10 8:4,11  
 14:19,21 21:21  
 25:22 26:7  
 kinds 16:23  
 know 6:23,25 8:9,  
 10,17 10:3,11 11:15,  
 18 12:1,13 13:9  
 14:4,8 16:22 17:19  
 18:6,9 20:5,14  
 23:13 26:22 27:14

<L>

language 10:24  
 largely 14:5

law 6:3 11:18,21  
 12:2,4 13:24 24:23  
 25:3 26:18  
 lawful 6:2  
 laws 23:6,9  
 lawyers 8:5  
 LECLAIRE 1:11  
 left 12:8  
 left-hand 15:10  
 legislative 16:8  
 legislature 12:3  
 lesser 25:25  
 likelier 27:15  
 likelihood 25:24  
 limited 24:22 25:3  
 limits 23:2,11  
 Lin 7:1  
 Linda 2:5 29:6,17  
 linkage 15:25  
 litigation 9:1 10:5  
 little 17:18 18:4  
 LLP 3:14  
 long 7:11  
 longer 8:18  
 look 16:24 18:15  
 looked 9:18  
 looking 18:5  
 Lorrie 18:20  
 Louvis 3:11 28:20  
 lower 13:4

<M>

Main 1:10  
 MAINE 1:1,7,12,15,  
 17,20 3:10 7:15  
 9:18 13:15 15:19  
 16:1 19:16 20:14  
 22:2,21 23:22 24:12,  
 13,23 25:3  
 making 17:6  
 Man 18:3  
 manager 7:25  
 MARBLE 1:14  
 MARKED 5:4 10:15  
 matter 6:9,10 10:4  
 30:8  
 MCEA 14:2  
 mean 10:2 23:6  
 means 12:22 18:6



meant 23:8	notes 4:12	oversight 8:13	11:17, 25
measure 11:19	notice 2:7 4:9	<P>	positions 9:15
meet 7:24	number 19:7, 9 20:4	PAC 16:14 25:23	potential 27:7
Member 1:9, 12, 14, 17	22:18	27:12	Practices 1:8, 11, 13, 16, 18 7:16
mentioned 8:2, 18 9:14	NW 3:4, 14	PACs 12:17, 20, 21 16:16, 25 17:6	prepare 11:8
microphone 17:23	<O>	PAGE 5:3 14:25	prescribed 6:3
Milbank 3:14	oath 6:3 29:9 30:15	15:5 18:4 24:16	presence 4:13
Miller 3:1 5:4 6:6, 8 10:18 14:17 17:22 22:4 25:12 26:3, 9 27:21, 24 28:4, 9, 12	object 14:14 21:22 25:9 26:2 27:5	31:2, 5, 8, 11, 14, 17, 20 32:2, 5, 8, 11, 14, 17, 20	presented 17:8
Mills 20:22	occurring 24:3	paid 25:17	pretty 6:12
mind 14:10	offer 22:7 30:14	painless 27:18	primary 21:4, 15
mine 11:4, 11	offering 26:7	Paragraph 13:13 14:25 16:7 17:2 24:16	prior 8:22, 25 9:2, 3, 4 12:11, 14
missed 15:2	Office 3:9 8:1 11:23, 25	paragraphs 13:12 14:16	private 7:22 8:3, 6
mix 8:7	offices 22:23	part 12:4 17:2, 5, 7 23:19	pro 24:1, 2, 11 25:25 26:15, 20 27:3, 7
model 8:16	official 1:6, 9, 11, 14, 16, 19 4:14 27:9	participate 14:1 16:1	probable 26:6
monthly 7:24	officials 27:8	participating 13:15 15:19	probably 6:12 19:12
morning 6:7	Oh 19:21	particular 11:17 17:5, 11 18:12	Procedure 2:4 4:8
motion 9:25	Ohio 29:3, 7, 14, 20	parties 4:4 24:21 25:2 29:11	process 6:24 10:22 11:16
move 14:23	Okay 6:23 8:2, 17 9:6, 10, 17, 20 10:10 11:1, 14 12:10 13:11, 23 14:4, 18 15:24 16:6 17:9, 15 18:19 19:1, 12, 22 20:11, 18, 21 21:11 22:13, 15 23:15, 21 24:15 25:24 27:17 28:3, 9, 19	parts 15:20	Program 22:22, 23
moved 9:17	ones 9:13	party 20:25 21:3, 4, 9, 10 24:16 25:1, 6, 14, 21 27:3, 12	promised 27:17
muted 14:13	one-week 28:12	pause 11:12	proof 4:14
<N>	one-year 9:3, 4	PENALTY 30:5, 6	propose 26:19, 24
Name 18:6	open 21:15	periods 18:11	provide 14:5
named 11:24	opinion 22:8 26:4, 8 27:16	PERJURY 30:5, 6	provided 17:1
necessarily 19:16	oppose 14:1 19:13 25:18	person 6:25	provides 8:13
necessary 11:19	opposed 20:9	perspective 25:5	public 8:5 22:22 29:7, 20
need 28:15, 18	opposing 20:5	placed 6:2	publicly 22:17
neither 29:10	orange 15:11	Plaintiffs 1:4 2:3 3:1 4:6 6:8	purpose 17:5 25:17
never 9:18	organization 8:15 22:19 25:20, 22	plays 22:20	purposes 10:15
New 8:24 9:11, 13, 14, 16	organizations 8:10 26:1	please 14:12	pursuant 2:7 4:9
No.____Change 31:2, 5, 8, 11, 14, 17, 20 32:2, 5, 8, 11, 14, 17, 20	outside 13:18 25:8, 15	point 28:6	put 6:15
No.____Line 31:2, 5, 8, 11, 14, 17, 20 32:2, 5, 8, 11, 14, 17, 20	oversee 7:16	political 8:7 21:9 23:13, 24 25:2, 22	<Q>
nods 7:6		politicos 8:4	qualification 4:15
nominated 20:25		portion 15:17	qualitative 14:9
nomination 21:3		position 7:19 9:5, 13	quantitative 14:9, 16
nominees 21:8			question 11:3, 7 12:7 14:14 15:3 19:23 21:12 22:1 23:12 24:7, 25 25:11
nonelection 22:24			questions 27:20
Notary 29:7, 19			quid 24:1, 2, 11 25:25 26:15, 20 27:3, 7
			quite 8:20

