

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

\_\_\_\_\_  
 SAMUEL RONAN and )  
 )  
 ANA CORDERO )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 FRANK LaROSE, in his official capacity )  
 as Secretary of State of Ohio, )  
 )  
 DOUGLAS J. PREISSE, in his official )  
 Capacity as Chair of the Franklin County )  
 Board of Elections, )  
 )  
 MEREDITH FREEDHOFF, in her official )  
 Capacity as Member of the Franklin County )  
 Board of Elections, )  
 )  
 JAMIE L. SHUMAKER, in her official )  
 Capacity as Member of the Franklin County )  
 Board of Elections, and )  
 )  
 MICHAEL E. SEXTON, in his official )  
 Capacity as Member of the Franklin County )  
 Board of Elections, )  
 )  
 )  
 )  
 Defendants. )  
 \_\_\_\_\_)

Civil No.: \_\_\_\_\_  
 Judge \_\_\_\_\_

**EMERGENCY ELECTION CASE**  
**TEMPORARY RESTRAINING ORDER**  
**PRELIMINARY INJUNCTION**  
**REQUESTED**

**VERIFIED COMPLAINT FOR DECLARATORY**  
**AND EMERGENCY TEMPORARY RESTRAINING ORDER**  
**AND PRELIMINARY INJUNCTIVE RELIEF**

**Facts and Parties**

1. Plaintiff, Samuel Ronan, was certified by the Franklin County Board of Elections, whose four members are Defendants sued in their official capacities and who at all relevant times were acting under color of Ohio within the meaning of 42 U.S.C. §1983 and engaged in state action

within the meaning of the First and Fourteenth Amendments to the United States Constitution, as a ballot-qualified candidate for Ohio's Republican Party May 5, 2026 primary election to fill Ohio's 15<sup>th</sup> Congressional District on or about February 17, 2026. *See* Franklin County Board of Elections, Certified Candidates, May, 6, 2026 Primary Election, <https://vote.franklincountyohio.gov/getmedia/d6820021-1845-49a3-8340-1541ca9f683e/2026-Primary-Certified-Candidates-6>.

2. Ronan had timely satisfied to the satisfaction of the Franklin County Board of Elections all of the objective requirements required by Ohio to run in the May 5, 2026 Republican primary for Ohio's 15th Congressional District and had truthfully declared pursuant to O.R.C. § 3513.07 both "I am a member of the Republican Party" and "I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican Party."

3. Plaintiff, Ana Cordero, intends to vote in the Republican party's 15<sup>th</sup> Congressional Republican primary on May 5, 2026 for Plaintiff-Ronan.

4. On February 20, 2026 Ronan's candidacy was ostensibly protested by a qualified Republican voter by the name of Marc A. Schare. *See* Exhibit A.

5. Based on Ronan's past political positions and political statements, Schare's protest claimed that Ronan was not in fact a Republican and did not intend to abide by Republican principles if elected even though Ronan declared in his nominating papers that he was a Republican and intended, if elected, to abide by Republican party principles. *See* Exhibit A.

6. Schare's attorneys at the March 6, 2026 hearing argued to the Board of Elections that Ronan should be removed from the ballot because he had not truthfully declared pursuant to O.R.C. § 3513.07 both that he is "a member of the Republican Party" and "if elected to said office

or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the Republican Party.”

7. Schare’s attorneys argued to the Secretary of State in a letter brief on March 13, 2026 following the Board of Elections tie vote (described below) that “Ohio law does not and should not allow a candidate to intentionally lie about their party affiliation. ... If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to ‘support and abide by the principles’ of the Republican Party is meaningless.” *See* Exhibit B.

8. The ostensible protestor, Schare, testified at the hearing on March 6, 2026 before the Board of Elections that he did not sign the protest, did not write it, did not deliver it, and was not responsible for paying the three attorneys whose names were listed as contacts and who identified themselves as representing Schare on the bottom of the written February 20, 2026 protest.

9. At the March 6, 2026 hearing held before the Franklin County Board of Elections, Schare testified under oath not only that he was not paying his lawyers but that he did not know who was, either.

10. Schare’s attorney at the March 6, 2026 hearing interrupted questioning of Schare to object to any inquiry into who was paying Schare’s lawyers and stated that notwithstanding Schare’s ignorance of who was paying his lawyers those lawyers had fully complied with Ohio’s Rules of Professional Conduct.

11. Neither Ronan nor the Board of Elections was told at or before the March 6, 2026 hearing that the Ohio Republican Party was a real party in interest that was paying Schare’s legal bills for the protest against Plaintiff-Ronan.

12. At the March 6, 2026 hearing before the Board of Elections, Plaintiff-Ronan testified under oath that his declaration of membership in the Republican party was truthful, that his declaration of intent to abide by, if elected, the principles of the Republican party was truthful, and that his political positions are consistent with historical Republican principles. As an example he read from and reiterated his statements made in an interview published in 2024 by Alabama Public Radio when he challenged former President Trump in the Republican presidential primary:

Ronan said he chose to run on the GOP ballot for this election because his policies and values align more with that party.

“I believe my values are actually better received in the Republican Party. So, I am choosing to run as a Republican. Now, taking it a step further, I’m choosing to run as a Republican because the current cadre of candidates do not represent the needs and the ideals of the American people,” he said. “In fact, the frontrunner [Donald] Trump is offering despotism dictatorship and worse, whereas the four other candidates are offering watered down versions of some or all of his policies.”

Another reason Ronan said he chose to run on the Republican ballot is because the party is open to hearing new ideas from their candidates. “The Republican Party, for all of the faults or all of its good, is open to varying ideas,” he explained. “They do not prevent people from running. They do not close their primaries, and they do not deny the winner their victory so they can have their preferred candidate in place.

My values match the Republican Party of yesterday. I feel that I represent the history of the Republican Party, the true value of where the Republican Party thrived back during the [Dwight D.] Eisenhower years,” Ronan said.

*See Exhibit C.*

13. At the March 6, 2026 hearing before the Board of Elections Plaintiff-Ronan reiterated under oath that he was a member of the Republican party and intended, if elected, to abide by the principles of the Republican party.

14. At the March 6, 2026 hearing, Defendant-Freedhoff questioned Plaintiff-Ronan extensively about the past political positions he had taken when he ran against former President Donald Trump in the Republican primary in 2024. *See Exhibit C.*

15. Defendant-Freedhoff raised a number of Plaintiff-Ronan's statements from his Republican candidacy in 2024 against Trump and stated that she found Plaintiff-Ronan's statements to be incompatible with the principles of the Republican party.

