CUYAHOGA COUNTY
BOARD OF ELECTIONS

Jeff Hastings, Chairman

Inajo Davis Chappell, Board Member

Lisa M. Stickan, Board Member

David J. Wondolowski, Board Member

Anthony W. Perlatti, Director

Anthony Kaloger, Deputy Director

MEETING AGENDA **October 18, 2021** **9:30 A.M.**

THE PLEDGE OF ALLEGIANCE

ADMINISTRATIVE

1. Approval of the minutes from the October 1, 2021, Board Meeting
2. Acknowledgment of Secretary of State Memorandum and Directive:
   a. Memorandum 2021-03: Responsibilities of Sheriffs and Chiefs of Police in the 2021 General Election (**NOTICE: Pursuant to R.C. 149.433, this document is not subject to disclosure as a public record**)
   b. Directive 2021-20; advisory 2021-05; Unofficial and Official Canvasses of the November 2, 2021, General Election

CANDIDATE AND PETITION SERVICES

3. Acknowledgment of deaths in, resignations from, and appointments to elected office
4. Acknowledgment of withdrawal of candidate from the November 2, 2021 General Election

ELECTION OFFICIALS

5. Authorization to pay: 295 Voting Location Managers x $200 = $59,000; 320 Voting Location Deputies x $200 = $64,000; 3,178 Precinct Election Officials x $172.10 = $546,933.80; 295 Sanitation Officials x $200 = $59,000; 150 Election Substitute Officials x $100 = $15,000 for the November 2, 2021, General Election

ELECTION SUPPORT

6. Authorization to process payment in the amount not-to-exceed $29,250.00 for 101 private voting locations being used for the November 2, 2021, General Election
7. Final authorization for the allocation of voting booths for the November 2, 2021, General Election. Allocation quantities are based on Social Distancing and room size per polling location. A total of 4, 613 voting booths will be allocated + 836 DS200 precinct scanners + 295 ADA AutoMark voting units and 1,131 Electronic Poll books

Video of this meeting can be viewed at https://www.youtube.com/CuyahogaCountyBOE

[1] Please email mbejjani@cuyahogacounty.gov or lwalker@cuyahogacounty.gov with your name and the nature of your comment so we can fully assist you.

FISCAL

8. Approval of Purchase Award Recommended to Marketing Communication Resource, Inc. (MCR) in the amount of $38,146.05 to Print and Deliver Voter Assistance Table Guides, Alphabetic Backup Paper Poll Books, Poll Location Voter Lists, Precinct Voter Lists, and associated Programming Charges for the November 2, 2021, General Election
9. Approval of Vouchers

REGISTRATION

10. Challenge of right to vote filed by Ryan Routh against Mordechai Rennert

NEW BUSINESS

- Update on November 2, 2021, General Election

PUBLIC COMMENT[1]

EXECUTIVE SESSION

Discussion of personnel issues (to consider the appointment, employment, dismissal, discipline, promotion, demotion, or compensation of a public employee or official) and disputes involving the public body that are the subject of pending or imminent court action.

CUYAHOGA COUNTY
BOARD OF ELECTIONS

2021 Board Meeting Schedule

October 2021

Friday, October 1st @ 9:30AM	Certification of the September 14th Primary Election
Monday, October 18th @ 9:30AM	Certification of the Recount from the September 14th Primary Election

November 2021

Tuesday, November 2nd	November 2nd General Election
Monday, November 15th @ 9:30AM	Provisional Certification for the November 2nd General Election
Monday, November 22nd @ 2:00PM	Certification of the November 2nd General Election

December 2021

Monday, December 6th @ 9:30AM	Certification of the Recount from the November 2nd General Election
Tuesday, December 7th	December 7th Run Off Election **(if needed)**
Monday, December 20th @ 9:30AM	Certification of the Audit from the November 2nd General Election Certification of the December 7th Run Off Election **(if needed)**

CUYAHOGA COUNTY
BOARD OF ELECTIONS

Board Meeting
10/1/2021

Attending:

Jeff Hastings, Chairman
Inajo Davis Chappell, Board Member
Lisa M. Stickan, Board Member
David Wondolowski, Board Member
Anthony W. Perlatti, Director
Tony Kaloger, Deputy Director

Mark R. Musson, Assistant Prosecutor, Cuyahoga County/via teleconference
Mary Bejjani, Clerk to the Board
Linda Walker, Clerk to the Board

The Cuyahoga County Board of Elections Meeting began at 9:32 a.m. Hereinafter referred to as the CCBOE/Board.
Chairman Hastings noted that all Board Members were in attendance.

Agenda Item 1: Approval of the minutes from the September 28, 2021, Board Meeting.

Chairman Hastings moved to approve the minutes from the September 28, 2021, Board Meeting. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 2: Acknowledgment of Secretary of State Advisory 2021-05; State ex rel. Ferrara v. Trumbull County Board of Elections

Chairman Hastings moved to acknowledge the Secretary of State Advisory 2021-05; State ex rel. Ferrara v. Trumbull County Board of Elections. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 3: Certification of the official results of the September 14, 2021, Primary Election

Brian Cleary, Ballot Department Manager, presented information from the Board packet regarding the Certification of the official results of the September 14, 2021, Primary Election.

- Authorization to approve the remake of the optical scan ballots from the September 14, 2021, Primary Election

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[1] Narrative that is underlined in the CCBOE minutes relates to a motion that was acted on by the Board.

Chairman Hastings moved to authorize to approve the remake of the optical scan ballots from the September 14, 2021, Primary Election. Board Member Wondolowski seconded. The motion passed unanimously.

- Authorization to approve absentee ballots from the September 14, 2021, Primary Election

Chairman Hastings moved to authorize to approve the absentee ballots from the Primary Election of September 14, 2021. Board Member Wondolowski seconded. The motion passed unanimously.

- Authorization to approve provisional ballots from the September 14, 2021, Primary Election

Chairman Hastings moved to approve the provisional ballots from the September 14, 2021, Primary Election. Board Member Wondolowski seconded. The motion passed unanimously.

- Acknowledgment of the pre & post-test results of the vote tabulation system from the September 14, 2021, Primary Election

Chairman Hastings moved to acknowledge the pre & post-test results of the vote tabulation system from the September 14, 2021, Primary Election. Board Member Wondolowski seconded. The motion passed unanimously.

Board Member Davis Chappell inquired why the Early In-Person (EIP) and Vote-by-Mail (VBM) does not begin until October 7, 2021, for certain municipalities. Director Perlatti stated there are two start dates for EIP and VBM for the November 2, 2021, General Election. For a political subdivision that did not have a September Election, EIP and VBM will begin Tuesday, October 5, 2021. For a political subdivision that had a September 14, 2021, Primary Election, per statute, once the September Primary Election is certified, there is five-calendar days wherein a party may request and pay for a recount. There are no automatic recounts for the September Election. After the five-day recount period concludes, the CCBOE the issues a Certificate of Nomination which allows the candidates to appear on the November 2, 2021, General Election ballot. The five-day window expires on Wednesday, October 6, 2021, at 4:00 p.m. On Thursday, October 7, 2021, the 442 precincts involved in the September Election will be mailed the VBM ballot or able vote in person at the CCBOE. Chairman Hastings asked how the affected voters were being notified about this two-day delay. Director Perlatti stated there is a marketing effort and any affected voters who comes to the CCBOE for EIP voting will be given a notice explaining which municipalities are included and when EIP and VBM start for those affected municipalities. The CCBOE has also notified all the candidates, the two major political parties, posted the information on the CCBOE website, sent out press releases to the media on October 1st and on October 4th, and held a press conference and the County Executive's Communication Department has also been notified. Board Member Davis Chappell asked if community leadership has been informed. Mike West, Manager of Community Outreach, stated the community leaders and mayors will be notified now that the September Election has been certified. Chairman Hastings asked if affected voters could by law vote provisionally in this circumstance. Assistant Prosecutor Musson along with director Perlatti stated they would need to investigate the question and will follow up with the Board. Chairman Hastings asked if the SOS is aware voting will not open to the municipalities involved in the September Election.

Chairman Hastings moved to certify the official results of the September 14, 2021, Primary Election. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 4: Acknowledgment of the post-election audit for the September 14, 2021, Primary Election.

Brian Cleary, Ballot Department Manager, stated that there are 19 eligible races for the post-election audit. The contests were written on sheets of paper and placed in a bin. Board Member Wondolowski randomly selected a paper from the bin and stated Cleveland Council Ward 2 was selected. Chairman Hastings confirmed Cleveland Council Ward 2 was chosen for the post-election audit for the Primary Election of September 14, 2021. The date and time of the audit will be determined when the November 2, 2021, General Election is certified.

Chairman Hastings moved to acknowledge Cleveland Council Ward 2 for the post-election audit for the September 14, 2021, Primary Election. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 5: Final approval of the ballot order for the November 2, 2021, General Election

Brian Cleary, Ballot Department Manager, presented information from the Board packet regarding the final approval of the ballot order for the November 2, 2021, General Election.

Chairman Hastings moved to approve the final ballot order for the November 2, 2021, General Election. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 6: Acknowledgment of death in elected office

Chairman Hastings moved to acknowledge the death in elected office. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 7: Acknowledgment of resignation from elected office

Chairman Hastings moved to acknowledge the resignation from elected office. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 8: Acknowledgment of withdrawal of candidate from the November 2, 2021, General Election

Chairman Hastings moved to acknowledge the withdrawal of a candidate from the November 2, 2021, General Election. Board Member Wondolowski seconded. The motion passed unanimously.

Agenda Item 9: Approval of vouchers

Chairman Hastings moved to approve the vouchers. Board Member Wondolowski seconded. The motion passed unanimously.

NEW BUSINESS

National Voter Registration Day (NVRD)

Director Perlatti provided an update on National Voter Registration Day, which took place on Tuesday, September 28, 2021. The CCBOE serves administratively, working with various organizations across the County. Cleveland VOTES, a non-profit organization, also participates and recruits volunteers for NVRD. The CCBOE provides volunteers with materials and training and provides the CCBOE's building as a meeting site. The CCBOE set a goal of gathering 2,000 new voter registrations and updates and exceeded the goal of collecting approximately 2,400 voter registrations and updates. There were 30 local partners involved at 36 event locations which those organizations staff and secure the sites. The CCBOE held events at libraries located in Strongsville, North Royalton, and Mayfield Village. The CCBOE was also at Public Square and in the CCBOE parking lot. The media coverage was very good, broadcasting at least 11 local news stories about voter registration. Elia Burgos, Community Outreach Coordinator, did an excellent job coordinating the coverage. The Election Officials Department also provided staff to promote voter registration and the Vote-by-Mail program, and recruit Election Day officials. The CCBOE promoted NVRD through social media, and analytics indicated over 9,000 click interactions. Board Member Davis Chappell stated the coverage she observed was wonderful and thanked the Community Outreach Department and all those involved for the hard work and great job on NVRD.

Chairman Hastings stated the CCBOE received notification from two outreach groups regarding their interest in registering individuals. Deputy Director Kaloger stated the two organizations were The Voter Participation Center and The Center for Voter Information, and their goal is to get more people to register to vote. The organizations notified the CCBOE that approximately 87,000 letters would be mailed in Cuyahoga County. The organizations identify young people who recently turned 18, recently moved, and people of voting age but not registered by using different databases and compare the information to voter registration databases. In the past, the wording of the letters from these two organizations created confusion regarding the recipient's voter registration status, and it prompted a flood of calls to the CCBOE. Since that time, the two organizations have worked with the Secretary of State's office to modify the wording of the correspondence. The organizations began to mail the modified letters on September 22, 2021. According to the CCBOE Registration Department, the calls are minimal, and there are no increased calls and confusion.

Update on the November 2, 2021, General Election

Director Perlatti stated the close of registration would be Monday, October 4, 2021, and the start times for absentee voting. The CCBOE will have voting location changes in Brook Park, North Royalton, and one location in Cleveland. Brook Park is going from two voting locations to four locations, so each of the four wards has its own location. The CCBOE has worked with the Brook Park Mayor to get the word out to voters. The Brook Park change will impact six precincts and approximately 6,100 voters. A location change was also necessary for North Royalton due to two school buildings closing. In working with the North Royalton Mayor and School Board, the CCBOE will be going from six to five locations. The change will impact 11 precincts and approximately 11,000 voters. The mayor committed to communicating these changes to the voters. In Cleveland, the one location change is Plymouth Church. The church was used as a polling location in August, but there was a conflict using the location in September, so the polling location was moved to Our Lady of Peace Church. Plymouth Church no longer has the issue, so

the voting location will be transferred back to Plymouth. The wards affected for the location are Ward 4, precincts Q, R, and S, and Ward 6, precinct T, impacting approximately 3,600 voters. All voters have been notified of the changes. Poll worker checks for September were mailed out this week, and now there will be a single focus for placing poll workers for November. The CCBOE has one-third of the election day workers placed and trained, including 1,400 Precinct Election Officials. The recruitment numbers will increase over the following weeks, with part of the CCBOE staff starting later in the day to recruit into the early evening to increase the success rate of reaching people. There are also more resources focused on recruitment for November and sending a large number of emails to workers. Projections are to have three to three and a half workers per precinct for the November election. County-wide voter turnout is anticipated to be about 30% or approximately 265,000 voters, based on voting figures from 2017 and 2013. Approximately 80,000 plus people are anticipated to vote-by-mail. To date, the CCBOE has processed approximately 19,000 vote-by-mail ballot applications. Voters are now receiving the Voter Information Guide, which increases voter activity. The CCBOE has now received about 3,000 vote-by-mail ballot applications and processing about 3,000 requests for the vote-by-mail applications to be mailed to voters every day.

Board Member Davis Chappell requested to re-visit poll worker paychecks, stating the CCBOE wants people to work, but one of the disincentives may be the turnaround time to receive compensation. Director Perlatti stated the CCBOE is always looking for ways to make the process quicker. The process takes the CCBOE about 14 calendar days to create the payroll file for over 4,000 people. Several factors need to be confirmed, including no-shows, call-offs, and changes in positions which could affect the pay rate. It takes a couple of days for this information to be gathered before beginning the payroll data entry. Once the date entry is completed, there are two rounds of proofing. Once the payroll file is ready, it is sent to the County, which produces checks twice a week, and typically takes the County one week to send the checks back. When the paychecks come back to the CCBOE, the checks are manually stuffed and mailed via the U.S. Postal Service, which also takes time. One solution for November is to put more resources into the process to improve the turnaround. The challenge this year has been splitting resources due to the overlap in five elections. Board Member Davis Chappell stated she appreciated the timeline, and the processes need to be done accurately. The poll worker payroll turnaround is important and may impact our poll worker recruitment. People are serving as a civic duty, but people need to be paid timely. Director Perlatti stated the CCBOE needs to better establish expectations as to the compensation timeframe.

Chairman Hastings asked how the redrawing of the districts works. SOS Directive 2021-04 sets forth the legislative authority for cities sub-dividing their cities and wards within 90 days after October first. Director Perlatti stated some of the municipalities, especially the chartered communities, would require the re-balance of their wards based on either population or registered voters. The charter communities will independently redraw their communities and submit to the CCBOE the legal definitions of their boundaries. The CCBOE then applies this information when drawing precinct and ward boundaries. The CCBOE has yet to receive this information from any municipality. The CCBOE also has deadlines where precinct boundaries cannot be changed too far in front of a primary, especially when electing precinct committee persons for each major party. In gubernatorial years the Democrats elect their precinct committee persons, and in presidential years the Republicans elect theirs. County Council is a chartered community, and they have provided us with legal definitions for the County districts. The CCBOE will begin creating the maps and have staff proof the legal definitions of the

assignment of precincts to the wards. The CCBOE cannot make any changes to DIMS until after the Certification of the November 2, 2021, General Election. In the future the State House, Senate, and Congressional lines will also be provided to the CCBOE.

Chairman Hastings acknowledged and congratulated Board Member Davis Chappell as a Progressive Woman Honoree and an award winner of the 2021 Smart Women Award.

PUBLIC COMMENT

There was no public comment.

Chairman Hastings moved to adjourn the meeting at 10:17 a.m. Board Member Wondolowski seconded. The motion passed unanimously.

Certification: I have reviewed the above minutes and certify that they are an accurate summary of the actions taken by the Cuyahoga County Board of Elections at its meeting held on October 1, 2021.

Jeff Hastings, Chairman _____

Inajo Davis Chappell, Board Member _____

Lisa M. Stickan, Board Member _____

David J. Wondolowski, Board Member _____

Anthony Perlatti, Director _____

DIRECTIVE 2021-20 - Unofficial and Official Canvasses of the November 2, 2021 General Election

RELEASED: October 1, 2021

SUMMARY

- Directive 2021-20 outlines the procedures boards of elections must follow when conducting both the Unofficial and Official Canvasses for the November 2, 2021 General Election.
- **Important dates include**:
  - ***Post-Election Cure Period***: November 3rd-9th
  - ***Official Canvass***: Must be completed by 2 p.m. on Tuesday, November 23rd.
  - ***Post-Election Audit***:
    - *If there is no recount*: The audit may start six days after the official results are declared and must be completed by the 21st day after that declaration.
    - *If there is a recount*: The audit must begin immediately after the board certifies the results of the recount and be complete **within 14 days.**
  - ***Voter History***: Must upload voter history no later than 14 days after official certification.
  - ***Retention of Ballots***: All ballots prepared for the *Special Congressional Election* must be retained for 22 months. All ballots prepared for *non-federal contests* must be retained for at least 60 days.
- Rules and procedures governing drop boxes are the same as they have been for all elections in 2021 and outlined in Directive 2021-10.

PART ONE – UNOFFICIAL CANVASS

The Unofficial Canvass of the November 2, 2021 General Election must be conducted on Election Night in accordance with processes and procedures outlined in Chapter 8, Section 1.02 of the Election Official Manual.

I. PROCESSING ABSENTEE BALLOTS

Boards of elections may begin processing (including scanning, but not tabulating) absentee ballots the day after the close of voter registration. Boards are prohibited from tabulating any absentee ballot prior to 7:31 p.m. on Election Day.

II. ELECTION NIGHT REPORTING

Counties conducting the Special Congressional Election for the 11th and 15th Congressional Districts must use the Secretary of State's County Submission System ("CSS") to provide summary results on all candidates for Congress that appear on the county's ballot.

A. SCHEDULE FOR REPORTING RESULTS

Each board must log into the CSS no later than 7:45 p.m. on November 2. The board must immediately notify the SOS assigned personnel of delays in completing any portion of the results reporting activity.

B. REPORTING ABSENTEE BALLOT RESULTS

Each board involved in a Special Congressional Election **must upload vote totals for absentee ballots by 8:00 p.m.** The board must enter zero (0) precincts reporting when it uploads its first absentee results.

C. MAXIMUM TIME BETWEEN ENR REPORTS

Election Night reporting for counties conducting a Special Congressional Election begins with the first upload of absentee results by 8:00 p.m. and will continue at the assigned time throughout the night. After Cuyahoga County has uploaded its first summary election results, it must report every "quarter-hour" (e.g., 8:00 p.m., 8:15 p.m., 8:30 p.m., 8:45 p.m., etc.).

Once 100 percent of the precincts have reported, boards must enter final vote tallies into the Election Night Reporting System ("ENR").

D. SUPPLEMENTAL STATISTICS

The board must provide supplemental statistics when it reports the last precinct or shortly thereafter. **Boards must promptly report vote totals, even if supplemental statistics are not yet available.**

The required supplemental statistics include:

- The total number of *Counted* ballots from:
  - Regular ballots counted from Election Day precincts.
  - Non-UOCAVA absentee ballots.
  - UOCAVA absentee ballots.
- The total number of *Outstanding* ballots (ballots issued but not yet counted) from:
  - Non-UOCAVA absentee ballots issued but not returned.
  - UOCAVA absentee ballots issued but not returned.
  - Total number of provisional ballots issued on Election Day.
  - Total number of provisional ballots issued before Election Day, but after close of registration at the board office or early vote center.

III. SUMMARY AND FINAL REPORTS

Boards of elections with a Special Congressional Election must follow the procedures for reporting summary results and submitting final summary reports in even-numbered year elections (due to the contest for federal office). The required reports and forms for the Unofficial Canvass are:

1. Unofficial Vote Total Summary Report.
2. Most Populous Report(s); and (Cuyahoga is the most populous county in the 11th Congressional District primary and will receive results from Summit County.)
3. Signature Form

The Director must not leave the office until the assigned Secretary of State Elections Division staff member contacts the Director to confirm that the board's reports have been received and reviewed to ensure the results match.

PART TWO – POST-ELECTION CURE PERIOD

Each board of elections must be open to the public on each of the seven calendar days immediately following Election Day, and during the hours specified below, in order to allow voters to cure a deficiency on an absentee or provisional ballot:

- Weekdays, November 3rd- November 9th 8:00 a.m. – 5:00 p.m.
- Saturday, November 6th 8:00 a.m. – 12:00 p.m. and Sunday, November 7th 1:00 p.m. – 5:00 p.m.

PART THREE – OFFICIAL CANVASS

I. TIMELINE FOR OFFICIAL CERTIFICATION

Boards of elections may begin the Official Canvass no earlier than Saturday, Nov. 13, and must begin no later than Wednesday, Nov. 17. Each board must complete its Official Canvass and certify the results no later than Tuesday, Nov. 23. Cuyahoga will certify the results of the election during the November 22nd Board Meeting.

II. PRE-CANVASS AND CANVASS ACTIVITY

Each board of elections must follow the instructions for pre-canvass activity and conducting the Official Canvass outlined in the Election Official Manual.

III. FORMS FOR OFFICIAL CERTIFICATION

All certifications and reports must be signed by the appropriate board personnel before being submitted to the SOS; another board of elections; or another public entity.

Each board of elections must submit the signature form, along with the Supplemental Reports for Absentee Ballots and Provisional Ballots to the SOS.

A. CERTIFICATION OF OFFICIAL RESULTS

1. After a board completes its Official Canvass, it must email Results@OhioSoS.gov and attach a copy of the official vote total summary report generated by the board's voting system.
2. The board of elections for the most populous county of any jurisdiction must generate a separate report. The report must include the total number of votes recorded for the office from each county in a multi-county jurisdiction and the total number of votes for all counties.

B. ABSENTEE AND PROVISIONAL BALLOT SUPPLEMENTAL REPORT

State law requires the SOS to publish a report on the number of absentee and provisional ballots cast and counted. Each board of elections must provide this supplemental data.

C. CERTIFICATE OF OFFICIAL SUMMARY RESULTS FOR LOCAL LIQUOR OPTION QUESTIONS AND LOCAL QUESTIONS AND ISSUES

Each board of elections must send a completed copy of Form 126-B to the SOS and a copy of the completed form to the Ohio Division of Liquor Control.

The board of elections must certify the results of an election on tax levies and bond issues to the following:

- The county auditor of each county in which the election was held.
- The fiscal officer of the subdivision in which the election was held.
- The Tax Commissioner of the State of Ohio
- The Secretary of State

The board of elections of the most populous county must certify the results of an election on a school district income tax on Form 125-A to the following:

- The board of education that placed the issue on the ballot.
- The Tax Commissioner of the State of Ohio
- The Secretary of State

D. ELECTRONIC PRECINCT-LEVEL OFFICIAL RESULTS FILE OF VOTES

Each board of elections that conducted a Special Congressional Election must upload an electronic precinct-level results file of votes that includes all candidates that appeared on the county's ballots on Wednesday, Nov. 24, via the CSS.

Additionally, boards of elections are required to provide, via email to Results@OhioSoS.gov, a separate report from the county's central tabulating system detailing turnout by precinct. Boards must also submit a Statement of Votes Cast ("SOVC") or similar report detailing the turnout by precinct with their turnout report.

IV. TIMELINE FOR REPORTS

No later than 2:00 p.m. on Tuesday, Nov. 23, the SOS must receive each of the following:

- Certification report and signature form;
- Report forms;
- Electronic turnout detail by precinct; and
- SOVC report.

V. RECOUNTS

The deadline for a candidate or group to request a recount is five days after the certification of official results. If the recount to be conducted is for a multi-county jurisdiction, the SOS will issue the notice of recount after receiving notice from the most populous county.

VI. POST-ELECTION AUDIT

Every board of elections must conduct a post-election audit.

- **If there is no recount**: The audit may start six days after the official results are declared and must be completed by the 21st day after that declaration.

- **If there is a recount:** The audit must begin immediately after the board certifies the results of the recount and be complete within 14 days.

VII. VOTER HISTORY

All boards must upload voter history to the Statewide Voter Registration Database no later than 14 days after the board's official certification.

VIII. RETENTION OF BALLOTS

Boards must retain all ballots prepared for the Special Congressional Election for at least 22 months following the election. Boards must retain all ballots prepared for a non-federal election for at least 60 days following the election.

PART FOUR – OPEN MEETINGS AND OBSERVERS DURING THE CANVASS

I. BOARD MEETINGS MUST BE IN PERSON

Although boards may not conduct their meetings remotely, boards are encouraged to live-stream meetings for public viewing.

II. OBSERVERS

A board must allow the presence of observers who present a valid certificate of appointment for the Unofficial or Official Canvass, recount, or post-election audit. Voting location managers, directors, deputy directors, and appointing authorities have the authority to administratively remove observers from their posts for behavior that interferes with, impedes, or disrupts an election.

PART FIVE – USE OF SECURE RECEPTACLES AND ELECTION OFFICIALS TO RECEIVE ABSENTEE BALLOTS OUTSIDE OF THE BOARDS OF ELECTIONS

I. AVAILABILITY AND MONITORING OF SECURE RECEPTACLES

For the November 2, 2021 General Election, boards of elections must follow the same rules and procedures as set forth in *Directive 2021-10* for the use of secure receptacle(s) outside the county board of elections. (These are the same rules that have been in effect for every election in 2021)

II. ELECTION OFFICIALS RECEIVING ABSENTEE BALLOTS OUTSIDE THE BOARD OF ELECTIONS

As stated in *Directive 2021-10*, boards of elections may have permanent or temporary board employees collect absentee ballots outside the office of the board of elections from electors. Boards of elections, by a vote of a majority of the board's members, may have board employees collect absentee ballots directly outside of the office of the board of elections in addition to the secure receptacle(s) that are available 24 hours a day.

Frank LaRose
Ohio Secretary of State

DIRECTIVE 2021-20
October 1, 2021

To: All County Boards of Elections
Board Members, Directors, and Deputy Directors

Re: Unofficial and Official Canvasses of the November 2, 2021 General Election

SUMMARY

This Directive outlines the procedures that boards of elections must follow when conducting both the Unofficial and the Official Canvasses of the November 2, 2021 General Election.

To assist boards of elections with any problems, questions, or concerns on Election Day, the Secretary of State's Office is staffed on Election Day from 6:00 a.m. until all boards have reported their unofficial results to our Office. Boards should contact the Secretary of State's Office using the dedicated telephone number that will be emailed prior to November 2, 2021.

All directors, deputy directors, and board members must ensure that they are able to receive emails via their .gov address and other communications sent from the Secretary of State's Office on November 2, 2021 (including after the polls close).

PART ONE – UNOFFICIAL CANVASS

The Unofficial Canvass of the November 2, 2021 General Election must be conducted on Election Night in accordance with state law[1] and Chapter 8, Section 1.02 of the Election Official Manual.

The Unofficial Canvass must be conducted in full view of the members of the board of elections and any observer appointed in accordance with R.C. 3505.21.[2] The board must continuously count the ballots during the Unofficial Canvass.[3]

[1] R.C. 3505.27 (counting regular ballots that were cast at precinct polling locations); R.C. 3505.28 (ballots not counted); R.C. 3509.06 (counting absentee ballots); R.C. 3509.07 (absentee ballots not counted); R.C. 3511.11-3511.13 (uniformed service and overseas voter absentee ballots).
[2] R.C. 3505.27.
[3] R.C. 3505.27; R.C. 3505.29; R.C. 3505.30.

I. PROCESSING ABSENTEE BALLOTS

Boards of elections may begin processing (including scanning, but not tabulating) absentee ballots not earlier than the day after the close of voter registration (October 5, 2021). The boards must begin this process prior to Election Day to ensure the Unofficial Canvass includes all absentee ballots received by the close of polls on November 2, 2021. Boards are prohibited from tabulating any absentee ballot prior to 7:31 p.m. on November 2, 2021. If a court orders polls to remain open later than 7:30 p.m. on Election Day, boards will receive a directive with alternate instructions.