<p><b>quo</b> 24:1, 2, 11 25:25 26:15, 20 27:3, 7</p> <p><b>&lt;R&gt;</b></p> <p><b>race</b> 15:12 16:9 22:6</p> <p><b>races</b> 15:8 16:8, 25 19:9 20:4, 8 22:2, 8</p> <p><b>ranked-choice</b> 22:2, 9</p> <p><b>raw</b> 11:11</p> <p><b>read</b> 18:4 30:7, 9</p> <p><b>ready</b> 7:7</p> <p><b>really</b> 27:11</p> <p><b>Realtime</b> 2:6, 7 29:6, 7, 18, 19</p> <p><b>reason</b> 27:1, 14 31:4, 7, 10, 13, 16, 19, 22 32:4, 7, 10, 13, 16, 19, 22</p> <p><b>recall</b> 22:11</p> <p><b>receive</b> 13:17 21:3 23:25</p> <p><b>received</b> 12:22 18:23, 24</p> <p><b>receiving</b> 22:17 27:10</p> <p><b>recollection</b> 13:20</p> <p><b>record</b> 7:1</p> <p><b>recount</b> 21:21</p> <p><b>reduced</b> 4:11</p> <p><b>refer</b> 15:20 16:19 18:17 23:4</p> <p><b>reference</b> 17:6</p> <p><b>references</b> 15:6</p> <p><b>referred</b> 16:12</p> <p><b>referring</b> 23:4</p> <p><b>refers</b> 15:17 18:16, 22 20:9</p> <p><b>Registered</b> 2:5 29:6, 17</p> <p><b>regular</b> 28:2, 11</p> <p><b>related</b> 29:10</p> <p><b>relating</b> 23:6</p> <p><b>relative</b> 29:12</p> <p><b>relatively</b> 27:18</p> <p><b>remember</b> 21:6</p> <p><b>REMOTE</b> 1:21 2:1 4:4, 10, 17, 19, 22 28:23 29:8, 11</p>	<p><b>repeat</b> 24:7, 24 25:10</p> <p><b>report</b> 7:21 14:5, 8</p> <p><b>Reporter</b> 2:6 4:9, 12, 15, 18, 23 17:15, 16, 21 28:2, 7, 10, 14, 19 29:6, 18</p> <p><b>reporting</b> 12:15, 21 13:4, 8 22:17</p> <p><b>reports</b> 14:6 22:17</p> <p><b>republican</b> 22:15</p> <p><b>request</b> 26:13</p> <p><b>requested</b> 6:9</p> <p><b>requirements</b> 23:13</p> <p><b>respect</b> 22:25</p> <p><b>respective</b> 4:4</p> <p><b>response</b> 27:9</p> <p><b>responsibilities</b> 7:13</p> <p><b>responsive</b> 22:1 23:11</p> <p><b>return</b> 27:10</p> <p><b>reviewed</b> 17:3</p> <p><b>Rifle</b> 2:5 29:6, 17</p> <p><b>right</b> 6:23 7:10 8:17 9:10, 17, 20 10:10 11:14 12:11, 25 13:3, 7, 23 14:18, 19 15:14 16:6, 14, 19 18:3, 4 19:6, 15, 22 20:11, 23 21:19 22:13, 14, 16 26:11 27:17</p> <p><b>risk</b> 27:13</p> <p><b>role</b> 7:11 8:19</p> <p><b>roles</b> 22:19, 24</p> <p><b>rough</b> 28:5, 16, 18</p> <p><b>rule</b> 12:25 29:14</p> <p><b>rules</b> 2:4 4:7</p> <p><b>run</b> 8:11</p> <p><b>runs</b> 8:14</p> <p><b>&lt;S&gt;</b></p> <p><b>S/O</b> 19:12</p> <p><b>SARAH</b> 1:11</p> <p><b>save</b> 30:10</p> <p><b>saying</b> 27:11</p> <p><b>SCHNEIDER</b> 1:6 30:4</p> <p><b>second</b> 8:16 18:18 28:21</p> <p><b>section</b> 17:11</p>	<p><b>see</b> 11:14 14:7, 24 18:9 20:18</p> <p><b>separated</b> 