

IN THE SUPREME COURT OF OHIO

STATE OF OHIO <i>ex rel.</i> CITIZENS	:	Case No. 2024-1200
NOT POLITICIANS, <i>et al.</i> ,	:	
Relators,	:	Original Action in Mandamus Pursuant
	:	to Article XVI, Section 1 of the Ohio
	:	Constitution
vs.	:	
	:	Expedited Election Case
OHIO BALLOT BOARD, <i>et al.</i> ,	:	Pursuant to Supreme Court Rule of
	:	Practice 12.08
Respondents.	:	

BRIEF *AMICUS CURIAE* OF OHIO WORKS IN SUPPORT OF RESPONDENTS

Donald J. McTigue (0022849)
Counsel of Record
MCTIGUE & COLOMBO, LLC
545 East Town Street
Columbus, OH 43215
(614) 263-7000
dmctigue@electionlawgroup.com

Ben Stafford (PHV Pending)
ELIAS LAW GROUP LLP
1700 Seventh Ave., Suite 2100
Seattle, WA 98101
(206) 656-0176
bstafford@elias.law

Emma Olson Sharkey (PHV Pending)
Jyoti Jasrasaria (PHV Pending)
Omeed Alerasool (PHV Pending)
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Suite 400
Washington, DC 20002
(202) 968-4490
eolsonsharkey@elias.law
jjasrasaria@elias.law
oalerasool@elias.law

Counsel for Relators

David R. Langdon (0067046)
Counsel of Record
Riley E. Kane (0100141)
LANGDON LAW LLC
1201 Main Street, Ste. 2
Cincinnati, OH 45202
(513) 577-7380
dlangdon@langdonlaw.com
riley@langdonlaw.com

Counsel for Amicus Curiae Ohio Works

Dave Yost (0056290)
OHIO ATTORNEY GENERAL

Julie M. Pfeiffer (0069762)
Counsel of Record
Michael A. Walton (0092201)
Stephen Tabatowski (0099175)
Kristopher Haines (0080558)
Mark Tucker (0036855)
ASSISTANT ATTORNEYS GENERAL,
CONSTITUTIONAL OFFICES SECTION
30 East Broad Street, 16th Floor
Columbus, OH 43215
(614) 466-2872
Julie.Pfeiffer@OhioAGO.gov

Counsel for Respondents

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INTEREST OF *AMICUS CURIAE*

Ohio Works is an Ohio nonprofit organization dedicated to advancing public policy that protects and defends Ohio working families. It is registered with the Ohio Secretary of State as a ballot issue political action committee and is the official organization designated by the Ballot Board to prepare the arguments against the Redistricting Commission Amendment (hereafter, the “Amendment”).

INTRODUCTION

Relators, the proponents of the Amendment and their *Amicus* (collectively the “Proponents”), seem to think that assigning the task of drawing district maps to people who are not actively, formally engaged in politics and restricting their decision-making by using aggregated statewide data will end gerrymandering. It will not. Even if the Amendment is passed, districts will still be cracked and packed, there will still be snake- and salamander-shaped districts, and voters will still be placed in districts designed to advantage the “other” political party. However, the process will now be sprinkled with the magic dust of new complex procedures, a seemingly endless number of public meetings, and the so-called “independent” commissioners. It will not be the end of, but rather, a new era for gerrymandering—now to be conducted by technocrats wielding considerable influence over a new branch of the administrative state.

The Proponents argue that the Amendment’s removal of incumbent elected officials and statewide partisan balancing procedures categorically cannot be called gerrymandering, but they argue based on their own preferred definition. Gerrymandering, however, is a broader concept than Proponents would prefer. While resisting a precise all-encompassing definition, gerrymandering certainly has obvious hallmarks, one of which is intentionally creating districts

to favor a specific party. Perhaps the Amendment’s Proponents realize that neither law nor facts are on their side, and so they have unfortunately (but not surprisingly) stooped to *ad hominem* table-pounding, going so far as to republish and disseminate a defamatory attack on Secretary LaRose and the Ballot Board.¹

The Amendment’s text states that it seeks “[t]o ban partisan gerrymandering and prohibit the use of redistricting plans that favor one political party and disfavor others” but the immediately following section prescribes a method for determining “the statewide proportion of districts in each redistricting plan that favors each political party[.]” Amendment at §6(B). The Proponents seem to view that as exculpatory, but it seems more like a contradiction that will be heavily litigated if this Amendment passes. “Gerrymandering” is clearly the subject of this amendment. The question then, is whether drawing districts to favor a political party can accurately be called “gerrymandering.” It can be—perhaps not based on the Proponents’ idiosyncratic definition, but certainly based on a host of other publicly available and more common definitions. As a result, the Court, consistent with its prior ruling in *Ohioans United*,² should not deem “gerrymander” argumentative and defer to the Ballot Board’s language.