II. ELECTION NIGHT REPORTING ("ENR") FOR COUNTIES CONDUCTING THE SPECIAL CONGRESSIONAL ELECTION

State law requires boards of elections to provide election results for certain contests to the Secretary of State's Office.[4] Counties conducting the Special Congressional Election for the 11th and 15th Congressional Districts must use the Secretary of State's County Submission System ("CSS") to provide summary results on all candidates for Congress that appear on the county's ballot. The Secretary of State personnel assigned to each county board of elections and their contact information will be provided prior to November 2, 2021.

Although boards of elections will have access to hand-key the results at the time frames below, the upload tool allows each board to do this more efficiently. This method also helps prevent data entry errors. Boards must use the USB thumb drives provided by the Secretary of State's Office to ensure the security of ENR and the Election Management System ("EMS"). The USB thumb drives must be used only once.

Unofficial election results provided to the Secretary of State's Office will be summary only, rather than precinct-level. Boards will upload precinct-level results for the Official Canvass.

A. SCHEDULE FOR REPORTING RESULTS

Each board must log in to the CSS no later than 7:45 p.m. on November 2, 2021. The board must immediately notify the Secretary of State assigned personnel of delays in completing any portion of the results reporting activity. Boards will receive an email with contact information for the Secretary of State personnel assigned to each county.

B. REPORTING ABSENTEE BALLOT RESULTS

Each board involved in the Special Congressional Election must upload vote totals for absentee ballots by 8:00 p.m., unless the voting system is technologically unable to do so. If necessary, the board may upload partial absentee results (e.g., for GEMS users who were unable to scan all absentee ballots prior to starting the central tabulation of precinct cards). If the board uploads partial absentee results at 8:00 p.m., the board must not double-report the initial upload. Contact the board's voting system vendor if you need technical assistance. The board must enter zero (0) precincts reporting when it uploads its first absentee results.

[4] R.C. 3505.27(C).

C. MAXIMUM TIME BETWEEN ENR REPORTS

ENR for counties conducting the Special Congressional Election begins with the first upload of absentee results by 8:00 p.m. and will continue at the assigned time throughout the night. After the board uploads its first summary election results, it must report on the following time increment assigned to the county:

1. "Quarter-Hour" Counties - *Cuyahoga, Fairfield, Franklin, and Summit Counties.*

"Quarter-hour" counties must report at each quarter hour (e.g., 8:00 p.m., 8:15 p.m., 8:30 p.m., 8:45 p.m., etc.), beginning with the quarter hour that follows the board's first upload of summary election results and continuing until all precincts report results.

The board must notify the Secretary of State personnel assigned to the board if, as the board approaches full reporting, one or more precincts did not report and it is more than 30 minutes since the last report, to explain the delay. Once 100 percent of the precincts report, boards must enter final vote tallies into ENR. The board does not have to wait until its designated reporting time (noted above) before reporting the final results.

2. "Half-Hour" Counties - *Athens and Ross Counties.*

"Half-hour" counties must report at each half-hour (e.g., 8:30 p.m., 9:00 p.m., 9:30 p.m., etc.), beginning at 8:30 p.m., the first half-hour that follows the upload of the board's absentee summary election results at 8:00 p.m., then on every half hour after and continuing until all precincts report results.

The board must notify the Secretary of State personnel assigned to the board if, as the board approaches full reporting, one or more precincts did not report and it is more than 30 minutes since the last report, to explain the delay. Once 100 percent of the precincts have reported, boards must enter final vote tallies into ENR. The board does not have to wait until its designated reporting time (noted above) before reporting the final results.

3. "Hourly" Counties

"Top-of-the-hour" counties (e.g., 8:00 p.m., 9:00 p.m., etc.): *Clinton, Fayette, Madison, and Pickaway Counties.*

"Bottom-of-the-hour" counties (e.g., 8:30 p.m., 9:30 p.m., etc.): *Hocking, Morgan, Perry, and Vinton Counties.*

Note: "Bottom-of-the-hour" counties will report once at the "Top-of-the-hour" at 8:00 p.m. and then at the bottom hour as noted above.

"Hourly" counties must report summary election results at the top *or* bottom of every hour, as specified above, and continue until all precincts have reported. If the board reports more frequently, it must still report on the hour.

The board must notify the Secretary of State personnel assigned to the board if, as the board approaches full reporting, one or more precincts did not report and it is more than 60 minutes since the last report, to explain the delay. Once 100 percent precincts have reported, boards must enter final vote tallies into ENR. The board does not have to wait until its designated reporting time (noted above) before reporting the final results.

D. SUPPLEMENTAL STATISTICS

Boards of elections must provide supplemental statistics upon reporting the county's last precinct or shortly thereafter. **Boards must promptly report vote totals, even if supplemental statistics are not yet available.** Upload the election results, then submit the statistics when ready.

The required supplemental statistics are as follows:

Counted Ballots

- Total number of regular ballots counted from Election Day precincts (not including absentee ballots; they are reported separately below).
- Total number of non-UOCAVA absentee ballots counted.
- Total number of UOCAVA absentee ballots counted.
- Total number of absentee ballots counted.
- Total regular Election Day and absentee ballots counted.

Outstanding Ballots (ballots issued but not yet counted)

- Total number of outstanding non-UOCAVA absentee ballots issued by the board, but not returned.
- Total number of outstanding UOCAVA absentee ballots issued by the board, but not returned.
- Combined total number of outstanding absentee ballots (issued by BOE but not returned by close of polls).
- Total number of provisional ballots issued on Election Day.
- Total number of provisional ballots issued before Election Day, but after close of registration at the board office or early vote center.
- Total number of provisional ballots issued at the polls or the board office.

III. UNOFFICIAL CANVASS REPORTS FOR COUNTIES WITHOUT A SPECIAL CONGRESSIONAL ELECTION

Boards of elections must follow the procedures outlined in Chapter 8, Section 1.02 for reporting summary results and submitting final summary reports in odd-numbered year elections. The Secretary of State's Office will provide all report and signature forms via email prior to the election. Additionally, the following reporting requirements must be followed:

- On Election Night, after a board has completed its Unofficial Canvass, it must email the Secretary of State's Office and attach a copy of the unofficial vote total report generated by the board's voting system. This report must be clearly labeled "[County]'s Unofficial Canvass," and it must contain only vote totals for that county. The board must also submit the Unofficial Certification of Results Signature Form on Election Night. The Secretary of State's Office will not contact boards of elections without a Special Congressional Election for release on Election Night.

- By 10:00 a.m. on November 3, 2021 (the day after the election), each board must provide a report showing the number of ballots cast and counted by absentee voters and the number of regular ballots cast and counted on Election Day. The board should generate this report from the board's EMS and may provide summary or precinct-level detail.
- Each board must complete and submit an Unofficial Certification of Results Supplemental Data Form to provide the following statistics:

Counted Ballots:

- Total number of Election Day Ballots (regular ballots cast at polling locations on Election Day);
- Total number of Non-UOCAVA Absentee Ballots Counted (as reported in the board's voter registration ("VR") system); and
- Total number of UOCAVA Absentee Ballots Counted (as reported in the board's VR system).

Outstanding Ballots (ballots issued but not yet counted):

- Total number of Outstanding Non-UOCAVA Absentee Ballots (as reported in the board's VR system as having been issued by the board but not returned or returned but not counted (for which Form 11-S is provided to the voter));
- Total number of outstanding UOCAVA absentee ballots issued by the board (as reported in the board's VR system as having been issued by the board but not returned or returned but not counted (for which Form 11-S is provided to the voter));
- Total number of provisional ballots cast on Election Day; and
- Total number of provisional ballots cast before Election Day.

By 10:00 a.m. on November 3, 2021 (the day after the election), the board of the most populous county of any multi-county district must generate a separate summary report showing the combined vote totals for its county and the overlapping county that reports to the most populous county for that contest, question, or issue. The board must clearly label the report "[County]'s Unofficial Canvass – Most Populous County." The board may use its voting system, the relevant Secretary of State Form, or some other form to provide this information.

PART TWO – POST-ELECTION CURE PERIOD

Each board of elections must be open to the public on each of the seven calendar days immediately following Election Day, and during the hours specified below, in order to allow voters to cure a deficiency on an absentee or provisional ballot, as provided for in state law:[5]

[5] R.C. 3505.181(B)(7); R.C. 3509.06(D)(3). *See also Northeast Ohio Coalition for the Homeless v. Husted*, 837 F.3d 612 (6th Cir. 2016) (holding that the seven-day post-election cure period for absentee and provisional ballots established in state law is constitutional).

- Wednesday, November 3rd 8:00 a.m. – 5:00 p.m.
- Thursday, November 4th 8:00 a.m. – 5:00 p.m.
- Friday, November 5th 8:00 a.m. – 5:00 p.m.
- Saturday, November 6th 8:00 a.m. – 12:00 p.m.
- Sunday, November 7th 1:00 p.m. – 5:00 p.m.
- Monday, November 8th 8:00 a.m. – 5:00 p.m.
- Tuesday, November 9th 8:00 a.m. – 5:00 p.m.

Whenever a board of elections receives an absentee ballot ID envelope that is missing required information or that contains information that does not conform to the voter's registration record, and the board of elections cannot determine the voter's eligibility without the missing or nonconforming information, the board of elections must contact the absentee voter to give an opportunity to supplement their ID envelope so the voter's ballot can be counted. The board must meet this requirement by issuing (Secretary of State Form 11-S) to the voter.[6] When a telephone number or email address is available, boards must use that contact information to quickly notify the voter about the deficiency on their ID envelope. The voter must provide the necessary information in writing on (Form 11-S), either by in person delivery or by mail.[7]

If a board of elections has no voters with a deficiency on their absentee or provisional ballot after Election Day (i.e., there is nothing *possible* to cure for any voter that cast a ballot in the election) or all deficiencies have been cured, the board may return to its normal operating hours for the remainder of the cure period.

PART THREE – OFFICIAL CANVASS

I. TIMELINE FOR OFFICIAL CERTIFICATION

Boards of elections may begin the Official Canvass of the November 2, 2021 General Election no earlier than the 11th day after the election (Saturday, November 13, 2021) and no later than the 15th day after the election (Wednesday, November 17, 2021). Each board must complete its Official Canvass and certify no later than the 21st day after the election (Tuesday, November 23, 2021).[8]

II. PRE-CANVASS AND CANVASS ACTIVITY

Boards of elections must follow the instructions for pre-canvass activity outlined in Chapter 8, Section 1.03 of the Election Official Manual. Boards must also follow the rules and procedures outlined in Chapter 8, Section 1.04 of the Election Official Manual for conducting the Official Canvass. Each board must reconcile results with records from the poll books and the voter registration system to ensure that only one ballot per voter is counted.[9] This includes ensuring that

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[6] *See* Election Official Manual Chapter 5, pages 30-32 and 35-37.
[7] R.C. 3509.06(D)(3)(b).
[8] R.C. 3505.32(A).
[9] R.C. 3505.32(D).

all returned absentee ballots are logged in the voter registration system and reconciling the list of voters whose ballots were returned with the number of physical ballots returned.

Pursuant to R.C. 3505.32, board members and employees are prohibited from disclosing partial or final results of any contest in the election between the completion of the Unofficial Canvass and the certification of official results.

III. FORMS FOR OFFICIAL CERTIFICATION

After the Unofficial Canvass, our Office will provide the forms for reporting results. All certifications and reports must be signed by the appropriate board personnel before being submitted to our Office, another board of elections, or another public entity. The board may not use digital or stamped signatures for these reports. Each board of elections must submit the signature form to certify the Official Election Results, including the Supplemental Reports for both Absentee Ballots and Provisional Ballots, to the Secretary of State's Office.

A. CERTIFICATION AND REPORTING OF OFFICIAL RESULTS[10]

After a board completes its Official Canvass, it must email Results@OhioSoS.gov a copy of the official vote total summary report generated by the board's voting system. This report must be clearly labeled "[County]'s Official Canvass," and it must contain *only* vote totals for that county.

The board of elections for the most populous county of any multi-county jurisdiction or district must generate a separate report from its voting system, create a report outside of its voting system, or use a reporting form which will be provided after the Unofficial Canvass. This report must be clearly labeled "[County's] Official Canvass – Most Populous County." The report must include the total number of votes recorded for the office, question, or issue from each county in a multi-county jurisdiction and the sum total for all counties. The board must mark the contest(s) for which a board is the most populous county to clearly identify it as a contest contains vote totals from other counties. The board must email the report(s) to Results@OhioSoS.gov.

B. ABSENTEE AND PROVISIONAL BALLOT SUPPLEMENTAL REPORT

State law requires the Secretary of State to publish a report on the number of absentee and provisional ballots cast and counted for the election in each county.[11] Each board of elections must provide this supplemental data for absentee and provisional ballots. The reporting forms will be provided after the Unofficial Canvass.

C. CERTIFICATE OF OFFICIAL SUMMARY RESULTS FOR LIQUOR OPTION QUESTIONS AND LOCAL QUESTIONS AND ISSUES

Each board of elections must send a completed copy of Secretary of State Form 126-B to the Secretary of State's Office via email to Results@OhioSoS.gov and a copy of the completed form to the Ohio Division of Liquor Control via email: LiquorLicensingMailUnit@com.state.oh.us or by mailing to the following address:

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[10] R.C. 3505.30.
[11] R.C. 3501.05(Y).

Division of Liquor Control
6606 Tussing Road
Reynoldsburg, Ohio 43068-9005

The board of elections (most populous county only if it is a multi-county issue) must certify the results of an election on tax levies and bond issues to the following offices and agencies:

- The county auditor of each county in which the election was held.
- The fiscal officer of the subdivision in which the election was held.
- The Tax Commissioner of the State of Ohio via email at: DTE@tax.state.oh.us.
- The Secretary of State.

The board of elections of the most populous county must certify the results of an election on a school district income tax on Secretary of State Form 125-A to the following offices and agencies:

- The board of education that placed the issue on the ballot.
- The Tax Commissioner of the State of Ohio via email at DTE@tax.state.oh.us.
- The Secretary of State.

D. ELECTRONIC PRECINCT-LEVEL OFFICIAL RESULTS FILE OF VOTES – COUNTIES WITHIN THE 11TH AND 15TH CONGRESSIONAL DISTRICTS ONLY

On Wednesday, November 24, 2021, board of elections that conducted a Special Congressional Election must upload an electronic precinct-level results file of votes that includes all candidates that appeared on the county's ballots via the CSS. Instructions regarding the upload process as well as the time to complete the upload will be sent separately.

Additionally, boards of elections must provide, via email to Results@OhioSoS.gov, a separate report from the county's central tabulating system detailing turnout by precinct. Boards must also submit a Statement of Votes Cast ("SOVC") or similar report detailing the turnout by precinct with their turnout report. This report will vary by vendor and will be used to proof the turnout by precinct. Details outlining the content and generation of these reports will also be sent separately.

IV. TIMELINE FOR REPORTS

No later than 2:00 p.m. on Tuesday, November 23, 2021, the Secretary of State's Office must receive each of the following:

- Certification report and signature form;
- Report forms;
- Electronic turnout detail by precinct (if in the 11th or 15th Congressional District); and

- SOVC report (if in the 11th or 15th Congressional District).

Each board must submit these reports to Results@OhioSoS.gov as soon as the board completes its official certification. Boards must not delay submitting the official certification forms because of a recount for any race or issue. Every board must maintain a copy of each completed certification and report form.

V. RECOUNTS

Before scheduling and conducting a recount, please review the procedures in state law and Chapter 9, Section 1.02 of the Election Official Manual. The deadline for a candidate or group to request a recount is five days after the certification of official results. A recount must take place no later than ten days after an application for a recount is filed or an automatic recount is declared.[12]

The Secretary of State's Office will email a recount survey along with the Official Canvass report forms. Boards must complete this survey to notify the Secretary of State of a recount. All boards must complete the survey, regardless of whether there is a recount in their county. If the board must conduct a recount, it must provide the information regarding the recount in a format provided by the Secretary of State's Office in the email along with the Official Canvass Report forms. If the recount to be conducted is for a multi-county jurisdiction, the Secretary of State's Office will issue the notice of recount after receiving notice from the most populous county. If a recount changes vote totals, the board of elections must submit a properly completed and signed amended certification and abstract to Results@OhioSOS.gov.

VI. POST-ELECTION AUDITS

Every board of elections must conduct a post-election audit. The timeline for post-election audits depends on whether there is a recount, as explained below:

1. **If there is no recount**: The audit may start six days after the official results are declared and must be completed by the 21st day after that declaration. The board has five days after completion to certify those audit results to the Secretary. A form will be offered for certifying audit results.

2. **If there is a recount**: The audit must begin immediately after the board certifies the results of the recount and be complete within 14 days. The board has five days after completion to certify those audit results to the Secretary.

After Election Day, the Secretary of State's Office will provide more instructions for the post-election audit.

VII. VOTER HISTORY

All boards must upload voter history for the November 2, 2021 General Election to the Statewide Voter Registration Database no later than 14 days after the board's official certification. Counties with more than 100,000 registered voters must contact Robin Fields at

[12] R.C. 3515.02 and R.C. 3515.03.

SWVRD@OhioSoS.gov to schedule their upload in advance. The election name to submit the history for the election is **2021_NOV_GEN**.

For purposes of assigning voter history, a voter record should be marked as having voted in an election, only if any of the following are true:

- The voter signed the signature poll book on Election Day.
- The voter was issued an absentee ballot in-person during the period for in-person absentee voting.
- The voter timely returned the voter's identification envelope (including UOCAVA and Federal Write-In Absentee Ballot (FWAB)), regardless of whether the ballot was eligible to be counted.
- The voter is an eligible elector of the State of Ohio and cast a provisional ballot, regardless of whether the ballot was eligible to be counted. **If a provisional ballot affirmation is used to register an individual to vote, the newly registered voter must be assigned voter history for casting a provisional ballot.**

VIII. RETENTION OF BALLOTS

Boards must retain all ballots prepared for the Special Congressional Election for at least 22 months following the election. Boards must retain all ballots prepared for a non-federal election for at least 60 days following the election.[13] If the board uses a voting system and software that captures images of ballots as they are scanned by a high-speed scanner, those images may be subject to disclosure pursuant to a public records request and must be retained.[14] Accordingly, consult with the county prosecuting attorney regarding their retention.

PART FOUR – OPEN MEETINGS AND OBSERVERS DURING THE CANVASS

I. BOARD MEETINGS MUST BE IN-PERSON

Consistent with R.C. 3505.30, board members must open session at 6:30 a.m. on November 2, 2021, just as polls open on Election Day. The temporary law that authorized a public body to hold meetings and hearings by means of teleconference, video conference, or any other similar electronic technology has expired.[15] Although boards may not conduct their meetings remotely, boards are encouraged to live-stream meetings for the public.

II. OBSERVERS

Political parties, groups of candidates, or issue committees appoint election observers to observe the conduct of the election. A board must allow the presence of observers who present a valid certificate of appointment for the Unofficial or Official Canvass, recount, or post-election audit.[16]

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[13] R.C. 3505.31; 52 U.S.C.S. 20701.
[14] *See* Election Official Manual Chapter 8, pages 30-32.
[15] Section 12 of H.B. 404 of the 133rd General Assembly permitted virtual meetings until July 1, 2021.
[16] R.C. 3505.21.

The role of observers is limited to observing the proceedings of an election. Accordingly, while observers are permitted to watch and inspect, observers are prohibited from handling any election materials.[17] They also must not interfere with election officials or poll workers doing their jobs or otherwise slow down the operation of the polling location, board of elections, or early vote center, nor may they interact with voters in a manner that interferes with or disrupts an election.[18]

Voting location managers, directors, deputy directors, and appointing authorities have the authority to administratively remove observers from their posts for behavior inconsistent with Ohio law or Secretary of State directive, or that interferes with, impedes, or disrupts an election. Law enforcement officials have the statutory duty to remove observers at the order of one of the above-listed election officials.[19]

PART FIVE – USE OF SECURE RECEPTACLES AND ELECTION OFFICIALS TO RECEIVE ABSENTEE BALLOTS OUTSIDE OF THE BOARDS OF ELECTIONS

I. AVAILABILITY AND MONITORING OF SECURE RECEPTACLES

For the November 2, 2021 General Election, boards of elections must follow the rules and procedures in Directive 2021-10 for the use of secure receptacle(s) outside the county board of elections. Boards are required to retrieve the contents of the secure receptacle immediately upon the absentee ballot application deadline (12:00 noon on October 30, 2021) and the deadline for personal delivery of absentee ballots (7:30 p.m. on Election Day).

II. ELECTION OFFICIALS RECEIVING ABSENTEE BALLOTS OUTSIDE THE BOARD OF ELECTIONS

As stated in Directive 2021-10, boards of elections, by a vote of a majority of the board's members, may permit board employees, including permanent[20] or temporary board employees who have undergone a criminal background check, to collect absentee ballots directly outside of the office of the board of elections from electors personally delivering[21] their absentee ballots to the board. This is in addition to the secure receptacle(s) that is available 24 hours a day at the board office. Boards are strongly encouraged to do so whenever a high volume of traffic/turnout is anticipated.

If a majority of the board members vote to have board employees receive absentee ballots outside the office of the board of elections from electors who personally deliver their ballots to the board, the board's plan must meet the requirements outlined in Directive 2021-10.[22] Boards should consult with their county health department regarding any necessary health precautions. The

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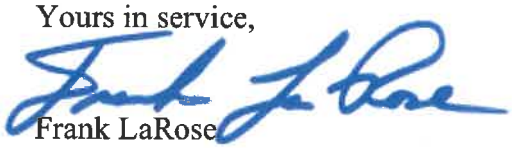
[17] R.C. 3505.21.
[18] R.C. 3599.24.
[19] R.C. 3501.33 and 3505.21.
[20] All permanent board of elections employees are required to have a criminal background check conducted. *See* Election Official Manual Chapter 2, page 11.
[21] An absentee voter may also have certain designated relatives deliver the voter's ballot "to the director." *See* R.C. 3509.05(A) ("spouse of the elector, the father, mother, father-in-law, mother-in-law, grandfather, grandmother, brother, or sister of the whole or half blood, or the son, daughter, adopting parent, adopted child, stepparent, stepchild, uncle, aunt, nephew, or niece of the elector.").
[22] The Secretary of State's Health Guidance for the May 4, 2021 Primary/Special Election contained within Directive 2021-10 no longer applies.

bipartisan team of election officials may use any secure container to collect ballots outside the board office.

If you have any questions regarding this Directive, please contact the Secretary of State's elections counsel at (614) 728-8789.

Yours in service,



Frank LaRose
Ohio Secretary of State

Deaths in Elected Office

1. Larry A. Jones, 8th District Court of Appeals, Judge[1]
2. Joseph D. Russo, Court of Common Pleas (General Division), Judge[2]

Resignation from Elected Office

1. Jennifer P. Weiler, Garfield Heights Municipal Court, Judge[3]
2. Annette Danczak, Parma Heights City Council, Member of Council Ward 2[4]

Appointments to Elected Office

1. Amanda Kurland, Orange Village Council, Member of Council[5]
2. Lesley Ann DeSouza, Parma Heights City Council, Member of Council Ward 2
3. John J. Krupinski, Strongsville Board of Education, Member[6]

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[1] ***Term ends 12/31/2027; special election to fill unexpired four-year term required 11/8/2022.***

[2] ***Term ends 12/31/2024; special election to fill unexpired two-year term required 11/8/2022.***

[3] Term ends 12/31/2023; no special election required.

[4] Term ends 12/31/2021; no special election required.

[5] Vacancy acknowledged by the CCBOE at the 10/1/2021 meeting. Term ends 12/31/2023; no special election required.

[6] Vacancy acknowledged by the CCBOE at the 8/22/2021 meeting. Term ends 12/31/2021; no special election required.

Cuyahoga County Judge Larry A. Jones dies unexpectedly

Third county judge to die in 2 week span

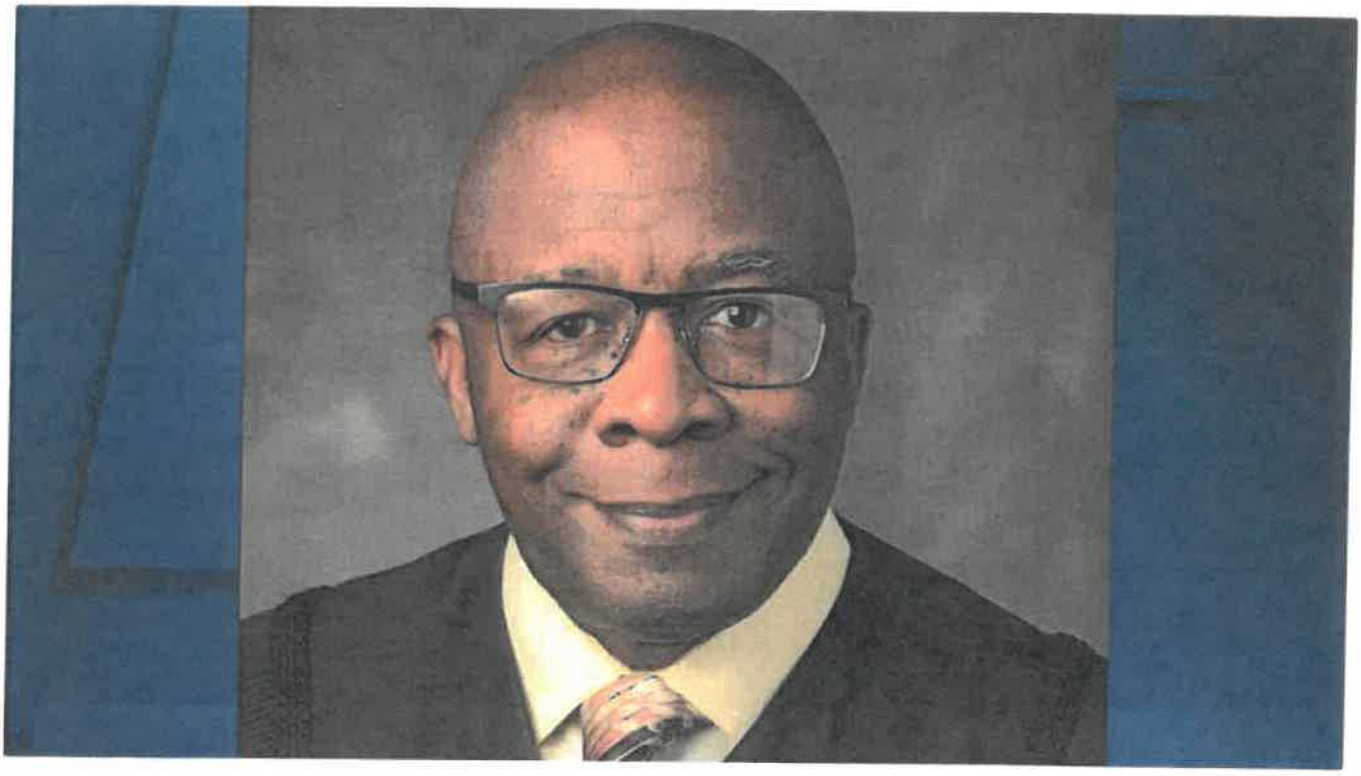

Photo by: Eighth District Court of Appeals

Judge Larry A. Jones, Sr.

By: Camryn Justice

Posted at 6:02 PM, Oct 07, 2021 and last updated 6:02 PM, Oct 07, 2021

CLEVELAND — The Cuyahoga County Courthouse's Eighth District Court of Appeals announced that Judge Larry A. Jones, Sr. died unexpectedly Thursday.

Jones joined the Eighth District Court of Appeals in 2009 after serving Cleveland Municipal Court for 21 years, states a release from the Cuyahoga County Court of Common Pleas. Jones served as the administrative judge at Cleveland Municipal Court for 14 years. It was in his time on the Cleveland Municipal Court that Jones helped launch the Greater Cleveland Drug Court.

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AD

Before serving on the bench, Jones worked a long career in public service as an assistant prosecutor and councilman, the release states.

Jones received his education from the College of Wooster and the Case Western Reserve University Law School.

"Larry Jones was the quintessential public servant — dedicated to making the judiciary and the community better," said Administrative and Presiding Judge Mary J. Boyle in the news release. "Apart from being a pioneer and legend in the legal community, he was a friend to everyone and made everyone feel that they were his favorite...he will be greatly missed, and our thoughts and prayers are with Judge Jones's family and friend."

Jones is the third Cuyahoga County judge to die in the past two weeks. Judge Joseph D. Russo died unexpectedly on Oct. 2 and Judge Nancy McDonnell died on Sept. 28.

