

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
MAX RUCKDESCHEL**

Max Ruckdeschel, being duly sworn, says under penalty of perjury as follows:

1. I am a Plaintiff in the above-captioned action and a citizen of the State of New York, residing in Town of Dewitt, 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 regularly vote for candidates in local, state and federal elections, and engage in campaign activity for Democratic party running for Congress, and local state legislative offices.
5. I submit the affidavit to challenge maps submitted by the County of Onondaga County Legislature which seek to redraw the legislative districts in the County of Onondaga.
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.

7. These new maps undermine efforts throughout the County of Onondaga, State of New York to elect candidates for the County Legislature that accurately reflect the will of the citizens of the county and unfairly dilute the votes of those who support candidates of the democratic party.
8. According to the 2020 census, the Town of Dewitt has 26,074 population.
9. The optimal average for the 17 Onondaga County Legislative districts is 28,030, therefore the Town of Dewitt standing alone has a population that is insufficient to stand alone as a legislative district.
10. When the County Legislature drafted the new maps, they did not add an adjoining, similar community into a single legislative district but rather divided the Dewitt community into four parts attaching to legislative districts that do not share common features.
11. I allege the proposed map divided the Dewitt Community into separate legislative districts due to the partisan intent of the Republican majority in the County Legislature.
12. The Town of Dewitt is the most Democratic town in Onondaga County whose residents share common community-based interests.
13. Yet, the Republican majority in the County Legislature have proposed legislative districts that divide the Town into 4 different legislative districts.
14. It renders the citizens of Dewitt into the role of the minority in each of the 4 legislative districts in which they have been placed.
15. The byproduct of that division of the Dewitt community is that the political power of the citizens of Dewitt is diminished to the point that their desires and concerns for their community are unlikely to be a priority for the county legislator representing them.

16. The partisan design of the Republican majority is revealed when you compare the proposal regarding Dewitt to Republican proposal regarding Lysander.
17. Lysander, which is of a similar size to Dewitt, but has GOP registration advantage.
18. When dealing with Lysander, the Republicans have chosen to keep that town wholly inside a single legislative district, thus assuring a Republican advantage in future elections.
19. However, when it came to the Town of Dewitt, the Republican majority revealed its intent by dividing and diluting Democratic votes by carving up the Town of Dewitt and adding the constituent parts into adjoining, but largely Republican communities.
20. This transparently partisan effort to create Republican majorities in each county legislative district is accomplished by pairing portions of the town of Dewitt with unrelated adjoining communities in which the majorities are Republican.
21. By way of example, the proposed OCL 5 takes a small portion of suburban Dewitt in the northern Kirkville section and puts it in a district containing 4 different rural towns
22. Additionally, OCL 7 snakes from the southeastern border of Dewitt up to East Syracuse and Kirkville to envelope portions of Dewitt in the fashion of an Anaconda, thereby assuring Democratic voters in that portion of Dewitt will be forever in the minority.
23. OCL 7 also takes portions of Eastwood and Sedgewick communities in the urban City of Syracuse and pairs it with suburban portions of Dewitt.
24. None of the communities the Republican have married with the divided Dewitt communities share common interests with the citizens of the Town of Dewitt.
25. They do not share a common school district and the elected officials of the town do not represent the citizens of the adjoining communities.

26. These communities are not only different, but also randomly divided by the arbitrary way in which this district was drawn and are not as compact as is practical.
27. Turing next to proposed OCL 12, that district takes in southern Jamesville portion of Dewitt and puts in a sprawling rural district encompassing the southeast corner of Onondaga County.
28. The Jamesville citizens have little in common with rural agrarian-based communities that make up the majority of the land mass of this district.
29. The marriage of these disparate populations with portions of the Dewitt community is a marriage of political convince that will result in Republican domination of the county legislature, while simultaneously assuring the largely democratic population of that of Dewitt, is perpetually represented in the county legislature by representatives who hold contrary political views.
30. Turing to OCL 17, that proposed district takes the Lewiston Manor portions of Dewitt and pairs it with Genesee hills bordering Lemoyne College. The Salt Springs Road neighborhood of Syracuse and portions of Westcott and university neighborhoods. These are disparate communities that share little in common.
31. The result of all these divisions is to dilute the vote of citizens of Dewitt and silence their voice within County Government.
32. Despite being the 4th most populous town in Onondaga County, the County legislature plan sets up likely scenarios where Dewitt could not have any representation in the County legislature.

33. The Legislature's partisan and incumbent-favoring gerrymanders of the 2022 County Legislative 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.
34. These new maps undermine efforts throughout the County of Onondaga to elect Democratic candidates for the Onondaga County Legislature.
35. The result of all these divisions caused to dilute the vote of the residents of Dewitt.
36. It is respectfully submitted that my voice and the voice of those who share my political goals in County Government will be stifled by the proposed legislative maps.
37. Despite being the 4th most populous town in Onondaga County, the County legislature plan sets up likely scenarios where the residents of Dewitt will not have a representative in the County legislature who accurately reflects the views, hopes and aspirations of the people of Dewitt.


MAX RUCKDESCHEL

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


NOTARY PUBLIC

JOSEPH S. COTE III
Notary Public, State of New York
Qualified in Onon. Co. No. 4942588
Commission Expires 3/28/2023