STATEMENT OF FACTS

Ohio Works adopts the Respondents’ Statement of the Facts.

¹ Citizens Not Politicians, *Instagram Post of Aug. 28, 2024*, available at https://www.instagram.com/citizensnotpoliticians/p/C_LXhyzS_uY/ (accessed Aug. 31, 2024) [<https://perma.cc/Z4AM-5FKG>] (republishing the following statement from Cleveland.com: “The ballot board is as criminal as Frank Larose here. They’re just as bad as he is.”) (miscapitalization of LaRose in original).

² *State ex rel. Ohioans United for Reproductive Rights v. Ohio Ballot Bd.*, 2023-Ohio-3325 (“*Ohioans United*”).

LAW AND ARGUMENT

Ohio’s Constitution vests the authority to determine ballot language that “properly identif[ies] the substance of the proposal to be voted upon” in the Ballot Board. Art. XVI, Section 1. And states that the Board’s “ballot language shall not be held invalid unless it is such as to mislead, deceive, or defraud the voters.” *Id.* That is a high bar.

Ballot language must “fairly and accurately present a statement of the question or issue to be decided in order to assure a free, intelligent and informative vote by the average citizen affected.” *Markus v. Trumbull Cty. Bd. of Elections*, 22 Ohio St. 2d 197, 203 (1970).

Last year, after a similar barrage of pedantic criticisms against valid ballot language, the Court explained the Constitution’s mandate in detail:

While relators do not like the way in which the language is phrased ... this court will not deem language to be argumentative when it is accurate and addresses a subject in the proposed amendment.

...

[W]hether the ballot board could have employed better language is not the issue before us. “[T]he sole issue is whether the board’s approved ballot language ‘is such as to mislead, deceive, or defraud the voters.’” Thus, the ballot board’s language is not invalid simply because this court “might have used different words to describe the language used in the proposed amendment.”

Ohioans United, 2023-Ohio-3325, ¶¶ 20, 41 (internal citations omitted).

This year appears to be no different. Proponents of a ballot measure that have neglected to define one of its critical components are improperly asking this Court to substitute their judgment for that of the Ballot Board. The Court should decline this invitation to correct Proponents’ oversight.

I. Intentionally creating districts to favor a political party is gerrymandering.

Proponents and the Ballot Board disagree over the definition of “gerrymander.” The Proponents seem to have a specific, more limited understanding of the term than the Ballot

Board. The Proponents are entitled to have and share their own opinions, but the Constitution vests the responsibility for writing ballot language with the Ballot Board, so the Court defers to its language so long as it is not false and will not mislead, deceive, or defraud voters. The question then, is whether the procedures described in the Amendment could reasonably be described as gerrymandering.

“Gerrymandering” has no fixed definition. The term is undefined in the Revised Code, the Constitution and, despite purporting to “ban partisan gerrymandering,” the Amendment. Courts frequently have discussed gerrymandering, but usually in paragraphs, without ever defining it.³ Additionally, courts have made statements about gerrymandering that point to definitions, but are not definitions themselves.⁴ Black’s Law Dictionary describes it as “[t]he practice of dividing a geographical area into electoral districts, often of highly irregular shape, to give one political party an unfair advantage by diluting the opposition’s voting strength.”⁵

But since the applicable legal standard is based on the understanding of the average citizen rather than judicial opinions or law dictionaries, commonly used online reference materials likely provide the definition closest to what an ordinary Ohioan will understand when they read “gerrymander.” The Cambridge Dictionary definition of gerrymander is “to change the borders of an area in order to increase the number of people within that area who will vote for a particular

³ See, e.g., *Rucho*, 588 U.S. at 696–710 (discussing gerrymandering’s history, the different types, and the philosophical underpinnings of why it is a problem); *Gaffney v. Cummings*, 412 U.S. 735, 753, 93 S. Ct. 2321, 2331 (1973) (discussing, but never defining gerrymandering).

⁴ See, e.g., *League of Women Voters of Ohio v. Ohio Redistricting Comm’n*, 2022-Ohio-65, ¶ 151 (“Gerrymandering at its core prevents voters from voting on equal terms to alter or reform their government.”) (Brunner, J., concurring).