JOSEPH DOMINIC RUSSO

FUNERAL HOME

DeJohn-Flynn-Mylott Funeral Home
4600 Mayfield Road
South Euclid, OH

Share

Send Flowers

The Honorable Judge Joseph Dominic Russo, Court of Common Pleas, aged 59 years, beloved husband for 28 years of Diana (nee Voulgaris), devotéd father of Gabriella and Joseph, cherished

son of Jean (nee Yenchus) and the late Dominic, dear brother of Dominic (wife Catherine) and Danielle Russo O'Hara (husband Adam), treasured son-in-law of Anthony and Helen (nee Xenidis) Voulgaris, brother-in-law to Dr. Debra Voulgaris, loving grandson of the late Alex and Anne Kukwa, and Joseph and Nancy Russo, loved nephew of James and Mary Yenchus, dearest uncle to Dominic, Madison, Reese and Delaney and cousin to many. In lieu of flowers, contributions in memory of Judge Russo suggested to The American Heart Association, One Cleveland Center, 1375 E. 9th St., Suite 600, Cleveland, OH 44114. Private funeral services will be held for the family. Relatives, friends and co-workers are invited to pay tribute and celebrate the life of Judge Russo at THE DeJOHN-FLYNN-MYLOTT FUNERAL HOME OF SOUTH EUCLID, 4600 MAYFIELD RD. (just East of Green Rd.) FRIDAY 4-8 PM AND SATURDAY 2-6 PM. NOTE: Family suggests masks and social distancing. On-line obituary and guestbook at www.DeJohnCares.com.

Published by The Plain Dealer from Oct. 5 to Oct. 8, 2021.

GARFIELD HEIGHTS MUNICIPAL COURT

5555 Turney Road
Garfield Heights, Ohio 44125-3798

Telephone: (216) 475-4927 Fax: (216) 475-3087

JENNIFER P. WEILER
Judge

September 24, 2021

Chief Justice Maureen O'Connor
Ohio Supreme Court
65 South Front Street
Columbus, Ohio 43215-3431

Re: Retirement

Dear Chief Justice O'Connor.

Pursuant to Rule VII of the Supreme Court Rules for the Government of the Judiciary of Ohio, I am writing to provide notice to you that I am retiring from my position as Judge of the Garfield Heights Municipal Court effective September 30, 2021. To that effect, I am enclosing a copy of a letter I am sending to Governor DeWine notifying him of my retirement.

I have been dealing with personal illness for the past year. Also, I have had to provide substantial care for my youngest daughter related to her cystic fibrosis and double-lung transplant. Owing to these issues, it is the right time for me to retire.

I certainly treasure the opportunity I have had to serve as a Judge. Moreover, I appreciate and thank you for your fine leadership of the judiciary.

Very truly yours,

Jennifer P. Weiler

Enc.

'21 OCT 1 PM3:52

Garfield Heights Municipal Court
Cuyahoga County, Ohio

IN RE:	)	
	)	
	)	
	)	
Retirement of Judge Jennifer P. Weiler	)	
	)	NOTICE
	)	

Whereas Judge Jennifer P. Weiler has given notice of her intent to retire from her position as judge of the Garfield Heights Municipal Court effective September 30, 2021 with a last date of service being September 30, 2021, notice is hereby given to Cuyahoga County, Ohio of said retirement and termination of Judge Weiler from the County payroll.

Dated: 09/22/2021

Judge Deborah J. Nicastro
Presiding Judge 2021

'21 OCT 4 PM 4:03

CITY OF Parma Heights
COMMUNITY GROWS HERE

Annette Danczak, Councilwoman Ward 2 Parma Heights, Ohio

6281 Pearl Road | Parma Heights, Ohio 44130 | 440-884-9600

September 1, 2021

Members of Parma Heights City Council
Mayor Michael P. Byrne

Dear Colleagues,

Please allow this to serve as my resignation from City Council, Ward 2, effective September 1, 2021.

It has been a great honor to represent the residents of Ward 2 and I am not only grateful for the opportunity to serve my community but am also proud of our accomplishments to make the city even more attractive to residents and businesses.

I have witnessed the professionalism of our safety forces and can attest to the fact that their service to the residents of our community is exceptional. I would like to personally thank our Chief of Police Steve Scharschmidt and Assistant Fire Chief Matt Bernard for their outstanding leadership and for sharing vital information with city council.

Many thanks to Mayor Byrne and his administration for their hard work and transparency in accomplishing difficult tasks in the most difficult of times. I am grateful for your service to our community.

Parma Heights is a lovely community filled with wonderful people. Best wishes as you continue your efforts to provide the highest quality of safety and service to all of our residents and businesses.

Very truly yours,

Annette Danczak
Councilwoman, Ward 2

'21 OCT 4 PM4:03

September 29, 2021

STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

I, Lesley Ann DeSouza, do solemnly swear that I will support the Constitution of the United States, the Constitution of the State of Ohio, the Charter of the City of Parma Heights, and that I will faithfully, honestly, and impartially discharge the duties of the office of Councilwoman for the City of Parma Heights, Ohio, during my continuance in said office.

So Help Me God

Lesley Ann DeSouza

SWORN TO BEFORE ME and subscribed in my presence this 29th day of September 2021.

Christina Reason, CMC

CHRISTINA L REASON, NOTARY PUBLIC
COMM. EXP. AUG 2, 2026
STATE OF OHIO

21 OCT 4 PM 4:03

OATH OF OFFICE

STATE OF OHIO)
)
COUNTY OF CUYAHOGA)

I, AMANDA KURLAND, DO SOLEMNLY SWEAR THAT I WILL SUPPORT THE CONSTITUTION OF THE UNITED STATES, THE CONSTITUTION OF THE STATE OF OHIO, THE RULES, REGULATIONS AND CHARTER OF ORANGE VILLAGE; AND THAT I WILL FAITHFULLY, HONESTLY AND IMPARTIALLY DISCHARGE MY DUTIES AS A COUNCILWOMAN OF ORANGE VILLAGE, STATE OF OHIO, DURING MY CONTINUANCE IN SAID OFFICE.

AMANDA KURLAND

SWORN TO BEFORE ME AND IN MY PRESENCE SUBSCRIBED, THIS 27TH DAY OF SEPTEMBER, 2021. IN WITNESS WHEREOF I HAVE HEREUNTO SET MY HAND AND CAUSED TO BE AFFIXED THE SEAL OF ORANGE VILLAGE THIS 27TH DAY OF SEPTEMBER, 2021.

KATHY U. MULCAHY
MAYOR

VOTE CUYAHOGA COUNTY BOARD OF ELECTIONS
RECEIVED
CANDIDATE & PETITIONS SERVICES

'21 OCT 5 AM10:42

Strongsville City Schools

ADMINISTRATIVE OFFICES

Dr. Cameron M. Ryba, Superintendent
cryba@scsmustangs.org

George K. Anagnostou, Treasurer
ganagnostou@scsmustangs.org

18199 Cook Avenue • Strongsville, Ohio 44136
Phone 440.572.7010 • Fax 440.572.7041
www.strongnet.org

September 3, 2021

Cuyahoga County Board of Elections
2925 Euclid Avenue
Cleveland, OH 44102

Attention: Mr. Cory Milne

Dear Mr. Milne:

Please accept this as official notification that Mr. John J. Krupinski has been appointed by the Strongsville Board of Education to fill the vacant seat of Mr. Seth Roberts at the September 2, 2021 Regular Board Meeting.

Mr. Krupinski was sworn in at the September 2, 2021 Regular Board Meeting. Enclosed is Mr. Krupinski's signed Oath of Office.

Mr. Krupinski will serve the remainder of Mr. Roberts unexpired term through December 31, 2021.

Sincerely,

G. K. Anagnostou

George K. Anagnostou
Treasurer/CFO

'21 SEP 8 AM 11:07

Strongsville City Schools

ADMINISTRATIVE OFFICES

Cameron M. Ryba, Superintendent
cryba@scsmustangs.org

George K. Anagnostou, Treasurer
ganagnostou@scsmustangs.org

18199 Cook Avenue • Strongsville, Ohio 44136
Phone 440.572.7021 • Fax 440.572.8562
www.strongnet.org

OATH OF OFFICE

I, John J. Krupinski, do solemnly affirm that I will support the Constitution of the United States and the Constitution of the State of Ohio; and that I will faithfully and impartially discharge my duties as a member of the Strongsville Board of Education to the best of my ability, and in accordance with the laws now in effect and hereafter to be enacted, during my continuance in said office and until my successor is chosen and qualified.

Signature

Sworn to and subscribed before me this second day of September, 2021.

'21 SEP 8 AM11:07

Signature, George K. Anagnostou
Treasurer

Withdrawal of Candidate from the November 2, 2021 General Election*

Office	Name	Party
Member of Council at Large Strongsville	Amy Casner	Nonpartisan

*Candidate names remains on ballot, votes cast not counted nor posted, notices posted in voting booths and included in VBM packets.

October 12, 2021

Cuyahoga County Board of Elections
2925 Euclid Ave.
Cleveland, OH 44115

Via: USPS

Re: Withdrawal of Candidacy
Amy Casner – City Council of Strongsville

To Whom It May Concern:

I have moved out of Strongsville and am withdrawing from the race for City Council. Please contact me at AJCasner@aol.com or 216-235-6526 with any questions.

Thank you.

Amy Casner

2021 OCT 15 AM 11:27

CUYAHOGA COUNTY
BOARD OF ELECTIONS

Agenda Item Request

Requested By: Becky Brake **Department:** Election Officials

Requested Action:
- ☐ Approval
- ☑ Authorization
- ☐ Other _____

Type of Request
- ☐ RFP/contract
- ☐ Travel/Training
- ☐ Personnel
- ☐ Provisional Rejections
- ☐ Absentee Rejection
- ☐ Certification
- ☐ Protest
- ☐ Other _____

Requested for the 10/18/2021 **Board Meeting Agenda.**
Date

Specific description of request:
Authorization to Pay: 295 Voting Location Managers x $200 = $59,000; 320 Voting Location Deputies x $200 = $64,000;

3178 Precinct Election Officials x $172.10 = $546,933.80; 295 Sanitation Officials x $200 = $59,000;

150 Election Subsitute Officials x $100 = $15,000 for the November 2, 2021 General Election

Estimated Expense: $743,933.80

Budgeted Item: Yes ☑ No ☐

Requestor Signature: Becky Brake **Date:** 10/7/2021

Manager Signature: _____ **Date:** _____

Fiscal Officer Signature: _____ **Date:** _____

Deputy Director: _____ **Date:** _____

Director Approved: Yes ☑ No ☐

Director's Signature: [signature] **Date:** 10.13.21

Please enclose all associated documentation along with this request form to the Clerk of Board.

Forward to the Clerk of the Board: **Date:** _____

Received by the Clerk of the Board: **Date:** 10/7/21

CUYAHOGA COUNTY BOARD OF ELECTIONS

Jeff Hastings, Chairman
Inajo Davis Chappell, Member
Lisa M. Sticklan, Member
David J. Wondolowski, Member
Anthony W. Perlatti, Director
Anthony N. Kaloger, Deputy Director

Agenda Item Request

Requested By: __Dane R. Thomas_____ **Department:** _Election Support_____

Requested Action: x Approval
☐ Authorization
☐ Other _Signature_

Type of Request
☐ RFP/contract
☐ Travel/Training
☐ Personnel
☐ Provisional Rejections
☐ Absentee Rejection
☐ Certification
☐ Protest
x Other - Private Locations Payroll

Requested for the available Board Meeting Agenda

Specific description of request: Authorization to process payment in the amount not-to-exceed **$29,250.00** for 101 private voting locations being used for the November2, 2021 Election.

Estimated Expense: $29,250.00 _____

Budgeted Item: Yes __X____ No _____

Requestor Signature: _____ **Date: __9/15/2021**

Manager Signature: _____ **Date:** 9-15-21

Business Administrator Manager Signature: _____ **Date:** _____

Deputy Director: _____ **Date:** _____

Director Approved: Yes ✓ **No** _____

Director's Signature: _____ **Date:** 10.13.21

Please enclose all associated documentation along with this request form to the Clerk of Board.

Forward to the Clerk of the Board: Date: _____

Received by the Clerk of the Board: Date: _____

CUYAHOGA COUNTY
BOARD OF ELECTIONS

Agenda Item Request

Requested By: Victor Rush **Department:** Election Support

Requested Action: x Approval
☐ Authorization
☐ Other
_____

Type of Request
☐ RFP/contract
☐ Travel/Training
☐ Personnel
☐ Certification
☐ Protest
☐ Other _____
☐ Provisional Rejections
☐ Absentee Rejection

Specific description of request:
Allocation of voting booths for the November 2, 2021 General Election. Allocation quantities are based on Social Distancing and room size per polling location. A total of 4613 voting booths will be allocated + 836 DS200 precinct scanners + 295 ADA AutoMark voting units and 1131 Electronic Poll books.

Estimated Expense: _____

Budgeted Item: Yes _____ **No** _____

Requestor Signature: Victor Rush **Date:** 10-5-21

Manager Signature: Victor Rush **Date:** 10-5-21

Deputy Director: _____ **Date:** _____

Director Approved: Yes ✓ **No** _____

Director's Signature: [signature] **Date:** 10.13.21

Please enclose all associated documentation along with this request form to the Clerk of Board.

Forward to the Clerk of the Board: **Date:** _____

Received by the Clerk of the Board: **Date:** _____

November 2, 2021 General Election
Unit Allocation

poll_code	Polling Location	Address	Municipality	Registered Voters	Total_Precincts	Number of Precinct Scanners at Location	AutoMark A#D#A# Unit	Number of Voting Booths	EPbs@_Location
8133	ABRAHAM LINCOLN ELEMENTARY SCHOOL	6009 DUNHAM ROAD	MAPLE HTS	4,509	4	2	1	24	5
8146	ADLAI STEVENSON PRE K-8 SCHOOL	18300 WODA AVENUE	CLEVELAND	5,362	6	4	1	23	5
7470	ADVENT LUTHERAN CHURCH SOLON	5525 HARPER ROAD	SOLON	2,680	2	2	1	14	2
8251	ALBERT BUSHNELL HART ELEMENTARY SCHOOL	3900 EAST 75TH STREET	CLEVELAND	2,863	4	4	1	17	3
8176	ALMIRA K-8 SCHOOL	3375 WEST 99TH STREET	CLEVELAND	3,150	3	3	1	18	3
3150	AMBLESIDE TOWERS APARTMENTS	2190 AMBLESIDE DRIVE	CLEVELAND	489	1	2	1	3	2
4240	AMERICAN LEGION POST 469	4910 MEMPHIS AVENUE	CLEVELAND	2,680	3	3	1	15	2
8115	AMERICAN LEGION POST 572	6483 STATE ROAD	PARMA	2,828	3	2	1	12	2
8306	AMERICAN LEGION POST 738	19311 LORAIN ROAD	FAIRVIEW PARK	2,679	3	2	1	12	2
8039	ANDREW J RICKOFF PRE K-8 SCHOOL	3500 EAST 147TH STREET	CLEVELAND	3,738	6	3	1	19	4
3390	ANTON GRDINA ELEMENTARY SCHOOL	2955 EAST 71ST STREET	CLEVELAND	1,765	3	3	1	11	2
8261	ARBOR ELEMENTARY SCHOOL	20400 ARBOR AVENUE	EUCLID	2,914	3	3	1	16	2
8109	ARTEMUS WARD PRE K-8 SCHOOL	4315 WEST 140TH STREET	CLEVELAND	1,212	2	2	1	7	2
8199	ATHLETIC WING OF ORANGE HIGH SCHOOL	32000 CHAGRIN BOULEVARD	PEPPER PIKE	5,391	5	5	1	30	5
8005	BAIN PARK CABIN	21077 NORTH PARK DRIVE	FAIRVIEW PARK	2,307	2	2	1	13	2
1100	BAY PRESBYTERIAN CHURCH	25415 LAKE ROAD	BAY VILLAGE	4,034	4	2	1	17	3
8254	BAY UNITED METHODIST CHURCH	29931 LAKE ROAD	BAY VILLAGE	2,931	3	2	1	15	2
8013	BAY VILLAGE MIDDLE SCHOOL	27725 WOLF ROAD	BAY VILLAGE	2,100	2	2	1	12	2
1120	BEACHWOOD HIGH SCHOOL	25100 FAIRMOUNT BOULEVARD	BEACHWOOD	5,293	5	5	1	29	5
1190	BEDFORD HEIGHTS COMMUNITY CENTER	5615 PERKINS ROAD	BEDFORD HTS	7,684	9	6	1	36	7
1280	BEDFORD HIGH SCHOOL	481 NORTHFIELD ROAD	BEDFORD	1,467	2	2	1	8	2
8044	BEIT HANINA SOCIAL CLUB	10301 LORAIN AVENUE	CLEVELAND	2,555	3	3	1	15	2
1390	BENTLEYVILLE VILLAGE HALL	6253 CHAGRIN RIVER ROAD	BENTLEYVILLE	757	1	2	1	3	2

November 2, 2021 General Election
Unit Allocation

8275	BEREA BRANCH LIBRARY	7 BEREA COMMONS	BEREA	2,162	2	2	1	9	2
8296	BEREA RECREATION CENTER	451 FRONT STREET	BEREA	3,486	4	2	1	14	3
7615	BESSIE KINSNER ELEMENTARY SCHOOL	19091 WATERFORD PARKWAY	STRONGSVILLE	4,701	4	3	1	24	4
8192	BETHANY BAPTIST CHURCH	1211 EAST 105TH STREET	CLEVELAND	2,864	5	4	1	15	3
8112	BETHEL CHRISTIAN	12901 WEST PLEASANT VALLEY ROAD	PARMA	3,002	3	3	1	15	3
8075	BETHEL-CLEVELAND-CHURCH	16670 EAST BAGLEY ROAD	MIDDLEBURG HTS	2,368	2	2	1	13	2
1580	BLOSSOM PROPERTY BUILDING 7	4400 OAKES ROAD	BRECKSVILLE	4,108	4	4	1	18	4
4960	BLUESTONE ELEMENTARY SCHOOL	1455 EAST 260TH STREET	EUCLID	4,163	5	4	1	24	4
4690	BOLTON ELEMENTARY SCHOOL	9803 QUEBEC AVENUE	CLEVELAND	1,444	3	3	1	9	2
8280	BOYS AND GIRLS CLUBS OF CLEVELAND	6114 BROADWAY AVENUE	CLEVELAND	1,241	2	2	1	8	2
1651	BRATENAHL COMMUNITY CENTER	10300 BRIGHTON ROAD	BRATENAHL	1,268	1	2	1	7	2
1540	BRECKSVILLE COMMUNITY CENTER	1 COMMUNITY DRIVE	BRECKSVILLE	4,453	4	2	1	25	4
8206	BROADVIEW HEIGHTS BAPTIST CHURCH	9850 BROADVIEW ROAD	BROADVIEW HTS	4,423	4	3	1	23	4
1400	BROADVIEW HEIGHTS COMMUNITY BUILDING	9543 BROADVIEW ROAD	BROADVIEW HTS	6,317	7	4	1	43	8
1460	BROOK PARK RECREATION CENTER	17400 HOLLAND ROAD	BROOK PARK	2,849	3	3	1	17	3
1510	BROOK PARK UNITED METH. CHURCH	6220 SMITH ROAD	BROOK PARK	2,961	3	2	1	11	3
1640	BROOKLYN HIGH SCHOOL	9200 BIDDULPH ROAD	BROOKLYN	2,944	3	3	1	17	3
1000	BROOKLYN HTS COMMUNITY CENTER	225 TUXEDO AVENUE	BROOKLYN HTS	1,124	1	2	1	7	2
3120	BROOKLYN HTS UNITED CHURCH OF CHRIST	2005 WEST SCHAAF ROAD	CLEVELAND	3,219	4	2	1	13	3
1630	BROOKLYN SENIOR COMMUNITY CENTER	7727 MEMPHIS AVENUE	BROOKLYN	2,659	3	3	1	15	3
1450	BROOKVIEW ELEMENTARY SCHOOL	14105 SNOW ROAD	BROOK PARK	3,201	3	2	1	12	3
1130	BRYDEN ELEMENTARY SCHOOL	25501 BRYDEN ROAD	BEACHWOOD	2,572	2	2	1	14	2
8102	CALEDONIA ELEMENTARY SCHOOL	914 CALEDONIA AVENUE	CLEVELAND HTS	4,761	4	4	1	27	3
1850	CANTERBURY ELEMENTARY SCHOOL	2530 CANTERBURY ROAD	CLEVELAND HTS	3,223	3	3	1	18	3
1670	CHAGRIN FALLS HIGH SCHOOL	400 EAST WASHINGTON STREET	CHAGRIN FALLS	3,559	4	4	1	20	3
8144	CHARDON HILLS MAGNET SCHOOL	1750 EAST 234TH STREET	EUCLID	2,166	2	2	1	12	2
3440	CHARLES A MOONEY MIDDLE SCHOOL	3213 MONTCLAIR AVENUE	CLEVELAND	2,412	3	3	1	14	2
8125	CHARLES DICKENS ELEMENTARY SCHOOL	13013 CORLETT AVENUE	CLEVELAND	1,808	3	3	1	11	2
7110	CHRISTIAN ASSEMBLY	25595 CHARDON ROAD	RICHMOND HTS	1,691	2	2	1	10	2

November 2, 2021 General Election
Unit Allocation

6320	CHURCH OF ST CLARENCE	30106 LORAIN ROAD	NORTH OLMSTED	4,571	5	3	1	23	4
8190	CHURCH OF ST MARY OF THE ASSUMPTION	15519 HOLMES AVENUE	CLEVELAND	2,325	3	3	1	14	2
8304	CHURCH OF THE RESURRECTION	32001 CANNON ROAD	SOLON	2,621	3	3	1	15	2
2420	CITIZENS ACADEMY EAST	12523 WOODSIDE AVENUE	CLEVELAND	2,724	5	4	1	18	3
7870	CLAGUE CABIN	1500 CLAGUE ROAD	WESTLAKE	3,242	3	2	1	15	3
6330	CLAGUE ROAD UNITED CHURCH OF CHRIST	3650 CLAGUE ROAD	NORTH OLMSTED	3,301	3	3	1	17	3
3050	CLARA E WESTROPP MIDDLE SCHOOL	19101 PURITAS AVENUE	CLEVELAND	2,231	3	3	1	17	2
4191	CLEVELAND COLLEGE PREPARATORY SCHOOL	4906 FLEET AVENUE	CLEVELAND	2,171	3	3	1	13	2
8140	CLEVELAND HEIGHTS COMMUNITY CENTER	1 MONTICELLO BOULEVARD	CLEVELAND HTS	9,269	10	6	1	40	8
8288	COLLINWOOD RECREATION CENTER	16300 LAKE SHORE BOULEVARD	CLEVELAND	1,975	3	2	1	12	2
8293	COMMUNITY ROOM IN OLMSTED TOWNSHIP	7900 FITCH ROAD	OLMSTED TWP	3,132	3	2	1	17	3
5940	CORNERSTONE COMMUNITY CHURCH	1400 LANDER ROAD	MAYFIELD HTS	3,135	3	3	1	15	3
3040	CUDELL RECREATION CENTER	1910 WEST BOULEVARD	CLEVELAND	5,572	7	4	1	32	5
4700	CUYAHOGA HEIGHTS VILLAGE HALL	4863 EAST 71ST STREET	CUYAHOGA HTS	410	1	2	1	3	2
1550	CUYAHOGA VALLEY CAREER CENTER	8001 BRECKSVILLE ROAD	BRECKSVILLE	2,335	2	2	1	10	2
2650	DANIEL E MORGAN PRE K-8	8912 MORRIS COURT	CLEVELAND	1,248	2	2	1	8	2
1730	DEBORAH DELISLE EDUCATIONAL OPTIONS CTR	14780 SUPERIOR ROAD	CLEVELAND HTS	3,880	4	3	1	17	3
3710	DENISON ELEMENTARY SCHOOL	3799 WEST 33RD STREET	CLEVELAND	2,979	4	3	1	20	3
6750	DENTZLER ELEMENTARY SCHOOL	3600 DENTZLER ROAD	PARMA	3,830	4	2	1	16	3
6680	DONNA SMALLWOOD ACTIVITIES CENTER	7001 WEST RIDGEWOOD DRIVE	PARMA	3,240	3	2	1	17	3
1600	DR MARTIN LUTHER EVANGELICAL LUTHERAN CH	4470 RIDGE ROAD	BROOKLYN	1,877	2	2	1	11	2
8111	EAST CLARK SCHOOL	885 EAST 146TH STREET	CLEVELAND	1,929	4	4	1	12	3
8235	EAST TECH HIGH SCHOOL	2439 EAST 55TH STREET	CLEVELAND	1,527	2	2	1	9	2
7550	EDITH WHITNEY ELEMENTARY SCHOOL	13548 WHITNEY ROAD	STRONGSVILLE	5,011	4	2	1	21	5
7620	EDNA SURRARRER ELEMENTARY SCHOOL	9306 PRIEM ROAD	STRONGSVILLE	3,309	3	3	1	17	3
6720	ELKS HALL	2300 SNOW ROAD	PARMA	2,115	2	2	1	12	2
1240	ELLENWOOD CENTER	124 ELLENWOOD AVENUE	BEDFORD	5,583	6	3	1	17	5
5610	EMERSON ELEMENTARY SCHOOL	13439 CLIFTON BOULEVARD	LAKEWOOD	3,868	4	4	1	22	3
8157	EUCLID EARLY LEARNING CENTER	22800 FOX AVENUE	EUCLID	3,341	4	4	1	17	3

November 2, 2021 General Election
Unit Allocation

5170	EUCLID HIGH SCHOOL	711 EAST 222ND STREET	EUCLID	1,842	2	2	1	10	2
4920	EUCLID LAKE FRONT COMMUNITY CENTER	1 BLISS LANE	EUCLID	1,726	2	2	1	10	2
8151	EUCLID PARK SCHOOL	17914 EUCLID AVENUE	CLEVELAND	3,556	5	3	1	18	3
5150	EUCLID PUBLIC LIBRARY	631 EAST 222ND STREET	EUCLID	2,388	3	3	1	14	2
1900	FAIRFAX ELEMENTARY SCHOOL	3150 FAIRFAX ROAD	CLEVELAND HTS	2,175	2	2	1	13	2
3230	FAIRFAX RECREATION CENTER	2335 EAST 82ND STREET	CLEVELAND	2,862	4	4	1	17	3
2380	FAIRHILL PARTNERS	12200 FAIRHILL ROAD	CLEVELAND	2,248	3	2	1	12	2
5210	FAIRVIEW PARK CITY HALL	20777 LORAIN ROAD	FAIRVIEW PARK	2,866	3	3	1	16	2
8032	FAIRVIEW PARK REGIONAL LIBRARY	21255 LORAIN ROAD	FAIRVIEW PARK	2,325	2	2	1	11	2
6510	FALLS LENOX PRIMARY SCHOOL	26450 BAGLEY ROAD	OLMSTED FALLS	6,434	8	3	1	24	5
4270	FATIMA FAMILY CENTER	6600 LEXINGTON AVENUE	CLEVELAND	3,562	6	4	1	14	3
7280	FERNWAY ELEMENTARY SCHOOL	17420 FERNWAY ROAD	SHAKER HTS	2,370	2	2	1	13	2
8239	FIRST ZION MISSIONARY BAPTIST CHURCH	10313 GARFIELD AVENUE	CLEVELAND	1,866	3	2	1	8	2
8119	FRANKLIN CIRCLE CHRISTIAN CHURCH	1688 FULTON ROAD	CLEVELAND	4,061	4	3	1	16	3
8173	FRANKLIN D ROOSEVELT PRE K-8	800 LINN DRIVE	CLEVELAND	1,202	2	2	1	12	2
8298	FRATERNAL ORDER OF POLICE HALL	2249 PAYNE AVE	CLEVELAND	1,275	2	2	1	12	2
8087	FRIENDLY INN SETTLEMENT	2386 UNWIN ROAD	CLEVELAND	1,906	3	3	1	12	2
3620	FULTON BRANCH LIBRARY	3545 FULTON ROAD	CLEVELAND	1,741	2	2	1	8	2
3720	GARFIELD ELEMENTARY SCHOOL	3800 WEST 140TH STREET	CLEVELAND	2,481	3	3	1	14	2
8198	GARFIELD HEIGHTS BRANCH LIBRARY	5409 TURNEY ROAD	GARFIELD HTS	2,397	2	2	1	10	2
5280	GARFIELD HEIGHTS HIGH SCHOOL	4900 TURNEY ROAD	GARFIELD HTS	10,431	11	7	1	60	8
8067	GARFIELD SCHOOL	13114 DETROIT AVENUE	LAKEWOOD	4,726	5	5	1	27	4
5400	GATES MILLS COMMUNITY HOUSE	1460 CHAGRIN RIVER ROAD	GATES MILLS	2,019	2	2	1	9	2
7630	GEARITY PROFESSIONAL DEVELOPMENT SCHOOL	2323 WRENFORD ROAD	UNIVERSITY HTS	3,058	3	3	1	21	3
1260	GLENDALE PRIMARY SCHOOL	400 WEST GLENDALE AVENUE	BEDFORD	1,859	2	2	1	11	2
4220	GLENVILLE HIGH SCHOOL	650 EAST 113TH STREET	CLEVELAND	2,443	4	4	1	23	3
5410	GLENWILLOW VILLAGE HALL	29555 PETTIBONE ROAD	GLENWILLOW	608	3	2	1	4	2
8028	GRACE CHRISTIAN MISSIONARY ALLIANCE CH	7393 PEARL ROAD	MIDDLEBURG HTS	2,567	3	2	1	11	2
5690	GRANT ELEMENTARY SCHOOL	1470 VICTORIA AVENUE	LAKEWOOD	2,026	2	2	1	12	2

