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MEGAN FITZMARTIN

of lawful age, Witness herein, was examined and testified as follows:

DIRECT EXAMINATION

BY MS. GAFFNEY-PAINTER:

Q. Good morning, Ms. Fitzmartin.

A. Good morning.

Q. Where do you work?

A. State of Ohio.

Q. Generally speaking, what do you do for the state of Ohio?

A. I oversee policy and communications for the House of Representatives.

Q. When did you first become professionally involved in politics?

A. 2011.

Q. What was your first professional role in politics?

A. I was an intern on the campaign.

Q. Were you working in politics in 2017?

A. Yes.

Q. Did there come a time in your political professional life where you met someone named Jeff Longstreth?

A. Yes.

Q. And when was that, approximately?

A. September of 2017.

Q. Will you describe for us the circumstances of that first

1 meeting with Mr. Longstreth?

2 **A.** Yes. A -- an individual mutual friend connected us for
3 a job opportunity. So I met him for coffee.

4 **Q.** And what did you discuss with Mr. Longstreth at that
5 coffee?

6 **A.** There was a job opportunity to work for Speaker
7 Householder, and talk to candidates and help run their
8 campaigns.

9 **Q.** Now, during that first coffee with Mr. Longstreth, did he
10 offer you the job or conduct any sort of interview? What was
11 sort of --

12 **A.** No.

13 **Q.** -- the nature of that conversation?

14 **A.** Sorry.

15 **Q.** No problem.

16 **A.** It was fairly casual and more conversational, just
17 getting to know each other 'cause I had never met Jeff at
18 that time, or Mr. Longstreth. And so we just kind of -- he
19 got to know my background, my professional background
20 because I had obviously a career prior to that, as well.
21 And the prompting was that I would meet Mr. Householder
22 after.

23 **Q.** Did you have, after that initial coffee, any follow-up
24 meetings with Mr. Longstreth?

25 **A.** I met with Jeff Longstreth and Larry Householder, I

1 believe, the next day, or within the following couple days.

2 Q. Where was that meeting held?

3 A. It was held in Speaker Householder's office.

4 Q. What did you, Mr. Householder, and Mr. Longstreth discuss
5 at that meeting?

6 A. A job opportunity to again run kind of the political
7 campaigns of a number of candidates that were running for
8 the House of Representatives.

9 Q. During that meeting with Mr. Householder, Mr. Longstreth,
10 did they officially hire you?

11 A. No.

12 Q. Did that ultimately happen? Were you ultimately hired?

13 A. I was ultimately offered a job, and I accepted.

14 Q. And what were the circumstances of that offer and
15 acceptance?

16 A. I was offered to be -- to be honest, I don't recall the
17 exact title. However, I was offered a job to be a part of
18 the political team for Speaker Householder.

19 Q. When did you officially start that position that you were
20 offered by Mr. Householder and Mr. Longstreth?

21 A. September like 20, 21, 20th or 21st of 2017.

22 Q. And were you an employee or a contractor or some other
23 sort of relationship?

24 A. I was a contractor.

25 Q. And who were you contracting with?

1 A. JPL & Associates.

2 Q. Now, during the time that you were contracted with JPL &
3 Associates, who paid you?

4 A. It's my understanding JPL & Associates.

5 Q. In connection with this position, did you have an office?

6 A. I worked out of my home, but also reported -- like, I
7 was able to go to an office that was at 65 East State.

8 Q. Who else had offices within that space?

9 A. Jeff Longstreth, Friends of Larry Householder, and a
10 couple other people would come in and out.

11 Q. Was there anyone else who had an office, a fixed office
12 in that space?

13 A. Anna Lippincott.

14 Q. Who's Anna Lippincott?

15 A. She was an associate of mine, like and worked kind of
16 as a part of the Team Householder folks.

17 Q. Now, during the time that you were contracted by JPL &
18 Associates, what was the mission of the organization, would
19 you say?

20 A. To elect good people to the House of Representatives
21 and also help Larry Householder become Speaker, again.

22 Q. Now, at that time when you started your position, what
23 did you understand your job to be?

24 A. Talk to candidates every day, help them with whether
25 they needed a walk book or a logo design. Just helping

1 their -- their campaigns kind of from the ground up. A lot
2 of folks, a lot of good people were recruited to run for the
3 Ohio House, and -- but they needed help obviously putting
4 together a campaign, and so I was someone who worked with
5 them daily.

6 **Q.** Let's talk about the period of time from September of
7 2017 --

8 **A.** Okay.

9 **Q.** -- through February of 2018?

10 **A.** Okay.

11 **Q.** Please, if you need water.

12 So from September of 2017 through February of 2018, what
13 were your responsibilities during that period of time?

14 **A.** There are a number of open seats which means that there
15 is no incumbent running, there is no one who had held the
16 seat that is coming back to the House, and so I worked to
17 kind of secure -- not kind of -- sorry. I worked to secure
18 candidates that could be good representatives for their --
19 for their districts and help them actually make the ballot.
20 'Cause no one can run for the Ohio House unless they secure
21 50 signatures of registered voters of a specific party or
22 unaffiliated party. So that was the majority of my work
23 until February 7th. That was the filing deadline, a snowy
24 day, of that year.

25 **Q.** And when you say filing deadline, what are you referring

1 to you filing?

2 **A.** The filing deadline is the day that you have to submit
3 at least 50 signatures to make it on the ballot for the
4 office that you're seeking.

5 **Q.** Now, the candidates that you were assisting, how were
6 they identified?

7 **A.** Can you clarify the question?

8 **Q.** How did you -- how did JPL & Associates, your
9 organization, identify candidates to support?

10 **A.** Some folks were already interested in running. You
11 know the idea is that, you know, the Ohio House of
12 Representatives is a body of 99 members, and to have a good
13 representation of the state, it makes sense to make sure
14 that there's a good kind of overall cross-section of
15 individuals that represent different industries, different
16 backgrounds, et cetera. So, you know, if someone is
17 interested in running or if there is kind of a void in that
18 representation, like what, you know, it's a good thing to
19 find a good person who is willing to put public service at
20 the forefront.

21 **Q.** Now, before JPL & Associates and you would work with
22 these identified candidates --

23 **A.** Um-hmm.

24 **Q.** -- who had to approve those candidates?

25 **A.** No one approved a candidate. We -- we would -- so I

1 would meet or someone from the organization would meet with
2 the candidate, but I wouldn't really call it an approval
3 process. We would meet with folks and -- and see kind of if
4 they -- if they had a -- if they would check their egos and
5 join a team mentality.

6 **Q.** Now, during this period that we're talking about,
7 September of 2017 through September of 2018, did you have any
8 staff members working for you?

9 **A.** I did not, no. I worked with vendors.

10 **Q.** During this initial period of time, just an estimate, how
11 many hours a week were you working?