⁵ *Black’s Law Dictionary* (10th Ed. 2014).

party or person.”⁶ The Collins Dictionary definition is “to divide the constituencies of (a voting area) so as to give one party an unfair advantage ... to manipulate or adapt to one’s advantage.”⁷ Merriam-Webster defines it as acting “to divide or arrange (a territorial unit) into election districts in a way that gives one political party an unfair advantage ... to divide or arrange (an area) into political units to give special advantages to one group.”⁸ From a sampling of easily accessible online sources,⁹ gerrymandering can essentially be defined as a process involving the intentional manipulation of district boundaries to give one party an unfair advantage.

The Proponents’ objection to the use of “gerrymandering” appears to be based on their own narrow interpretation of the term tailored to promote the passage of the Amendment. Pro Issue 1 campaign materials focus on gerrymandering mainly as incumbents’ involvement in

⁶ Cambridge Dictionary, *Gerrymander*, available at <https://dictionary.cambridge.org/us/dictionary/english/gerrymander> (accessed Aug. 30, 2024) [<https://perma.cc/2SUD-AXAW>].

⁷ Collins Dictionary, *Gerrymander*, available at <https://www.collinsdictionary.com/dictionary/english/gerrymander> (accessed Aug. 31, 2024) [<https://perma.cc/D7G6-8H9M>].

⁸ Merriam-Webster, *Gerrymander*, available at <https://www.merriam-webster.com/dictionary/gerrymander> (accessed Aug. 30, 2024) [<https://perma.cc/8G4B-AA5B>].

⁹ See, e.g., Oxford Reference, *Gerrymandering*, available at <https://www.oxfordreference.com/display/10.1093/oi/authority.20110803095849914> (accessed Aug. 31, 2024) [<https://perma.cc/7C4Q-Z4WD>] (“Redrawing constituency boundaries for political gain. It involves ‘careful drawing of constituency boundaries by a party so that either it wins a particular seat or, more generally, it wins more seats than its opponents’[.]”); Wikipedia, *Gerrymandering*, available at <https://en.wikipedia.org/wiki/Gerrymandering> (accessed Aug. 30, 2024) [<https://perma.cc/PAB6-NUAJ>] (“the political manipulation of electoral district boundaries with the intent to create undue advantage for a party, group, or socioeconomic class within the constituency.”); Britannica Encyclopedia, *Gerrymandering*, available at <https://www.britannica.com/topic/gerrymandering> (accessed Aug. 30, 2024) [<https://perma.cc/L7GD-8PCJ>] (“gerrymandering, in U.S. politics, the practice of drawing the boundaries of electoral districts in a way that gives one political party an unfair advantage over its rivals”).

redistricting.¹⁰ Additionally, the Amendment’s use of a “statewide partisan balance” and *Amicus* Campaign Legal Center’s citations to United States Supreme Court precedents suggests that the Amendment’s proponents are thinking about gerrymandering only at the state, not the local, level. The Amendment’s proponents are entitled to their view, but it is only a part of gerrymander’s whole definition. The Amendment’s proponents’ best argument probably comes from *Amicus* Campaign Legal Center’s quote from Professor Griffith’s 1907 dissertation that the Supreme Court cited in *Rucho*,¹¹ but it is just a definition from a single scholar placed at the start of a more than ten-page discussion. The voluminous discussions about gerrymandering in courts and the academy testify to the concept’s breadth. The truth is that a complete understanding gerrymandering, which is reflected in the current ballot language, is broader than the Amendment’s Proponents would like. Ultimately, however, they have no one to blame but themselves, for their failure to define this critical terminology in the Amendment.

II. Gerrymandering accurately describes what the Amendment would require.

The fundamental question is whether what the Amendment would require fits the general description of gerrymandering. It does. The Amendment mandates that districts be drawn to

¹⁰ Citizens Not Politicians, *It’s time to end gerrymandering in Ohio*, accessible at <https://www.citizensnotpoliticians.org/> (accessed Aug. 30, 2024) [<https://perma.cc/5658-U2TM>] (“When politicians draw biased, ridiculously shaped voting districts to favor their own interests, it’s called gerrymandering[.]”); Campaign Legal Center, *What is Gerrymandering?*, accessible at <https://campaignlegal.org/update/what-gerrymandering> (accessed Aug. 30, 2024) [<https://perma.cc/5WVJ-FARW>] (“Partisan gerrymandering” is “creating political maps that enable a political party to gain a systemic advantage for itself.”). *See also* Fair Districts Ohio, *Ohioans Deserve Fair Representation*, available at <https://www.fairdistrictsohio.org/> (accessed August 30, 2024) [<https://perma.cc/4LFP-DFDQ>] (Gerrymandering “is when electoral districts are drawn by incumbent politicians to maintain their power, with the intention of influencing elections to their advantage” and state that the gerrymandering’s main goal is “for the political party in power to maintain their power by rigging districts in their favor.”).