November 2, 2021 General Election
Unit Allocation

7485	GRANTWOOD GOLF COURSE	38855 AURORA ROAD	SOLON	2,479	2	2	1	13	2
6730	GREEN VALLEY ELEMENTARY SCHOOL	2401 WEST PLEASANT VALLEY ROAD	PARMA	1,885	2	2	1	11	2
6630	GREENBRIAR MIDDLE SCHOOL ANNEX	11810 HUFFMAN ROAD	PARMA	2,721	3	2	1	16	3
8025	GUNNING PARK RECREATION CENTER	16700 PURITAS AVENUE	CLEVELAND	3,415	4	4	1	25	3
8250	HALLE SCHOOL OF INQUIRY	7901 HALLE AVENUE	CLEVELAND	382	1	2	1	3	2
2280	HALLORAN SKATING RINK	11815 LINNET AVENUE	CLEVELAND	3,736	4	3	1	16	3
8064	HANNAH GIBBONS-NOTTINGHAM SCHOOL	1401 LARCHMONT ROAD	CLEVELAND	1,315	2	2	1	8	2
5750	HARDING MIDDLE SCHOOL	16601 MADISON AVENUE	LAKEWOOD	2,896	3	3	1	17	2
8068	HARRISON ELEMENTARY SCHOOL	2080 QUAIL STREET	LAKEWOOD	3,045	3	3	1	17	3
5730	HAYES ELEMENTARY SCHOOL	16401 DELAWARE AVENUE	LAKEWOOD	2,752	3	3	1	17	2
1350	HERITAGE CONGREGATIONAL CHURCH	485 WEST STREET	BEREA	2,381	3	2	1	10	2
5420	HIGHLAND HILLS VILLAGE HALL	3700 NORTHFIELD ROAD	HIGHLAND HILLS	523	1	2	1	3	2
5450	HIGHLAND HTS COMMUNITY CENTER	5827 HIGHLAND ROAD	HIGHLAND HTS	6,760	8	5	1	27	6
7260	HILLSIDE MIDDLE SCHOOL	1 EDUCATIONAL PARK DRIVE	SEVEN HILLS	4,611	4	3	1	31	4
1110	HILLTOP ELEMENTARY SCHOOL	24524 HILLTOP DRIVE	BEACHWOOD	2,187	2	2	1	12	2
5520	HORACE MANN ELEMENTARY SCHOOL	1215 WEST CLIFTON BOULEVARD	LAKEWOOD	4,272	4	4	1	24	4
7560	HOWARD CHAPMAN ELEMENTARY SCHOOL	13883 DRAKE ROAD	STRONGSVILLE	3,856	4	2	1	20	3
5440	HUNTING VALLEY VILLAGE HALL	38251 FAIRMOUNT BOULEVARD	HUNTING VALLEY	528	1	2	1	3	2
8187	IMANI TEMPLE MINISTRIES	2463 NORTH TAYLOR ROAD	CLEVELAND HTS	4,665	4	3	1	17	3
8233	INDEPENDENCE CIVIC CENTER	6363 SELIG DRIVE	INDEPENDENCE	5,908	5	4	1	33	5
8278	JANE ADDAMS BUSINESS CAREERS CENTER	2373 EAST 30TH STREET	CLEVELAND	1,142	2	2	1	7	2
8072	JOHN ADAMS HIGH SCHOOL	3817 MARTIN LUTHER KING JR DRIVE	CLEVELAND	4,138	7	5	1	25	4
8113	JOHN CARROLL UNIVERSITY RECREATION CTR	1 JOHN CARROLL BOULEVARD	UNIVERSITY HTS	3,903	4	4	1	23	3
8294	JOHN F KENNEDY HIGH SCHOOL	15111 MILES AVENUE	CLEVELAND	5,273	6	4	1	27	4
8279	JOHN HAY HIGH SCHOOL	2075 STOKES BOULEVARD	CLEVELAND	2,335	3	3	1	12	2
6250	JOHN KNOX PRESBYTERIAN CHURCH	25200 LORAIN ROAD	NORTH OLMSTED	4,508	4	2	1	22	3
6700	JOHN MUIR ELEMENTARY SCHOOL	5531 WEST 24TH STREET	PARMA	2,429	2	2	1	14	2
4250	JOSEPH GALLAGHER MIDDLE SCHOOL	6601 FRANKLIN BOULEVARD	CLEVELAND	1,646	2	2	1	10	2
8299	LAKEVIEW COMMUNITY CENTER	1290 WEST 25TH STREET	CLEVELAND	749	1	2	1	5	2

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3320	LAKEVIEW TOWERS APARTMENTS	2700 WASHINGTON AVENUE	CLEVELAND	2,081	2	2	1	9	2
5570	LAKEWOOD CITY HALL	12650 DETROIT AVENUE	LAKEWOOD	2,773	3	3	1	16	2
5680	LAKEWOOD PRESBYTERIAN CHURCH	14502 DETROIT AVENUE	LAKEWOOD	2,088	2	2	1	12	2
5720	LAKEWOOD UNITED METHODIST CHURCH	15700 DETROIT AVENUE	LAKEWOOD	2,185	2	2	1	13	2
8174	LANGSTON HUGHES LIBRARY	10200 SUPERIOR AVENUE	CLEVELAND	563	1	2	1	4	2
8048	LEE ROAD LIBRARY	2345 LEE ROAD	CLEVELAND HTS	2,746	3	3	1	15	2
5710	LINCOLN ELEMENTARY SCHOOL	15615 CLIFTON BOULEVARD	LAKEWOOD	1,994	2	2	1	12	2
3430	LINCOLN WEST HIGH SCHOOL	3202 WEST 30TH STREET	CLEVELAND	3,240	4	4	1	21	3
7290	LOMOND ELEMENTARY SCHOOL	17917 LOMOND BOULEVARD	SHAKER HTS	3,076	3	3	1	19	3
2070	LOUISA MAY ALCOTT ELEMENTARY SCHOOL	10308 BALTIC ROAD	CLEVELAND	3,761	4	4	1	19	3
2860	LUIS MUNOZ MARIN MIDDLE SCHOOL	1701 CASTLE AVENUE	CLEVELAND	1,070	2	2	1	7	2
8083	LYNDHURST COMMUNITY CENTER	1341 PARKVIEW DRIVE	LYNDHURST	6,971	7	4	1	27	6
6240	MAPLE ELEMENTARY SCHOOL	24101 MAPLE RIDGE ROAD	NORTH OLMSTED	3,160	3	2	1	13	3
8160	MAPLE LEAF ELEMENTARY SCHOOL	5764 TURNEY ROAD	GARFIELD HTS	5,915	6	4	1	26	5
3380	MARION STERLING ELEMENTARY SCHOOL	3033 CENTRAL AVENUE	CLEVELAND	2,416	3	3	1	15	2
3090	MARTIN LUTHER KING JR LIBRARY	1962 STOKES BOULEVARD	CLEVELAND	710	1	2	1	5	2
2290	MARY M BETHUNE SCHOOL	11815 MOULTON AVENUE	CLEVELAND	3,220	4	4	1	19	3
8074	MAYFAIR ELEMENTARY SCHOOL	13916 MAYFAIR AVENUE	EAST CLEVELAND	2,874	4	4	1	18	3
8205	MAYFIELD VILLAGE CIVIC CENTER	6622 WILSON MILLS ROAD	MAYFIELD VILLAGE	2,575	4	4	1	11	3
8041	MEMORIAL SCHOOL	410 EAST 152ND STREET	CLEVELAND	3,056	4	4	1	16	3
8179	MESSIAH LUTHERAN CHURCH	5200 MAYFIELD ROAD	LYNDHURST	2,840	3	3	1	13	2
6770	MICHAEL A RIES RINK	5000 FORESTWOOD DRIVE	PARMA	3,411	3	3	1	19	3
2010	MICHAEL R WHITE ELEMENTARY SCHOOL	1000 EAST 92ND STREET	CLEVELAND	1,770	3	3	1	16	2
4190	MICHAEL ZONE RECREATION CENTER	6301 LORAIN AVENUE	CLEVELAND	3,467	4	3	1	17	3
8244	MIDDLEBURG HEIGHTS BRANCH LIBRARY	16699 EAST BAGLEY ROAD	MIDDLEBURG HTS	1,558	2	2	1	9	2
6065	MIDDLEBURG HEIGHTS COMMUNITY CENTER	16000 EAST BAGLEY ROAD	MIDDLEBURG HTS	1,908	2	2	1	9	2
8147	MILES PARK K-8 SCHOOL	4090 EAST 93RD STREET	CLEVELAND	2,502	4	4	1	15	3
2330	MILES PRE K-8	11918 MILES AVENUE	CLEVELAND	2,382	4	4	1	15	3
3825	MILL CREEK COMMUNITY CENTER	4401 BROOKS ROAD	CLEVELAND	1,050	1	2	1	4	2

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8302	MOORE COUNSELING AND MEDIATION SERVICES	22639 EUCLID AVENUE	EUCLID	2,249	2	2	1	13	2
3290	MORNING STAR BAPTIST CHURCH	10250 SHAKER BOULEVARD	CLEVELAND	2,110	3	3	1	12	2
8182	MOUND-STEM SCHOOL	5935 ACKLEY ROAD	CLEVELAND	1,211	2	2	1	7	2
2210	MT HAVEN BAPTIST CHURCH	3484 MARTIN LUTHER KING JR DRIVE	CLEVELAND	1,294	2	2	1	8	2
2260	MT OLIVE MISSIONARY BAPTIST CHURCH	3290 EAST 126TH STREET	CLEVELAND	577	1	2	1	3	2
8134	MURTIS TAYLOR HUMAN SERVICES CENTER	13411 UNION AVENUE	CLEVELAND	1,084	2	2	1	7	2
8201	NATHAN HALE ELEMENTARY SCHOOL	3588 MARTIN LUTHER KING JR DRIVE	CLEVELAND	2,186	4	4	1	12	3
8128	NEIGHBORHOOD HOUSING SERVICES OF GR CLE	5700 BROADWAY AVENUE	CLEVELAND	475	1	2	1	3	2
8303	NEIGHBORHOOD LEADERSHIP INSTITUTE	5246 BROADWAY AVENUE	CLEVELAND	413	1	2	1	3	2
8305	NEO CHURCH	7593 ELMHURST DRIVE	SEVEN HILLS	2,140	2	2	1	13	2
8185	NEW LIFE CATHEDRAL	16200 EUCLID AVENUE	EAST CLEVELAND	1,457	2	2	1	9	2
8223	NEWBURGH HEIGHTS VILLAGE HALL	3801 HARVARD AVENUE	NEWBURGH HTS	1,071	1	2	1	7	2
6740	NORMANDY HIGH SCHOOL	2500 WEST PLEASANT VALLEY ROAD	PARMA	1,902	2	2	1	8	2
6280	NORTH OLMSTED BRANCH LIBRARY	27403 LORAIN ROAD	NORTH OLMSTED	3,440	3	2	1	12	3
6300	NORTH OLMSTED COMMUNITY CABIN	28114 LORAIN ROAD	NORTH OLMSTED	3,415	3	2	1	19	3
6370	NORTH RANDALL VILLAGE HALL	21937 MILES ROAD	NORTH RANDALL	656	1	2	1	3	2
8162	NORTH ROYALTON BRANCH LIBRARY	5071 WALLINGS ROAD	NORTH ROYALTON	3,301	4	2	1	13	3
8036	NORTH ROYALTON CHRISTIAN CHURCH	5100 ROYALTON ROAD	NORTH ROYALTON	3,596	3	2	1	16	3
8237	NORTH ROYALTON CITY HALL	14600 STATE ROAD	NORTH ROYALTON	4,178	4	4	1	17	3
8312	NORTH ROYALTON ELEMENTARY SCHOOL	16400 STATE ROAD	NORTH ROYALTON	3,999	4	3	1	18	3
8285	NORTHERN OHIO RECOVERY ASSOCIATION	1400 EAST 55TH STREET	CLEVELAND	747	1	2	1	5	2
6532	OAKWOOD COMMUNITY CENTER	23035 BROADWAY AVENUE	OAKWOOD	2,707	5	4	1	12	3
8255	OLIVER HAZARD PERRY ELEMENTARY SCHOOL	18400 SCHENELY AVENUE	CLEVELAND	1,921	2	2	1	12	2
8156	OLMSTED FALLS INTERMEDIATE SCHOOL	27043 BAGLEY ROAD	OLMSTED TWP	3,681	3	3	1	20	3
8106	OLMSTED FALLS MIDDLE SCHOOL	27045 BAGLEY ROAD	OLMSTED TWP	3,144	3	3	1	17	3
6580	ORANGE VILLAGE HALL	4600 LANDER ROAD	ORANGE	2,830	3	3	1	12	2
3670	OUR LADY OF ANGELS LINUS HALL	3600 ROCKY RIVER DRIVE	CLEVELAND	3,680	4	3	1	20	3
4910	OUR LADY OF THE LAKE	175 EAST 200TH STREET	EUCLID	2,608	3	3	1	14	2
5910	OUR SAVIOR LUTHERAN CHURCH	2154 SOM CENTER ROAD	MAYFIELD HTS	3,418	4	4	1	17	3

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6790	PARMA EVANGELICAL LUTHERAN CHURCH	5280 BROADVIEW ROAD	PARMA	2,072	2	2	1	10	2
6660	PARMA HEIGHTS BAPTIST CHURCH	8971 WEST RIDGEWOOD DRIVE	PARMA HTS	10,023	9	4	1	39	8
6930	PARMA LIBRARY	6996 POWERS BOULEVARD	PARMA	2,165	2	2	1	10	2
2320	PATRICK HENRY MIDDLE SCHOOL	11901 DURANT AVENUE	CLEVELAND	1,461	3	3	1	14	2
3880	PEARL ROAD UNITED METHODIST CHURCH	4200 PEARL ROAD	CLEVELAND	4,246	5	4	1	20	4
8301	PEP EASTWOOD SCHOOL	1941 SAGAMORE DRIVE	EUCLID	2,339	3	3	1	13	2
3310	PILGRIM CONGREGATIONAL CHURCH	2592 WEST 14TH STREET	CLEVELAND	1,316	2	2	1	7	2
6940	PLEASANT VALLEY ELEMENTARY SCHOOL	9906 WEST PLEASANT VALLEY ROAD	PARMA	3,931	4	4	1	22	3
1940	PLYMOUTH CHURCH UCC	2860 COVENTRY ROAD	CLEVELAND	3,709	4	3	1	17	4
8178	PRIMERA IGLESIA BAUTISTA HISPANA	6800 DENISON AVENUE	CLEVELAND	3,247	4	4	1	16	3
4890	PROSPECT ACADEMY	1843 STANWOOD ROAD	EAST CLEVELAND	3,456	5	4	1	16	3
3415	QUINN CHAPEL CHURCH	3241 EAST 130TH STREET	CLEVELAND	1,863	3	3	1	11	2
7130	REGINA HALL AT NOTRE DAME COLLEGE	1857 SOUTH GREEN ROAD	SOUTH EUCLID	2,654	3	2	1	12	2
6980	RENWOOD ELEMENTARY SCHOOL	8020 DEERFIELD DRIVE	PARMA	3,449	3	2	1	19	3
8277	RICE BRANCH LIBRARY	11535 SHAKER BOULEVARD	CLEVELAND	509	1	2	1	3	2
8310	RICHMOND HEIGHTS UPPER SCHOOL	447 RICHMOND ROAD	RICHMOND HTS	4,031	5	3	1	20	4
8059	RICHMOND HTS CHURCH OF THE NAZARENE	499 TREBISKY ROAD	RICHMOND HTS	2,145	2	2	1	9	2
6710	RIDGE-BROOK ELEMENTARY SCHOOL	7915 MANHATTAN AVENUE	PARMA	3,087	3	3	1	17	3
6890	RIDGEWOOD UNITED METHODIST CHURCH	6330 RIDGE ROAD	PARMA	1,131	1	2	1	7	2
8040	RIVERSIDE ELEMENTARY SCHOOL	14601 MONTROSE AVENUE	CLEVELAND	2,726	3	3	1	16	3
2580	ROBERT H JAMISON PRE K-8 SCHOOL	4092 EAST 146TH STREET	CLEVELAND	3,039	4	4	1	14	3
8256	ROBINSON G JONES ELEMENTARY SCHOOL	4550 WEST 150TH STREET	CLEVELAND	2,492	3	3	1	18	3
8297	ROCKET MORTGAGE FIELD HOUSE	1 CENTER COURT	CLEVELAND	4,341	3	3	1	21	3
7050	ROCKY RIVER CIVIC CENTER	21016 HILLIARD BOULEVARD	ROCKY RIVER	7,037	7	5	1	61	8
7070	ROCKY RIVER PRESBYTERIAN CHURCH	21750 DETROIT ROAD	ROCKY RIVER	3,970	4	2	1	20	3
7030	ROCKY RIVER UNITED METHODIST CHURCH	19414 DETROIT ROAD	ROCKY RIVER	5,273	5	3	1	20	4
5640	ROOSEVELT ELEMENTARY SCHOOL	14237 ATHENS AVENUE	LAKEWOOD	4,275	4	4	1	24	4
5960	ROSS C DEJOHN COMMUNITY CENTER	6306 MARSOL ROAD	MAYFIELD HTS	5,409	5	4	1	23	5
6410	ROYAL VIEW ELEMENTARY SCHOOL	13220 RIDGE ROAD	NORTH ROYALTON	6,993	7	5	1	26	5

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8153	SAGRADA FAMILIA	7719 DETROIT AVENUE	CLEVELAND	2,695	3	3	1	15	2
3420	SALVATION ARMY CLARK	4402 CLARK AVENUE	CLEVELAND	3,002	4	2	1	16	3
2940	SALVATION ARMY GROVEWOOD	17625 GROVEWOOD AVENUE	CLEVELAND	1,503	2	2	1	10	2
2340	SECOND CALVARY BAPTIST CHURCH	12017 EMERY AVENUE	CLEVELAND	1,687	3	3	1	10	2
7310	SHAKER FAMILY CENTER	19824 SUSSEX ROAD	SHAKER HTS	2,180	2	2	1	12	2
7390	SHAKER HEIGHTS MIDDLE SCHOOL	20600 SHAKER BOULEVARD	SHAKER HTS	6,397	6	5	1	27	5
5905	SHERRI PARK APARTMENTS	2201 ACACIA PARK DRIVE	LYNDHURST	1,009	1	2	1	6	2
6880	SHILOH MIDDLE SCHOOL	2303 GRANTWOOD DRIVE	PARMA	3,326	3	3	1	18	3
8158	SHOREVIEW ELEMENTARY SCHOOL	490 EAST 260TH STREET	EUCLID	4,408	5	5	1	24	4
8079	SOLON CITY HALL	34200 BAINBRIDGE ROAD	SOLON	2,693	2	2	1	11	2
8249	SOLON COMMUNITY CENTER	35000 PORTZ PARKWAY	SOLON	7,030	6	5	1	36	6
8262	SOUTH EUCLID - LYNDHURST BRANCH LIBRARY	1876 SOUTH GREEN ROAD	SOUTH EUCLID	2,721	3	3	1	11	2
7160	SOUTH EUCLID COMMUNITY CENTER	1370 VICTORY DRIVE	SOUTH EUCLID	5,089	5	4	1	27	4
8183	SOUTH EUCLID UNITED CHURCH OF CHRIST	4217 BLUESTONE ROAD	SOUTH EUCLID	4,099	4	4	1	23	3
6910	ST ANTHONYS SCHOOL	6750 STATE ROAD	PARMA	2,367	3	2	1	13	2
1030	ST BARNABAS EPISCOPAL CHURCH	468 BRADLEY ROAD	BAY VILLAGE	3,358	3	2	1	16	3
2980	ST JOHN LUTHERAN CHURCH	17403 NOTTINGHAM ROAD	CLEVELAND	2,787	3	3	1	14	2
7890	ST LADISLAS CHURCH	2345 BASSETT ROAD	WESTLAKE	6,182	6	4	1	31	5
4030	ST LEO PARISH COMMUNITY CENTER	4940 BROADVIEW ROAD	CLEVELAND	2,931	3	2	1	13	2
8129	ST MARYS CATHOLIC CHURCH	250 KRAFT STREET	BEREA	4,490	4	3	1	25	4
2710	ST MEL HALL	14436 TRISKETT ROAD	CLEVELAND	2,682	3	3	1	15	2
1430	ST MICHAELS WOODSIDE HALL	5025 EAST MILL ROAD	BROADVIEW HTS	3,700	3	2	1	21	3
3920	ST PATRICKS CHURCH	4427 ROCKY RIVER DRIVE	CLEVELAND	2,528	3	2	1	9	2
8194	ST PAULS EPISCOPAL CHURCH	2747 FAIRMOUNT BOULEVARD	CLEVELAND HTS	3,179	3	2	1	12	2
7240	ST PETER UNITED CHURCH OF CHRIST	125 EAST RIDGEWOOD DRIVE	SEVEN HILLS	2,192	2	2	1	12	2
1590	ST THOMAS MORE CHURCH	4180 NORTH AMBER DRIVE	BROOKLYN	2,427	3	3	1	14	2
7350	STEPHANIE TUBBS JONES COMMUNITY BUILDING	3450 LEE ROAD	SHAKER HTS	2,884	3	3	1	12	2
8050	STERLING RECREATION CENTER	1380 EAST 32ND STREET	CLEVELAND	3,214	4	3	1	21	3
8208	STRONGSVILLE CITY SCHOOLS ADMIN OFFICES	18199 COOK AVENUE	STRONGSVILLE	4,105	4	4	1	18	3

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7540	STRONGSVILLE COMMUNITY LIBRARY	18700 WESTWOOD DRIVE	STRONGSVILLE	3,812	3	2	1	21	3
7600	STRONGSVILLE HIGH SCHOOL	20025 LUNN ROAD	STRONGSVILLE	3,202	3	3	1	17	3
7530	STRONGSVILLE MIDDLE SCHOOL	13200 PEARL ROAD	STRONGSVILLE	2,529	2	2	1	14	2
8188	STRONGSVILLE SENIOR CENTER	18100 ROYALTON ROAD	STRONGSVILLE	3,059	3	3	1	14	3
5135	STS ROBERT AND WILLIAM CATHOLIC SCHOOL	351 EAST 260TH STREET	EUCLID	3,896	5	5	1	22	4
6600	THE CHURCH OF THE WESTERN RESERVE	30500 FAIRMOUNT BOULEVARD	PEPPER PIKE	3,032	3	3	1	12	3
8181	THE DRAKE APARTMENTS	6503 MARSOL ROAD	MAYFIELD HTS	880	1	2	1	6	2
8258	THE GEMINI CENTER	21225 LORAIN ROAD	FAIRVIEW PARK	2,314	3	2	1	13	2
6810	THOREAU PARK ELEMENTARY SCHOOL	5401 WEST 54TH STREET	PARMA	2,665	3	3	1	15	3
4550	THURGOOD MARSHALL RECREATION CENTER	8611 HOUGH AVENUE	CLEVELAND	2,405	4	4	1	15	3
3250	TREMONT MONTESSORI SCHOOL	2409 WEST 10TH STREET	CLEVELAND	2,198	2	2	1	12	2
8135	TRINITY CHURCH	14040 EAST BAGLEY ROAD	MIDDLEBURG HTS	2,363	2	2	1	11	2
8117	UAW HALL LOCAL 1250	17250 HUMMEL ROAD	BROOK PARK	3,141	3	3	1	18	3
3570	UNION SQUARE APARTMENTS	3495 EAST 98TH STREET	CLEVELAND	644	1	2	1	4	2
7170	UNIVERSITY HEIGHTS LIBRARY	13866 CEDAR ROAD	UNIVERSITY HTS	3,101	3	2	1	17	2
8232	URBAN LEAGUE OF GREATER CLEVELAND	2930 PROSPECT AVENUE E	CLEVELAND	624	1	2	1	3	2
6670	VALLEY FORGE HIGH SCHOOL	9999 INDEPENDENCE BOULEVARD	PARMA HTS	3,189	3	3	1	18	3
7710	VALLEY VIEW COMMUNITY CENTER	6828 HATHAWAY ROAD	VALLEY VIEW	1,570	2	2	1	8	2
3470	VFW POST 2850	3296 WEST 61ST STREET	CLEVELAND	1,434	2	2	1	9	2
8007	W H KIRK MIDDLE SCHOOL	14410 TERRACE ROAD	EAST CLEVELAND	2,690	4	4	1	18	3
4370	WADE PARK SCHOOL	7600 WADE PARK AVENUE	CLEVELAND	1,151	2	2	1	7	2
3520	WALTON ELEMENTARY SCHOOL	3409 WALTON AVENUE	CLEVELAND	671	1	2	1	5	2
7850	WALTON HILLS COMMUNITY BUILDING	7595 WALTON ROAD	WALTON HILLS	1,750	2	2	1	9	2
8180	WARNER GIRLS LEADERSHIP ACADEMY	8315 JEFFRIES AVENUE	CLEVELAND	947	2	2	1	5	2
8246	WARRENSVILLE HEIGHTS RECREATION CENTER	4270 NORTHFIELD ROAD	WARRENSVILLE HTS	9,553	12	4	1	48	8
8234	WEST PARK ACADEMY	4697 WEST 130TH STREET	CLEVELAND	3,796	4	4	1	21	3
8257	WEST PARK PARTY CENTER	3556 WEST 130TH STREET	CLEVELAND	3,506	4	3	1	14	3
8195	WESTLAKE BOE AT PARKSIDE	24525 HILLIARD BOULEVARD	WESTLAKE	3,634	4	3	1	20	3
7950	WESTLAKE CENTER FOR COMMUNITY SERVICES	29694 CENTER RIDGE ROAD	WESTLAKE	3,627	3	2	1	17	3

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8056	WESTLAKE CITY HALL	27700 HILLIARD BOULEVARD	WESTLAKE	1,850	2	2	1	8	3
8196	WESTLAKE RECREATION CENTER	28955 HILLIARD BOULEVARD	WESTLAKE	6,209	6	4	1	33	6
8252	WESTSIDE COMMUNITY SCHOOL OF THE ARTS	3727 BOSWORTH ROAD	CLEVELAND	1,927	2	2	1	12	3
8253	WILLIAM RAINEY HARPER PRE-3 SCHOOL	5515 IRA AVENUE	CLEVELAND	2,637	3	3	1	15	3
8154	WILLSON SCHOOL	1126 ANSEL ROAD	CLEVELAND	2,101	4	4	1	13	4
8240	WILLSON UNITED METHODIST CHURCH	9226 ST CLAIR AVENUE	CLEVELAND	2,137	3	2	1	17	3
7340	WOODBURY ELEMENTARY SCHOOL	15400 SOUTH WOODLAND ROAD	SHAKER HTS	5,265	5	4	1	23	4
8202	WOODHILL HOMES COMMUNITY CENTER	2491 BALDWIN ROAD	CLEVELAND	587	1	2	1	4	3
7860	WOODMERE TOWN HALL	27899 CHAGRIN BOULEVARD	WOODMERE	493	1	2	1	3	3
6170	WYLIE ATHLETIC CENTER AT MAPLE HTS HIGH	1 MUSTANG WAY	MAPLE HTS	11,631	12	5	1	60	9
2390	ZELMA GEORGE COMMUNITY CENTER	3155 MARTIN LUTHER KING DRIVE	CLEVELAND	4,379	7	5	1	28	5

Registered_ Voters	Ttoal Precincts	Precinct Scanners at Location	AutoMark A.D.A. Unit	Number of Voting Booths	Numbers of EPB's at Location+CS
877,453	**975**	**836**	**295**	**4613**	**1131**

CUYAHOGA COUNTY
BOARD OF ELECTIONS

Jeff Hastings *Chairman* | **Inajo Davis Chappell** *Member* | **Lisa M. Stickan** *Member* | **David J. Wondolowski** *Member* | **Anthony W. Perlatti** *Director* | **Anthony N. Kaloger** *Deputy Director*

Memorandum

To: Board Members

Cc: Anthony W. Perlatti, Director

Anthony N. Kaloger, Deputy Director

From: Kendra Zusy, Fiscal Services Manager

Date: October 18, 2021

Re: Approval of Purchase Award – Marketing Communication Resource, Inc. (MCR) for the Printing and Delivery of Voter Assistance Table Guides, Alphabetic Backup Paper Poll Books, Poll Location Voter Lists and Precinct Voter Lists for the November 2, 2021 General Election

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As a part of conducting each election, the Board of Elections provides the above printed material at each polling location.