12 **A.** Probably 80 to 100.

13 **Q.** And during that period of time, what were you using for
14 work communications?

15 **A.** Certainly, an all, you know, above approach. So
16 whether it was text, phone, email, conversation, meeting,
17 whatever communications are available.

18 **Q.** How would you quantify, approximately, the amount of work
19 communications you were receiving during this time?

20 **A.** The limit does not exist. I'm not exactly sure of how
21 to quantify other than, you know, I enjoy being busy. So I
22 worked hard.

23 MS. GAFFNEY-PAINTER: Your Honor, may we please have
24 permission to publish what's already been admitted as
25 Government Exhibit 256A?

1 THE COURT: Yes. It will come up on the screens in
2 a moment.

3 I think it's up.

4 Q. Thank you. Ms. Fitzmartin, just directing you to the top
5 of this page, who is this text exchange between?

6 A. Jeff Longstreth and me.

7 Q. Let's look, if we could --

8 MS. GAFFNEY-PAINTER: Thank you, Ms. Terry.

9 Q. -- at these three texts.

10 A. Um-hmm.

11 Q. What is the date of this exchange?

12 A. January 12, 2018.

13 Q. You see that first text box there, it's gray?

14 A. Um-hmm.

15 Q. There's a reference within that text to CC endorsement
16 committee list with Borges. What is the CC endorsement
17 committee?

18 A. The Ohio Republican party has a State Central
19 Committee, which is the governing body, and within that body
20 there is an endorsement committee. I believe it's at the
21 discretion of the chairman. I actually don't know those
22 exact details.

23 And so this committee would review the potential
24 endorsements of Republicans seeking office.

25 Q. And who is Borges?

1 **A.** Matt Borges is the former chairman of the Ohio
2 Republican party, and at that time was a lobbyist.

3 **Q.** Now, this message from Mr. Longstreth, will you please
4 share the CC endorsement committee list with Borges and see
5 how many friends we have, what was your understanding of what
6 he was asking you to do here?

7 **A.** Having been the former chairman, Matt Borges had
8 relationships with a number of committee members. And so it
9 was to work with him to see, you know, who we could talk to
10 for endorsements or for no endorsement.

11 **Q.** Can you explain no endorsement to us?

12 **A.** The -- so -- yes. So the endorsement process comes
13 with a number of benefits. Obviously, the Ohio Republican
14 party is a brand, and that's helpful. And no endorsement
15 would mean that no one would have the ability to use that
16 brand and/or benefit of the postage reimbursement.

17 **Q.** Can you explain a little bit more about postage
18 reimbursement you had just mentioned?

19 **A.** As a nonprofit, the Ohio Republican party has
20 discounted rates on mail.

21 **Q.** Now, during this time that you were contracted with JPL &
22 Associates, was there ever in your estimation a time where you
23 were seeking a non-endorsement for one of your candidates?

24 **A.** Certainly. It's tradition of the Ohio Republican party
25 not to endorse in a contested primary, especially with

1 non-incumbents. And so we were just seeking to ensure the
2 tradition. And, you know, it's -- at that time there was an
3 opponent in the Speaker's race who was seeking to overturn
4 that traditional stance and seek endorsements.

5 MS. GAFFNEY-PAINTER: Ms. Terry, may we please
6 advance to the second page. Thank you.

7 And may we please blow up the top text message there.

8 **Q.** Now, there's a reference in this text message from
9 Mr. Longstreth to kitchen cabinet. What is a kitchen cabinet?

10 **A.** A kitchen cabinet is a group of advisors of any elected
11 official who, you know, again that kind of a cross-section
12 of folks that hope to see an individual succeed and give
13 advice at kind of their request.

14 **Q.** Who was in Mr. Householder's kitchen cabinet at this
15 time?

16 **A.** At this time, I would say Bob Klaffky, Doug Price, and
17 Rex Elsass.

18 MS. GAFFNEY-PAINTER: Now, Ms. Terry, if we could,
19 stay on this page, please, but blow up the middle two texts
20 there.

21 **Q.** All right. I'm looking, Ms. Fitzmartin, at your second
22 text here beneath your "okay" text.

23 **A.** Um-hmm.

24 **Q.** There are -- would you mind reading this text for us? It
25 begins with "Frost."

1 **A.** Frost should be able to get to Lamb. I know Talmage,
2 Carnes, Goodman, Simon. Obviously, BDM won't be gettable.

3 **Q.** Can you explain to us what you're referring to here?

4 **A.** These were members, at the time, of the State Central
5 Committee, and we're just talking about relationships that
6 people have with the members of the State Central Committee,
7 whether it be me or Frost.

8 MS. GAFFNEY-PAINTER: All right. Ms. Terry, may we
9 stay on this page and go to the bottom text.

10 **Q.** And here we see a reference to a non-endorsement.
11 Ms. Fitzmartin, is this related to what you had testified to
12 about seeking a non-endorsement for some of your candidates?

13 **A.** Correct. This is just me confirming that we are going
14 the traditional route of a non-endorsement as opposed to
15 seeking an endorsement of the nonincumbent candidates.

16 MS. GAFFNEY-PAINTER: Your Honor, may we please have
17 permission to publish what's been admitted already as
18 Government Exhibit 240A?

19 THE COURT: Yes.

20 **Q.** Now, Ms. Fitzmartin, directing your attention to the top
21 of the page, who is this text exchange between?

22 **A.** Jeff Longstreth and me.

23 MS. GAFFNEY-PAINTER: If we could, Ms. Terry, will
24 you please blow up the two green texts that appear on this
25 page? Thank you.

1 Q. Ms. Fitzmartin, what is the date on this exchange?

2 A. January 12, 2018.

3 Q. Will you please read for us your texts that you have
4 here?

5 A. If possible, I think SLH should call Daniels. He's
6 going to be in Shane's group meeting tomorrow.

7 Q. And can you please read the next one as well.

8 A. I can call, if that's helpful too. Just having another
9 reassuring voice in the room that money/infrastructure will
10 be there would be helpful.

11 Q. What are you talking about here?

12 A. I am talking about a potential candidate who was having
13 their own sort of kitchen cabinet meeting back home in their
14 district, and I was requesting that Speaker Householder
15 reach out to an individual who I thought he may have a prior
16 relationship with. And then it's no secret that there was
17 a -- an opponent in the Speaker's race who also was, you
18 know, providing infrastructure and fundraising help too, and
19 so this was just kind of allowing for that assurance that
20 just because you're not with the official caucus, that
21 you -- that an individual would have support.

22 Q. Is that what you're referring to in the second text where
23 you say, "money/infrastructure"?

24 A. Yes.

25 Q. Let's turn now to February of 2018. What, of

1 significance, happens in the election of 2018?