16. Before the March 6, 2026 hearing before the Board of Elections, Plaintiff-Ronan on February 27, 2026 timely moved to disqualify Defendant-Freedhoff from participating in the protest, a motion to disqualify that was rejected by Defendant-Freedhoff.

17. Plaintiff-Ronan's disqualification motion was premised on Freedhoff's being the chair of the Franklin County Republican Party and the Franklin County Republican Party's support for Ronan's Republican opponent in the May 6, 2026 primary, Michael Carey.

18. Financial records downloaded by Plaintiff-Ronan from the Federal Election Commission establish that the Franklin County Republican Party contributed \$500 to Carey's campaign in late August 2025, and that Carey's campaign had paid the Franklin County Republican Party over \$10,000 in December 2025. *See* Exhibit D.

19. The Franklin County Republican Party also at this time had formally endorsed Carey's candidacy. *See* Franklin County Republican Party, Our Endorsed Candidates, <https://franklincountygop.org/> (copy attached as Exhibit E).

20. Plaintiff-Ronan on February 25, 2026 timely moved to dismiss the protest based on the protestor's not having signed the protest and on the failure of the protest to state a proper claim under O.R.C. §§ 3513.07 and 3513.191(B).

21. The Board of Elections at the March 6, 2026 hearing ruled that it did not have the authority to dismiss a protest before a hearing was held.

22. The Board of Elections tied 2 to 2 over the motion on the floor to deny the protest without being informed that the Ohio Republican Party was the real party in interest paying the legal bills for the protest against Ronan.

23. The two Republican members of the Board of Elections, Defendant-Preisse and Defendant-Freedhoff (who had refused to disqualify herself), voted against the motion to deny the protest.

24. The two Democratic members of the Board, Defendant-Shumaker and Defendant-Sexton, voted in favor of the motion to deny the protest.

25. Because the motion tied 2 to 2, O.R.C. § 3501.11(x) directed that the vote be forwarded to Defendant-Secretary of State, who is sued in his official capacity and who at all relevant times was acting under color of Ohio within the meaning of 42 U.S.C. §1983 and engaged in state action within the meaning of the First and Fourteenth Amendments to the United States Constitution.

26. Only on March 10, 2026, after counsel for Ronan sent to Schare's lawyers on March 7, 2026 a demand for the identity of the real party in interest who was paying the legal bills and directing the protest, along with legal authority from this Court establishing that Ronan's lawyers had a right to this information, *see Libertarian Party of Ohio v. Husted*, 2014 WL 3928293 (S.D. Ohio 2014) (holding that protested candidate was entitled to discover identity of person paying protestor's lawyers), did Schare's lawyers belatedly respond that "our client the Ohio Republican Party will be paying our invoices in connection with this protest."

27. The Secretary of State was notified by Plaintiff-Ronan on March 10, 2026 that the Ohio Republican Party had been identified by Schare's lawyers as a real party in interest and

moved Defendant-Secretary to disqualify Defendant-Freedhoff and remand the matter back to the Board of Elections for further proceedings without Defendant-Freedhoff's participation.

28. Secretary LaRose, who is presently running in Ohio for the Office of State Auditor in the 2026 election, has been officially endorsed for that office by the Ohio Republican Party, which as explained above is a real party in interest in the protest against Ronan. *See* Ohio Republican Party Slate Card: Official 2026 Ohio Republican Party endorsed candidates, <https://ohiogop.org/2026-orp-slate-card/>.

29. On March 19, 2026, just one day before the March 20, 2026 deadline for finalizing overseas ballots in Ohio, Defendant-Secretary LaRose added his vote to the two Republicans who voted against the motion to deny the protest and removed Plaintiff-Ronan from Ohio's primary ballot, stating in an official post from the Office of the Secretary of State:

Secretary LaRose has decided a tie vote of the Franklin County Board of Elections in favor of a protest against the candidacy of Samuel Ronan, who was seeking the Republican nomination for the office of U.S. Representative in the 15th Congressional District. The board has been informed that Mr. Ronan is no longer a certified candidate for the May 5, 2026 Primary Election, and the board has been instructed to provide proper notice with all ballots that votes for this candidate will not be counted.

*See* Exhibit F.

30. Plaintiff-Ronan's removal from the ballot has caused him injury-in-fact to his First and Fourteenth Amendment rights that has been caused by the named Defendants' actions and that can be redressed by a favorable decision by this Court within the meaning of Article III of the United States Constitution.

31. Plaintiff-Ronan's removal from the ballot has caused Plaintiff-Cordero injury-in-fact to her right to vote under the First and Fourteenth Amendments that has been caused by the named Defendants' actions and that can be redressed by a favorable decision by this Court within the meaning of Article III of the United States Constitution.

**Ohio Law and Defendants' Interpretation of Ohio Law**

32. Section 3513.191(B) of the Ohio Revised Code provides in relevant part that “either of the following persons may be candidates for nomination of any political party at a party primary: (1) A person who does not hold an elective office; (2) A person who holds an elective office other than one for which candidates are nominated at a party primary.” (Emphasis added).

33. Section 3513.191(B) authorizes any otherwise qualified candidate in Ohio who is not presently holding an elective office to run for office in “any” political party primary.

34. This Court in *Jolivette v. Husted*, 886 F. Supp. 2d 820, 835 (S.D. Ohio), *aff'd*, 694 F.3d 760 (6<sup>th</sup> Cir. 2012), determined that because of §3513.191(B), for a candidate who seeks to associate with a political party and run in its primary, as opposed to a candidate who seeks to disassociate from a political party to run as an independent in the general election, “there is no requirement that the candidate make the change in good faith, unlike the rule that applies to a candidate who disaffiliates from a party.” (Emphasis added).

35. Political party membership in Ohio is determined “purely” by the intent of voters and candidates, respectively. *See State ex rel. Bender v. Franklin County Board of Elections*, 132 N.E.3d 664, 668 (Ohio 2019) (“Party affiliation in Ohio is purely a matter of self-identification, and that self-identification is subject to change.”). *See also State ex rel. Young v. Gasser*, 257 N.E.2d 389, 391 (Ohio 1970) (“[P]arty affiliation or membership [in Ohio] is that which [a voter or candidate] desires it to be from time to time.”); *Pirincin v. Board of Elections of Cuyahoga County*, 368 F. Supp. 64, 70 (N.D. Ohio 1973) (“In practice Ohio's election laws permit and result in shifting party affiliations.”).