An unrestricted, informal bid was conducted through the Cuyahoga County's procurement system, INFOR, to 34 registered suppliers. The bid closed on Thursday, September 16, 2021 at 2:00pm EST. There was only one (1) successful bidder, **Marketing Communication Resource, Inc.** with a total bid of **$38,146.05**.

A second effort was performed by contacting two suppliers, who commonly bid on Board of Elections' projects, to see why they did not submit bids. Both suppliers indicated that they would not be able to submit a competitive bid at this time. See summary of the expected costs for the printing, delivery and programming printed material:

Item	Quantity	Rate	Unit	Total
Voter Assistance Table (VAT) Guide	348	$8.00	EA	$2,784.00
Alphabetic Backup Paper Poll Book	816	$10.25	EA	$8,364.00
Poll Location Voter List	296	$5.80	EA	$1,716.80
Precinct Voter List	975	$24.75	EA	$24,131.25
Programming	8	$100.00	HR	$800.00
Delivery Charge	1	$350.00	EA	$350.00
TOTAL				**$38,146.05**

Necessary funds are available in the 2021 BOE General Election Budget to fund this request.

Voucher Summary

Board Approval Date October 18, 2021

$103,028.01

		Vendor	Department	Description	Amount
1	PO210971-CM1774	Midwest/Direct	Ballot	Printing of Election Day ballots, early in-person ballots, vote-by-mail ballots, remakes, and test ballots for the September 14, 2021 Primary Election.	$76,553.01
2	I-2021-5205	Berman Moving & Storage	Election Support	Delivery and return of voting equipment and supplies to 157 Tier 1 voting locations ($150/location) and 15 Tier 2 voting locations ($195/location) for the September 14, 2021 Primary Election.	$26,475.00

CHALLENGED VOTER PACKET

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1. Summary Statement

2. Challenge Submitted by Ryan T. Routh

3. Correspondence from Vasvari/Zimmerman, Counselors-at-Law

4. Ohio Revised Code, Section 3503.24, Application for correction of precinct registration list or challenge of right to vote

5. Mordechai Rennert
   A. Cancelled Registration
   B. Voter Information Report – Current Registration

5. Ryan T. Routh
   A. Voter Information Report

SUMMARY STATEMENT

CHALLENGER: Ryan Routh
2359 Ardleigh Road
Cleveland Hts., Ohio

CHALLENGED: Mordechai Rennert
4365 Churchill Avenue
University Hts., Ohio

A Challenge of Right to Vote and Correction of Registration List (SOS Form #257), dated September 28, 2021, was received from elector Ryan Routh. Mr. Routh stated that Mr. Mordechai Rennert "on July 1, 2021, testified under oath, in a deposition taken pursuant to the laws of New York, that he resides only temporarily in the Cleveland area and that his residence is located at 54 St. Regis Drive North, Rochester (Monroe County) New York.

Staff Research:

As a result of the Challenge Form received from Mr. Routh, an investigation was conducted by the Registration Department into the voter registration record of Mr. Mordechai Rennert. The following information is provided:

- Mr. Rennert originally registered to vote in Cuyahoga County on November 17, 2000.
  - The residential address listed by Mr. Rennert was 3662 Severn Road, Cleveland Hts., Ohio.
  - He did not vote in any Elections from 2001 through 2007.
  - On September 28, 2007, after no voter activity, Mr. Rennert was sent a NVRA Confirmation Notice for lack of voter activity.
  - Mr. Rennert's registration was cancelled on September 29, 2011 respective to the 2007 NVRA Notice.
- Mr. Rennert again registered to vote in Cuyahoga County on September 8, 2020.
  - The residential address listed by Mr. Rennert was 4365 Churchill Blvd., University Hts., Ohio.
  - Mr. Rennert successfully voted by mail in the November 3, 2020 General Election and August 3, 2021 Special Congressional Election

Additional Information:

- It should be noted that Mr. Rennert started circulating a Petition for the Cleveland Hts., /University Hts., Consolidated School District on July 16, 2021.
  - Mr. Rennert filed the petition with the CCBOE on August 3, 2021.
  - Mr. Rennert received the required number of valid signatures (150) to be placed on the November 3, 2021 General Election Ballot.
- Mr. Routh initially tried to file a candidacy protest concerning Mr. Rennert. However, his protest was not filed with the CCBOE prior to the August 20th deadline

Form No. 257 Prescribed by the Secretary of State (03-19) **print clearly**

Challenge of Right to Vote and Correction of Registration List

R.C. 3503.24

(To be filed with the Board of Elections not later than 30 days prior to the election)

I, Ryan Routh, am a qualified elector of Cuyahoga (County).

My address is 2359 Ardleigh Road (Street Address), Cleveland Heights (City)

I hereby: (check one box below and fill in remaining information)

☒ Challenge the Right to Vote of Mordechai Rennert (Name of Person Challenged)

whose Address is (ostensibly) 4365 Churchill Avenue (Street Address), University Heights (City), Cuyahoga (County)

☐ Request correction of the registration list of Precinct _____ Ward _____

I file this challenge or correction for the following reason(s): On July 1, 2021, Mr. Rennert testified under oath, in a deposition taken pursuant to the laws of New York, that he resides only temporarily in the Cleveland area and this his residence is located 54 St. Regis Drive North, Rochester (Monroe County) New York. A copy of the transcript is attached.

PLEASE NOTE: The return of mail, sent by an elections official or any other individual, as undeliverable, unable to forward, or a change of address on file (NCOA) alone is insufficient to grant a challenge or application for correction. Evidence of a foreclosure action alone is insufficient to grant a challenge or correction. The fact that a voter's status is recorded in the Statewide Voter Registration Database as "active-confirmation" (also known as "inactive") alone is insufficient ground to grant a challenge or correction.

I hereby declare under penalty of election falsification that the statements above are true based on my personal knowledge, information or belief.

Ryan T Routh

Signature of Elector

9/27/2021

WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.

Vasvari | Zimmerman
attorneys | counselors-at-law

20600 Chagrin Boulevard
Suite 800 Tower East
Shaker Heights, Ohio 44122-5353

t 216.458.5880
f 216.302.3700

Raymond V. Vasvari, Jr.
vasvari@vasvarilaw.com

28 September 2021

RE: Eligibility of Mordechai Rennert as an Elector in the Cleveland Heights University Heights School District

Anthony Perlatti
Director
Cuyahoga County Board of Elections
2925 Euclid Avenue
Cleveland, Ohio 44115
Email: aperlatti@cuyahogacounty.gov

Dear Mr. Perlatti:

We have been retained by Ryan Routh, an elector in the Cleveland Heights University Heights City School District (CHUH CSD) to provide advice and counsel regarding the eligibility of Mordechai Rennert to stand for election in the upcoming General Election. Mr. Routh has challenged Mr. Rennert's status as a legitimate elector in the CHUH CSD and we write in support of, and to elaborate upon, that challenge.

On July 16, 2021, Mr. Rennert filed a Nominating Petition and Statement of Candidacy, in an effort to appear on the ballot as a candidate for election to the CHUH CSD Board of Education. As you know, Rev. Code § 3.15 (A) (4) requires every member of a Board of Education to be a resident within the geographical boundaries of the school district governed by that Board, and Rev. Code § 3313.01 limits Board membership to qualified electors residing within the district.

On September 14, 2021, Mr. Routh sent you a letter and email, along with attachments, that strongly support the contention that Mr. Rennert was a resident of Monroe County, New York when he filed his Petition to be listed as a candidate for the CHUH CSD Board of Education. On September 20, 2021, you responded by email. In your response, you indicated that the Board of Elections determines the residency of a candidate based upon the information contained in documents within its custody, and that in any event, the deadlines for challenging Mr. Rennert's candidacy had already passed.

We understand the Board's position that it has a limited ability to investigate the eligibility of a candidate whose petitions have already been accepted. The limitations of the law, however, apply to protests and investigations regarding Mr. Rennert's **candidacy** and do not prohibit the Board of Elections from investigating his status as a legitimate **elector**.

As you know, Rev. Code §§ 3503.25 and 3501.11(Q) confer upon the Board of Elections the authority to investigate the accuracy of voting lists and the eligibility of electors.

The authority to conduct such an investigation, sua sponte, is not subject to the time bars imposed by Rev. Code §§ 3501.39 et seq or 3513.263, and is independently authorized by Rev. Code § 3501.11 (J). See, e.g., State ex rel. Harbarger v. Cuyahoga Cty. Bd. of Elections, 75 Ohio St.3d 44, 46-47 (1996).

2 OCT '21 AM9:42

In your email, you informed Mr. Routh that the Board of Elections must determine questions regarding residency and the status of an elector based on the records it possesses, and that Board records show that Mr. Rennert has been registered to vote in Cuyahoga County for over a year. But your representation in this regard does not dispose of the question of whether Mr. Rennert remains a qualified elector in the CHUH USD, for several reasons.

While we understand that Mr. Rennert may previously have been registered to vote in the CHUH CSD, his past registration status does not preclude his since having acted in a manner inconsistent with his being a qualified elector now.

Rev. Code § 3503.02 (C) provides that persons who intend to stay in the County only temporarily, do not reside in the County for purposes of being electors.

Under Rev. Code § 3503.24(A), any elector may contest the eligibility of another elector to vote in a given election. Mr. Routh, an elector in the CHUH USD, hereby challenges the status of Mr. Rennert as an elector in the same district. A signed copy of Secretary of State Form 257 is being submitted herewith in support of that challenge.

Whatever his status a year ago, Rev. Code § 3503.07 requires that Mr. Rennert remain a resident of the County to remain qualified as an elector. The Ohio Revised Code further provides:

> On receiving an application or challenge filed under this section, the board of elections promptly shall review the board's records. If the board is able to determine that an application or challenge should be granted or denied solely on the basis of the records maintained by the board, the board immediately shall vote to grant or deny that application or challenge.
>
> If the board is not able to determine whether an application or challenge should be granted or denied solely on the basis of the records maintained by the board, the director shall promptly set a time and date for a hearing before the board. The hearing shall be held, and the application or challenge shall be decided, no later than ten days after the board receives the application or challenge.

Ohio Rev. Code § 3503.24 (B).

You are now in possession of a deposition transcript, taken in July 2021, in which Mr. Rennert testified under oath that he in is the Cleveland area only temporarily and that he considers New York to be his place of residence.

Accordingly, one of three things is true: either **(a)** Mr. Rennert perjured himself; **(b)** the "records within the Board's custody" now include substantial, credible evidence that Mr. Rennert is not an eligible elector in the CHUH USD, or **(c)**: the Board is unable, in light of this new and conflicting information, to determine whether Mr. Rennert is an eligible elector based solely on the records maintained by the Board. There is no reason to believe that perjury is afoot. Accordingly, the eligibility of Mr. Rennert as an elector is either negated by his testimony, or at the very least seriously called into question.

I am enclosing a copy of the deposition transcript with this communication to avoid any doubt that the Board has a copy in its records.

Pursuant to Rev. Code § 3503.24, Mr. Routh is contesting the status of Mr. Rennert as an elector. His contest is timely pursuant to Rev. Code § 3503.24 (A), in that the General Election will be conducted more than thirty days from now.

Mr. Routh would also like to examine the records maintained by the Board regarding Mr. Rennert's registration. As a voter registered in Monroe County, New York, Mr. Rennert was required, pursuant to Rev. Code § 3503.33, to declare that fact and to authorize the cancellation of his New York voter registration to become eligible to vote in Ohio. Did he?

Please also consider this letter to be a public records request made pursuant to Rev. Code § 149.43 for all non-exempt records maintained by the Board of Education regarding the registration of Mr,. Rennert to vote, both in Cuyahoga County generally, in the CHUH USD, and in any other jurisdiction, including New York.

Mr. Rennert has testified, under oath, that he is a resident of Monroe County New York. It may be too late to contest his candidacy, but if his testimony was true, he has no business voting in the upcoming General Election as a resident of the CHUH USD. It is not too late to prevent him from doing so. We urge the Board to act accordingly and look forward to your prompt response.

Sincerely,

Raymond V. Vasvari, Jr.

Enclosures (2)

Via Email as PDF Attachment & Via First Class U.S. Mail

MONROE COUNTY CLERK'S OFFICE

THIS IS NOT A BILL. THIS IS YOUR RECEIPT.

Receipt # 2819204

Book Page CIVIL

No. Pages: 91

Instrument: EXHIBIT(S)

Control #: 202108231336
Index #: E2020003651

Date: 08/23/2021

Time: 3:41:08 PM

Return To:
DAVID A. ROTHENBERG
45 Exchange Boulevard, Suite 800
Rochester, NY 14614

Rennert, Mordechai

Derech Hatorah of Rochester
Goldstein, Lea

Total Fees Paid: $0.00

Employee:

State of New York

MONROE COUNTY CLERK'S OFFICE
WARNING – THIS SHEET CONSTITUTES THE CLERKS ENDORSEMENT, REQUIRED BY SECTION 317-a(5) & SECTION 319 OF THE REAL PROPERTY LAW OF THE STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

JAMIE ROMEO

MONROE COUNTY CLERK

2 STATE OF NEW YORK

3 COUNTY OF MONROE : SUPREME COURT

4 - - - - - - - - - - - - - - - - - X

5 MORDECHAI RENNERT,

6 Plaintiff

7 -vs-

8 DERECH HATORAH OF ROCHESTER,

9 LEA GOLDSTEIN,

10 Defendants

11 - - - - - - - - - - - - - - - - - X

12 Index No. E2020003651

13

14 Examination before trial of MORDECHAI RENNERT

15 conducted remotely taken pursuant to notice on

16 Thursday, July 1, 2021, commencing at 9:07 a.m.

17

18

19

20

21 Reported by:

22 COMPUTER REPORTING SERVICE

23 Melissa J. Kuntz

24 16 East Main Street, Suite 7

25 Rochester, New York 14614 (585) 325-3170

2 APPEARANCES:

3 VAN LOON LAW

4 By: NATHAN A. VAN LOON, Esq.

5 421 University Avenue

6 Rochester, New York 14607

7 Attorneys for plaintiff.

8

9 ROTHENBERG LAW

10 By: DAVID ROTHENBERG, Esq.

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12 Rochester, New York 14614

13 Attorneys for defendants.

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M. Rennert - Examination by Mr. Rothenberg

It is hereby stipulated by and between the attorneys for the respective parties herein that the signing and filing of the transcript be waived; that any and all objections except as to the form of the question be reserved until the time of trial;

It is further stipulated that the oath and presence of the Referee be waived, and that Melissa J. Kuntz, Notary Public, may swear in the witness.

(Deposition Exhibits Nos. 1 through 12 marked for identification.)

MORDECHAI RENNERT

called herein as a witness, being duly sworn, testified as follows:

EXAMINATION BY MR. ROTHENBERG:

Q. Good morning, Mr. Rennert. Can you please state your full name for the record and spell your name?

A. Sure. Mordechai Schmuel Mordechai. First name M-o-r-d-e-c-h-a-i. Middle name is S-h-m-u-e-l. Last name is R-e-n-n-e-r-t.

Q. I take it you've testified previously, Mr. Rennert; is that correct?

A. Not in this matter, sir, but I have testified previously.

M. Rennert - Examination by Mr. Rothenberg

Q. I want to talk to you about some general ground rules and procedures for the deposition.

First of all, you have to verbalize your answers. You can't shake your head or say uhm-uhm. Do you understand that?

A. I do.

Q. Secondly, you have to -- well, you don't have to, but I would ask you to wait for me to finish my question before you answer and I will do the same in return. That will give our stenographer an opportunity to give us a nice clean record if we don't talk over each other. Do you understand that?

A. I do.

Q. If I get impatient and you are in the process of answering and I interrupt you, then just tell me that I have interrupted you and I will stop and let you finish your answer. Do you understand that?

A. I do.

Q. If you don't understand anything I'm asking you I want you to tell me you don't understand it. If you answer my question I will assume you have understood it. Do you understand that?

A. I do.

Q. Are you, Mr. Rennert, the plaintiff in this

action; the party suing, the guy suing?

A. Yes, sir.

Q. What is your current residence address?

A. 54 St. Regis Drive North, Rochester, New York 14618 is my home in Rochester. I live in Cleveland right now currently due to the COVID situation.

So I've rented that residence out, but my residence is still in New York State.

Q. I missed this, but you said that you're currently residing in Cleveland; is that correct?

A. Correct, I am.

Q. But you're maintaining your St. Regis Drive address as your residence; is that correct?

A. That is correct, sir.

Q. Okay. Did you review any documents to prepare for this deposition?

A. I did a quick overview on what was sent to me by the attorney which I believe came from you.

Q. Were those exhibits, do you know?

MR. ROTHENBERG: Nathan, do you know what you provided him?

THE WITNESS: Would you mind repeating that? The technical stuff backfired. It broke you up a little bit.

M. Rennert - Examination by Mr. Rothenberg

BY MR. ROTHENBERG:

Q. So you said you had reviewed some documents that came from your attorney; is that correct?

A. Yes, sir.

Q. I'd like some kind of a description of what those documents are for the record. Are these documents that were produced during the lawsuit? Are they the pleadings? Are they something your lawyer wrote for you? What were they?

A. All the documents that were sent to you and documents that were returned by you and then sent to me by my attorney. All those documents within the e-mail, forms, in addition to any of the paper forms that I was requested to sign or that I asked him to produce so that I could sign. I'm familiar with all those documents.

To prepare for this -- in response to your question, to prepare for this deposition I did a quick overview of the PDF contained in the e-mail that you sent maybe a week or two ago.

I can verify that that if you'd like. I have my phone here with the e-mail.

Q. Well, no, if it's my e-mail and stuff that was attached, that's okay. I don't care.

M. Rennert - Examination by Mr. Rothenberg

A. Okay.

MR. ROTHENBERG: Nathan, can you confirm that the documents that he has are either pleadings or documents we've disclosed in discovery?

MR. VAN LOON: They are. There's no other documents I'm aware that he's reviewed. You sent me a first batch like around June 8th and then you sent me another batch a few days ago.

MR. ROTHENBERG: Fair enough. Okay. Thank you.

THE WITNESS: I just have a question to Mr. Van Loon about questions of inquiry versus the testimonial --

MR. ROTHENBERG: I'm sorry. Say that again.

THE WITNESS: I was just making sure that the question that my attorney just answered was more of a verification than it was witness testimony.

MR. VAN LOON: Yes, it was verification. That's what I gave you.

BY MR. ROTHENBERG:

Q. Mr. Rennert, I see that you are in Mr. Van Loon's office this morning; is that correct?

A. Yes, sir.

Q. You have the right to consult with him and if

you want to do that, you just have to tell us that you want to do that, but you have to answer whatever question is on the table before you consult with him. Is that understood?

A. I hear everything you're saying, yes, sir.

Q. Okay.

MR. ROTHENBERG: I would like to have Exhibit 1 displayed to you and Melissa is going to put it up on the screen.

BY MR. ROTHENBERG:

Q. Are you able to see Exhibit 1?

A. I am. If I could just verify the paper form so I can actually read it.

Q. I'm only going to ask you a couple of questions on it, but can we go back to the op of the first page? I want to see the whole caption.

Mr. Rennert, do you recognize this as a copy of the summons and verified complaint in this case?

A. That's what it appears to be. If you don't mind if I can just take a look at the paper form.

Q. Take a look at your paper copy.

A. Thank you very much.

This looks like the original. It looks like the same thing on it. So it is.

M. Rennert - Examination by Mr. Rothenberg

Q. Go to page 6.

A. Verification on top, yes, I'm looking at it.

Q. According to page 6 here, you read this complaint before it was filed, correct?

A. That is correct.

Q. And is that a copy of your signature there?

A. It's my actual signature, yes, sir.

Q. You swore at the time that the contents were true and accurate, correct?

A. I affirmed, yes, sir.

MR. ROTHENBERG: Okay. Can we display Exhibit 2 to Mr. Rennert.

BY MR. ROTHENBERG:

Q. Do you recognize this as a response to our demand for Bill of Particulars?

A. Yes. And again, I'm just going to get the physical paper copy, but yes.

Q. Okay. Now, I do not have a verified Bill of Particulars from you, Mr. Rennert. So what I'm going to do is ask you to read the answer to paragraph three about the addresses of medical providers.

A. If you don't mind I'm just going to pull up the physical paper. Is that okay?

Q. Yes. You can look at a copy. If you have a

M. Rennert - Examination by Mr. Rothenberg

hard copy go ahead and look at the hard copy.

A. Yes, sir.

Q. Mr. Rennert, we lost your video.

A. I put a stop on the video just while I was looking it over.

Q. I'd like you to keep the video on, Mr. Rennert, so that you're present throughout the depo.

A. Response to demand for Bill of Particulars?

Q. Yes.

A. Okay.

Q. Have you ever seen that before?

A. I'm sure I have.

Q. Can you tell us today under oath that its contents are true and accurate?

A. It's accurate. There's probably more we could have added to it, but it's accurate.

Q. In response to paragraph three you listed two medical providers who gave treatment to your child YR. Do you see that?

A. I do.

Q. Are there any other medical providers who gave treatment to your child YR for the injuries that are referenced in your complaint?

A. Yes. There is the urgent care on Monroe

M. Rennert - Examination by Mr. Rothenberg

Avenue which is where I initially brought him, but it's all under the University of Rochester Medical Center.

So if that helps, it's all in one place, if you will, one medical conglomerate.

Q. When did you bring your child to urgent care?

A. I believe on or about May 10th if that's a Friday, but I can double check that date right now.

Q. How are you going to double check the date?

A. On my phone. I have a calendar and I'm going to go back because I know the date of May 9th.

Q. Let me say this before you go do that, Mr. Rennert.

A. Yup.

Q. Anything that you refer to today to refresh your recollection I'm going to ask you to produce. Your lawyer will -- hold on. You don't have to show it to me. I can't see the thing from here.

But if you're going to refer to a calendar or something else, I'm going to ask your lawyer afterwards to provide me a copy of whatever you looked at. So you're free --

A. I --

Q. Hold on. You're free to do that, but I want you to do that with the understanding that it's going

to be disclosed.

So if there's like other appointments on there and stuff you don't want me to see, don't look at it. Okay?

A. Yes, sir. I actually just took a screen shot of what I looked at and I e-mailed it to my attorney right now.

Q. All right.

A. I didn't look at anything else. I just looked at the date on the calendar from 2019.

I know that the issue that we're dealing with here started on May 9th of 2019. So I just wanted to verify that Friday was the 10th.

I've done so, but I've sent him the screen shot to ensure that you have that.

Q. Okay. But other than the fact that we don't have the address of the urgent care on Exhibit 2, you're saying that those are all of the medical providers to whom you brought your child YR for treatment; is that correct?

A. The urgent care is the one that I brought him to, yes, sir.

I'm going to use my phone again and I'm going to get the address and then I'll screenshot that as well.

M. Rennert - Examination by Mr. Rothenberg

Q. No. Don't do that. Don't do that. Don't worry about that. If I want the address I will ask you for it. Okay?

A. Yes, sir.

MR. ROTHENBERG: Can we display Exhibit 3 to Mr. Rennert?

THE WITNESS: I recognize that. I don't need a paper copy, but I'm going to look at a paper copy.

BY MR. ROTHENBERG:

Q. So you can see Exhibit 3 on the screen; is that correct?

A. Oh, yes, yes.

Q. And Exhibit 3 is a letter dated May 16, 2019, correct?

A. That's what it says, yes, sir.

Q. Signed by Lea Goldstein, correct?

A. Yes, sir. The principal, yes.

Q. And it's on the letterhead of Derech HaTorah of Rochester, right?

A. Correct, it is.

Q. For purposes of this deposition is it okay if we call Derech HaTorah of Rochester DHR?

A. Absolutely.

Q. Fair enough. So if I say DHR you'll

1 understand that to mean Derech HaTorah of Rochester,
2 right?
3 A. Absolutely.
4 Q. Can you see that this letter is addressed to
5 DHR parents?
6 A. I do, yes.
7 Q. Is this a copy of the letter that you allege
8 to be defamatory?
9 A. It is one of -- yes. It's one of them, yes,
10 sir.
11 Q. There's another letter that you claim is
12 defamatory?
13 A. Sure. I received a copy in discovery of
14 e-mails that went from Rabbi Chastain to be defamatory
15 as well, but if we're going to concentrate on this
16 letter, I believe because that's what we're focused on.
17 Q. What passage or passages in this letter do
18 you claim are defamatory?
19 A. Well, here's the thing. I'm not an attorney.
20 So I'm going to answer that the best way that I can and
21 if I don't answer it appropriately you can correct me
22 and I'll do my best to answer it more appropriately for
23 you if I can. Is that okay?
24 The premise of the letter is a lie. Thereby, the
25

intent and the content of the letter which was sent out with our family name attached to it, literally calls me "an individual in the community" and my child "have been spreading Motzi Shem Rah," which is lies with intent to damage a person's reputation. So that line there would be number one.

The next sentence following is also a lie. So from my understanding, defaming somebody would be -- and again, this is my understanding. I may be wrong. Defaming someone would be producing Motzi Shem Rah which is a lie with intent to damage a person's reputation which is exactly what this letter did.

So I'm actually very appreciative that they translated the name, the Hebrew words, into English. It's kind of calling the kettle black.

Q. So what you are saying, sir, is the second paragraph of this letter is the language that you claim to be defamatory, correct?

A. That would be part of it, yes, sir.

And then we can go to the next paragraph also. I would say that there's a statement of fact which I wouldn't agree with, the first sentence, but that's neither here nor there.

The second sentence, again, would be what we would

1 M. Rennert - Examination by Mr. Rothenberg
2 call, I refer to it as this lies with intent to damage
3 a person's reputation. That would be that sentence.
4 "This person has accused Rabbi Shulman of breaking his
5 son's harm and has been parading his son around town
6 showing off his splint/cast and attempting to
7 perpetrate this cruel hoax."
8 That sentence is not just defamatory, which is a
9 lie with intent to damage a person's reputation. It's
10 actually denying the truth of what occurred.
11 So it's worse than just the lie with intent to
12 damage a person's reputation. It's somebody in a
13 position of authority watching over children,
14 specifically my children, was notified that my child
15 was hurt by one of the employees of that institution
16 and didn't just dismiss it, but then went out there and
17 said it was a lie.
18 So however you translate defamatory, that's my
19 understanding of the letter and how it fits into what I
20 understand is not okay.
21 Q. Okay. Mr. Rennert, to your knowledge was
22 this letter sent to DHR parents?
23 A. I have no idea how to verify that or not. I
24 can only say it came by e-mail and I was given a copy
25 of it by multiple people that were not parents of DHR.

M. Rennert - Examination by Mr. Rothenberg

Q. I was going to ask you about that. So who other than a parent of DHR gave you a copy of this letter?

A. I don't recall at the moment. I probably put it in the e-mail somewhere. If I can find it I will be more than happy to send it over to you.

Q. Do you have any recollection today as you sit here the names of any people who showed you this letter who were not DHR parents?