2 A. In February 2018 we did a good job of running races and
3 we won a lot of primaries.

4 Q. I'm talking about February of 2018.

5 A. Oh, sorry.

6 Q. That's okay. And what of significance in relation to the
7 filing happens in February of 2018?

8 A. In February 2018, we or a number of individuals filed
9 for the Ohio House of Representatives.

10 Q. Now, after the petitions to run are filed in February --

11 A. Um-hmm.

12 Q. -- how did your responsibilities change at that time?

13 A. Well, so the filing deadline signifies 90 days until an
14 election. And so we, you know -- my duties shifted to
15 running races, meaning coordinating media and grassroots
16 efforts.

17 Q. What month was the primary election in 2018?

18 A. May.

19 Q. All right. Now, during this February to May 2018 period,
20 how many hours a week would you estimate you were working?

21 A. 80 to 100.

22 Q. How many of the Team Householder candidates won their
23 primary in May of 2018?

24 A. 20 out of 21.

25 Q. And after that primary election in May of 2018, how did

1 your responsibilities change?

2 **A.** Then we -- my responsibilities shifted to the general
3 election. So I recalibrate to the November 2018 election.

4 **Q.** Now, describe for us what your work was from May of 2018
5 through November of 2018.

6 **A.** I continued to coordinate media efforts and help
7 support grassroots efforts in a number of Ohio House races.

8 **Q.** When you say coordinate media, can you explain what you
9 mean to us?

10 **A.** Sure. I worked to, you know -- if an individual needed
11 TV, radio, mail, phone calls, just all the kind of tactics
12 that are used in a campaign, I would help them, whether it's
13 with a script or kind of connect them with individuals who
14 could help their campaign.

15 **Q.** And you mentioned mail. For the mailers that you helped
16 produce, who had final approval over those mailers?

17 **A.** The candidates.

18 **Q.** Was anyone else consulted during that approval process
19 for the mailers?

20 **A.** Sure. I worked with a number of individuals, both with
21 the candidates' teams back home, in addition to Speaker
22 Householder and Jeff Longstreth.

23 **Q.** Are you familiar with an entity called Hardworking
24 Ohioans?

25 **A.** I've heard of it.

1 Q. In 2018, what was Hardworking Ohioans' role, as far as
2 you're aware?

3 A. I believe that was the super PAC used in the 2018
4 elections.

5 Q. Who ran Hardworking Ohioans, as far as you're aware?

6 A. I do not recall.

7 Q. Now, what role did you have with respect to Hardworking
8 Ohioans?

9 A. I had no role, other than I was able to see a couple of
10 their commercials on my television screen.

11 Q. Did you have any responsibilities related to polling?

12 A. I certainly helped coordinate polling in a number of
13 districts.

14 Q. Did any of your responsibilities including sharing
15 polling information?

16 A. I did help coordinate with our -- or with a website
17 vendor to make sure that polling information was publicly
18 available.

19 Q. Can you explain that to us, what you mean by that?

20 A. In campaigns, you're able to share information if you
21 make it publicly available so it's accessible to anyone, and
22 I did work with a website vendor to ensure that polling
23 information was able to be publicly available.

24 Q. After the general election in November of 2018, how did
25 your responsibilities shift?

1 THE COURT: I'm going to interject myself and ask
2 about, is this a good time to break?

3 MS. GAFFNEY-PAINTER: Oh, yes. It would be. I
4 apologize, Your Honor.

5 THE COURT: That's all right. We've reached our
6 traditional breaking point being midmorning and we are going
7 to give the jury a break, and I want you to take a break. Go
8 upstairs, relax. As always, do not discuss the case even
9 among yourselves. Keep an open mind. Keep away from the
10 media, take a break. We will be back here shortly after
11 11:05.

12 We will rise out of respect for you as you leave for your
13 20-minute break.

14 THE COURTROOM DEPUTY: All rise for the jury.

15 (Jury exited the courtroom at 10:46 a.m.)

16 THE COURT: The jury's left the room. The door is
17 closing. As always, we will stay in the courtroom until we
18 have been advised that the jury has cleared the floor and we
19 will break until shortly after 11:05.

20 During the break, the witness is not to discuss her
21 testimony with anyone. Do you understand?

22 THE WITNESS: Yes.

23 THE COURT: Thank you.

24 You can be seated or stand as you choose.

25 We're on break.

1 THE COURTROOM DEPUTY: All rise. This Court is in
2 recess.

3 (Recess from 10:47 a.m. until 11:06 a.m.)

4 THE COURT: Are we ready for the jury from the
5 government's perspective?

6 MS. GAFFNEY-PAINTER: Yes, Your Honor.

7 THE COURT: Mr. Householder's?

8 MR. GLICKMAN: Yes, Judge.

9 THE COURT: Mr. Borges'?

10 MR. SCHNEIDER: Yes, Judge.

11 THE COURT: Let's call for the jury.

12 (Pause.)

13 THE COURT: We're going to look to break at 12:20.

14 (Pause.)

15 THE COURTROOM DEPUTY: All rise for the jury.

16 (Jury ended the courtroom at 11:11 a.m.)

17 THE COURT: Jurors can be seated as they join us.

18 You may all be seated. Thank you.

19 I hope you had a decent break. We're going to continue
20 with the taking of testimony.

21 Ms. Painter, you may approach the podium and begin.

22 MS. GAFFNEY-PAINTER: Thank you, Your Honor.

23 THE COURT: Very well.

24 **Q.** Ms. Martin -- excuse me -- Ms. Fitzmartin, before the
25 break, we were discussing some of your responsibilities with

1 regards to polling.

2 MS. GAFFNEY-PAINTER: Your Honor, may the government
3 have permission, please, to display both Government Exhibit
4 260A and Government Exhibit 260A1, both of which have been
5 admitted into evidence?

6 THE COURT: Yes.

7 Q. Ms. Fitzmartin, directing your attention to the left side
8 of the screen, this first page, what are we looking at here?

9 A. An email from me to Jeff Longstreth.

10 Q. And what is the date on this email?

11 A. Thursday, October 18, 2018.

12 MS. GAFFNEY-PAINTER: Ms. Terry, may we please
13 advance to the second page of 260A.

14 Q. Ms. Fitzmartin, what are we looking at here on this
15 second page?

16 A. Poll results.

17 Q. Okay. Now, if I may, direct your attention to the right
18 side of the screen, what are we looking at here?

19 A. An email from Jeff Longstreth to our website vendor.

20 Q. And who was your website vendor?

21 A. Kevin Bingle.

22 Q. And in the body of the email, can you read the body of
23 the email to us, please?

24 A. This is ready to post on Gen Now News website. Link
25 should be titled "10-18-2018 Update."

1 Q. And there is a reference there to Gen Now News website.
2 What is that?

3 A. It's a website for Generation Now.

4 Q. When you testified earlier that part of your
5 responsibility was getting polling information put on a
6 publicly available website, was this what you were referring
7 to?

