

STATE OF NEW YORK
SUPREME COURT COUNTY OF ONONDAGA

CHRISTOPHER RYAN; DUSTIN CZARNY;
CHARLES GARLAND; WILLIAM KINNE; MARY
KUHN; LINDA ERVIN; PEGGY CHASE; HELEN
HUDSON; MICHAEL GREENE; MARK F. MATT;
MAX RUCKDESCHEL; MARCIA FERGUSON; and
CHRISTOPHER J. SHEPHERD

Plaintiffs,

vs.

RYAN MCMAHON; COUNTY OF ONONDAGA;
ONONDAGA COUNTY LEGISLATURE; and
ONONDAGA COUNTY BOARD OF ELECTIONS,

Defendants.

**AFFIDAVIT OF
MARK F. MATT**

Mark F. Matt, being duly sworn, says under penalty of perjury as follows:

1. I am a Plaintiff in the above-captioned action and a citizen of State of New York, residing in the Town of Manlius, County of Onondaga.
2. I make this affidavit based on my personal knowledge, and if called upon to testify, I could and would testify to the following facts.
3. I am registered to vote in the State of New York.
4. I am currently serving as Trustee of the Village of Fayetteville and as such I am familiar with the effect of the currently proposed redistricting for the County of Onondaga.
5. I regularly vote for Democratic candidates in local, state, and federal elections, and engage in campaign activity for Democratic Party for County legislative offices.
6. The County Legislature's partisan and incumbent-favoring gerrymanders of the 2021 Onondaga County maps have harmed me because the new maps dilute the power of my vote based on my political beliefs and diminish the effect of my political action efforts.

These new maps undermine efforts throughout the County of Onondaga, State of New York to elect Democratic candidates for the County Legislature.

7. More specifically, the town of Manlius has population of 33,712 according to the 2020 Census. Since it has more than the optimal average for legislative districts in Onondaga County (28,030), it needs to be divided into two districts, which the County legislative plan does.
8. However, the County legislature's plan shifts the traditional Manlius district north. It has rested in the southern portion of Manlius for 20 years. The last ten years the villages of Manlius, Minoa, and Fayetteville were all in the same district. The County legislative map separates the village of Manlius into the 12th district while keeping the rest of Manlius in the 10th district.
9. Separating the village of Manlius from the village of Fayetteville is particularly egregious. Fayetteville and Manlius share a school district & a sewer system.
10. The Fayetteville-Manlius schools were formed via consolidation in the 1950's and 60's. They were formed based on commonalities and the community has grown stronger. The demographics of the two villages are extremely similar.
11. The people of Fayetteville and Manlius have a long history of being part of the same community; having shared train and trolley services in the past. The village of Manlius is placed inside the 12th district which it does not share any ties with the rest of the rural agrarian communities of the 12th district.
12. Fayetteville-Manlius are in fact tied together in a single Central School District and those living in The Village of Manlius and Village of Fayetteville share common community

interests, such as participation in the same clubs and social organizations including as Rotarians, Fayetteville-Manlius Soccer Club, and other clubs.

13. Fayetteville and Manlius have a long history of working together. In the early 1900's freight trains ran between Fayetteville and Manlius. Passenger service on trolleys between the two villages was available in 1910. The villages are separate but they both have Memorial Day Parades and their fire departments march in both. Manlius has a 4th of July Parade that both fire departments participate.

14. Fayetteville and Manlius share similar income levels and other commonalties.

15. The new maps join our community with communities which are separate and distinct from our community.

16. I have in the past served as an officer of the Rotary Club organization and have coached sports that include children from both Fayetteville and Manlius.

17. In short, the community of interest of which I am a part is being divided by reason of this new map and needlessly ties my community to unrelated communities which do not share the political and social interests of my community.


MARK F. MATT

Sworn before me on August
this 16th day of June, 2022


NOTARY PUBLIC

JOSEPH S. COTE III

Notary Public, State of New York

Qualified In Onon. Co. No. 4842588

Commission Expires March 26, 2023