13:14</p> <p><b>servant</b> 8:6</p> <p><b>set</b> 2:8 29:9</p> <p><b>shakes</b> 7:6</p> <p><b>SHEET</b> 30:1, 13 31:1 32:1</p> <p><b>short</b> 6:12 27:18</p> <p><b>shows</b> 15:11, 15</p> <p><b>sign</b> 4:16</p> <p><b>Signature</b> 28:22</p> <p><b>SIGNATURE:</b> _____ _____ <b>DA</b></p> <p><b>TE</b> 31:23 32:23</p> <p><b>signed</b> 4:21 30:16</p> <p><b>significant</b> 8:21 25:6</p> <p><b>similar</b> 16:7</p> <p><b>simply</b> 14:6 20:24</p> <p><b>single-candidate</b> 16:16 17:6</p> <p><b>situation</b> 26:17</p> <p><b>six</b> 7:16, 17</p> <p><b>slowly</b> 7:3</p> <p><b>soft</b> 17:18</p> <p><b>solicited</b> 23:17</p> <p><b>soon</b> 7:20</p> <p><b>sooner</b> 28:4</p> <p><b>sorry</b> 10:1, 2 14:13 15:2 19:21, 22 23:8 24:24 26:3 28:20</p> <p><b>sort</b> 6:13 8:4, 5, 10, 13, 21 10:4 11:14, 17 12:5 13:12 14:8, 19 21:18 22:16 26:5 27:13</p> <p><b>source</b> 27:3</p> <p><b>speak</b> 7:2, 3</p> <p><b>specifically</b> 23:3</p> <p><b>Speech</b> 3:4</p> <p><b>spend</b> 13:25</p> <p><b>spending</b> 13:14, 18 16:15 18:7, 10 19:3, 4, 25 25:20</p> <p><b>spent</b> 26:10</p> <p><b>SS</b> 29:3</p> <p><b>staff</b> 7:16 8:13, 23 26:18</p> <p><b>start</b> 13:8 14:19</p>	<p><b>started</b> 7:8</p> <p><b>starting</b> 13:8</p> <p><b>State</b> 3:9 9:8 13:4 22:23 29:3, 7, 20</p> <p><b>STATES</b> 1:1</p> <p><b>Station</b> 3:9</p> <p><b>statute</b> 12:6</p> <p><b>stenographer</b> 7:1</p> <p><b>stenotype</b> 4:11</p> <p><b>stipulated</b> 4:3</p> <p><b>stipulations</b> 2:8</p> <p><b>stop</b> 10:1</p> <p><b>strategy</b> 10:5</p> <p><b>Street</b> 3:14</p> <p><b>studio</b> 18:1</p> <p><b>subsequent</b> 11:3</p> <p><b>sued</b> 11:22</p> <p><b>suggested</b> 13:10</p> <p><b>suggestion</b> 13:22</p> <p><b>suggestions</b> 23:23</p> <p><b>Suite</b> 3:4, 14</p> <p><b>supervised</b> 11:12</p> <p><b>support</b> 14:1 19:12 25:18</p> <p><b>supported</b> 20:9, 12, 15, 17</p> <p><b>supporting</b> 20:5</p> <p><b>sure</b> 6:15 7:14 13:24 14:22 15:6 17:14 21:6 23:11 28:8, 14</p> <p><b>suspect</b> 26:15</p> <p><b>system</b> 21:19</p> <p><b>systems</b> 21:15</p> <p><b>&lt;T&gt;</b></p> <p><b>TABLE</b> 1:1 30:3</p> <p><b>take</b> 7:1, 3</p> <p><b>taken</b> 2:4 4:8 29:9, 12 30:2, 8</p> <p><b>takes</b> 11:25</p> <p><b>talked</b> 10:23 16:22</p> <p><b>talking</b> 12:13 18:11 23:3</p> <p><b>term</b> 22:5</p> <p><b>testified</b> 6:4</p> <p><b>testimony</b> 29:8</p> <p><b>Thank</b> 17:21</p> <p><b>theoretically</b> 20:5</p> <p><b>thing</b> 16:7</p>
--	--	--	---