8 A. Yes.

9 Q. All right. Let's go to the general election of November
10 of 2018. After that election, how did your responsibilities
11 shift?

12 A. They shifted to helping Larry Householder become
13 Speaker. So it's a continuation of my responsibilities.

14 Q. When was the vote for Speaker held?

15 A. On January 7th, 2019.

16 Q. And who were the contenders for Speaker at that time?

17 A. Larry Householder and Ryan Smith.

18 Q. Who ultimately won the vote for Speaker?

19 A. Larry Householder.

20 Q. Now, are you familiar with a piece of legislation known
21 as House Bill 6?

22 A. I've heard of it.

23 Q. What responsibilities did you have with relation to House
24 Bill 6?

25 A. As a piece of legislation, I did not have

1 responsibilities as it relates to House Bill 6.

2 Q. Did you have any responsibilities related to the
3 political side of House Bill 6?

4 A. I helped run a public relations campaign for House Bill
5 6.

6 Q. Now, when you say public relations campaign, can you just
7 explain that for us?

8 A. Certainly. I helped highlight the positive benefits of
9 House Bill 6.

10 Q. And how did you highlight the positive benefits of House
11 Bill 6?

12 A. Using typical campaign tactics -- phone, mail. I
13 believe that's it, phone and mail.

14 Q. Who assigned those responsibilities to you?

15 A. Jeff Longstreth.

16 Q. Now, were there any other individuals with JPL &
17 Associates working on House Bill 6 advocacy with you?

18 A. Certainly there were other contractors that were to
19 help advance the positive -- the positive items that came
20 with House Bill 6. Anna Lippincott as well. And other
21 vendors, mail vendors, phone vendors, et cetera.

22 Q. Now, did you ever attend any meetings about advocacy for
23 House Bill 6?

24 A. Yes.

25 Q. Who was present for those meetings?

1 A. Can you clarify the question? At what time?

2 Q. Well, you tell us. How frequently did you attend
3 meetings related to the advocacy work for House Bill 6?

4 A. So while it was working through the legislature, every
5 once in a while, but not too often. There might have been
6 one or two meetings.

7 Q. Do you recall any of the individuals who attended those
8 one or two meetings with you?

9 A. Yes. Neil Clark, Jeff Longstreth, Anna, and me.

10 Q. Do you recall a meeting about House Bill 6 that you
11 attended on June 3rd, 2019?

12 A. I will need a little bit more information as for the
13 date. That was a couple years ago.

14 Q. So what happened with House Bill 6 on May 29, 2019, do
15 you recall?

16 A. I do not recall.

17 Q. Do you recall any conference calls held in June of 2019
18 about winning support for House Bill 6 in the Senate?

19 A. No specific conference calls.

20 Q. Now, did House Bill 6 ultimately pass the Senate?

21 A. Yes.

22 Q. And after House Bill 6 was signed into law, were there
23 further efforts made in opposition to it?

24 A. Yes.

25 Q. What was JPL & Associates' role with respect to the

1 repeal referendum?

2 A. JPL & Associates worked to stop the repeal.

3 Q. What was Neil Clark's role with respect to the repeal
4 referendum?

5 A. He advised on stopping the repeal.

6 Q. Do you recall his advice?

7 A. He would provide insight in the media materials, and he
8 also worked to stop signature collectors.

9 Q. During this time of the repeal referendum, did you have
10 any interaction at all with any of the signature collectors?

11 A. There is one individual who came to an office. The --
12 one of the signature collectors, the business side of the
13 signature collector's name was Megan, and he had completed
14 the two of us. I never met said Megan, and so upon his
15 arrival, said you have the wrong Megan, and he left.

16 Q. Do you remember what he was seeking from you at that
17 time?

18 A. A plane ticket, I believe.

19 Q. During this period of the ballot referendum, what role
20 did Matt Borges play, as far as you knew?

21 A. He was advising on the effort to stop the repeal.

22 Q. And what role did Larry Householder have as far as you
23 were aware?

24 A. He certainly wanted to keep House Bill 6 as law. When
25 the Speaker passes a law, they want to maintain said

1 legislation, and I actually did not speak to Larry
2 Householder during the repeal effort. I don't believe we
3 had any conversations.

4 Q. Are you familiar with an entity known as Ohioans For
5 Energy Security?

6 A. Yes.

7 Q. What is Ohioans For Energy Security?

8 A. It was an entity created to stop the repeal effort of
9 House Bill 6.

10 Q. Who was associated with Ohioans For Energy Security?

11 A. Carlo LoParo was the spokesman. I believe that.

12 Q. Do you recall anyone else involved with Ohioans For
13 Energy Security?

14 A. A number of people were advising them, Ohioans For
15 Energy Security. You know, Matt Borges, Neil Clark, Jeff
16 Longstreth, and a number of others.

17 Q. I want to advance now to 2020.

18 A. Okay.

19 Q. During 2020, did you ever attend any meetings between
20 Jeff Longstreth and Larry Householder?

21 A. Yes.

22 Q. Was one such meeting in mid January of 2020?

23 A. Yes.

24 Q. And was there discussion of term limits at this meeting?

25 A. Yes, among other things, because the State Central

1 Committee was meeting to endorse. Excuse me. It was
2 meeting to endorse candidates of the 2020 election, so that
3 was a topic of discussion among mail, right in the thick of
4 campaign season again. And then also term limits came up.

5 **Q.** Do you recall who was present for that meeting?

6 **A.** Larry Householder, Jeff Longstreth, Neil Clark, and me.

7 **Q.** And can you explain to us what were term limits at that
8 time?

9 **A.** At that time, and currently, term limits, an individual
10 can hold an office for eight years. In the House that means
11 you can serve four 2-year terms. And then you can go seek
12 another office.

13 **Q.** Another office within the House?

14 **A.** Sorry. Outside the House.

15 **Q.** Who is Chuck Jones?

16 **A.** The former CEO of FirstEnergy.

17 **Q.** Do you recall hearing any conversations between
18 Mr. Longstreth and Mr. Householder in February of 2020 about
19 Chuck Jones and raising money?

20 **A.** Jeff Longstreth requested that the Speaker seek \$5
21 million in donations from Chuck Jones. I don't know if that
22 call ever happened. It was just the request that I heard.

23 **Q.** During the time that you worked with JPL & Associates,
24 were you aware of conversations between Larry Householder and
25 Chuck Jones?

1 Q. And during the course of that meeting, you learned that
2 Mr. Longstreth had an opportunity for you, right?

3 A. Yes.

4 Q. And that was an opportunity that you wanted, right?

5 A. That's correct.

6 Q. You had been in politics since 2011, I think you said?

7 A. Yes.

8 Q. And you viewed this opportunity working with
9 Mr. Longstreth as an opportunity to continue advancing your
10 political career; is that right?