36. Section 3513.07 of the Ohio Revised Code states that a primary candidate must state in his or her declaration of candidacy filed with elections officials that “I am a member of the \_\_\_\_\_ Party,” after filling in the relevant party’s name, and “I further declare that, if elected to said office or position, I will qualify therefor, and that I will support and abide by the principles enunciated by the \_\_\_\_\_ Party,” after filling in the relevant party’s name.

37. Section 3513.07 requires that these declarations “shall be substantially” in the form included in the statute, but says nothing about removal from the ballot should an elections board conclude the two declarations were not truthfully, the cannot pass an ideological purity test imposed by elections officials, or that the candidate otherwise did not act in good faith.

38. Secretary LaRose and the Franklin County Board of Elections interpreted § 3513.07 to require – notwithstanding this Court’s conclusion that Ohio law does not impose a subjective “good faith” requirement on candidates who seek to change political parties to run in primaries -- that the two political party declarations required by § 3513.07 must be made truthfully to the subjective satisfaction of the Board of Elections, and that a failure to truthfully make the two political party declarations to the subjective satisfaction of the Board of Elections required removal of the protested candidate from the primary ballot.

39. Defendants’ decision to remove Plaintiff-Ronan under § 3513.07 was not based on objective facts but was based solely on the Board of Elections’ subjective conclusion that Plaintiff-Ronan’s past political speech rendered his declared present intent to be associated with and a member of the Republican party false.

40. Defendants’ decision to remove Plaintiff-Ronan under § 3513.07 was not based on objective facts but was based solely on the Board of Elections’ subjective conclusion that

Plaintiff-Ronan's past political speech rendered his declared future intent to, if elected, abide by principles of the Republican party false.

41. Defendants' decision to remove Plaintiff-Ronan under § 3513.07 was premised solely upon his past political positions and past political statements and the Board of Elections' subjective determination that this past core political speech was not consistent with membership in the Republican party.

42. Defendants' decision to remove Plaintiff-Ronan under § 3513.07 was premised solely upon its subjective determination that Plaintiff-Ronan's past political statements and past political positions rendered his present ideology inconsistent with what the Board of Elections deemed acceptable Republican party principles.

43. Defendants imposed an "ideological purity test" on Plaintiff-Ronan's candidacy and removed him from the ballot because Defendants did not consider him to be "Republican enough."

44. Federal UOCAVA ballots must be finalized by March 20, 2026 under O.R.C. §3511.16.

### **JURISDICTION AND VENUE**

45. This Court has subject matter jurisdiction over Plaintiffs' claims pursuant to 42 U.S.C. § 1983 and 28 U.S.C. § 1331, because such claims arise under the First and Fourteenth Amendments to the United States Constitution.

46. Venue is proper in this Court because a substantial part of the events giving rise to this action occurred in this district, *see* 28 U.S.C. §1391(b)(2), and because most Plaintiffs are residents of the State of Ohio and Defendants are state officials who maintain offices in Columbus, Ohio. *See* 28 U.S.C. § 1391(b)(1).

**COUNT I**

**(Violation of Plaintiffs' Rights Guaranteed  
by the First and Fourteenth Amendments)**

47. Plaintiffs reassert each preceding allegation in paragraphs 1 to 46 as if set forth fully herein.

48. The Board of Election's and Secretary's decision pursuant to O.R.C. § 3513.07 to remove Ronan from the ballot based on a subjective determination that he could not truthfully declare himself to be a Republican with intent to, if elected, abide by Republican principles violates Plaintiffs' speech, associational and voting rights as guaranteed by the First and Fourteenth Amendments.

49. Section 3513.07's two requirements that a primary candidate truthfully declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate is presently a member of the relevant political party and declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate will abide by the relevant political party's positions if elected are facially violative of the First and Fourteenth Amendments to the United States Constitution.

50. Section 3513.07's two requirements that a primary candidate truthfully declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate is presently a member of the relevant political party and declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate will abide by the relevant political party's

positions if elected are unconstitutional as-applied to Plaintiffs under the First and Fourteenth Amendments to the United States Constitution.

**COUNT II**

**(Violation of Article I's Elections Clause)**

51. Plaintiffs reassert each preceding allegation in paragraphs 1 to 46 as if set forth fully herein.

52. The Board of Election's and Secretary's decision pursuant to O.R.C. § 3513.07 to remove Ronan from the ballot based on a subjective determination that he could not truthfully declare himself to be a Republican with intent to, if elected, abide by Republican principles violates Plaintiffs' rights under the federal Elections Clause in Article I, § 4, which prevents States from regulating anything other than the time, place and manner of Congressional elections.

53. Section 3513.07's two requirements that a primary candidate truthfully declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate is presently a member of the relevant political party and declare to the subjective satisfaction of elections officials based on the candidate's past political speech and past political positions that the candidate will abide by the relevant political party's positions if elected violate the federal Elections Clause in Article I, § 4 by authorizing state officials to remove from congressional primary ballots those candidates the state officials find not to be politically acceptable.

**Count III**

**(Fourteenth Amendment Due Process Violation)**

**By Defendant-Freedhoff)**

54. Plaintiffs reassert each preceding allegation in paragraphs 1 to 46 as if set forth fully herein.

55. Plaintiff-Ronan's removal from the ballot with the participation of Defendant-Freedhoff violated Plaintiffs' Fourteenth Amendment right to due process of law.

56. Defendant-Freedhoff's contribution and support of Plaintiff-Ronan's only competitor (Mike Carey) on the ballot through the Franklin County Republican Party and the Franklin County Republican Party's receipt of thousands of dollars from Carey's campaign created a debilitating conflict of interest on Defendant-Freedhoff's part.

57. The Ohio Republican Party's undisclosed secret involvement compounded Defendant-Freedhoff's conflict of interest, since the Franklin County Republican Party which Defendant-Freedhoff chairs is part of the Ohio Republican Party.

58. Defendant-Freedhoff's refusal to disqualify violated Plaintiffs' Fourteenth Amendment rights under the Due Process Clause.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Enter a declaratory judgment holding that the Secretary's and Franklin County Board of Elections' enforcement of O.R.C. § 3513.07 is unconstitutional on its face and as applied;
- B. Enter a temporary restraining order and/or preliminary injunction enjoining the Secretary and Franklin County Board of Elections from enforcing the foregoing provision as applied to Plaintiffs in the present matter and on its face in the future;
- C. Enter a permanent injunction enjoining the Secretary and Franklin County Board of Elections from enforcing the foregoing provision as applied to Plaintiffs in the present matter and on its face in the future
- D. Enter a temporary restraining order and/or preliminary injunction requiring that the Secretary and Franklin County Board of Elections restore Plaintiff-Ronan to the ballot;

- E. Enter a permanent injunction requiring that the Secretary and Franklin County Board of Elections restore Plaintiff-Ronan to the ballot;
- F. Enter a declaratory judgment holding that Defendant-Freedhoff violated the Due Process Clause by participating in Plaintiff-Ronan's removal from the ballot;
- G. Enter a temporary restraining order, preliminary injunction and permanent injunction prohibiting Defendant-Freedhoff from participating in Plaintiff-Ronan's protest;
- H. Award other and further relief as the Court deems proper; and
- I. Award costs and attorney's fees to Plaintiffs under 42 U.S.C. §1988.