A. I can't recall the answer to that question right at this second, but I know there were more people.

But I mean, here's one. I'm looking at the paper of the important letter, the cover letter with the --

Q. Hold on. We're going to get there in a minute. I'm going to --

A. Well, I want to answer your question with the paper that you asked me to review.

Q. Well, Mr. Rennert, hold on. Hold on.

A. Yes, sir.

Q. I will ask you about that exhibit in a couple minutes.

A. Oh, okay.

Q. So before we refer to the next exhibit, do

M. Rennert - Examination by Mr. Rothenberg

you have an independent recollection here -- look at me, sir, instead of looking at the paper. I don't want you distracted right now.

Do you have an independent recollection in your mind's eye of a person who showed you the letter or told you about the letter who was not a parent? We'll turn to the exhibit in a second. I want to know if you have an independent recollection before you do that.

A. I don't recall at the moment. I'll be happy to allow that to sit in my mind. If I remember at any point in the deposition or thereafter I will certainly make sure that you have that information.

Q. We're going to get to that exhibit in a second.

Did you at some point in time receive a copy of this letter?

A. I did.

Q. Do you have a recollection today how you first received a copy of the letter?

A. No. Because I received more than one copy. So I don't recall exactly who it came from. I know one person was the children's, my children's mother also received a copy of it.

Q. Okay. Well, she would be a parent of a DHR

student, right?

A. Yes. There's no question about that.

Funny thing, I wasn't sent the letter. That's the funny thing.

Q. After you received this letter, Mr. Rennert, did you show this letter or send this letter to anybody else?

A. My attorney.

Q. Did you show the letter or send the letter to anybody other than your attorney?

A. I'm sure I did. I'm sure I did. I probably sent it to my uncle to -- no, I don't think I sent it to him. I discussed it with him.

Did I send it to anybody else? The physical e-mail of, no. I only physically sent an e-mail of the letter to my attorney.

I discussed the letter with other people. So no, I don't believe I sent it in physical format to anybody else.

Q. What is your uncle's name?

A. Shmaryehu Rennert. He was someone who was familiar with both myself and the hierarchy in TIUNY and Derech HaTorah and I felt that maybe he could help be a good intermediary.

1 M. Rennert - Examination by Mr. Rothenberg
2 There was communication between Mrs. Goldstein and
3 him as well. I guess all roads led to nowhere.
4 Q. Spell his name for the stenographer please.
5 A. It's Rabbi Shmaryehu, S-h-m-a-r-y-e-h-u.
6 Last name is the same as mine, R-e-n-n-e-r-t.
7 Q. Other than your uncle did you discuss this
8 letter with anybody else other than your lawyer? I'm
9 not asking you about conversations with your lawyer.
10 A. I can't recall at the moment.
11 Q. But you believe that people other than your
12 wife, Dara Rennert showed you copies of this letter; is
13 that correct?
14 A. Not only that, I believe that more than just
15 the parents of DHR received a copy of this letter.
16 And to be frank, it really doesn't make a
17 difference if it was anybody outside of one other
18 person. The fact is that the letter itself is a
19 complete and total lie with regard to what it refers to
20 me and thereby, I don't know the exact statute. I'm
21 happy to look at it with you, but I would believe that
22 if the intent to send this out was to make me look like
23 an ass, she did a good job of it.
24 Q. I don't think that's what I'm asking you.
25 A. I know that. I know that. I'm trying to

M. Rennert - Examination by Mr. Rothenberg

answer the question that you're asking me in a way of --

MR. VAN LOON: Mr. Rennert, I'm going to counsel you to try to just answer Mr. Rothenberg's questions as best you can.

THE WITNESS: Sure.

MR. VAN LOON: And try and just answer what his questions are.

THE WITNESS: Sure.

BY MR. ROTHENBERG:

Q. So my question for you is as you sit here you've told me you cannot recall the names of anyone other than Dara Rennert who showed you the letter, correct?

A. I said I can't recall. I didn't say there weren't, but that's what I said.

Q. No. But you believe there were other people who did that, correct?

A. Yes, sir.

Q. Is there some way you would be able to refresh your recollection as to figure out who those other people were?

A. Absolutely.

Q. How would you do that?

M. Rennert - Examination by Mr. Rothenberg

A. By actually thinking about it. By going through my phone call, text messages. I have no idea. I'll figure it out.

Q. Okay.

A. It's that important. So I'll really dwell on it.

Q. Here's what I'm going to do. I'm going to serve a written interrogatory on your lawyer to name the individuals who showed you the letter.

MR. ROTHENBERG: And Mr. Van Loon, can we have a stipulation on the record that we can use an interrogatory for that purpose?

MR. VAN LOON: Of course. You must understand, Mr. Rothenberg, it's been about two years.

So I would suggest to my client that he check his e-mail from right around that time period and if he's got any other people that he corresponded with or corresponded with him on this topic or on this particular letter, we'll forward -- we'll give you those names.

MR. ROTHENBERG: Okay. I'm going to ask for the names and I'm going to ask for copies of any of the e-mails by which the letter was conveyed to him.

BY MR. ROTHENBERG:

M. Rennert - Examination by Mr. Rothenberg

Q. We'll do that in writing, Mr. Rennert, afterwards. You don't have to do it today.

A. No problem.

MR. ROTHENBERG: Now, let's display Exhibit 4 please.

BY MR. ROTHENBERG:

Q. I think this is what you were looking at earlier. It's going to go up on the screen.

A. If this were in person it would be a little bit easier.

Q. Look, I set this up virtually because I was told it had to be done virtually. I'd have been happy to do this in person, but I got an e-mail from Mr. Van Loon's office that said we have to do it virtually. So that's why we're doing it virtually.

But in any event, never mind that. You can see Exhibit 4, correct?

A. Yes, I can.

Q. If you want to look at the hard copy, if it's easier for you to look at the hard copy, can you identify people listed on Exhibit 4 who are not either parents or teachers at DHR?

A. I'm sorry. Did you say parents or teachers?

Q. I said parents or teachers. So they're --

M. Rennert - Examination by Mr. Rothenberg

MR. VAN LOON: So they're not parents or teachers.

THE WITNESS: I understand. But you were just going back and your prior question to me was, from what I understood and maybe you can correct me, but you said this was only sent out to parents.

BY MR. ROTHENBERG:

Q. Mr. Rennert, excuse me. I'm not testifying today. I'm asking you questions. That's all I'm doing.

A. I understand.

Q. So my job is to ask questions. Your job is to answer questions.

So my question now is can you identify anybody listed on Exhibit 4 who is not either a parent of a child at DHR or a teacher at DHR?

A. I'll look through it and we'll see.

Q. Okay.

A. There's some people here, but I'd prefer not to say their names because I don't know them and don't want to pull them in.

But I guess, I mean, as long as they're not pulled into this because I don't know who they are, is there a way to question about who a person is?

MR. VAN LOON: No, no. If you don't -- answer his questions.

THE WITNESS: I don't know some of these people.

MR. VAN LOON: Recite their names. It's up to them what they want to do with it.

THE WITNESS: Okay. Gitana Mirochnik.

BY MR. ROTHENBERG:

Q. Pardon me?

A. Gitana Mirochnik.

Q. Why don't you spell that name?

A. Last name is M-a-r-o-c-h-n-i-k. Under the BCC, it would be one, two, three, four, five, six, seven, eight, nine. It would be the ninth line down, whatever that is.

Q. Okay. I see the name.

A. Again, it could be that they are. I don't know.

Q. Okay. So what I'm asking you is there a name on Exhibit 4 --

A. Yeah, that --

Q. Hold on, Mr. Rennert.

A. I'm --

Q. Mr. Rennert, stop. You've got to go back to

the second rule. Remember we're not going to interrupt each other. Remember that rule?

Here's the question: Is there a name listed on Exhibit 4 that you know today as you sit here is neither a parent of a child at DHR or a teacher at DHR? And if you don't know just say you don't know.

A. Yes.

Q. Yes. The answer is yes?

A. Yes.

Q. Who is the person?

A. Nechemia Vogel.

Q. Okay. Rabbi Vogel?

A. Is that who that is? Rabbi Vogel? Rabbi Vogel is neither a teacher or a parent at DHR.

Q. Okay. Anybody else?

A. There's another name, but I don't know if he has a child in there or not. I'm not going to put his name up there.

So I guess I'll do my due diligence on the names and find out during 2019 if they had children or were teaching there. I'll find out and if they weren't I'll --

Q. I don't mean exclusively during 2019. If that person was a parent in the past, that's what I'm

M. Rennert - Examination by Mr. Rothenberg

trying to ask you.

A. Mr. Rothenberg, I don't know everybody who's ever been employed or ever had a child. I can't ever say that conclusively. I'm not entitled or in possession of any of those documents, nor do I care to be.

But to my knowledge, Rabbi Nechemia Vogel was not a teacher or parent in DHR at the time that this letter went out.

Q. Okay. Understood. We can put Exhibit 4 aside, sir.

In May of 2019, Mr. Rennert, did you know an individual Yitzi Shulman, also known as Rabbi Shulman?

A. I did.

Q. Was Rabbi Shulman a teacher at DHR?

A. Is he rabbi? We're giving titles here. I just want to make sure he's a rabbi.

Q. I'm asking the questions. So if you can't answer the question you just tell me you can't answer the question. But we don't do any business where the witness asks the examining lawyer the question. That's kind of not the way the thing works.

A. Can you hold on one second? I'd like to talk to my attorney for a second.

M. Rennert - Examination by Mr. Rothenberg

Q. I've got a question on the table. Let's answer the question and then I will let you consult with Mr. Van Loon.

Was Rabbi Shulman in fact --

A. But --

Q. Was Rabbi Shulman in fact -- I'll rephrase this.

Was Mr. Yitzi Shulman, regardless of whether he's Rabbi Shulman, was he in fact a teacher for any of your students in 2019?

A. My children, yes, sir.

Q. Okay. And Yitzi Shulman is the guy that you claimed injured your child YR, correct?

A. Yes, sir.

Q. Do you want to talk to Mr. Van Loon?

A. No. I think you solved the issue.

Q. Okay. In May of 2019, between May 9 and May 16 -- strike that.

I think you testified earlier that May 9, 2016 was the date of the incident on the bus, correct?

A. That is correct, yes, sir.

Q. And May 16 we saw from Exhibit 3 was the date of Mrs. Goldstein's letter, correct?

A. It is dated May 16th, but the e-mail showed

that it was sent out May 17th.

Q. Okay. Fine.

So between May 9 and May 17 of 2019 had you ever accused Yitzi Shulman of injuring your child, YR?

A. I personally had not before May 9th; is that correct?

Q. No. I said between May 9 and May 17. Between the date of the incident on the bus and May 17th had you in fact accused Rabbi Shulman or Yitzi Shulman of injuring your child?

A. I apologize. I had misheard that question. Absolutely, yes, I did.

Q. Okay. More specifically had you accused Yitzi Shulman at that time of fracturing your child's wrist?

A. No, I did not.

Q. Okay. What was the accusation that you leveled against him?

A. I leveled the accusation -- well, actually if I can clarify it, on May 9th I made an inquiry to Mrs. -- well at that point I didn't know.

To Yitzi Shulman. I tried to find out what happened from Yitzi Shulman at that point. I didn't get an answer.

1 M. Rennert - Examination by Mr. Rothenberg
2 So I went to Mrs. Goldstein and then the next
3 morning I again went to get an inquiry and try to
4 figure out what happened with his arm and once I didn't
5 get any answers and the pain continued, at that point I
6 brought him to a medical facility who at that point
7 told me that it was a sprain and then called me back on
8 that same Friday a couple hours later telling me that
9 it may be fractured and that I needed to come down
10 there for them to put a splint on his arm which I
11 subsequently did.
12 And after that, there was no accusation between May
13 9th and May 16th about fracturing an arm and the reason
14 that is is because we weren't told that it was
15 fractured until quite a while later, sir.
16 Q. Okay. So I'll rephrase the question.
17 Between those two dates, May 9 and May 17th, did
18 you make accusations that Yitzi Shulman or Rabbi
19 Shulman had injured your child's wrist?
20 A. Can you quantify, when you say made
21 accusations, to whom?
22 Q. To anybody. Anybody on the planet.
23 A. Yes.
24 Q. Okay. Those statements that you made
25 concerned on the one hand your child YR, correct?

M. Rennert - Examination by Mr. Rothenberg

A. Yes, sir.

Q. Who was then a student at DHR. Am I right?

A. Yes, sir.

Q. And they also concerned Yitzi Shulman who was employed by DHR, correct?

A. Yes, sir.

Q. As a teacher in fact, right?

A. Correct, yes.

Q. The statements that you made concerned an incident that happened on the school bus, correct?

A. Correct.

Q. Your child and Yitzi Shulman were on the bus traveling from DHR to take the kids home; is that correct?

A. Can you repeat that again? I'm sorry. It broke up in the middle.

MR. ROTHENBERG: Melissa, did you get it?

(Record read.)

THE WITNESS: YR was on the bus coming home, correct.

BY MR. ROTHENBERG:

Q. And Yitzi Shulman was on the bus, right?

A. Correct.

Q. And whatever happened, happened or didn't

M. Rennert - Examination by Mr. Rothenberg

happened on the bus, right?

A. That is correct.

Q. Can I ask you to take your hands away from your mouth? It's tough with the Zoom here to understand if I can't see your face.

A. Yup.

Q. Thank you.

A. Sure.

Q. Go back to Exhibit 1. That's the Summons and Complaint and I want you to look at paragraph 18.

A. Yes.

Q. Do you see paragraph 18 in front of you, sir?

A. I do.

Q. Paragraph 18 reads as follows, "Defendant's libelous act has damaged my reputation in the Jewish community of Rochester, New York and beyond." Do you see that?

A. I do.

Q. In fact, that's your statement made under oath.

A. It is.

Q. Fair enough. Describe for me your reputation in Rochester, New York in May of 2019.

A. Well, with all due respect, that would be an

M. Rennert - Examination by Mr. Rothenberg

objective position, not a subjective position. I can't answer you that in a -- I can't quantify that in a small paragraph.

Q. I'm not asking you to quantify it. I'm just asking you to describe it. Tell me about your reputation. You've alleged a damage to your reputation, correct?

A. Sure did.

Q. So in making that allegation, you must have had some idea what your reputation was before and after this letter, correct?

A. I can tell you -- I can answer it in a way that I understand how to answer the question if you don't mind taking my answer for the record and then if it doesn't satisfy, we can try to figure out how to break it down.

I would like to answer you question. I'd just like to do that properly. This isn't meant to try and divert you or anything else. It's just a matter of how I don't know how to properly answer that question.

So I'm going to do my best to do it if you don't mind.

Q. The question -- okay. Before you do that, the question I want you to answer is I want you to tell

me a description of your reputation in Rochester.

A. I'm going to answer the best I know how.

My reputation in Rochester never included that I was a liar.

Q. Okay. But did you have a reputation for anything else other than not being a liar?

A. Oh, of course. I had had a very positive reputation in Rochester.

Q. That's what I'm asking you to tell me about.

A. Sure. I was known to be able to get things done.

So when the defendant and myself had a problem with BOCES, the defendant and I had text messages back and forth about strategizing how to assert our position and make sure that we got what we wanted with BOCES.

When the defendant and I had interest in making things better in the school, when I had the money I cut checks and made sure that I was able to support many of the functions that went on in school.

My reputation, I would suggest, was that I was someone that if there was an issue, I could help solve that issue both from the municipal end and from the citizen end, particularly within the Jewish community.

Q. Okay. Prior to May of 2019 had you ever made

any accusations against any other educators or rabbis in the Jewish community in Rochester?

A. That's a very broad question.

Q. Well, do your best to answer it.

A. What kind of accusations, sir?

MR. VAN LOON: I'm going to object to form, but if you can -- I mean the form of the question. You can answer if you can.

THE WITNESS: I don't know how to answer it.

MR. VAN LOON: Okay.

BY MR. ROTHENBERG:

Q. What don't you understand about the question?

A. Well, accusations is a broad term. Very ambiguous. It could mean anything. What types of accusations are you particularly asking me about?

Q. Any types of accusations at all.

A. I mean, I don't know how to answer that question. I really don't.

Q. Okay. I'll ask a different question.

Prior to May of 2019 had you ever threatened to sue any business or public officials in the Rochester area?

A. Absolutely.

Q. Tell me about that.

A. Which one would you like, sir?

1 M. Rennert - Examination by Mr. Rothenberg
2 Q. As many as you can recall.
3 A. Well, I think the answer -- I think the point
4 would be that I didn't do that. I didn't sue --
5 MR. VAN LOON: Mr. Rennert, he asked you a
6 question. Try and answer it to the best of your
7 ability please.
8 THE WITNESS: When somebody did something
9 wrong, if anybody did something that was illegal or
10 unethical and there was a legal means to solve it, then
11 I made sure that they understood that there was a legal
12 means to solve that issue if they didn't want to do
13 that in what I would call can a menschless kind of way.
14 Mrs. Goldstein can help you with that. She
15 and I were partners in that multiple times.
16 BY MR. ROTHENBERG:
17 Q. Let's separate these between accusations and
18 actual lawsuits.
19 Had you been involved in litigation with any
20 members of the Jewish community prior to May of 2019?
21 A. I'm going to decline to answer that question.
22 I don't think that's an answer that I --
23 Q. No, you don't have that option, sir. The
24 Uniform Rules require you to answer these questions
25 unless I'm asking you about something privileged. If

you decline --

A. You are --

Q. Hold on. Just hear me out. If you decline you're going to leave me no choice but to run off and get a court order, drag us all back here again.

Now, if you want to talk to Mr. Van Loon, tell me you want to talk to Mr. Van Loon, but I'm going to insist that you answer the question.

A. Sure. And I don't have a problem answering it. The last time I asked you if I could talk to Mr. Van Loon you said answer the question first.

If you wouldn't mind I'd like a moment with my attorney so I can figure out how to answer that question in a way that protects my family.

MR. VAN LOON: If we could, just go mute for a second. Mr. Rennert, you're going to have to answer his question.

THE WITNESS: I have no problem with that.

MR. VAN LOON: Okay.

(Discussion held off the record.)

THE WITNESS: Okay, sir. Thank you for that opportunity. Can you hear me?

BY MR. ROTHENBERG:

Q. I can hear you.

M. Rennert - Examination by Mr. Rothenberg

A. Litigation I had which I preferred not to get into directly is litigation that was in matrimonial related issues and I would prefer not to discuss those issues unless they are really pertinent, but we can if you want.

Your defendant has had ringside seats and participated in it as well. Hopefully we don't have to go down that line.

Q. I'm not going to ask you many of the details. I do have a couple questions about the matrimonial litigation later on, but as a matter of public record, there's a published decision in the case, correct?

A. Oh, yes, there is.

Q. Other than the matrimonial litigation have you been involved in any litigation with any members of the Jewish community in Rochester?

A. Jewish community, I don't think so. No, I don't think so.

Q. Did you not have a dispute with the Talmudical Institute back in 2008?

A. Oh, did you ask me if I had disputes with people or if I took --

Q. Hold on. I only asked you about litigation.

A. Oh, there was no litigation.

M. Rennert - Examination by Mr. Rothenberg

Q. Okay. You did have a dispute with the Talmudical Institute, correct?

A. I'm having another one right now, correct? Yes, I did, and I'm having one right now.

Q. What dispute are you having with them right now?

A. DHR and Talmudical Institute are one and the same.

Q. You're talking about this lawsuit that we're here for, the deposition.

A. This is the only filed litigation that I have with any members of the Jewish community and I think anywhere.

Q. Okay. The dispute with the Talmudical Institute then, was that resolved without litigation?

A. The dispute was resolved without litigation, yes, sir.

Q. Okay. Fair enough.

Sir, at any time prior to May of 2019, to your knowledge had you ever been accused by anybody in the Jewish community of being a bully?

A. Yes.

Q. What do you recall about that? Who made that accusations, when, why, et cetera?

M. Rennert - Examination by Mr. Rothenberg

A. Well, people ask when I went to the Town Board of Brighton and why I was quote unquote bullying the town board. They didn't feel somebody was right that -- I mean, not everybody. Different minds in many communities.

So they said that I was wearing a yarmulke and I was talking to the town board and they didn't like my political position. They said I was bullying.

Those are the kind of instances, but in the translation of bullying in a physical manner, I've never been accused of that.

In bullying in a realistic sense, I don't believe that I've ever bullied anybody. I believe that I've been very aggressive with my advocacy for the best of the community, the best of DHR at the time that I did and the best of my children.

Q. This thing about the town board, is that the thing where there was a newspaper story that the town clerk had made an inappropriate comment that got picked up? Is that what you're talking about?

A. That -- no. That's the only one that made it to the -- well, not the only one, but that's one of the most well known instances where I was then at that point called a bully until they found out that the town

M. Rennert - Examination by Mr. Rothenberg

clerk had lied to the reporters, et cetera, et cetera, but yes, that's one. I mean --

Q. When you say that's one, what were the others?

A. Well, there's a litany. I mean, in the Brighton Town Library you'll find CDs from town board meetings where I was present and on camera.

I mean, I was always present. I ran for office. I mean, I was involved with day to day town issues along with the community as well as Mrs. Goldstein well knows.

Q. Okay. Outside of your conduct at the Brighton Town Board, do you recall being accused of being a bully by anybody else in connection with any other incident or incidents?

A. I can't recall, but I'm sure there is. I mean, again, I was involved with a lot of communal affairs. When you're advocating for one position there's always somebody on the other side that doesn't like you.

You know this as an attorney. I'm sure you're a very nice person, but you and I are on different sides. So if I called you a bully because I felt that you were trying to advocate for your client, I wouldn't really

be correct. But I'd be calling you a bully.

I'm not calling you that by the way. Please don't take that --

Q. I'm not offended. Don't worry about that.

A. I'm not trying to be disrespectful or offensive. I'm kind of trying to contextualize my responses so you can understand what I'm saying.

I'm sure there are people that call me a bully and that's their prerogative, sir.

Q. So my question is this: Do you have a recollection as you sit here today of an incident other than the town board where one or more persons referred to you as a bully?

A. Outside of this litigation here?

Q. Anything at all.

A. This litigation here has caused a lot of people to tell me I was a bully for coming after Mrs. Goldstein and Rabbi Davidowitz, et cetera.

Q. Prior to this lawsuit. So let's eliminate this lawsuit. Prior to this lawsuit can you recall an incident or incidents where somebody referred to you as a bully?

A. Yes. Back in 2011 we -- me and about eleven other men tried to start or segregate a Sabbath morning

M. Rennert - Examination by Mr. Rothenberg

prayer service in the synagogue and there were people there that felt that we were trying to bully the synagogue into accepting something that wasn't the norm, meaning they had a schedule of prayers which was at nine o'clock and they didn't want anybody to come in earlier. They wanted everybody at one point.

There were -- like I said, there were about eleven of us that were together and I was called a bully by members of the board of the synagogue.

Q. Which synagogue was that, sir?

A. Beth Hakneses Hachodosh. It's on the corner of St --

Q. BHH?

A. Yes. Yes, sir.

Q. Okay. Other than that 2011 incident can you remember any other incident where one or more persons referred to you as a bully?

A. One of the psychological impacts of asking me questions is that you're trying to make me think and I don't know, but I'm assuming that you have something in mind.

I'd be happy to directly answer a specific incident that you have. I'm not trying to lie here. I have no regrets on things that I've done.

M. Rennert - Examination by Mr. Rothenberg

Q. Time out. Mr. Rennert, hold on a second.

A. Yes, sir.

Q. Look, I don't know what went on in your life. I'm not asking you about anything that I have personal knowledge of. You're the guy who lived your life. Not me. I am asking you if you, sir, have a recollection as you sit here today of some other incident where one or more persons called you or referred to you as a bully. That's all. Do you have a recollection today?

A. Not of something specific, but if you do have I'll be happy to address it.

Q. Okay. So you cannot recall another specific incident as you sit here; is that right?

A. Not anything specific, no, sir.

Q. Do you recall that in paragraph eighteen that we saw a minute or so ago that you finished that paragraph by saying "and beyond"? Do you --

A. Yes.

Q. Do you remember that?

A. I do.

Q. What does that mean, "and beyond"?

A. And beyond means beyond Rochester. Beyond the borders of the Jewish community in Rochester, but in particular, the Jewish community.

M. Rennert - Examination by Mr. Rothenberg

Q. Where are we talking about as beyond? Do you have a specific area, cities, locations? What does beyond mean?

A. I'll give you one example which would be Lakewood, New Jersey.

Q. Lakewood, New Jersey. Your reputation was damaged in Lakewood, New Jersey?

A. Yes, sir.

Q. How did that occur?

A. Well, in particular we were trying to get our children into school. Mrs. Goldstein and her actions caused hesitations and thereby didn't get admissions to schools for some of the children.

Q. How did Lakewood, New Jersey know about Mrs. Goldstein's accusation?

A. The Jewish community is a very small world, sir. Specifically the Orthodox Jewish community.

Mrs. Goldstein I'm sure has told you that -- I'm not going to assume. I'm going to presume that she's explained to you how the Jewish community works.

She's part of associations that have tentacles in every community in the country or --

Q. Let me ask it this way: Did anybody in Lakewood, New Jersey tell you that they knew about Mrs.

Goldstein's letter of May 16? Did anybody say that to you?

A. Yes.

Q. Who?

A. Principal of two schools. And I'm not going to name them and you will have to get a Judge's order to do so.

Q. No. You have to name them if we're --

A. Not going to do it.

Q. I'm going to follow up on this.

A. No problem. Not a problem. If you get a Judge's order to do so, I will comply with the Judge's order, but I will not name --

MR. VAN LOON: Mr. Rothenberg, may I speak to my client?

MR. ROTHENBERG: Yes. That's fine with me.

MR. VAN LOON: Thanks.

(Discussion held off the record.)

MR. VAN LOON: Okay. We're back on the record.

BY MR. ROTHENBERG:

Q. Is it still your intention not to answer that question, Mr. Rennert?

A. Yes, sir. And I apologize, but yes.

M. Rennert - Examination by Mr. Rothenberg

Q. Well, you don't have to apologize.

A. Well, what I want to make clear to you is that I'm not trying to be confrontational with you and I'm not trying to be contentious or make it contentious.

I have a conscience. Others do not, whoever they are, but I do and when somebody tells me something that they've maybe discussed with other people and in particular with your client and they ask me not to repeat it, I'm going to hold those confidences as they are until there is a required release of that.

At least this way I can say look, I held a confidence until I was required to do so.

Q. That's your choice. I'm just telling you though here - and I'll put this one on the record - the complaint says "and beyond." I asked you about "and beyond," and you told me about Lakewood, New Jersey. Okay?

A. Yes.

Q. So those are allegations you have made in this lawsuit.

A. Sure.

Q. So I am entitled to find out about that. I am entitled to contact these individuals as potential

M. Rennert - Examination by Mr. Rothenberg

witnesses and I am also entitled to test your credibility.

So I'm going to follow through on this and if I get an order requiring you to come back, I am going to ask the Judge to require you to compensate us for the cost of the second deposition.

I'm just telling you that now so you know about it.

A. Listen --

MR. VAN LOON: No, no, no. One at a time. One at a time.

THE WITNESS: Your client has a way about them and I say them, because it's not just Mrs. Goldstein. She does have to get permission from her father to do different things.

They have a name out there and I'll be happy to spill the names of the people who were unwilling to deal with them because of their behaviors, all of them, when you get a Judge's order.

But the Judge's order is coming because I am trying to protect people from the wrath of people like your client.

So I'm going to -- when you try to get that order, I'm going to ask for a hearing in front of a Judge --

MR. VAN LOON: No. Mr. Rennert --

THE WITNESS: So I can explain that --

MR. VAN LOON: Mr. Rennert --

BY MR. ROTHENBERG:

Q. You're free to do whatever you please. You're free to do whatever you please, but I'm just giving you fair warning about what will be following in this case, but let's move on. I don't want to spend all morning on this.

A. Yes, sir.

Q. Other than Lakewood, New Jersey does beyond refer to any other particular location?

A. I'm sure it does. I have yet to find the full ramifications of Mrs. Goldstein's letter.

Q. Let me state this for the record. If we're going to hear any testimony about any location other than Lakewood, New Jersey I am going to move to preclude that because I'm asking you here today and I'm not getting an answer. I don't want to quarrel with you all morning about this stuff.

A. You're getting an answer. My answer to you is I can't recall to you at the moment, but if something comes up I'm sure Mr. Van Loon will absolutely give you those names.