¹¹ Brief of Amicus Curiae Campaign Legal Center at 4 (*citing Rucho*, 588 U.S. at 697).

account for the “statewide partisan preferences of the voters of Ohio.” Amendment at §6(B).¹² That phrase is defined as the median of the proportion of votes for Republican and Democratic candidates in every statewide election in the preceding six years. *Id.* at §6(B)(2). The Amendment gives instructions for determining the number of districts that will favor each party: (1) take each proportion referenced before, (2) divide it by the total number of districts to determine the proportion of districts that “would have been won,”¹³ and (3) from the proportion of districts that “would have been won” calculate the median for both parties, which will be the number of districts drawn to favor them. *Id.* at §(B)(1)–(3). The Amendment does *encourage* certain decisions when drawing districts (such as maintaining the cohesion of minority communities, other “communities of interest,” and political subdivisions), but none of that is required and commissioners are given complete discretion to decide which communities merit preservation. *Id.* at §(C).

The Amendment establishes a formula for how to draw districts (which will very likely be of an irregular shape due to other requirements in the Amendment) that will give Democrats an advantage in some districts and Republicans in others. This outcome is consistent with the Black’s Law Dictionary definition of gerrymandering as well as the definitions in commonly available online reference materials.

The Proponents will likely say their system is fair, so it cannot be “gerrymandering”—but fair to who? The United States Supreme court has observed that fairness is a fraught question, as

¹² The Amendment does also require that the maps conform to federal redistricting laws, but this is no change from that status quo. *Id.* at §6(A).

¹³ This phrase (as well as the nonchalant language about splitting communities of interest at §6(C)(3)(d) betrays the drafter’s apparent belief that aggregate representation is more important than individual representation, that districts are mere statistics, not communities, that an elected official’s primary tie should be to the statewide party, not to the people of the place that elected them.

deciding among “different visions of fairness (you can imagine many []) pose[] basic questions that are political, not legal.” *Rucho*, 588 U.S. at 707; *see also id.* at 704–710 (discussing generally the problem of “fairness” in redistricting). Is a system that intentionally gives an advantage to one or the other political party in a certain district fair in general? How will the districts that favor Republicans versus Democrats be chosen? Is a system intentionally designed to maroon voters in districts designed to favor the election of a candidate opposed to their values, fair to the minority? Is a system that requires diverse communities of interest across the state to be split apart in the name of “statewide partisan balance” fair to the people whose communities get split?

Further, recent opinions from Justices on this Court describe procedures that this Amendment would require when condemning gerrymandering. The dissent in the second *League of Women Voters* case dedicated a full subsection to describing how the majority opinion (which called for procedures similar to those in the Amendment) would

... require the commission to intentionally gerrymander the General Assembly-district plan in order to overcome the political geography of Ohio in which Democrats are more concentrated in urban areas while Republican voters dominate the suburban and rural areas of the state. To draw five more safe Democratic-leaning districts, the commission will have to crack the areas in which Democrats live and pack them into new districts containing far-flung Republican voters in the suburbs and rural areas.

The problem ... is that creating these districts requires intentional gerrymandering and violates Article XI’s neutral map-making requirements. The “pizza slice” districts would ... divid[e] too many municipalities and townships, while the “snake” districts would violate [the] prohibition of excessive divisions of counties ... [and] would also require the commission to violate the ... duty ... to draw compact districts....

It also will require the commission to go to absurd lengths to dilute Republican votes in urban counties ... cracking Republican-leaning areas of the county and packing them with urban areas where Democrats predominate. This intentional gerrymandering therefore unnecessarily dilutes the votes of Republican voters in the areas surrounding cities.

League of Women Voters of Ohio v. Ohio Redistricting Comm'n, 2022-Ohio-342, ¶¶ 124–126

(Kennedy and DeWine, JJ., dissenting).

In the fourth *League of Women Voters* case, a dissent emphasized how

every expert in this case—including the independent map drawers—to opine on the issue has acknowledged, the political geography of Ohio makes it nearly impossible to meet the majority’s requirement to achieve partisan symmetry in the makeup of competitive districts. The majority’s answer is to require the commission to reverse-gerrymander (or hire map drawers who will)—that is, carve up Ohio’s metropolitan areas like a pie to maximize the number of solidly Democratic districts. In doing so, it commands exactly what the Constitution forbids: gerrymandering.