**VERIFICATION of PLAINTIFF-SAMUEL RONAN  
(Pursuant to 28 U.S.C. § 1746(2))**

I, Samuel Ronan, verify under penalty of perjury that the foregoing is true and correct.

Executed on March 20, 2026.



\_\_\_\_\_  
Samuel Ronan

**VERIFICATION of PLAINTIFF-ANA CORDERO  
(Pursuant to 28 U.S.C. § 1746(2))**

I, Ana Cordero, verify under penalty of perjury that the foregoing is true and correct.

Executed on March 20, 2026.



\_\_\_\_\_  
Ana Cordero

Dated: March 20, 2026

Respectfully submitted,

*/s/Mark R. Brown*

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*/s/Oliver B. Hall*

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*Counsel for Plaintiffs*



**Ronan v. LaRose, et. al**

# **Exhibit A**

February 20, 2026

**Via Electronic Mail and Hand Delivery**

Franklin County Board of Elections  
22 North Fourth Street  
Columbus, Ohio 43215

Re: **Protest of Candidacy of Samuel Peter Ronan as a Republican Candidate for office of Representative to Congress from the 15<sup>th</sup> District**

Dear Members of the Franklin County Board of Elections:

Pursuant to § 3513.05 of the Ohio Revised Code, Marc A. Schare, a member of the Republican party and qualified elector in the state of Ohio, hereby protests the candidacy of Samuel Ronan as a Republican candidate for the office of Representative to Congress from the 15th District.

The basis for this protest is straightforward: although Ronan filed a Declaration of Candidacy for the Republican primary, clear and convincing evidence confirms ***he is not in fact a Republican.***

To the contrary, as explained in greater detail below, Ronan has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles. He has consistently and unequivocally associated with and advocated for progressive positions and policies of other parties, most prominently the Democratic party. Indeed, he has previously (and recently) campaigned as a Democrat, including for the role as *chairman of the Democratic National Committee.*

In short, Ronan's past *and current* statements and actions unmistakably demonstrate that Ronan is not and does not want to be a Republican. Instead, he is simply pretending to be a Republican as a tool to "get a foot in the door." January 2026 Facebook Post, Exhibit A. ; 2018 Rebel HQ interview, "DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!", *available at* <https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF>.

This is precisely the type of "opportunistic" maneuvering the primary rules are designed to prevent. *State ex rel. Bible v. Bd. of Elections of Hamilton Cnty.*, 22 Ohio St. 2d 57, 60 (1970).

Because the evidence outlined below supplies clear and convincing evidence that Samuel Ronan's purported affiliation with the Republican party and declaration to "support and abide by the principles enunciated by the Republican Party" are false, the Board should disqualify Ronan from appearing on the ballot in the May 5, 2026 Republican primary election.

**A. Ronan’s political history and prior campaigns reveal a strong and consistent affiliation with the Democratic and other left-wing/progressive parties.**

Ronan’s political career spans nearly a decade and demonstrates strong, consistent ties to the Democratic party and other liberal organizations. Ronan’s political career formally began in 2016 when he ran as a Democrat in the Democratic primary for the Ohio House of Representatives District 62 seat. Ballotpedia profile, Ex. B, *available at* [https://ballotpedia.org/Samuel\\_Ronan](https://ballotpedia.org/Samuel_Ronan). Although he won the Democratic nomination, he lost in the general election. *Id.* The next year, he sought to *lead* the Democratic party, running as a candidate for chair of the Democratic National Committee, which he lost. *Id.*

Ballotpedia reports that Ronan has also been associated with the PDPR [People for Democratic Party Reform], the Green Party, the Sunrise Movement, a progressive group focused on climate change issues, and the Socialists of America. *Id.*

**B. Ronan has explicitly and repeatedly proclaimed that Democrats should run for office as Republicans to get elected in conservative districts and admits to doing so here.**

Unable to get elected in the progressive parties with which he actually aligns, Ronan tried a different strategy. In 2018, he ran in the Republican primary for U.S. House Ohio District 1 against incumbent Steve Chabot. In a video interview featured on an online interview series entitled “Rebel Headquarters,” Ronan freely admitted that the party flip stemmed not from any genuine change in political ideology, but from a new experimental strategy for trying to defeat Republican incumbents and get progressive candidates elected:

Q. There is something unique about your candidacy, you are running as the only Republican, I believe that we have profiled here . . . You are running to replace Steve Chabot as a Republican, but you are a Progressive?

A. Yes sir. . . . I put my money where my mouth is. Last year I ran for the DNC Chair and I said if I were the Chair, we would still have to run Democrats as Republicans because that’s the only way you’re going to make it through. And here I am, I guess, putting the rubber to the road.

Q. Well, it’s going to be an amazing test case.

2018 Rebel HQ interview, “DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!” *available at*:  
<https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF>.

Ronan further explained that the Democratic leadership was not supportive of his candidacy and the Democratic candidate field was crowded, so going to “the GOP side” to “challenge the incumbent directly” would be a more effective strategy in his view. *Id.*

Perhaps most telling, Ronan explained that calling himself a Republican was “the trick” to try to get people to listen to him. *Id.*

Although this interview took place in 2018, Ronan recently reaffirmed his continued support for this strategy. Just weeks ago, *after he submitted his declaration of candidacy as a Republican*, Ronan openly acknowledged that he is simply following the strategy he has been advocating for years:

“I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of American, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door. So if I’m doing anything, it’s following the argument I made on that stage.”

Sam Ronan post on Grove City Area Progress Facebook page:

<https://www.facebook.com/groups/1052994605934831>, Screenshot Exhibit A.

Although Ohio law allows candidates to change parties, it prohibits them from “altering their political party affiliations for opportunistic reasons” as Ronan admittedly seeks to do here. *See, e.g., State ex rel. Guest v. Husted*, 2018-Ohio-3161, ¶ 15; *Jolivette v. Husted*, 694 F.3d 760, 770 (6th Cir. 2012).