1 M. Rennert - Examination by Mr. Rothenberg
2 Q. Let's move on.
3 A. Yes, sir.
4 Q. Is it your contention in this lawsuit that
5 Yitzi Shulman or Rabbi Shulman inflicted an injury to
6 your child, YR while they where on the school bus on
7 May 9 of 2019; yes or no?
8 A. Absolutely, it is, sir, but that's not what
9 the purpose of this lawsuit is, is it?
10 Q. Time out. Let me just ask you to answer my
11 question so we can finish this thing some time today.
12 All I'm asking you about is whether that's your
13 contention in this lawsuit; yes or no?
14 A. Is that my contention?
15 Q. Yes. That Rabbi Shulman inflicted an injury
16 on your, YR while they where on the school bus on May 9
17 of 2019.
18 A. Okay.
19 Q. Is that your contention; yes or no?
20 A. It is.
21 Q. Okay. What is your source of information for
22 that contention?
23 A. Well, number one would be my son. Number two
24 would be one of my daughters. Number three would be
25 YM. He was sitting right next to him. There was a --

he was on the phone with me. He's a child. I'm sorry to bring up a child. Number four would be multiple other children if we need to name them. How is it appropriate to name children?

Q. So here's what we're going to do.

A. I don't --

Q. Hold on. Here's what we're going to do so that we don't put the names of children on the transcript here.

Do you know other children who were on the bus who told you they observed the incident?

A. Yes, sir.

Q. Okay. I'm going to add that to an interrogatory so you can answer that in writing and we don't have to put it on the record today. Okay?

A. Yes, sir.

MR. ROTHENBERG: Off the record.

(Discussion held off the record.)

MR. VAN LOON: Mr. Rothenberg, Mr. Rennert indicated a daughter. What initials are we going to use for that particular child?

MR. ROTHENBERG: For his daughter? He didn't say a name, but were the initials CR?

THE WITNESS: Yes.

M. Rennert - Examination by Mr. Rothenberg

BY MR. ROTHENBERG:

Q. Let's go back to the medical treatment. You talked about this a little earlier.

Do I understand that it's your testimony that you took your child, YR for medical treatment on May 10, the Friday following the incident?

A. No. The -- that was the next day. Yes, sir.

Q. Yes?

A. The next day.

Q. May 10 was the day after the incident on the school bus, correct?

A. Correct, yes, sir.

Q. What location did you take your child to on May 10?

A. The urgent care center in Pittsford Mall. So it's on Monroe avenue.

Do you want me to get you the actual address? I can screenshot it. I can find it on the map and screenshot it to Mr. Van Loon.

Q. This is across the street from Pittsford Plaza, across the street from Century Liquors?

A. Across from Wegmans, but all the way down on the end.

Q. Yes. I know what you're talking about.

M. Rennert - Examination by Mr. Rothenberg

A. Okay.

Q. On the first visit I think you told me that you were told it was a sprain; is that right?

A. They said it was a possible sprain, yes, sir.

Q. And on the first visit was a cast or a splint applied?

A. No. They just said give him ice and kind of take it easy, but they did give him -- they gave a treatment. So part of the treatment was an x-ray and then they just sent us home and then -- I'm sorry. Yes.

Q. Did your child attend school on Friday, May 10th?

A. I believe so.

Q. How did your child get to school? Did the child ride the bus or did you drive your child there?

A. No, no. On the bus.

Q. Okay. And I take it when your child went to school on Friday, May 10 your child did not have a splint or cast on his wrist; is that correct?

A. I don't recall. Here's the thing, it was long ago. It is possible that he had an Ace bandage, but I know that he slept -- when I put him to bed that night I had him going to sleep with an Ace bandage with

M. Rennert - Examination by Mr. Rothenberg

ice pack on his wrist.

Q. I'll ask it a different way.

Do you recall when your child went to school on Friday, May 10 that your child had anything on the wrist meaning a splint, a cast, an Ace bandage?

A. I don't recall, but -- I don't recall, sir.

Q. Okay. Did you, sir, attend a kiddush at the London residence on Saturday, May 11?

A. I don't believe so.

Q. I'll rephrase it.

A. I guess it's possible.

Q. It is possible. So I'll ask it a different way.

As you sit here, do you have a recollection of attending a kiddush at the London residence on a Saturday following the incident, May 11th?

A. At the London residence?

Q. The London residence.

A. No. I guess it's possible though. If they had a kiddush and I was invited, I went.

Q. But as we sit here today, you're saying you do not have a recollection.

A. No, sir.

Q. Do you know, sir, whether by the weekend, in

other words, by Saturday, May 11, do you know whether your son, YR was at that time wearing some sort of a protective device on his wrist, either a cast or a splint or a bandage?

A. Yes, he was.

Q. Okay. What was he wearing on his wrist at that time?

A. He was wearing an immobilizing splint given to him by the urgent care.

Q. Is that one of these plastic things that gets strapped on or are we talking about a plaster cast or a plastic cast that's unremovable?

A. No. It's just got like a metal bar on the bottom and it has like straps on the top that go around the wrist. (Indicating.)

Q. So it could be removed by somebody other than medical personnel, correct?

A. Oh, yes, absolutely.

Q. Let's switch topics entirely here.

A. (Inaudible.)

Q. I'm sorry. I missed that.

A. Sometimes it's very enlightening to see the strategy that an attorney has.

MR. VAN LOON: Stop, stop.

M. Rennert - Examination by Mr. Rothenberg

THE WITNESS: So I was just appreciating your questions. That's all.

MR. VAN LOON: Stop.

BY MR. ROTHENBERG:

Q. So what, are you telling me you're amused by my strategy this morning?

A. No. What I'm amused by is that Mrs. Goldstein is sitting here and looking me in the face after having written this letter and still contending that it was okay to do it. That's all. That's the real amusing part. It's not really amusing. It is -- it is what it is. I don't know if I would have the gall to do that to somebody.

MR. VAN LOON: Mr. Rennert, let's move on.

THE WITNESS: Okay.

BY MR. ROTHENBERG:

Q. Okay. So sir, we've touched on this in the past, but I want to start the topic afresh.

Do you have any children who at any time in the past attended school at DHR?

A. Yes. All of them and they were treated --

MR. VAN LOON: No. That's not the question. Just answer the question.

THE WITNESS: I was going to say something

else.

BY MR. ROTHENBERG:

Q. Well, you saved me some time there, but you're saying that all of your children at one time or another attended DHR; is that correct?

A. Yes, sir.

Q. How many different children attended DHR?

A. Five.

Q. Let's just put their initials on the record same as we've done previously and I presume everybody's got an R for the last name, but can you just state the initials of the children starting form the oldest and moving to the youngest?

A. Sure. The oldest, the first initial is B. The second child, letter initial is Y. The third child, her initial is C. The fourth child her initial is S, as in Sam. The fifth child is my only boy, his initial is Y.

Q. And the fifth child is the child that is involved in this incident, correct?

A. Yes, sir.

Q. At the time of the incident one of the other children was on the bus with YR; is that correct?

A. Yes, sir.

M. Rennert - Examination by Mr. Rothenberg

Q. And the one who was on the bus with YR at that time is CR; is that right?

A. Actually all of the children were on the bus except for BR.

Q. So four of your children were on the bus on the day of the incident.

A. Yes, sir.

MR. ROTHENBERG: Can we display Exhibit 5 to Mr. Rennert?

THE WITNESS: Yes, sir.

BY MR. ROTHENBERG:

Q. Exhibit 5 is an agreement between you and the Talmudical Institute; is that correct?

A. Yes.

Q. Prior to the execution of Exhibit 5 had you at some time been employed at the Talmudical Institute?

A. Yes.

Q. In what capacity?

A. I was the cook in the school.

Q. The cook?

A. So I did two things. I was employed by them to be the cook and I also worked for them at the bingo hall.

Q. I missed the end of that. What is the second

thing you did?

A. I worked for them at the bingo hall.

Q. Was your employment with the Talmudical Institute terminated?

A. Was it terminated? Yes. It was mutually agreed upon that termination was necessary.

Q. Well, did you have a dispute with them at or about the time of the termination?

A. Yeah. My child was awaiting surgical procedures and they wanted me to come and make breakfast when school was not in session.

Q. Is it fair to say that Exhibit 5 represents an agreement that resolved your dispute with the Talmudical Institute?

A. I don't have a physical copy, but if I can make it easy and if it doesn't make it easy I apologize for taking the time to do so. I believe that this is a copy of the agreement that I had made with Rabbi Davidowitz that settled our differences at that time.

Q. Okay. Fair enough.

We'll scroll down a little bit. I want to see the signatures and the dates.

A. That looks about right. Dr. Madeb was there as a witness because he explained to me that he was

procuring the funds to help end the dispute.

Q. That's a copy of your signature on Exhibit 5; is that correct?

A. It is. And just for the record, the notary public is the wife of the executive director of TIUNY/DHR.

Q. Okay. It's dated February and March of 2018; is that correct?

A. 2018 or 2008?

Q. I'm sorry. My mistake. I'll rephrase that. It was my mistake.

A. I'm looking at it now, yes, sir.

Q. February and March of 2008, correct?

A. Yes, sir.

Q. Now, you told me that all five of your children attended DHR school; is that right?

A. At some point, yes, sir.

Q. Part of the agreement, Exhibit 5, is an agreement that the school will limit the amount of tuition that is charged for you and your children; is that right?

A. That is correct, sir.

Now, again, that's based on them going to this school. It wasn't an automatic thing. So I didn't

M. Rennert - Examination by Mr. Rothenberg

have all five of my children in school at the time or at all times.

Q. Okay. You told me earlier that in May of '19 you had four children in school at DHR, right?

A. Yes, I did.

Q. So would it be fair to say that between '08 and '19 you had one or more children at DHR at all times?

A. Yes.

Q. Did you ever make any payments to DHR for tuition?

A. I made many, many multiple kinds of payments to DHR for many, many reasons, sir.

Q. I'm asking about tuition though. Did you make payments for tuition?

A. It is very possible. I can't tell you that I know exactly what payments. I don't even have that bank account anymore.

Q. Time out. Why did you make payments to DHR for any reason other than tuition?

A. Well, that would be donations. That would be -- they have these pretty cool Chinese auctions. They have some -- there was a program I paid for that was something to do with music color something. I

don't remember what it was. It was something really cool.

You know, different things. At the time they had -- I mean, they had a great education offering and we all got along really well.

MR. ROTHENBERG: Okay. Let me ask Melissa to display Exhibit 6 to you, sir.

THE WITNESS: Sure.

BY MR. ROTHENBERG:

Q. Do you see Exhibit 6 in front of you?

A. Sure.

Q. Exhibit 6, do you see at the top it says, "Summary of payments - Rennert"?

A. I do, yeah. It's just like the name on the PDF.

Q. Does Exhibit 6 accurately reflect payments that you made to DHR in the school year 2010 to 2011 for tuition?

A. I have no idea, sir. I have no reason to dispute it. I have no idea. I don't have the checkbook. Don't have the account.

Q. Okay. Let me ask you it a simpler way.

A. I'm not trying to give you a hard time. I'm trying to -- it's a yes or no under oath kind of thing.

M. Rennert - Examination by Mr. Rothenberg

I simply don't know. I don't have any access to any of these -- on any of these payments, but I do know I've sent a lot of money DHR's way.

Q. Okay. Let me ask it this way: Do you have any reason at this moment to dispute that you made the payments for tuition that are reflected on Exhibit 6?

A. Yes.

Q. What's your basis for disputing that?

A. We're in a lawsuit, sir. There are things that are going to be procured that if I can't verify, maybe you use against my allegations or maybe you use against me in some way, shape or form.

That's the only reason I could actually give you. We're at odds right now.

Q. I understand, but Mr. Rennert, I'm representing DHR which is a defendant. I'm showing you a document and I'm asking you if you have a basis for disputing any of this. If you have a basis tell me the basis.

A. Sure. It says check No. 1142. I don't know what 1142 is. I need to see check No. 1142 to see a signature on it, et cetera, et cetera.

When people ask me to procure invoices and payment, we do so. This is a printed off paper from DHR. It

doesn't have any supporting evidence, if I can use that.

I'm not saying that it's a lie. I'm not saying it's not true. You asked me if I can absolutely say and validate this information. I cannot.

Q. Do you have a recollection of having made any payments to DHR in this particular school year?

A. In 2010?

Q. To 2011.

A. Sir, I don't have the recollection of making the actual payments, but I am sure I did.

Q. Okay. Fair enough.

MR. ROTHENBERG: Let's show Mr. Rennert Exhibit 7.

BY MR. ROTHENBERG:

Q. Let's try to do this more simply.

A. Here, sir, you see that's a different --

MR. VAN LOON: Stop, stop for a second. I'm trying to find it.

THE WITNESS: It says 2016.

MR. ROTHENBERG: Scroll down to the bottom, Melissa. Let me give Mr. Van Loon a number. It's DHR 8 in your discovery.

MR. VAN LOON: Thank you.

M. Rennert - Examination by Mr. Rothenberg

MR. ROTHENBERG: Have you got it?

MR. VAN LOON: Yes. So this is going to be Exhibit 7 for the deposition.

MR. ROTHENBERG: Yes. Just show it if you would please to Mr. Rennert so he's got a copy in front of him.

MR. VAN LOON: Will do.

THE WITNESS: So see here, look. This is --

MR. VAN LOON: No, no. Don't talk to me. If he's got a question he'll ask it.

THE WITNESS: Okay. Sure. No problem.

BY MR. ROTHENBERG:

Q. Do you see that Exhibit 7 is on DHR letterhead, correct?

A. Yes, sir.

Q. Addressed to you.

A. No. Let me retract that answer. I apologize. I see that there's a paper that says Darech HaTorah of Rochester in the left-hand corner, but the prior exhibit and the next exhibit or next page of the exhibit has actual letterhead. So I may --

Q. Fine. I'll rephrase my question.

Do you see that it has the name and address of Derech HaTorah, DHR, at the top, correct?

M. Rennert - Examination by Mr. Rothenberg

A. Yes, sir, I do.

Q. And then it has your name and a Sylvan Road address underneath that, correct?

A. Yes, sir.

Q. And then this document, Exhibit 7, purports to list some tuition payments and it has the names of your children, correct?

A. Yes, sir.

Q. I'll ask you the general question that we ended up with for the last exhibit. Is it your recollection that you made payments for tuition in any amount to DHR during the '15/'16 school year?

A. Sir, it is possible. It's also not possible. I don't know. That was a very tumultuous time.

Q. Do you have any reason to dispute that you made payments to DHR in 2015 or 2016?

A. Other than the fact that I went broke, nope.

Q. Okay. Do you see on here that it lists scholarship and it has four of your children's names thereafter? Do you see that?

A. Yeah. I see that, yes.

Q. Is it your recollection that the school awarded scholarship to any of your children?

A. Yeah. That's what the bingo thing is about,

the scholarship.

Q. Okay. Fair enough. Fair enough.

MR. VAN LOON: One moment. We're going to go on mute.

(Discussion held off the record.)

MR. VAN LOON: Go ahead.

MR. ROTHENBERG: Can we display Exhibit 8 for, Mr. Rennert?

THE WITNESS: Mr. Rothenberg, you have an impressive John Hancock there.

BY MR. ROTHENBERG:

Q. Thank you.

MR. VAN LOON: 35?

MR. ROTHENBERG: Yes. It's on the screen.

MR. VAN LOON: So this is Exhibit --

MR. ROTHENBERG: 8.

MR. VAN LOON: Exhibit 8, got it.

BY MR. ROTHENBERG:

Q. Mr. Rennert, Exhibit 8 purports to be an exchange of e-mail between you and Mrs. Goldstein on May 20, 2015, correct?

A. Yes. That's what it looks like.

Q. Mrs. Goldstein e-mailed you on that date to request payment, correct?

M. Rennert - Examination by Mr. Rothenberg

A. She's asking me if I have any way that I could help out with their -- with the fact that they had payroll and that she was short.

Q. Okay. And she says that you have a balance for this year's tuition, correct?

A. Mrs. Goldstein did say that in the e-mail. Mrs. Goldstein also said that I made up things about my son's hand.

So again, in 2006 I would say that I had no reason to question anything that Mrs. Goldstein said. Today I do.

Q. When you replied to Mrs. Goldstein on that date, the second line of your reply reads as follows, does it not, quote, "I can promise you this: As soon as I get something I will turn it to you"?

Did you write those words in that e-mail on that date?

A. That's what the e-mail that you are procuring states.

I can look at my own e-mail to see if I have the same. If you allow me to do so I can probably look at my e-mail on my phone and if I can verify that, I'll be happy to verify that for you, sir.

Q. Do you keep copies of all your e-mails with,

for example, Mrs. Goldstein or other people at DHR?

A. I'd say for the most part I try.

Q. Look, I'm going to tell you the same thing I told you earlier. If you're going to look at stuff on your telephone I'm going to ask you to provide it to Mr. Van Loon so he can provide it to me. Okay?

A. I will be more than happy. What I would look for is the e-mail that we're looking at here and there's probably a trail. I'll be happy to forward the whole trail so we have full context.

MR. VAN LOON: No. That's not what he's asking.

BY MR. ROTHENBERG:

Q. I'm going to accept your offer.

So go ahead and send it to Mr. Van Loon and he'll sent it on to me. Okay?

A. I would like that. Believe it or not, as much as the two lawyers can only say wow, I would like to because I think there's a lot of things in the e-mail that I would like to get cleared up, sir.

Q. Okay. So I'm requesting that what you do is you forward those e-mails to Mr. Van Loon and he will then send copies to me. Understood, sir?

A. If I can find them, you will have them.

M. Rennert - Examination by Mr. Rothenberg

Q. Not now. I don't mean right now. Don't interrupt the deposition.

A. Okay.

Q. At some later time.

A. No problem. I hope I find them, sir. I really do because I'd love to --

MR. VAN LOON: Stop the comments.

MR. ROTHENBERG: Can we display Exhibit 9 please?

BY MR. ROTHENBERG:

Q. Exhibit 9 is DHR 10 and let me -- so if it's easier for you to look at your hard copy, your lawyer can hand you DHR 10.

MR. VAN LOON: What's at the bottom? Because you're says May 17th, 2017. So this is page 12 that you sent me.

MR. ROTHENBERG: No. That's the next exhibit. That's Exhibit 10. Exhibit 9 is DHR 10.

We had the wrong one on the screen.

MR. VAN LOON: Okay.

MR. ROTHENBERG: Do you have a hard copy of this exhibit in front of you?

MR. VAN LOON: He does now.

BY MR. ROTHENBERG:

M. Rennert - Examination by Mr. Rothenberg

Q. Sir, you're looking at a document that in the lower right-hand corner says DHR 10, correct?

A. Yes, sir.

Q. And at the top of this page it has a date August 24, 2016, correct?

A. Yes, sir.

Q. And then it says, "Statement of overdue tuition for the Rennert family," correct?

A. It does say that, yes, sir.

Q. And then --

A. This one is on letterhead.

Q. Thank you. Thank you for pointing that out.

A. Yes, sir.

Q. Do you know as you sit here today whether you made any payments to DHR for which you are not receiving credit on Exhibit 9?

A. I'm going to -- the answer is I don't have any recollection, positive for me or negative for me, with regard to any payments with regard to Derech HaTorah of Rochester.

I don't have the bank account I use to have. I don't have access to any of that.

I assume Mrs. Goldstein does. I assume that she has records of deposited checks or wired funds or ACH

M. Rennert - Examination by Mr. Rothenberg

funds or any other way that funds where done. I assume that if there's a register of that and there was supporting evidence of payments made, not only wouldn't I, I assume I couldn't dispute that.

So I don't know, sir.

Q. Okay.

A. Like I said, I wouldn't ever suspect Mrs. Goldstein to be a thief. I assume she's not. I'm surprised that she was a liar and I'm surprised she's lied in the letter, but other than that, I wouldn't suspect her of doing something. She worked pretty hard to try and make the school work.

Q. Okay. As we sit here today do you have any recollection or knowledge that any of the amounts listed on Exhibit 9 are incorrect?

A. I assume for the sake of seeing the numbers there I would have to dispute it until I see the supporting evidence, but again, I'm not here to argue about that.

I'm here to discuss -- and I know that you're allowed to ask whatever you want and I'm required to answer, but I just want to remind you what I'm here for is not to sit here and discuss the tuition.

I'm here to discuss the fact of what happened with

my children and Mrs. Goldstein.

Q. That's not entirely true, sir. You understand that we have counterclaimed against you for tuition, correct?

A. I do.

Q. Okay.

A. And that's not --

Q. So the claim for tuition is a claim in this lawsuit, correct?

A. Well, you're bringing it about money. I'm not.

Q. But whether you like it or not, there is a counterclaim against you for tuition. Do you understand that?

A. Oh, I absolutely understand that. It's surprising because there are people that owe so much money and what you would suspect, that I've never seen them make any collection attempt on anybody.

Q. So you said to me that you're not here to talk about tuition, but sir, I am here to ask you questions about tuition because it's an issue in this lawsuit. Do you understand that?

A. Yes, I understand you. You made it -- I apologize. Not you. That's the wrong terminology.

1 M. Rennert - Examination by Mr. Rothenberg
2 I understand it has been made an issue in this
3 lawsuit and so I guess I'll answer the questions that
4 I've been directed to do so, but I'm very much the kind
5 of person and Mrs. Goldstein probably warned you about,
6 I like to stay focused on what's important.
7 Q. I can tell you, Mr. Rennert, this part is
8 important to us whether you think it's important or
9 not. This is important to us.
10 A. Oh, I agree with you, sir. Money seems to be
11 the only thing that's important to you and your
12 clients.
13 I, on the other hand, find it important to make
14 sure my children are safe and stable and happy and that
15 I don't put them in positions of danger and that when
16 people approach me and tell me they're in a position of
17 danger, I don't just shove it off and shove it up their
18 asses. Pardon my French.
19 Q. Let's parse that a little bit. Hold on.
20 Did you send all of your children back to school on
21 Friday, May 10?
22 A. I did because I thought that Mrs. Goldstein
23 was a person that she was for thirteen years, that I
24 knew her and I think she still is, but after she got
25 off that phone call with her father, it changed

1 everything.
2 Q. Hold on. You understood though that the
3 incident on the bus on May 9 involved YR and Mr.
4 Shulman, correct?
5 A. I would say Yitzi Shulman. I don't want to
6 disparage him if he earned the title rabbi or whatever,
7 but yes, I do understand.
8 But what I also understand, sir, is that I
9 documented to Mrs. Goldstein and I texted Mrs.
10 Goldstein after Yitzi Shulman didn't respond because I
11 was trying to get clarification.
12 Not everything is always as it seems on the
13 surface. Just because my son comes home and tells me
14 hey, Yitzi -- he says Rabbi Shulman hurt my hand. Just
15 because he said that doesn't mean that I'm going to say
16 well, okay, that's the whole story and let me run to my
17 lawyer. That's not how it worked.
18 Q. I'm not asking you about --
19 A. It was I went to Mr. Yitzi Shulman. He
20 didn't respond. So I went to Mrs. Goldstein and it's
21 the response from Mrs. Goldstein which is why we're
22 here.
23 It's not just the response. It's the subsequent
24 actions and the subsequent actions after that. We
25

M. Rennert - Examination by Mr. Rothenberg

shouldn't be here, sir.

Q. Okay. I'm asking you about whether you sent your children back to school on May 10; yes or no?

A. Absolutely I did. Absolutely I did.

Q. Okay. Fine.

In May of 2019 Yitzi Shulman or Rabbi Shulman was a teacher for more than one of your children, correct?

A. Yes. Unfortunately, yes, sir.

Q. Okay. Did there come a time in that month of May when you received a letter essentially expelling your children from DHR?

A. Yeah. Surprisingly. Well, not -- let me quantify that.

I received it as well as members of the judiciary received it from Mrs. Goldstein directly which is when I realized something changed.

So it wasn't just that I received it, sir. This was a punitive measure.

Q. Did you protest the expulsion in any way or did you agree to remove your children from DHR?

A. You're asking me if I protested? Of course I protested.

Are you trying to ask if I felt my children should still go to DHR, I did. I was very sad. I was very

deeply hurt. So were my children.

DHR was a wonderful place for them. I don't know what happened. I'll never understand it.

That's why I didn't ask for an explanation in my lawsuit. What I asked for prior to actually filing the lawsuit is the same thing that I would still contend is a retraction of the accusations by Mrs. Goldstein. That's all. And to pay my attorney for his time.

But that didn't happen then. I guess since you guys are all into the money, you guys can figure out what the cost of that is, right?

It's not about the money to me. It's about my children to me and it used to be about the children for Mrs. Goldstein. I don't know what happened. I wish I did. I'll never know.

Q. Okay.

MR. ROTHENBERG: Let's show Mr. Rennert Exhibit 10 which is --

THE WITNESS: Mr. Rothenberg, by the way, this isn't bullying. This is me being very --

MR. VAN LOON: Stop. There's no question, Mr. Rennert.

THE WITNESS: Okay. I just want to make sure he understands I'm being an advocate --

M. Rennert - Examination by Mr. Rothenberg

MR. VAN LOON: Stop.

MR. ROTHENBERG: Melissa, are you getting all this?

THE WITNESS: That was my conversation with my attorney.

MR. VAN LOON: That's fine. We have to go on mute. Go on mute.

THE WITNESS: Fine. I'll go on mute for a second.

MR. ROTHENBERG: Well, while that's happening I'm going to ask Melissa to put Exhibit 10 on the screen.

(Discussion held off the record.)

MR. VAN LOON: I think we're back.

MR. ROTHENBERG: Okay. Nathan, Exhibit 10 is DHR 12.

MR. VAN LOON: Okay. Got it. I'm showing it to my client.

BY MR. ROTHENBERG:

Q. Okay. Do you have the document in front of you, Mr. Rennert, that is marked --

MR. VAN LOON: One moment.

MR. ROTHENBERG: All right. You don't have the hard copy yet?

THE WITNESS: Mr. Rothenberg, is it okay if I run to my car and get a water?

MR. VAN LOON: We can take a five minute break.

(Recess taken.)

BY MR. ROTHENBERG:

Q. We're back on the record.

A. Yes, sir.

Q. And we have displayed Exhibit 10 and if Mr. Van Loon has given you the hard copy, the hard copy is DHR 12.

A. Is Mrs. Goldstein here as well?

Q. Mrs. Goldstein is still observing, yes.

A. Are you going to turn on your camera?

Q. We see you and hear you.

A. Well, I don't see Ms. Goldstein.

Q. I don't know why. I see her.

(Discussion held off the record.)

BY MR. ROTHENBERG:

Q. You have the exhibit in front of you that's marked DHR in the bottom right.

A. Yes, sir.

Q. At the top of the page there's a date May 17, 2017, correct?

M. Rennert - Examination by Mr. Rothenberg

A. Yes.

Q. It says, "Statement of overdue tuition for Rennert Family." Do you see that?

A. I see where it says a lot of things. I don't see any signatures. I don't see --

Q. I didn't ask you about that.

A. So --

Q. Sir, just answer my question.

Do you see at the top of the page, "Statement of overdue tuition for the Rennert Family"?

A. It does.

Q. Okay. Thank you.

Does it list figures for school years starting 2010 to 2011 and finish with 2016 to 2017?

A. That's what it says on the paper, sir.

Q. At the bottom it says, "Total due to DHR," ninety-two thousand four hundred twenty, correct?

A. That's what it says.

Q. As you sit here do you have knowledge of anything that would indicate that these numbers are incorrect?

A. I would repeat my assertion from earlier which was in 2006, '08, '10 I probably wouldn't question a darn thing that Mrs. Goldstein would

M. Rennert - Examination by Mr. Rothenberg

procure.

Based on the activities and/or behaviors which brought us to where we are, I question everything. So I would ask for supporting evidence for all of this.

Q. Okay. Let me ask a different question.

Did you receive a copy of Exhibit 10 in or about May of 2017?

A. I don't recall.

Q. Okay. Did you at any time prior to this lawsuit ever notify Mrs. Goldstein that any particular tuition bill or statement was incorrect?

A. Sir, I really don't know. Anything is possible. If you have any e-mails that say so I'm happy to --

Q. No. I'm asking you. I'm not the witness here. You're the witness.

A. Here's the thing, sir: You're asking me for a hundred twenty-five thousand dollars. You're asking for me to give you evidence for it. I'm not going to do it because I don't have it. If I had the evidence against myself I would have given it to my attorney because he asked me for it. I don't have it.