11 A. That's correct.

12 Q. And during the course of that initial meeting with
13 Mr. Longstreth, you understood that the role that you would
14 have would be supporting this slate of candidates, right?

15 A. Correct.

16 Q. And then either the next day or a few days -- a few days
17 after, you first met Mr. Householder, right?

18 A. Yes.

19 Q. And you had similar conversations with Mr. Householder;
20 is that right?

21 A. Yes.

22 Q. And at the time, were you aware that there was an
23 upcoming race for Speaker of the Ohio House of
24 Representatives?

25 A. Yes.

1 Q. And that would have been in 2018, right? Strike that.

2 After -- that would have been a race after the general
3 election in 2018, right?

4 A. Yes.

5 Q. And who were the candidates for Speaker of the Ohio House
6 of Representatives?

7 A. Larry Householder and Ryan Smith.

8 Q. And during the course of those initial meetings with
9 Mr. Longstreth and Mr. Householder, did you come to learn that
10 they were running a slate of candidates against candidates
11 that were being run by Ryan Smith?

12 A. They were running candidates opposing Ryan Smith, yes.

13 Q. And during the course of those initial meetings with
14 Mr. Longstreth and Mr. Householder, did you learn that
15 Mr. Householder was upset with the current leadership in the
16 Ohio House of Representatives?

17 A. Yes. A number of people were.

18 Q. And ultimately after having those initial meetings with
19 Mr. Longstreth and Mr. Householder, you were offered a job
20 working for them, right?

21 A. Correct.

22 Q. And who offered you that opportunity?

23 A. Jeff Longstreth.

24 Q. And ultimately I think you testified on your direct
25 examination that you worked as a contractor for

1 Mr. Longstreth's company, JPL & Associates; is that right?

2 A. That's correct.

3 Q. And you had your own company at the time, right?

4 A. That's right.

5 Q. What was that?

6 A. MC Fitzmartin, LLC.

7 Q. And so your company contracted with Mr. Longstreth's
8 company -- with Mr. Longstreth's company, right?

9 A. That's correct.

10 Q. And I think you testified to on your direct examination
11 that over the course of a couple years you served a variety of
12 different roles working for JPL & Associates, right?

13 A. Yes.

14 Q. So initially from that September 2017 time period until
15 early February of 2018, you were focused on candidate
16 recruitment; is that right?

17 A. Yes.

18 Q. And that was something that you and Mr. Longstreth were
19 working on, right?

20 A. That's correct.

21 Q. And I think you testified in your direct examination that
22 you were looking to recruit good people to run for the Ohio
23 House of Representatives?

24 A. That's right.

25 Q. What does that mean?

1 **A.** Good people are individuals who put others before
2 themselves, and they put public service ahead of their own
3 egos.

4 **Q.** So those were the types of individuals that you were
5 looking for to recruit to run for the Ohio House of
6 Representatives; is that right?

7 **A.** That's correct.

8 **Q.** And you also mentioned during your direct examination
9 that you were looking for a cross -- cross-section of
10 individuals from the community?

11 **A.** Correct.

12 **Q.** What does that mean?

13 **A.** Again, the Ohio House of Representatives is made up of
14 99 individuals, and I think it's in the best interest, and I
15 believe a number of people would agree that it's in the best
16 interest to have a representation of all the different
17 facets of life, meaning jobs, moms, single, you know,
18 whomever, so that their interests are represented when
19 voting on legislation that impacts the seventh largest state
20 in the country.

21 **Q.** And when recruiting these candidates, you and
22 Mr. Longstreth focused on open seats, right?

23 **A.** That's right.

24 **Q.** And that means that's a seat where there is not an
25 incumbent running for office, right?

1 A. That's correct.

2 Q. And because we have term limits in Ohio, there are
3 oftentimes a number of open seats that, you know, people would
4 run -- would run for in the Ohio House of Representatives,
5 right?

6 A. Correct.

7 Q. And because you're not -- you're not working with an
8 incumbent, you are working with people who by definition
9 haven't held elected office at this level before, they need a
10 lot of help and support; is that right?

11 A. Yes.

12 Q. And those were -- and that support was something that JPL
13 could provide, right?

14 A. Correct.

15 Q. The candidates retained JPL to provide kind of a soup to
16 nuts experience, right?

17 A. Yes. I have heard that term or phrase multiple times.

18 Q. And what does that phrase mean, to your knowledge?

19 A. It means -- it can be a very convoluted process to run
20 a campaign, and so the idea would be to have a one-stop shop
21 to have a menu of options for -- for your campaign, as
22 opposed to having to navigate through the murky waters.

23 Q. And those were services that Mr. Longstreth and his
24 related companies could provide?

25 A. Correct.

1 Q. And Mr. Longstreth at the time had a company, JPL &
2 Associates, right?

3 A. That's right.

4 Q. And then he also had another company called Constant
5 Content, right?

6 A. That's right.

7 Q. And the slate of candidates who were ultimately recruited
8 to run for the Ohio House of Representatives during the 2018
9 elections ultimately retained both Constant Content and JPL to
10 provide various services to them, right?

11 A. That's my understanding, yes.

12 Q. And is it your understanding that the candidates paid
13 monthly retainers both to JPL and to Constant Content for
14 those services?

15 A. Yes.

16 Q. Now, you testified to in your direct examination
17 regarding endorsements by the central committee. Do you
18 recall that?

19 A. Yes.

20 Q. And I think you had indicated that there was a
21 traditional approach to endorsements and a nontraditional
22 approach to endorsements, right?

23 A. Correct.

24 Q. And if I understand -- if I understood your testimony
25 correctly, the traditional approach would be that the

1 Republican central committee would not endorse candidates in
2 contested primaries; is that right?

3 A. That's my understanding, right.

4 Q. And what is a contested primary?

5 A. A contested primary would be when there is more than
6 one candidate.

7 Q. And in this case in the context of the 2018 elections,
8 was it your understanding that oftentimes the primaries were
9 contested?

10 A. Yes.

11 Q. And in many instances, the contested candidates for --
12 strike that.

13 In many cases, the candidates that were contesting those
14 primaries, some were supported by Mr. Householder and the
15 others were supported by Mr. Smith; is that right?

16 A. Yes.

17 Q. And Mr. -- and if I understood your testimony correctly,
18 Mr. Smith was advocating that the central committee endorse
19 his slate of candidates?