**C. According to his own statements, Ronan aligns with Democratic leaders and positions and does not support the positions of the Republican Party.**

Ronan’s political history and unapologetic gamesmanship amply demonstrate Ronan’s claimed affiliation with the Republican party is a sham, and his candidacy as a Republican should not be allowed. His public statements and policy statements only further cement the point.

The Internet is replete with videos, social media posts, and position statements in which Ronan openly and explicitly discusses his views on politics and government. His platform is clear, and as one social media commenter aptly put it, “[I]terally nothing on [his] platform resembles anything on the Republican platform.” Comment of Matt Jividen, February 16, 2026 in response to Sam Ronan post on Grove City Area Progress Facebook page. Ex. C.

To the contrary, his political positions, which, unlike his political affiliation, have stayed constant over the course of his political career, include the following:

- **Providing Universal Healthcare** (Samronan.com, <https://www.samronan.com/more-issues/universal-healthcare>)
- **Abolishing ICE and using their funding for public services** (*See Ballotpedia 2026, Ex. B, Candidate Survey* (“My goal is to abolish ICE, and BPD, reallocate their funds to public services, and prosecute all members of those agencies for their many crimes.”), available at [https://ballotpedia.org/Samuel\\_Ronan](https://ballotpedia.org/Samuel_Ronan))
- **Federalizing the police, ending all state and local funding for police forces** (<https://www.samronan.com/police-reforms>).

- **Federalization of all transportation services, banking, the Internet,** (<https://www.samronan.com/taxation-economics>).
- **“Immediate erasure of Medical and Student Loan debt, universally across the country.”** *Id.*

These policies and positions unequivocally align with the far-left views of the most liberal factions in American politics. It is perhaps no surprise then that Ronan also publicly aligns himself with liberal leaders like Bernie Sanders.

**D. Disqualifying Ronan from appearing on a Republican ballot when clear and convincing evidence shows his declaration of intent to support Republican positions is false serves important state interests.**

The abundant evidence of Ronan’s current and past political involvement, public statements, and alignment with Democratic leaders clearly and convincingly demonstrate that Ronan is not a Republican and does not support Republican positions. *Cf. Jolivette*, 694 F.3d at 769; *Guest* 2018-Ohio-3161, ¶ 15.

Ronan’s statements to the contrary in his Declaration of Candidacy are false. Accordingly, this Board should disqualify Ronan from appearing on the Republican ballot.

Limiting party primary ballots to those candidates who are genuine members of that party serves the state’s legitimate interests in “avoiding overcrowded ballots” and “protect[ing] the integrity of its political processes from frivolous or fraudulent candidacies.” *Jolivette*, 694 F.3d at 769 *quoting* *Bullock v. Carter*, 405 U.S. 134, 145 (1972). Moreover, “the state has an interest in regulating ballot access in order to avoid confusion, deception, and even frustration of the democratic process at the general election. *Id.* (internal quotation marks and citations omitted).

Permitting Samuel Ronan to appear on the Republican ballot at the May 5, 2026 primary would undermine these important objectives and undermine the integrity of Ohio’s primary system.

**E. Conclusion**

In short, Ohio law does not and should not allow a candidate to intentionally “trick” voters about their party affiliation. That is precisely what Ronan openly admits to doing here. If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to “support and abide by the principles” of the Republican Party is meaningless.

Accordingly, Republican voter Marc A. Schare respectfully asks the Board to disqualify Ronan from appearing on the ballot.

Please direct all future correspondence to my counsel.

Respectfully submitted,

Marc A. Schare

*Protestor*

Brodi J. Conover, bconover@bricker.com

Rachael N. Guastella, rguastella@bricker.com

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100 South Third Street

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*Counsel for Protestor*

**Ronan v. LaRose, et. al**

# **Exhibit B**

March 13, 2026

**Via Electronic Mail**

Franklin County Board of Elections  
22 North Fourth Street  
Columbus, Ohio 43215

Re: **Protest of Candidacy of Samuel Peter Ronan as a Republican  
Candidate for office of Representative to Congress from the 15<sup>th</sup>  
District**

Dear Members of the Franklin County Board of Elections:

On behalf of our client Marc A. Schare, a member of the Republican party and qualified elector in the state of Ohio, we submit this post-hearing letter in support of Mr. Schare's protest of the candidacy of Samuel Ronan as a Republican candidate for the office of Representative to Congress from the 15th District.

This protest asks whether a candidate who has openly, consistently, and recently admitted that he is not a Republican can lawfully pretend to be a Republican and appear on a Republican ballot at a primary election. Unless Ohio law allows a candidate to lie on the declaration of candidacy, the answer is and must be no, as two members of this Board correctly held.

As explained in Mr. Schare's written protest, which we incorporate here by reference and attach as Appendix A, Ronan has a long history of publicly denouncing the Republican party, its elected leaders, and its fundamental principles and has previously campaigned as a Democrat, including for the role as *chairman of the Democratic National Committee*.

To be sure, as counsel for Mr. Ronan stresses, a candidate can lawfully change parties. R.C. 3513.191. That's beside the point. Critically, the clear and convincing evidence cited in the protest and presented during the March 6, 2026 hearing confirms that didn't happen here. Instead, as the evidence makes clear, Mr. Ronan's sudden shift is not driven by a sincere change in politics, but rather by a transparent and unapologetic strategy to sabotage the party from within.

Mr. Ronan's social media posts and interview statements demonstrate that Mr. Ronan considers pretending to be a Republican and running in a Republican primary as a tool to "get a foot in the door" for progressive candidates like himself and an opportunity to double the chances of ousting a Republican incumbent.

In 2018, he ran in the Republican primary for U.S. House Ohio District 1 against incumbent Steve Chabot. In a video interview featured on an online interview series entitled "Rebel Headquarters," Ronan freely admitted that the party flip stemmed not from any genuine change in political

ideology, but from a new experimental strategy for trying to defeat Republican incumbents and get progressive candidates elected:

Q. There is something unique about your candidacy, you are running as the only Republican, I believe that we have profiled here . . . You are running to replace Steve Chabot as a Republican, but you are a Progressive?

A. Yes sir. . . . I put my money where my mouth is. Last year I ran for the DNC Chair and I said if I were the Chair, we would still have to run Democrats as Republicans because that's the only way you're going to make it through. And here I am, I guess, putting the rubber to the road.

Q. Well, it's going to be an amazing test case.

2018 Rebel HQ interview, "DNC Chair Candidate Sam Ronan Running As A REPUBLICAN?!", *available at*:  
<https://www.facebook.com/watch/?v=2025554687692236&rdid=HyQ3hAcwTOivj0xF>.