If Mrs. Goldstein has any papers, any e-mails that come from me and I can find that original e-mail in my

1 M. Rennert - Examination by Mr. Rothenberg
2 e-mail, then you will have my full endorsement on such.
3 Q. Okay. Just listen to my question. Okay?
4 A. Sure.
5 Q. My question is do you have a recollection at
6 any time of sending an e-mail or a letter or a written
7 communication to Mrs. Goldstein disputing any tuition
8 bill or statement ever?
9 A. I don't have a recollection of that, sir.
10 Q. Okay.
11 A. It's possible that there is. It's possible
12 that there isn't. But I don't have that recollection,
13 sir.
14 Q. Okay.
15 A. I have all the e-mails and text messages
16 regarding my son's injury.
17 MR. VAN LOON: Mr. Rennert, just answer the
18 question that's asked.
19 BY MR. ROTHENBERG:
20 Q. I'm going to ask Mr. Van Loon to give you two
21 documents so you have them both in front of you. One
22 is Exhibit 11 which is DHR 57 and one 12 Exhibit 12
23 which is DHR 58. If you could take a look at those
24 side by side I would appreciate it.
25 Do you see Exhibit 11 in front of you, Mr. Rennert?

M. Rennert - Examination by Mr. Rothenberg

A. Yes.

Q. Do you remember receiving a copy of Exhibit 11?

A. I don't, but it looks like Dara Rennert is copied on this. Is she also a defendant from your counterclaim?

Q. She is not, sir.

A. Okay. Then why am I looking at an e-mail with her on it?

Q. Because I'm showing it to you.

A. Fair enough. Okay.

Q. Do you see your name on it?

A. I do.

So let me ask you a question. Is that to Dara for the one twenty-five eight twenty that you're talking about?

Q. I told you earlier that's not the way this works. I ask you the questions and you answer the questions.

MR. VAN LOON: Mr. Rothenberg, I've got DHR 57 right here and that is Exhibit 11?

MR. ROTHENBERG: Yes.

MR. VAN LOON: And then DHR 58 is Exhibit 12?

MR. ROTHENBERG: Yes.

MR. VAN LOON: I've given him the hard copies.

THE WITNESS: This is the copy of the --

MR. VAN LOON: Yes.

THE WITNESS: Okay.

BY MR. ROTHENBERG:

Q. Mr. Rennert, do you have a recollection of receiving either or both Exhibit 11 or 12 in or about July of 2019?

A. No, I don't. But I'm sure if it's in my e-mail box that I received it. I can check it.

Q. Fair enough. That's fair enough.

Do you recall writing Mrs. Goldstein in or about July of 2019 objecting to or disputing any of the amounts listed on the spreadsheet, Exhibit 12?

A. Well, this would be the first time I've seen this.

Q. Why would it be the first time you've seen it?

A. Probably for the same reason that it was copied in a non-symmetrical way. Because probably it was never sent to me.

This is probably being procured now because you're looking for money because I was complaining about the

way that my child was treated.

So you're going to look for some reason or some way to get rid of that claim by your counterclaim.

Q. Well, we'll --

A. But I find --

Q. Hold on. Go back to Exhibit 11.

A. Yes.

Q. You just told me that if it was in your e-mail you received it, correct?

A. I would assume so.

Q. Okay.

A. It could have -- I have no idea. I have to look at my e-mail, sir.

Q. Do you see on Exhibit 11 that there is a reference to an attachment entitled, "Rennert Past Due Tuition Balance Spreadsheet"? Do you see that?

A. I do. Is that to both myself and Dara Rennert or is that just for me?

Q. I'm not asking you questions about Dara Rennert. I'm asking you questions about you, Mordechai Rennert.

A. So I understand, so if you look at the two it comes to me, correct? That's according to this paper it says my name. Right before my name is Dara Rennert.

M. Rennert - Examination by Mr. Rothenberg

So my question is --

MR. VAN LOON: No. There's no questions that you get to ask, Mr. Rennert.

THE WITNESS: Okay. I don't have any supporting evidence that I received this e-mail. I can check my e-mail and get back to you.

BY MR. ROTHENBERG:

Q. But do you see on Exhibit 11 there is an attachment referenced on Exhibit 11?

A. I do. Once again, my name is on the PDF. Yes, sir.

Q. Okay.

A. That's like the --

Q. Do you see that Exhibit 12, at the top it says, "Rennert Past Due Tuition as of July 2019" -- strike that. I'm going to say that question again.

Do you see on the top of Exhibit 12 that it says, "Rennert Past Due tuition as of July 1, 2019," correct?

A. I see what it says, sir, yes.

Q. That's the same date that appears on Exhibit 11 at the bottom with reference to the attachment, correct?

A. That's what it says on the papers.

Q. Okay. And my question then is this, simple

M. Rennert - Examination by Mr. Rothenberg

question yes or no: Do you have a recollection of writing anything to Mrs. Goldstein or anybody at DHR protesting any amounts of tuition that were referenced in this e-mail and attachment?

A. Sir, no. I have no recollection on the specificity of your question. I wish I did, but I don't --

MR. ROTHENBERG: I'd like to take five minutes and I'm just going to talk to Mrs. Goldstein offline. So let's just take a little break off the record.

(Recess taken.)

MR. ROTHENBERG: So Mr. Rennert, I have no further questions.

I want to indicate the following on the record, that there were several times today when you either didn't recall something or one instance where you refused to answer something. This is what I'm going to do.

After I get the transcript I'm going to serve a very brief set, I'm actually not going to call it interrogatories, Nathan. I'm going to call it a deposition on written questions. I'm just going to follow up.

1 M. Rennert - Examination by Mr. Rothenberg
2 Partly that's to get some information that
3 you thought you had and just didn't recall and partly
4 it's really to give you a second chance to decide what
5 to do about this Lakewood, New Jersey business.
6 Because I don't want to have to do this, but
7 it is my intent if you refuse, to go ask for a court
8 order and to seek costs and all that stuff which nobody
9 wants to do.
10 So after we serve --
11 THE WITNESS: That's --
12 MR. ROTHENBERG: You don't have to say
13 anything.
14 After we serve the written questions on Mr.
15 Van Loon you talk to him and maybe you reconsider that.
16 Okay?
17 THE WITNESS: Anything that --
18 MR. VAN LOON: Mr. Rennert, you and I will
19 talk about it.
20 MR. ROTHENBERG: That's all. Thank you.
21
22 * * *
23
24
25

REPORTER CERTIFICATE

I, Melissa J. Kuntz, do hereby certify that I did report in stenotype machine shorthand the proceedings held in the above-entitled matter;

Further, that the foregoing transcript is a true and accurate transcription of my said stenographic notes taken at the time and place hereinbefore set forth.

Dated: July 8, 2021

At Rochester, New York

S/ Melissa J. Kuntz

Melissa J. Kuntz

Section 3503.24 | Application for correction of precinct registration list or challenge of right to vote.

Ohio Revised Code / Title 35 Elections /
Chapter 3503 Voters - Qualifications; Registration

Effective: *March 20, 2019* ***Latest Legislation:*** *House Bill 41 - 132nd General Assembly*

(A) Application for the correction of any precinct registration list or a challenge of the right to vote of any registered elector may be made by any qualified elector at the office of the board of elections not later than the thirtieth day before the day of the election. The applications or challenges, with the reasons for the application or challenge, shall be filed with the board in person or by mail on a form prescribed by the secretary of state and shall be signed under penalty of election falsification.

(B) On receiving an application or challenge filed under this section, the board of elections promptly shall review the board's records. If the board is able to determine that an application or challenge should be granted or denied solely on the basis of the records maintained by the board, the board immediately shall vote to grant or deny that application or challenge.

If the board is not able to determine whether an application or challenge should be granted or denied solely on the basis of the records maintained by the board, the director shall promptly set a time and date for a hearing before the board. The hearing shall be held, and the application or challenge shall be decided, no later than ten days after the board receives the application or challenge. The director shall send written notice to any elector whose right to vote is challenged and to any person whose name is alleged to have been omitted from a registration list. The notice shall inform the person of the time and date of the hearing, and of the person's right to appear and testify, call witnesses, and be represented by counsel. The notice shall be sent by first class mail no later than three days before the day of any scheduled hearing. Except as otherwise provided in division (D) of this s Top

the director shall also provide the person who filed the application or challenge with such written notice of the date and time of the hearing.

At the request of either party or any member of the board, the board shall issue subpoenas to witnesses to appear and testify before the board at a hearing held under this section. All witnesses shall testify under oath. The board shall reach a decision on all applications and challenges immediately after hearing.

(C) If the board decides that any such person is not entitled to have the person's name on the registration list, the person's name shall be removed from the list and the person's registration forms canceled. If the board decides that the name of any such person should appear on the registration list, it shall be added to the list, and the person's registration forms placed in the proper registration files. All such corrections and additions shall be made on a copy of the precinct lists, which shall constitute the poll lists, to be furnished to the respective precincts with other election supplies on the day preceding the election, to be used by the election officials in receiving the signatures of voters and in checking against the registration forms.

(D) If an elector who is the subject of an application or challenge hearing has a confidential voter registration record, as described in section 111.44 of the Revised Code, all of the following apply:

(1) If the elector's right to vote has been challenged, the person who filed the challenge shall not receive notice of the date and time of any hearing held concerning the challenge, shall not be permitted to attend the hearing, and shall not receive notice of the disposition of the challenge.

(2) If the elector is the subject of an application for the correction of the precinct registration list and the elector is not the person who filed the application, the person who filed the application shall not receive notice of the date and time of any hearing held

Top

concerning the application, shall not be permitted to attend the hearing, and shall not receive notice of the disposition of the application.

(3) Notwithstanding section 121.22 of the Revised Code, any hearing held concerning the application or challenge shall not be open to the public.

(4) Any records created as a result of the application or challenge that include the elector's residence address or precinct shall not be open to public inspection.

Available Versions of this Section

August 15, 2012 – Senate Bill 295, 129th General Assembly

September 8, 2016 – Amended by House Bill 359, 131st General Assembly

March 20, 2019 – Amended by House Bill 41, 132nd General Assembly

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VOTER INFORMATION REPORT

MORDECHI S RENNERT

PRINTED ON: 10/11/2021

VOTER ID: 1857076

NAME: MORDECHI S RENNERT
RESIDENCE: 3662 SEVERN RD
CITY/STATE/ZIP: CLEVELAND HTS, OH 44118

CARE OF:
STREET/BX:
MAIL CITY:
MAIL STATE/ZIP:
COUNTRY:

PHONE NUMBER:

STATUS: CANCELED
PARTY: Z*ARCHIVE_UNAFFILIATED
REG DATE: 11/17/2000
ORIG REG DATE: 11/17/2000
PRECINCT: CLHT04G.01
PRECINCT NAME: CLEVELAND HEIGHTS -04-G

POLLING PLACE: CLEVELAND HEIGHTS COMMUNITY CENTE
1 MONTICELLO BOULEVARD

SIGNATURE:

I hereby certify that the above document is a true and correct copy of the original filed at the Cuyahoga County Board of Elections.

VOTE
CUYAHOGA COUNTY
BOARD OF ELECTIONS

Election Official: Betty Grant Edwards
Title: Registration Manager
Date: Oct 11, 2021
Signature: Betty Grant Edwards

THIS IS AN APPLICATION FOR A ☒ NEW REGISTRATION ☐ ADDRESS CHANGE ☐ NAME CHANGE

1 Last Name	First Name	Middle Name or Initial	Jr., II, etc.
Renner+	Mordechai	S	

2 House Number and Street (Enter new address if changed)	3 City or Post Office	4 Zip Code
3667 Severn RD.	Cleveland Hts.	44118

5 Additional Rural or Mailing Address (if necessary)	6 County where you live
	Cuyahoga

7 Birthdate	8 Birthplace	9 Social Security No. (voluntary)	10 Phone No. (voluntary)
MO DAY YEAR 1 79	Cleveland OH		216-371-5157

11 ADDRESS CHANGE ONLY - PREVIOUS ADDRESS

Previous House Number and Street

Previous City or Post Office	County	State

12 CHANGE OF NAME ONLY	Former Legal Name	Former Signature
		18570 76

I declare under penalty of election falsification I am a citizen of the United States, will have lived in this state, county, and precinct for 30 days immediately preceding the next election, and I will be at least 18 years of age at the time of the general election.

13 Signature of Applicant ➔

Date 11 / 17 / 00 (MO DAY YR)

Information that will remain confidential and will be used only for voter registration purposes: 1) the office where you submit your voter registration application or 2) the fact that you have declined to register. The penalty for election falsification is imprisonment for not more than 6 months, or a fine of $1,000, or both.

FOR BOARD USE ONLY
SEC4010 (Rev. 10/94)

City, Village, Twp.	Ward	Precinct	School Dist.	Cong. Dist.	Senate Dist.	House Dist.
CLHT	4	C			A	

Proof.ng

Voter History for Eligible Elections Only - MORDECHI RENNERT

#	Date	Title	Elig	V...	Cons Prec	Party	Poll Voter	AV Requested	AV Returned
1	11/06/2007	2007 NOV GENERAL	Y	N			N	N	N
2	11/07/2006	2006 NOV GENERAL	Y	N			N	N	N
3	11/08/2005	GENERAL NOV 2005	Y	N			N	N	N
4	11/02/2004	GENERAL NOV 2004	Y	N			N	N	N

MORDECHI S RENNERT OH0015209866 - *** COMMENT ***

Voter Details | Properties | Flags/Misc | Notices

County Info | State Info (S)

Voter ID: 1857076

Status: CANCELED

Reason: NVRA PURGE

Affidavit: OH0015209866

Sig: 1857076 Auto S

DMV Lic: SSN:

Name | Prior Name | Alternate Name

Name

Prefix:

First: MORDECHI

Middle: S

Last: RENNERT

Suffix: Birth Date: /1979

St Rsn:

Residence

Standard Residence Address Clear

House#: 3662 Frac: Dir:

Street: SEVERN Type: RD

Post: Bldg: Apt:

City: CLEVELAND HTS Zip: 44118

Prec: CLHT04G.01 Manual

Additional Address

Mailing

Cntry: Clear

CareOf:

Str/Bx:

City: St: Zip:

Additional Address

Print Ok Cancel

VOTER INFORMATION REPORT

MORDECHAI SHMUEL RENNERT

PRINTED ON: 10/11/2021

VOTER ID: 2954405

NAME: MORDECHAI SHMUEL RENNERT
RESIDENCE: 4365 CHURCHILL BLVD
CITY/STATE/ZIP: UNIVERSITY HTS, OH 44118

CARE OF:
STREET/BX:
MAIL CITY:
MAIL STATE/ZIP:
COUNTRY:

PHONE NUMBER:

STATUS: INACTIVE
PARTY: REPUBLICAN
REG DATE: 09/08/2020
ORIG REG DATE: 09/08/2020
PRECINCT: UNHT00H.01
PRECINCT NAME: UNIVERSITY HEIGHTS -00-H

POLLING PLACE: GEARITY PROFESSIONAL DEVELOPMENT
2323 WRENFORD ROAD

SIGNATURE:

I hereby certify that the above document is a true and correct copy of the original filed at the Cuyahoga County Board of Elections.

VOTE
CUYAHOGA COUNTY
BOARD OF ELECTIONS

Election Official: Betty Grant Edwards
Title: Registration Manager
Date: Oct 11, 2021
Signature: Betty Grant Edwards

VOTER INFORMATION REPORT

MORDECHAI SHMUEL RENNERT

PRINTED ON: 10/11/2021

VOTER'S DISTRICT INVENTORY

GROUP	NAME	
ALL	COUNTY WIDE DISTRICT	DISTRITO A NIVEL DE CONDADO
CCD	COUNTY COUNCIL DISTRICT 10	Consejo del Condado Distrito 10
CONG	CONGRESSIONAL DISTRICT 11	DISTRITO DEL CONGRESO 11
COURT	8TH DISTRICT COURT OF APPEALS	8 ° Distrito Tribunal de Apelaciones
HSE	HOUSE DISTRICT 09	CÁMARA DE DISTRITO 09
JUD	SHAKER HTS MUNI CT DISTRICT	SHAKER HTS DISTRITO DEL TRIBUNAL
LIB	CLEVE HTS/UNIV HTS LIBRARY DIST.	Distrito de la Biblioteca de CLE HT/UN H
MUN	UNIVERSITY HEIGHTS	Ciudad de University Heights
PARK	METROPARKS DISTRICT	
PCTDT	UNIVERSITY HEIGHTS-00- H	
SBOE	STATE BOARD OF EDU DISTRICT 11	Junta Estatal de Educación Distrito 11
SCSD	CLEVE HTS/UNIV HTS CSD - 1810	
SEN	STATE SENATE DISTRICT 21	DISTRITO DEL SENADO ESTATAL 21

1854

1. Are you a U.S. citizen? ☑ Yes ☐ No
2. Will you be at least 18 years of age on or before the next general election? ☑ Yes ☐ No
If you answered NO to either of the questions, do not complete this form.

3. Last Name	First Name	Middle Name or Initial	Jr., II, etc.
RENNERT	MORDECHAI	SHMUEL	

4. House Number and Street (Enter new address if changed)	Apt or Lot #	5. City or Post Office	6. Zip Code
4365 CHURCHILL BLVD		UNIVERSITY HTS	44118-3911

7. Additional Rural or Mailing Address (if necessary)	County where you live
	CUYAHOGA

8. Birthdate (MO-DAY-YR)	10. Ohio driver's license No. OR last 4 digits of Social Security No. (required)	11. Phone No. (voluntary)
1979		

12. PREVIOUS ADDRESS IF UPDATING CURRENT REGISTRATION

Previous House Number and Street

Previous City or Post Office	County	State

13. CHANGE OF NAME ONLY Former Legal Name Former Signature

I declare under penalty of election falsification I am a citizen of the United States, will have lived in this state for 30 days immediately preceding the next election, and I will be at least 18 years of age at the time of the general election.

14. Your Signature

Date 08 / 25 / 2020
MO DAY YR

FOR BOARD USE ONLY
SEC4010 (Rev.9/06)

City, Village, Twp.
Ward
Precinct
School Dist.
Cong. Dist.
Senate Dist.
House Dist.

RECEIVED ON SEP 08 2020 CCBOE

Voter History for Eligible Elections Only - MORDECHAI RENNERT

#	Date	Title	Elig	V...	Cons Prec	Party	Poll Voter	AV Requested	AV Returned	Category	Source
1	08/03/2021	AUGUST 3, 2021 SPECIAL CONGRESSIONA	Y	Y	UNHT00H	REP	N	Y	Y	I	OFF
2	11/03/2020	November 3, 2020 Presidential General Election	Y	Y	UNHT00H	NOP...	N	Y	Y	I	OFF

VOTER INFORMATION REPORT

RYAN THOMAS ROUTH

PRINTED ON: 10/11/2021

VOTER ID: 1782696

NAME: RYAN THOMAS ROUTH
RESIDENCE: 2359 ARDLEIGH DR
CITY/STATE/ZIP: CLEVELAND HTS, OH 44106

CARE OF:
STREET/BX:
MAIL CITY:
MAIL STATE/ZIP:
COUNTRY:

PHONE NUMBER:

STATUS: ACTIVE
PARTY: DEMOCRAT
REG DATE: 04/17/2008
ORIG REG DATE: 08/11/1999
PRECINCT: CLHT01E.01
PRECINCT NAME: CLEVELAND HEIGHTS -01-E

POLLING PLACE: ST PAULS EPISCOPAL CHURCH
2747 FAIRMOUNT BOULEVARD

SIGNATURE:

I hereby certify that the above document is a true and correct copy of the original filed at the Cuyahoga County Board of Elections.

VOTE
CUYAHOGA COUNTY
BOARD OF ELECTIONS

Election Official: Betty Grant Edwards
Title: Registration Manager
Date: Oct 11, 2021
Signature: Betty Grant Edwards

VOTER INFORMATION REPORT

RYAN THOMAS ROUTH

PRINTED ON: 10/11/2021

VOTER'S DISTRICT INVENTORY

GROUP	NAME	
ALL	COUNTY WIDE DISTRICT	DISTRITO A NIVEL DE CONDADO
CCD	COUNTY COUNCIL DISTRICT 10	Consejo del Condado Distrito 10
CONG	CONGRESSIONAL DISTRICT 11	DISTRITO DEL CONGRESO 11
COURT	8TH DISTRICT COURT OF APPEALS	8 ° Distrito Tribunal de Apelaciones
HSE	HOUSE DISTRICT 09	CÁMARA DE DISTRITO 09
JUD	CLEVELAND HTS MUNI COURT DIST.	CLEVELAND HTS DISTRITO DEL TRIBU
LIB	CLEVE HTS/UNIV HTS LIBRARY DIST.	Distrito de la Biblioteca de CLE HT/UN H
MUN	CLEVELAND HEIGHTS	Ciudad de Cleveland Heights
PARK	METROPARKS DISTRICT	
PCTDT	CLEVELAND HEIGHTS-01- E	
SBOE	STATE BOARD OF EDU DISTRICT 11	Junta Estatal de Educación Distrito 11
SCSD	CLEVE HTS/UNIV HTS CSD - 1810	
SEN	STATE SENATE DISTRICT 21	DISTRITO DEL SENADO ESTATAL 21
WARD	CLEVELAND HEIGHTS WARD 1	CLEVELAND HEIGHTS Distrito 1

1. Are you a U.S. citizen? ☒ Yes ☐ No
2. Will you be at least 18 years of age on or before the next general election? ☒ Yes ☐ No
If you answered NO to either of the questions, do not complete this form.

3. Last Name	First Name	Middle Name or Initial	Jr., II, etc.
ROUTH	RYAN	THOMAS	

4. House Number and Street (Enter new address if changed)	Apt. or Lot #	5. City or Post Office	6. ZIP Code
2359 ARDLEIGH DR		CLEVELAND HEIGHTS	44106

7. Additional Rural or Mailing Address (if necessary)	8. County where you live	FOR BOARD USE ONLY SEC4010 (Rev. 8/07)
	CUYAHOGA	

9. Birthdate (MO-DAY-YR) (required)	10. Ohio driver's license No. OR last 4 digits of Social Security No. (required to be listed if you have one)	11. Phone No. (voluntary)
- - 1972		

12. PREVIOUS ADDRESS IF UPDATING CURRENT REGISTRATION - Previous House Number and Street
2193 S TILLMAN RD

Previous City or Post Office	County	State
CLEVELAND HEIGHTS	CUYAHOGA	OH

13. CHANGE OF NAME ONLY Former Legal Name	Former Signature

I declare under penalty of election falsification I am a citizen of the United States, will have lived in this state for 30 days immediately preceding the next election, and will be at least 18 years of age at the time of the general election.

14. **Your Signature** →

Date 3 / 8 / 2009
MO DAY YR

Cuyahoga County Board of Elections
2925 Euclid Avenue, Cleveland, Ohio 44115-2497

1-9-02

THIS IS AN APPLICATION FOR A ☐ NEW REGISTRATION ☒ ADDRESS CHANGE ☐ NAME CHANGE

1 Last Name: ROUTH	First Name: RYAN	Middle Name or Initial, Jr., II, etc.: T
2 House Number and Street (Enter new address if changed): 2193 STILLMAN RD	3 City or Post Office: CLEVELAND HEIGHTS	4 Zip Code: 44118
5 Additional Rural or Mailing Address (if necessary):	6 County where you live: CUYAHOGA	
7 Birthdate: MO DAY YEAR 1972	8 Birthplace: SANDUSKY, OH	9 Social Security No. (voluntary):
10 Phone No. (voluntary): (216) 397-2991		

11 ADDRESS CHANGE ONLY - PREVIOUS ADDRESS

Previous House Number and Street: 2815 HAMPSHIRE RD APT 6 Cl Ht 3-E

Previous City or Post Office	County	State
CLEVELAND HEIGHTS	CUYAHOGA	OH

12 CHANGE OF NAME ONLY — Former Legal Name: | Former Signature: 1782 1/2 9/6

I declare under penalty of election falsification I am a citizen of the United States, will have lived in this state, county, and precinct for 30 days immediately preceding the next election, and I will be at least 18 years of age at the time of the general election.

13 Signature of Applicant ➜ Ryan T Routh

Date 10 / 27 / 2001 (MO / DAY / YR)

FOR BOARD USE ONLY
SEC4019 (Rev. 10/94)

City, Village, Twp.	CLHT
Ward	2
Precinct	K
School Dist.	
Cong. Dist.	
Senate Dist.	
House Dist.	

Information that will remain confidential and will be used only for voter registration purposes: 1) the office where you submit your voter registration application or 2) the fact that you have declined to register. The penalty for election falsification is imprisonment for not more than 6 months, or a fine of $1,000, or both.

Voter History for Eligible Elections Only - RYAN ROUTH

#	Date	Title	Elig	V...	Cons Prec	Party	Poll Voter	AV Requested	AV Returned	Orig. Party
1	09/14/2021	SEPTEMBER 14, 2021 PRIMARY ELECTION	Y	N			N	N	N	
2	08/03/2021	AUGUST 3, 2021 SPECIAL CONGRESSIONA...	Y	Y	CLHT01E	DEM	Y	N	N	DEM
3	11/03/2020	November 3, 2020 Presidential General Election	Y	Y	CLHT01E		Y	N	N	
4	03/17/2020	MARCH 17, 2020 PRIMARY ELECTION - EXT...	Y	Y	CLHT01E	DEM	N	Y	Y	REP
5	11/05/2019	November 5, 2019 General Election	Y	Y	CLHT01E		Y	N	N	
6	11/06/2018	November 6, 2018 General Election	Y	Y	CLHT01E		Y	N	N	
7	05/08/2018	MAY 8, 2018 PRIMARY ELECTION	Y	N			N	N	N	
8	11/07/2017	NOVEMBER 7, 2017 GENERAL ELECTION	Y	Y	CLHT01E		Y	N	N	
9	11/08/2016	NOVEMBER 8, 2016 PRESIDENTIAL GENER...	Y	Y	CLHT01E		N	Y	Y	
10	03/15/2016	MARCH 15, 2016 PRIMARY ELECTION	Y	Y	CLHT01E	REP	Y	N	N	NOPTY
11	11/03/2015	NOVEMBER 3, 2015 GENERAL ELECTION	Y	Y	CLHT01E		Y	N	N	
12	05/05/2015	MAY 5, 2015 PRIMARY ELECTION	Y	Y	CLHT01F	X	Y	N	N	DEM
13	11/04/2014	NOVEMBER 4, 2014 GENERAL ELECTION	Y	Y	CLHT01F		Y	N	N	
14	05/06/2014	MAY 6, 2014 PRIMARY ELECTION	Y	N			N	N	N	
15	11/05/2013	NOVEMBER 5, 2013 GENERAL ELECTION	Y	Y	CLHT01F		Y	N	N	
16	11/06/2012	NOVEMBER 6, 2012 PRESIDENTIAL GENER...	Y	Y	CLHT01F		Y	N	N	
17	03/06/2012	MARCH 6, 2012 PRIMARY ELECTION	Y	N			N	N	N	
18	11/08/2011	NOVEMBER 8, 2011 GENERAL ELECTION	Y	Y	CLHT01F		Y	N	N	
19	11/02/2010	NOVEMBER 2, 2010 GENERAL ELECTION	Y	Y	CLHT01F		N	Y	Y	
20	11/03/2009	NOVEMBER 3, 2009 GENERAL ELECTION	Y	Y	CLHT01F		Y	N	N	
21	11/04/2008	2008 NOV GENERAL	Y	Y	CLHT01C		Y	N	N	
22	03/04/2008	2008 MAR PRIMARY	Y	Y	CLHT01C	DEM	Y	N	N	DEM
23	11/06/2007	2007 NOV GENERAL	Y	Y	CLHT02K		Y	N	N	
24	11/07/2006	2006 NOV GENERAL	Y	Y	CLHT02K		Y	N	N	
25	11/08/2005	GENERAL NOV 2005	Y	Y	CLHT02K		Y	N	N	
26	11/02/2004	GENERAL NOV 2004	Y	Y	CLHT02K		Y	N	N	DEM
27	03/02/2004	2004 MAR PRIMARY	Y	Y		DEM		N	N	
28	11/04/2003	2003 NOV GENERAL	Y	Y		NO...		N	N	
29	05/06/2003	PRIMARY ELECTION	Y	Y		NOP...		N	N	
30	11/05/2002	2002 NOV GENERAL	Y	Y		NO...		N	N	
31	11/07/2000	2000 NOV GENERAL	Y	Y		NO...		N	N	
32	03/07/2000	2000 MAR PRIMARY	Y	Y		REP		N	N	