20 A. That's correct.

21 Q. And that would have been the nontraditional approach for
22 candidate endorsements, right?

23 A. Correct.

24 Q. And ultimately Mr. Longstreth and you were advocating for
25 taking the traditional approach, right?

1 A. That's right.

2 Q. And that would mean that the central committee would not
3 endorse?

4 A. Correct. Just let the primaries play out.

5 Q. And was it your understanding, as well, that Mr. -- that
6 Mr. Smith -- that Mr. Smith's slate of candidates were being
7 supported by the Republican Caucus during those election
8 primaries?

9 A. Correct. They were being supported by the Ohio House
10 Republican Caucus.

11 Q. And would that also be a nontraditional use of the
12 Republican party's monies to support candidates in contested
13 primaries?

14 A. That's my understanding.

15 THE JUROR: Your Honor?

16 THE COURT: Yes.

17 THE JUROR: Can we take a ten-minute break if I
18 could use the restroom?

19 THE COURT: Yes. We're going to take a ten-minute
20 break. During the break, do not discuss the case among
21 yourselves.

22 THE COURTROOM DEPUTY: All rise for the jury.

23 THE COURT: Get up and move around.

24 (Jury exited the courtroom at 11:34 a.m.)

25 THE COURT: A short, ten-minute break. Let's stay

1 in the courtroom until we're advised the jury has cleared the
2 floor.

3 (Pause.)

4 THE COURT: This is a short break, and the jury is
5 hanging out on this floor. So if we might all be seated and
6 remain quiet off the record. We'll get the jury back as soon
7 as we can. You can remain standing if you wish.

8 (Recess from 11:36 a.m. until 11:38 a.m.)

9 THE COURTROOM DEPUTY: All rise for the jury.

10 (Jury entered the room at 11:38 a.m.)

11 THE COURT: You may all be seated. Thank you.

12 And they are back. We will continue to take testimony.

13 **Q.** Circling back to candidate recruitment and recruiting
14 these good people to run for the Ohio House of
15 Representatives, in your experience during your time working
16 for JPL, did you ever observe Mr. Householder pressuring or
17 cajoling any of these candidates for their support?

18 **A.** No, I did not.

19 **Q.** After February of 2018, which is the filing deadline for
20 the candidates to -- to submit their petitions to run for the
21 Ohio House of Representatives, your role shifted after that
22 point, right?

23 **A.** Yes.

24 **Q.** You went from candidate recruitment to helping support
25 these candidates in their primary elections, right?

1 A. That's correct.

2 Q. And you focused on -- what did you focus on during that
3 time period?

4 A. I focused on their campaign, so grassroots and media
5 efforts.

6 Q. And you would -- you spoke to these candidates on a daily
7 basis; is that right?

8 A. Multiple times a day.

9 Q. And fair to say that each one of these candidates was
10 unique in how they wanted their imaging managed?

11 A. That's correct.

12 Q. Some of them wanted complete control over -- over their
13 imaging and marketing, right?

14 A. That's right.

15 Q. And others were more laid back about that, right?

16 A. That's correct.

17 Q. But either way, the individual candidates had final
18 approval over any mailing or advertisements that went out,
19 right?

20 A. Correct.

21 Q. And during that time period, as well, after the filing
22 deadline in February of 2018, were there -- were there
23 meetings at the JPL offices on State Street with the
24 candidates and various lobbyists?

25 A. Yes.

1 Q. And those were held on a regular basis, right?

2 A. That's correct.

3 Q. And do I understand this correctly, that lobbyists and
4 other interested individuals from companies like the utility
5 companies to -- to Medicaid and a variety of other industries
6 would meet with these candidates?

7 A. Correct.

8 Q. And why would they do -- and why would you set up those
9 kinds of meetings?

10 A. Due to term limits, there's a knowledge gap. And so in
11 order to make sure that folks not only have to know where
12 the restroom is but also how to vote on -- you know, have an
13 understanding or at least a foundation on policy. The
14 concept was to make sure that they at least had a -- an
15 understanding or an overview of some -- some base, you know,
16 whether it's Medicaid, utilities, or whatever industry, a
17 basic concept.

18 Q. The point is to build up the candidate -- these
19 candidates' knowledge bases for a variety of different
20 industries, right?

21 A. Correct.

22 Q. Because ultimately, if these individuals succeed and are
23 elected members of the Ohio House of Representatives, they
24 will have to vote on and consider issues relating to the
25 utilities, labor unions, and Medicaid, right?

1 A. That's right. They immediately have to look at the
2 budget.

3 Q. And those are just, you know, a handful of examples,
4 right?

5 A. Correct.

6 Q. We would want our elected officials to be educated on
7 these variety of issues, right?

8 A. That's the idea.

9 Q. And so in May of 2018 are the primary elections; is that
10 right?

11 A. Correct.

12 Q. And I think you had testified to on your direct
13 examination that in the lead-up to the primary elections, you
14 worked 80 to 100 hours a week, right?

15 A. Correct.

16 Q. Helping support or helping these slate of candidates
17 get -- win their primary elections, right?

18 A. That's correct.

19 MR. OLESKI: PJ -- or Your Honor, if we could
20 publish Government's Exhibit 241D, which has been admitted.

21 THE COURT: Yes.

22 MR. OLESKI: PJ, if you could just enlarge that a
23 little bit.

24 Q. Do you see that on your screen, Ms. Fitzmartin?

25 A. I do not yet -- there we go.

1 Q. Do you recognize this as an email sent by Jeff Longstreth
2 to a number of individuals, including yourself?

3 A. Correct. I see my name and Jeff Longstreth's name.

4 Q. And Mr. Longstreth sent this email on May 8, 2018, right?

5 A. Correct.

6 Q. And May 8, 2018, was the date of the primary elections in
7 2018, right?

8 A. That's correct.

9 Q. And there are a number of different -- a number of
10 individuals who he sent this email to, correct?

11 A. Correct.

12 Q. And the subject of the email is Update No. 3, right?

13 A. Yes, yes.

14 Q. Presumably there is an Update No. 1 and an Update No. 2,
15 right?

16 A. I would presume that as well, yes.

17 MR. OLESKI: PJ, if you could go to the attachment,
18 the next page.

19 Q. And this would reflect the Householder v. Smith primary
20 elections, right?

21 A. Correct.

22 Q. Mr. Longstreth was giving an update to these various
23 individuals regarding the initial results from those primary
24 elections, right?

25 A. Correct.

1 Q. And how the Householder candidates were doing against the
2 Smith candidates, right?

3 A. Correct.

4 Q. And I think you testified on your direct examination that
5 Team Householder went 20 and 1?

6 A. Correct.

7 MR. OLESKI: You can take that down, PJ.

8 Q. And then after the primary elections in 2018, your role
9 shifted to helping the candidates in the general election,
10 right?

11 A. That's correct.

12 Q. Is it fair to say that the slate of candidates that you
13 helped changed over time?

14 A. Yes.

15 Q. So the slate of candidates you were helping during the
16 primary elections in 2018 were different than the candidates
17 that you were helping support in the general elections, right?