Ronan further explained that the Democratic leadership was not supportive of his candidacy and the Democratic candidate field was crowded, so going to "the GOP side" to "challenge the incumbent directly" would be a more effective strategy in his view. *Id.*

Perhaps most telling, Ronan explained that calling himself a Republican was "the trick" to try to get people to listen to him. *Id.*

Although this interview took place in 2018, Ronan recently reaffirmed his continued support for this strategy. Just weeks ago, *after he submitted his declaration of candidacy as a Republican*, Ronan openly acknowledged that he is simply following the strategy he has been advocating for years:

"I believe I very clearly mentioned in that very same DNC Chair race that Democrats, if they wanted to govern and regain the trust of American, would have to primary Republicans in deep red districts, as Republicans, just to get a foot in the door. So if I'm doing anything, it's following the argument I made on that stage."

Sam Ronan post on Grove City Area Progress Facebook page:  
<https://www.facebook.com/groups/1052994605934831>, Screenshot Exhibit A.

Importantly, Ronan does not deny or dispute that he made these statements. To the contrary, at the March 6, 2026 hearing he openly acknowledged these statements were his.

Ronan further admitted that both he and his campaign are affiliated with a person who posts online as "Ana Aleida-March." She posted about Ronan's campaign just weeks ago. In response, a follower commented "I've always wondered if it might be easier to torpedo the republican party from within as opposed to trying to take on the dems." *See* Testimony of Sam

Ronan and corresponding Exhibits admitted at the March 6, 2026 hearing. To which Ronan's personal confidant and campaign advisor said: "yup! And we're testing out theory lol." *Id.*

Again, when asked about this post, Ronan made no attempt to disavow the strategy.

To the contrary, the crux of his argument, as further evidenced through the filings of his counsel, is not that Sam Ronan's campaign isn't a sham, but that it shouldn't matter under Ohio law.

Ronan's counsel insists that there is no "good faith" requirement to show party affiliation for purposes of declaring candidacy. He misreads snippets from Ohio cases to argue that Ohio law *allows a bad faith affiliation*. But the case law does not support this illogical leap.

Although Ohio law allows candidates to change parties, it prohibits them from "altering their political party affiliations for opportunistic reasons" as Ronan admittedly seeks to do here. *See, e.g., State ex rel. Guest v. Husted*, 2018-Ohio-3161, ¶ 15; *Jolivette v. Husted*, 694 F.3d 760, 770 (6th Cir. 2012). While these cases specifically addressed these issues in the context of disaffiliation from a political party, nothing in their language or reasoning suggests this maxim is limited to situations in which a party seeks to disaffiliate, rather than affiliate.

Indeed, to hold otherwise would essentially equate to a conclusion that Ohio law allows a candidate for office to commit fraud. It does not.

In *Morrison v. Colley*, 467 F.3d 503, 511 (6th Cir. 2006), the Sixth Circuit explicitly stated that "A person of ordinary intelligence . . . is put on notice that 'claims' of *party affiliation* or non-affiliation must be made in good faith; otherwise the person is subject to criminal prosecution." (emphasis added)

While it may be true that Ohio law does not require a candidate to affirmatively demonstrate that his affiliation is in good faith as a precondition to running for a partisan office, that does not mean that where, as here, the Board is presented with clear and convincing evidence that the affiliation is in *bad faith*, the Board should or even can turn a blind eye to that fact.

The bottom line here is that there is clear and convincing evidence that Samuel Ronan's purported affiliation with the Republican party and declaration to "support and abide by the principles enunciated by the Republican Party" are false, the Board should disqualify Ronan from appearing on the ballot in the May 5, 2026 Republican primary election.

A few final points bear mention. Mr. Ronan's counsel continues to insist that Board member Ms. Meredith Freedhoff should have been disqualified from participating in the protest hearing and decision even after the Board unanimously denied his motion to disqualify. Because there was no tie on that issue, it is finally resolved and therefore not before the Secretary of State. It is important to note, however, that the Board's decision was fully supported by Ohio law. Ronan has shown nothing other than that Ms. Freedhoff is an active member of the Franklin County Republican Party and as such has supported Republican candidates and interacted with the party and its members. Mr. Ronan's emphasis on this connection ignores the legal and factual reality that *all*

members of the Boards of election are statutorily required to be affiliated with either the Democratic or Republican party. If that association somehow made the members unqualified to participate in Board decisions, it would defeat the entire purpose of the statute to ensure that the inherently political decisions a Board must resolve are adjudicated by a politically balanced and representative Board.

Mr. Ronan's unfounded focus on who is or is not paying invoices associated with Mr. Schare's protest is equally irrelevant to the issues that were before the Board and are now in front of the Secretary of State. Mr. Brown cites no authority to suggest that there is anything improper about the unsurprising fact that the Ohio Republican party would have an interest in ensuring that political candidates running for office as Republicans are in fact Republicans. As already mentioned, Mr. Ronan has made clear that his entire campaign is a strategy designed to undermine the party. The party has an undeniable interest in ensuring the Board has an opportunity to evaluate that information and make an informed decision.

As this Board already unanimously concluded, such information is irrelevant to the validity of Mr. Schare's protest or Mr. Ronan's eligibility to appear on a Republican ballot. Counsel's voluntary release of that information less than one business day following that hearing as a courtesy to Mr. Ronan's counsel is no way alters or affects the issues before the Board. Put simply, it is a red herring that can only be intended to distract the Board and the Secretary from the real issues before it.

In short, Ohio law does not and should not allow a candidate to intentionally lie about their party affiliation. That is precisely what Ronan openly admits to doing here. If Ronan is permitted to appear on the Republican ballot against the backdrop of this body of evidence, the mandatory declaration to "support and abide by the principles" of the Republican Party is meaningless.

Accordingly, Republican voter Marc A. Schare respectfully urges the Secretary of State to break the tie vote in favor of those Board members who voted to disqualify Mr. Ronan from appearing on the Republican ballot.

Respectfully submitted,

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*Counsel for Protestor*

**Ronan v. LaRose, et. al**

# **Exhibit C**

Want to support APR? Become a monthly contributing listener today!

# GOP Presidential candidate Samuel Ronan gives one-on-one interview with APR

Alabama Public Radio

Published January 9, 2024 at 4:00 AM CST



*SamRonan.Com*

A new candidate for the Republican presidential ballot has emerged. [Samuel Ronan](#) is the latest person to declare his 2024 bid for the White House.

Prior to this presidential run, Ronan ran for Ohio Senate in 2022, Ohio's 1st Congressional District in 2018 and Democratic National Committee Chair in 2017. He said the reason he declared he was running so late in the Presidential race is because the current options for President are not ideal.