League of Women Voters of Ohio v. Ohio Redistricting Comm'n, 2022-Ohio-1235, ¶¶ 141

(DeWine, J., dissenting).

The Proponents broadly make two arguments, both of which are unconvincing.

First, they claim that the Amendment simply cannot require gerrymandering because its text states that its goal is “[t]o ban partisan gerrymandering and prohibit the use of redistricting plans that favor one political party and disfavor others...”¹⁴ But the section immediately following that nice sentiment instructs map makers on how they “shall” determine the “statewide proportion of districts... that favors each party...”¹⁵ which, as discussed above, *is gerrymandering!* That argument highlights that the Amendment is poorly written at best. At worst, it demonstrates Orwellian thinking on the part of the drafters and is the stuff of a future constitutional crisis, probably as soon as the first set of maps are drawn and challenged.

Second, the Proponents claim that the ballot language is inaccurate based on the Supreme Court permitting commissions to create statewide proportional maps as the Amendment

¹⁴ Brief of Amicus Curiae Campaign Legal Center at 3 (quoting the Amendment).

¹⁵ Amendment at §6(B)(1).

envisions.¹⁶ Both citations miss the point of the issues present in this case, which is about approving ballot language, not the constitutionality of a proposed redistricting process. And further, these are United States Supreme Court cases interpreting federal redistricting law, which Ohio cannot contravene, but also need not operate in lockstep with.¹⁷

CONCLUSION

As this Court held in the most recent ballot language case, “whether the ballot board could have employed better language is not the issue” and while the Amendment’s proponents may “not like the way in which the language is phrased, the structure of the statement[] is not improperly argumentative” because “this court will not deem language to be argumentative when it is accurate and addresses a subject in the proposed amendment.”¹⁸ What the Amendment requires is consistent with the definition of gerrymandering as it would be understood by the average citizen. The Ballot Board’s use of “gerrymander” is anything but misleading, deceptive, or factually inaccurate—it is a concise summary of what the Amendment would require.

Respectfully submitted,

/s/ David R. Langdon

David R. Langdon (0067046)

Counsel of Record

Riley E. Kane (0100141)

LANGDON LAW LLC

1201 Main Street, Ste. 2

Cincinnati, OH 45202

(513) 577-7380

dlangdon@langdonlaw.com

Counsel for Amicus Curiae Ohio Works

¹⁶ Brief of *Amicus Curiae* Campaign Legal Center at 4–5 (citing *Gaffney* and *Rucho*).

¹⁷ See generally, Hon. Jeffrey Sutton, *51 Imperfect Solutions* (2018) (discussing the phenomena of “lockstepping,” where state courts unnecessarily default to following federal standards despite differences between their laws).

¹⁸ *Ohioans United*, 2023-Ohio-3325, ¶¶ 20, 41.

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2024, the foregoing was filed electronically using the Court's e-filing system. I further certify that the foregoing was served by electronic mail on:

Donald J. McTigue (0022849)
McTIGUE & COLOMBO, LLC
545 East Town Street
Columbus, OH 43215
dmctigue@electionlawgroup.com

Ben Stafford
ELIAS LAW GROUP LLP
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
bstafford@elias.law

Emma Olson Sharkey
Jyoti Jasrasaria
Omeed Alerasool
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW, Ste. 400
Washington, DC 20001
eolsonsharkey@elias.law
jjasrasaria@elias.law
oalerasool@elias.law

Dolores P. Garcia (0085644)
UB GREENSFELDER LLP
1100 Skylight Office Tower
1660 West Second Street
Cleveland, Ohio 44113
dgarcia@ubglaw.com

Simone T. Leeper*
CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
sleeper@campaignlegal.org

Dave Yost (0056290)
OHIO ATTORNEY GENERAL
Julie M. Pfeiffer (0069762)
Michael A. Walton (0092201)
Stephen Tabatowski (0099175)
Kristopher Haines (0080558)
Mark Tucker (0036855)
ASSISTANT ATTORNEYS GENERAL,
CONSTITUTIONAL OFFICES SECTION
30 East Broad Street, 16th Floor
Columbus, OH 43215
Dave.Yost@OhioAGO.gov
Julie.Pfeiffer@OhioAGO.gov
Michael.Walton@OhioAGO.gov
Stephen.Tabatowski@OhioAGO.gov
Kristopher.Haines@OhioAGO.gov
Mark.Tucker@OhioAGO.gov

/s/ David R. Langdon
David R. Langdon