18 A. The slate evolved, yes.

19 Q. And why did the slate evolve?

20 A. There are a number of political calculations as to why
21 the slate would evolve. There are -- you know, some
22 individuals have a tough primary but have a relatively easy
23 general election, and some people ran unopposed in the
24 primary but then have a tough general election just based on
25 the demographics of each individual district.

1 Q. And ultimately, I think you testified to on your direct
2 examination, that you again worked 80 to 100 weeks helping
3 these candidates win their elections during the general
4 elections, right?

5 A. Yes. Campaigns are hard.

6 MR. OLESKI: Your Honor, permission to publish
7 Householder Exhibit 338, which has been admitted.

8 THE COURT: Yes.

9 MR. OLESKI: Can you blow that up, PJ?

10 Q. Do you recognize this, Ms. Fitzmartin, as an email sent
11 from Mr. Longstreth to you and a number of other individuals
12 on November 5th of 2018?

13 A. Yes.

14 Q. Now, during the course of this trial, we've heard the
15 phrase Team Householder quite a bit. What does Team
16 Householder mean?

17 A. A team, I mean, candidate's name, is just a pretty
18 common nomenclature to use to make sure that you're
19 identified as being a part of the candidate's team. So Team
20 Householder or team -- I've had a number of bosses
21 throughout the years, and it's team my boss's name.

22 Q. And Team Householder would include the various
23 individuals working to support Mr. Householder's interests,
24 right?

25 A. Correct.

1 Q. So not just the slate of candidates, right?

2 A. Correct.

3 Q. You're part of Team Householder, right?

4 A. Yes, I am. Or was.

5 Q. And this email by Mr. Longstreth was sent on the night
6 before the general elections in 2018; is that right?

7 A. Yes.

8 Q. And do you recognize all of the individuals that he sent
9 this email to to also have been part of Team Householder?

10 A. Correct.

11 Q. And, Ms. Fitzmartin, if you don't mind reading this
12 email, please.

13 A. Hi, Team Householder.

14 I just wanted to drop you all a note and tell you how
15 thankful I am for all the hard work, blood, sweat, and tears
16 you have given to the team over the last two years.

17 We started with nothing more than an appreciation to
18 shake up the system and an admiration for our guy Larry
19 Householder. In that time, we've all learned what an
20 inspirational leader he is and we've built the best team in
21 Ohio politics.

22 I'm so honored to have been part of such a special
23 group of people. Every single person on this team has given
24 up their time and energy to ensure victory, and each of you
25 deserves special credit for bringing home the victory.

1 I've spent time thinking about each of you tonight and
2 how you've helped us to get to this point. From that moment
3 we started to raise -- started raising money, to recruiting
4 candidates, to developing candidates, to the mail, research,
5 communications, photography, polling, phones, digital --

6 THE COURT: If you'll slow down, she's got to write
7 it all down. Go ahead.

8 **A.** Not only did we do it for 21 newbie candidates in the
9 primary against an organized, well-funded operation that
10 tried to kill us --

11 THE COURT: I'm really, really sorry. Will you read
12 slower? She has to write everything down.

13 THE WITNESS: Yes.

14 THE COURT: "Not only."

15 THE WITNESS: This team has never backed down, never
16 complained, and never stopped fighting to win.

17 By this time tomorrow night, we will see the fruits of
18 our labor and we are going to be victorious thanks to your
19 efforts.

20 Thank you and your teams for giving everything you have
21 to this cause.

22 Let's go win. Jeff.

23 Sent from my iPhone.

24 **Q.** And between September of 2017 and November of 2018, you
25 worked 80 to 100 hour workweeks helping support this slate of

1 candidates, right?

2 A. Correct.

3 Q. Ultimately all to get to that -- to this goal, to the
4 general elections in 2018, right?

5 A. Correct. Campaigns are built to win.

6 Q. And after the November 2018 elections, Mr. Householder
7 and Mr. Smith swear off in their race for Speaker, right?

8 A. Correct.

9 Q. And ultimately, Mr. Householder was successful and he was
10 elected Speaker of the Ohio House of Representatives in
11 January of 2019, correct?

12 A. That's right.

13 MR. OLESKI: You can take this down, PJ.

14 Q. Now, between September of 2017 and January of 2019, you
15 were working from your home; is that right?

16 A. I worked from my home and reported to an office.

17 Q. And the office was the JPL office at State Street?

18 A. Correct.

19 Q. And to be fair, I think you testified to in your direct
20 examination that Mr. Householder's campaign also had an office
21 space at that location?

22 A. That was my understanding, yes.

23 Q. After Mr. Householder was elected Speaker, did he no
24 longer have office space at that location?

25 A. That's correct.

1 Q. Where was his office space after that point?

2 A. He had an official office in the Riffe Center and a
3 ceremonial office in the State House. And I very, very
4 rarely saw him because he was doing the people's work.

5 Q. And JP&L also -- JPL & Associates also moved out of the
6 State Street office, right?

7 A. That's correct.

8 Q. And where did -- where did JPL move to?

9 A. When an individual's elected Speaker, they assume
10 authority of the campaign caucus, and at that time the
11 campaign caucus was in -- so the political arm of the House
12 was in an office on Broad Street. There was -- they were in
13 the midst of a lease.

14 Q. And your role shifted to the political side of things,
15 right?

16 A. I continued on the political side of things, yes.

17 Q. Fair enough. And you rarely saw Mr. Householder after
18 January of 2019, correct?

19 A. Correct.

20 Q. You testified in your direct examination that you
21 currently work for the state of Ohio, I think is what you
22 said, right?

23 A. Correct.

24 Q. Who do you work for currently?

25 A. I work for Speaker Jason Stephens.

1 Q. The current Speaker of the Ohio House of Representatives;
2 is that right?

3 A. That's correct.

4 MR. OLESKI: Moment to confer, Judge?

5 THE COURT: Yes.

6 MR. OLESKI: I have no further questions, Judge.

7 THE COURT: Very well. Questions on behalf of
8 Mr. Borges, if any?

9 MR. SCHNEIDER: Yes, thank you, Your Honor.

10 **CROSS-EXAMINATION**

11 BY MR. SCHNEIDER:

12 Q. Ms. Fitzmartin, good morning. I had to look to see if I
13 could say this morning.

14 A. You're safe.

15 Q. Just a couple questions for you. You had been asked on
16 direct examination about these kitchen cabinet calls. Matt
17 Borges wasn't on those, was he?

18 A. No.

19 Q. All right.

20 A. He and Speaker Householder didn't get along.

21 Q. Right. And, in fact, they didn't get along, did they?

22 A. Correct.

23 Q. And you indicated, you know, obviously there was a slate
24 of candidates, and you managed and oversaw a lot of those.
25 Stu Harris was one, and he was conflicted on the Speaker,

1 wasn't he?