"What we have is a bunch of people running for office, whether it's on the left or the right, who are effectively offering the American people," he said. "Nothing new.

Stanford: Symphonies 1-7 / Handley...  
**Symphony no 3 in F minor, ...**

same listen to your masters, follow, obey, etc.," Ronan continued. "The reason why I'm running for office this late in the game as a regular person, is to prove that it can be done. There are better ways, better opportunities, for our country to thrive, and for all of us Americans, just regular folks like you or me, to actually participate in the process."

Ronan said he chose to run on the GOP ballot for this election because his policies and values align more with that party.

"I believe my values are actually better received in the Republican Party. So, I am choosing to run as a Republican. Now, taking it a step further, I'm choosing to run as a Republican because the current cadre of candidates do not represent the needs and the ideals of the American people," he said. "In fact, the frontrunner [Donald] Trump is offering [despotism dictatorship](#) and worse, whereas the four other candidates are offering watered down versions of some or all of his policies."

Another reason Ronan said he chose to run on the Republican ballot is because the party is open to hearing new ideas from their candidates.

"The Republican Party, for all of the faults or all of its good, is open to varying ideas," he explained. "They do not prevent people from running. They do not close their primaries, and they do not deny the winner their victory so they can have their preferred candidate in place. My values match the Republican Party of yesterday. I feel that I represent the history of the Republican Party, the true value of where the Republican Party thrived back during the [\[Dwight D.\] Eisenhower](#) years," Ronan said.

One of Ronan's main policies is the [America Works Program](#). Through this program, Americans would have access to a job board and national training centers for major industries in the nation. Ronan said these training centers would help usher younger people into America's aging workforce.

"If we can train our soldiers straight out of high school how to fix multimillion dollar aircrafts and multibillion dollar ships, surely we can train our citizens how to get involved in rail, in infrastructure in fiber optics, in helping farmers," Ronan said. "There are many jobs out there, not all of them labor intensive, that are in desperate need of

trades and saying that they aren't as worthy as the bachelor's degrees and the master's and doctorate degrees."

The America Works Program is not just limited to American citizens. Ronan said he wants to allot a percentage of this program to immigrants who are working in America as well.

"We do have a border crisis. It's a humanitarian one. Our foreign policy has disrupted so many Latin American, Central American and South American nations, that they are fleeing their homes; traveling months, weeks, days across treacherous territory to make it to America for the simple hope that maybe they can survive and take care of their loved ones," Ronan said. "Of course, we can't just open our borders. Not everyone has good intentions, but what we can do is treat it as a humanitarian crisis rather than a criminal one," Ronan continued. "We can streamline the process: if you work in America and apply to the America Works program and agree to go to wherever America needs you with the skills that you provide and that you showcase, you can earn your path to citizenship, much like enlisting in the military."

Another policy Ronan feels strongly about is his [tax policy](#). He said he plans on eliminating taxes for people who make under \$100,000 a year, canceling all student and medical debt and taxing billionaires 99%.

"My goal is to eliminate any and all income taxes. All of them to include Social Security, to unfold Medicare and put paying for those things, on the wealthy on those who have 90% [and] control of all wealth in America," he said. "In so doing, we will dramatically improve the spending power of the average citizen. We will raise tens of thousands of millions of Americans out of poverty. We will be able to address the rising cost of living directly. We will be able to fully fund all of our federal and state projects and works directly by making those with the resources pay for it," Ronan continued.

He said his policy for taxing billionaires 99% comes from Former President [Dwight D. Eisenhower's tax policy](#).

"In my tax vision, billionaires will not exist. If you make a billion dollars, either as an

Eisenhower, a Republican president and war hero from World War II, when he himself implemented a 94% upper percent tax rate for the \$400,000 and above bracket," Ronan continued. "Meaning if you made at least \$400,000 as an individual or a business, you paid 94% in taxes."

Ronan said he also plans to [reform the police](#) once he becomes President. He said police brutality in America has been a problem for many years. However, in recent years, it has escalated significantly.

"It's because policing is an institution, and our country is directly derived from the slave patrol. Our country has had such a long and insidious history of slavery and cruelty against people of other that we have always had some sort of agency in place to prevent them, the other, from prospering," Ronan said.

He said the police budget in every state can range anywhere from 30% to 60% of the state's entire budget. However, despite the high amount of money, Ronan said the police and other law enforcements do not protect citizens. He said defunding the police by half is necessary to have a more functional police system in America.

"When I talk about police reform, I'm talking about that history and our current reality, needing to be fundamentally changed. First, we defund the police. As it is, that 50% should be put toward different social programs. That'll adjust crime and drug addiction, poverty, homelessness," Ronan said. "Police shouldn't be responsible for all of that anyway, even if they weren't a corrupt institution. It's entirely too many hats to wear for one institution. There's no way you could effectively train one person to handle a psychotic break, a medical emergency, homelessness, poverty," he continued. "There's no way to address all of that in one. So, first, we take those funds and redistribute it into other programs. We then address the real issues in our communities and in our state."

Ronan said along with defunding the police, he would also enforce federal standards to ensure law enforcement is protecting citizens.

"Enforcement of federal standards and enforcement of duties is how we reform our policing in America," he explained. "But it will require some significant changes to the

continued. “Those that do not comply, the officers who resist and refuse to change and be better, will be arrested. They will suffer the consequences of their actions. Because accountability is the primary missing element in our government in our society.”

Ronan said his police reform policy is also related to America’s apparent [border crisis](#).

“The border crisis is simply a continuation of all these atrocities in leading into today and the actions that have been committed by the American federal government and the administration's directive them,” he said. “These are human beings like you and me, who lived lives like you and me, who had jobs like you and me. Hopes, dreams and aspirations like you and me and had been torn from them because of the actions of American foreign policy,” Ronan said.

Ronan said treating the border as a [humanitarian crisis](#) would allow Americans to have more empathy for immigrants.

“I think treating [the border] as a humanitarian crisis is not only the ethical and moral thing to do, but it serves all of our interests,” he explained. “As Americans, as immigrants wanting to come to America and embracing the American dream, we are a nation of immigrants. We are the melting pot nation of the world. We are the social experiment. So, why would we stop that now? We should be embracing this opportunity to bring these people into our country. To help build it and rebuild it and reform it in an image that we can all participate in,” he continued.

Ronan said people should vote for him because he understands the problems of today’s America better than the other candidates do. He said the other candidates do not understand the plight of the American people because they have not had to live the experiences of the average American citizen.