**think** 6:11 12:9, 13  
 13:6 17:7 21:14  
 22:5  
**three** 8:24 9:15 19:2  
**threshold** 12:15 13:4  
**time** 4:8 7:23 8:20  
 18:11  
**TITCOMB** 1:3  
**today** 6:12 28:8  
**total** 15:11, 15 18:6,  
 7, 9, 10, 21 19:2, 3, 7,  
 9, 25  
**traditional** 15:22  
 21:19  
**transcribed** 4:13  
**transcript** 4:16, 22  
 28:15, 18 29:8 30:7  
**trends** 13:8  
**trial** 9:7, 8  
**true** 29:8 30:10  
**truly** 8:5  
**try** 7:2 24:20  
**Tuesday** 2:9 28:25  
**Turning** 24:15  
**TV** 18:1  
**two** 9:2 14:15 15:9,  
 14 19:6 28:2  
**type** 25:19  
**typically** 26:23  
  
**<U>**  
**unaddressed** 12:8  
**unartfully** 19:23  
**understand** 6:15  
 13:24 14:22 20:13  
 26:25  
**understanding** 12:2,  
 14 30:13  
**UNITED** 1:1  
**use** 21:13, 15, 18  
**usually** 12:5  
**utterances** 7:6  
  
**<V>**  
**ventilation** 17:18  
**versus** 14:9 25:14  
**vertical** 15:9, 10  
**VIDEOCONFERENC**  
**E** 1:21 2:1 4:5, 10,

17, 19, 20, 22 28:23  
 29:8, 11  
**view** 25:24  
**violation** 26:18  
**vis-à-vis** 10:20  
**vote** 21:20  
**voters** 25:18  
**voting** 21:17, 19  
 22:3, 9  
**vs** 1:5 30:4  
  
**<W>**  
**waived** 4:15 28:22  
**want** 6:14 11:2  
 13:24 16:18 17:14  
 18:17 21:5 23:11  
**Washington** 3:5, 15  
**way** 15:22 24:22  
 25:3  
**WAYNE** 1:23 2:2  
 4:5 5:4 6:1, 7 10:14  
 29:9 30:19 31:24  
 32:24  
**week** 28:6  
**weeks** 28:3  
**well** 7:19 9:12, 24  
 10:21 11:2, 12, 22  
 12:12 15:6 16:22  
 18:14 20:6 21:5  
 22:24 24:2 25:16  
 26:10, 17 27:17  
**went** 13:9  
**we're** 6:24 16:4 18:2  
**WILLIAM** 1:6 30:4  
**wise** 11:19  
**wisely** 9:18  
**wish** 18:3  
**witness** 2:2 4:6, 13,  
 16, 21 5:3 14:15  
 17:17 21:25 25:10  
 26:3 27:6  
**worded** 19:23  
**words** 7:5  
**worked** 8:23 11:3  
**working** 17:23  
**writing** 4:11  
**wrote** 10:22 17:1  
  
**<Y>**

**Yeah** 6:20 11:6  
 15:4 20:18 21:13  
 22:6 24:8 25:1, 13  
 26:25 28:7  
**year** 15:13, 17 18:6,  
 13, 23  
**years** 7:19, 20 8:25  
 9:2 15:7, 9 16:12  
 26:10  
**yellow** 15:15, 17  
**York** 8:24 9:11, 13,  
 14