2 A. He was.

3 Q. He was. And the reference to -- in the text message you
4 were shown by the prosecutor dealing with checking out the
5 process with the endorsement by the state Republican party,
6 that was reference that Matt had been former chairman and he
7 might ask -- be able to take the temperature and see whether
8 or not the nontraditional policy of not endorsing during
9 contested primaries might be changing, correct?

10 A. Correct.

11 Q. Right. Nobody asked him to change the policy or to
12 advocate. Just what's the process because you were state
13 chairman, and have you heard anything different?

14 A. Correct.

15 Q. That was the extent of it, right?

16 A. Correct.

17 Q. Okay. And one of the candidates that were on your slate
18 of candidates was Jon Cross, correct?

19 A. Yes.

20 Q. Right. And Jon, his opponent was Cheryl Buckland,
21 correct?

22 A. That's right.

23 Q. And you and Matt discussed Cheryl Buckland and his
24 sentiments towards her, correct?

25 A. Correct.

1 Q. And you understood those sentiments to be that he was a
2 friend of hers and he was going to support her?

3 A. That's right.

4 Q. Okay. And -- but he was upfront with you on that,
5 correct?

6 A. Yes.

7 Q. At the end of the day, your candidate prevailed, correct?

8 A. That's right.

9 Q. Right. And you actually did a stint of time, did you
10 not, at the Ohio Republican party that Matt hired you for a
11 project?

12 A. That's right, I worked for Matt.

13 Q. And with respect -- just going back here to Stu Harris.
14 Were you aware that Amie Kershner was fundraising for Ryan
15 Smith, correct?

16 A. That's correct.

17 Q. And were you aware that Amie would regularly attend Stu
18 Harris candidates' meetings, or campaign meetings?

19 A. I'm unaware.

20 Q. Okay.

21 MR. SCHNEIDER: Thank you. No further questions,
22 Judge.

23 THE COURT: Very well. Does the government have
24 redirect?

25 MS. GAFFNEY-PAINTER: Just briefly, Your Honor.

1 THE COURT: Very well. You may approach the podium.

2 MS. GAFFNEY-PAINTER: Thank you.

3 **REDIRECT EXAMINATION**

4 BY MS. GAFFNEY-PAINTER:

5 Q. Ms. Fitzmartin, on cross-examination you were asked some
6 questions about JPL's offices on State Street. Do you recall
7 those questions?

8 A. Yes.

9 Q. Generation Now's office was also in that same space,
10 correct?

11 A. I am not aware.

12 MS. GAFFNEY-PAINTER: Ms. Terry, will you -- may I
13 ask first for permission. May we publish what's already been
14 admitted as Government Exhibit 201A?

15 THE COURT: You asked very nicely. And, yes.

16 MS. GAFFNEY-PAINTER: Thank you.

17 Ms. Terry, will you please pull up Government's Exhibit
18 201A.

19 Will you please advance a little bit further, Ms. Terry,
20 please. If you could advance a little bit further, please. I
21 apologize. I don't know the exact page number.

22 This is great. Thank you.

23 Q. Ms. Fitzmartin, looking at this, do you recognize this
24 floor plan?

25 A. Yes.

1 Q. And what is this floor plan for?

2 A. It appears to be an office space for -- that I'd report
3 to.

4 MS. GAFFNEY-PAINTER: And if we could, please,
5 Ms. Terry, may we please blow up the very bottom of this page.
6 That footnoted area.

7 Q. Ms. Fitzmartin, directing your attention to this, the
8 middle of this row here, what is the address that's listed
9 here? Beneath the ads --

10 A. Capitol Square Office Building, 65 East State Street,
11 Columbus, Ohio, 43215. Suite 2540.

12 Q. Thank you. Now, Ms. Fitzmartin, were you still working
13 with JPL & Associates in 2020?

14 A. Yes.

15 Q. And what is the HRCC?

16 A. House Republican Campaign Committee.

17 Q. Now in 2020, who was Speaker of the Ohio House?

18 A. Larry Householder.

19 MR. OLESKI: Objection, Judge. Beyond the scope.

20 MS. GAFFNEY-PAINTER: Your Honor, I can explain
21 where we're going.

22 Q. You were asked a series of questions about traditional
23 versus nontraditional approach to endorsements. Do you recall
24 those questions?

25 A. Yes.

1 Q. In 2020, were you aware that it was the plan of the House
2 Republican Campaign Committee to support Larry Householder
3 candidates in 2020 by offering an endorsement?

4 MR. OLESKI: Objection; leading.

5 THE COURT: Overruled. Please proceed.

6 THE WITNESS: An endorsement by whom?

7 Q. By the House Republican Campaign Committee.

8 A. Incumbents weren't -- are automatically endorsed by the
9 House Republican Campaign Committee.

10 Q. Ms. Fitzmartin, you mentioned on cross-examination that
11 Speaker Householder was doing the people's work, and that's
12 why you didn't have much contact with him. What does
13 "people's work" mean to you?

14 A. The official office of the Speaker of the House, so
15 legislation and all that entails of being the Speaker.

16 MS. GAFFNEY-PAINTER: May I have a moment to confer,
17 Your Honor?

18 THE COURT: Yes.

19 MS. GAFFNEY-PAINTER: No further questions. Thank
20 you.

21 THE COURT: Very well. Recross on redirect from
22 Mr. Householder's counsel, if any.

23 MR. OLESKI: No questions, Judge.

24 THE COURT: Mr. Borges?

25 MR. SCHNEIDER: No questions, Judge.

1 THE COURT: My goodness. You appear to have
2 survived. You are free to go.

3 THE WITNESS: Thank you, sir.

4 THE COURT: We were anticipating breaking at 12:20.
5 What's the government make of that?

6 MS. GLATFELTER: We have our next witness here ready
7 to call if we can proceed with that.

8 THE COURT: Yes, please. Who do you call?

9 MS. GLATFELTER: The government calls Beth Ellis.

10 THE COURT: Someone's gone to retrieve that witness.
11 And we will need to break at 12:20.

12 MS. GLATFELTER: May I approach, Your Honor?

13 THE COURT: Yes.

14 (Pause.)

15 THE COURT: Good afternoon. If you'd follow her.
16 You're headed to the witness stand. If you'd be willing to
17 pause where you are and raise your right hand for the oath to
18 tell the truth.

19 THE COURTROOM DEPUTY: You do solemnly swear or
20 affirm that the testimony you are about to give in this case
21 will be the truth, the whole truth, and nothing but the truth.
22 This you do affirm under the pains and penalties of perjury?

23 THE WITNESS: Yes.

24 THE COURT: That was awfully fast, Ms. Santoro.

25 You are welcome to be seated. I tell everybody the seat