“Why take a chance and Samuel Ronan to become the next president of the United States? Look around you. Look at the candidates that are running: Joe Biden, Donald Trump, Nikki Haley, DeSantis, Rebecca, Vivek Ramaswamy, Governor Christie, even RFK Jr,” he said. “Why would you trust them to have your best interests in mind when

go through. They only see the social issues these domestic problems these foreign policies as polling numbers,” Ronan continued. “They don't care, nor do they understand the absolute suffering and pain that [Millennials and Gen Z](#) go through with all these steps and these lots of opportunity to get into the workforce to engage in their government.”

Ronan also gave his predictions for the Republican candidates and how the 2024 election will go.

“Vivek will be the first to drop out. DeSantis will be the second to drop out, and what we will see is that Nikki Haley will either close the gap between Donald Trump or she will end up becoming his running mate,” he said. “I do not believe Governor Christie will end up being the nominee for the simple fact that he doesn't offer much different to the American people. His policies and views are Bush Jr., Bush Sr.-esque, and the American people are not interested in that. What they want is some sort of [populism](#), and right now, the only person delivering that is Trump.”

Ronan said if America's political climate remains the same, there is a chance that the nation will see a second Donald Trump presidency.

“It's not that he's popular because he's a good leader, or a viable candidate, if he's popular, because the other guy, the other person, is so detestable, so unliked and unpopular, that Trump seems like the lesser of two evils,” Ronan said. “Now, on top of that, he keeps getting free media presence by being brazen. If the media treated his brazen behavior with the immaturity that it deserves, then he would not have nearly as much airtime as much presence in people's lives to be seen as viable,” he continued. “The fact that he did try or allegedly tried to facilitate an [insurrection on January 6](#), that he has so many charges and criminal indictments against him currently, this should be disqualifying outright, and yet, it isn't.”

Ronan said he thinks that [Governor Ron DeSantis' current policies](#) in Florida, from a strict abortion law to “[Don't Say Gay](#)” to [book banning](#) to less restrictive gun legislation, would not hold up on a national level if DeSantis became President of the United States.

explained. "No leader in history who burned or banned books has ever been on the right side of history, and Americans are aware of that. So, that wouldn't work," he explained. "Strict immigration policy is flying in the face of our nation's history and our core ethos in the first place. When you have so many immigrants in America regardless, that's just not going to work. And with the Don't Say Gay [law], gay people, transgender people, and everything in between, have existed for as long as humans have existed."

Ronan also said he does not believe that current President [Joe Biden](#) will remain in office for another four years.

"There is no national or international event that could galvanize him into remaining in the White House," he said "There is there is not a future in the entire multiverse where Joe Biden wins a second term, and it is because of his lack of agency. It is because of his will lack of inspiration It is because of his blatant corruption in violation of international law by aiding and abetting Israel's genocide and ethnic cleansing of Palestinians," he continued. "And never mind, the scandal with his son. Never mind his failure to fulfill his promises during the campaign of debt forgiveness. He has done nothing to fundamentally improve the lives of American citizens, and people are not going to be forgiving."

Ronan said he believes that Biden should retire from politics entirely.

"[Biden] is probably on his way to a nursing home, and I don't even say that derogatorily. We are seeing the early signs of dementia with the man, and I feel like it's elder abuse at this point to allow him to run into stay in office," Ronan explained. "It's only going to detrimentally impact our own national stability and standing in the world if we can't even trust the agency of our own president."

Ronan also said that while he does not know who Trump's Vice President will be if he wins the election, Nikki Haley would be the best.

"For all of his bluster, and for all of his poor views, and how horrifically his administration went... [populism](#) is covering the domestic issues platform solidly and that's what people like about him. He says the things that they want to hear, and then

Nikki Haley, being an ambassador and having been in the United Nations and having actually engaged with all of these foreign leaders, would be the stability.”

Ronan said overall, if American politics remain the same, there will be another Trump administration which is concerning due to the age of the former president.

To learn more about Ronan’s policies, visit his website [here](#).

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**Ronan v. LaRose, et. al**

# **Exhibit D**

303 East Broad Street  
Columbus, Ohio 43215

614-236-6590  
[mbrown@law.capital.edu](mailto:mbrown@law.capital.edu)

February 27, 2026

Franklin County Board of Elections  
c/o Jeffrey Mackey  
1700 Morse Rd  
Columbus, OH 43229

Delivered via email to [jomackey@vote.franklincountyohio.gov](mailto:jomackey@vote.franklincountyohio.gov)

In re Protest of Samuel Ronan

Dear Board of Elections,

I represent Samuel Ronan, a candidate for the 15th Congressional District Republican primary in Ohio. Mr. Ronan's candidacy has ostensibly been protested by Marc A. Schare, who claims to be a member of the Ohio Republican Party and eligible to vote in Mr. Ronan's election. A hearing has been scheduled for March 4, 2026, 3 pm at your Morse Road office.

The Board should have received Mr. Ronan's motion to dismiss that protest. Before the Board addresses that motion, and before it reaches the substance of Mr. Schare's protest, Mr. Ronan respectfully moves to disqualify Meredith Freedhoff from participating in the proceedings.

Meredith Freedhoff, presently a member of the Franklin County Board of Elections, chairs the Franklin County Republican Party (FCRP). *See* [Franklin County Republican Party, https://franklincountygop.org/history-fcrgop](https://franklincountygop.org/history-fcrgop) ("Meredith Freedhoff serve[s] as chair"). FCRP on August 26, 2025 contributed \$500 to the 2026 congressional campaign of Mike Carey. *See* Federal Election Commission, Schedule B, Franklin County Republican Party, <https://docquery.fec.gov/cgi-bin/forms/C00913681/1919146/sb/ALL>. Mike Carey is Samuel Ronan's sole opponent in the 2026 15th Congressional District Republican primary in Ohio. A ruling against Mr. Ronan by the Board will automatically elevate Mr. Carey (whom the FCRP and Ms. Freedhoff support) to the general election as the Republican Party's candidate.

Ms. Freedhoff's public support for Mr. Ronan's primary opponent's 2026 congressional campaign (i.e., Mr. Carey's campaign) creates a debilitating conflict of interest on her part. Just as she cannot now participate in a hearing addressing the validity of Mr. Carey's candidacy and petition papers, she cannot ethically participate in a hearing addressing the validity of the candidacy and petition papers of Mr. Carey's sole opponent, Samuel Ronan. Ms. Freedhoff's role as chair of the FCRP, which has taken sides in this contest by contributing to and supporting Mr.

Carey's 2026 congressional campaign, renders her unable to project the appearance of objective impartiality that Ohio's elections require. Ms. Freedhoff is disqualified as a matter of law from participating in Mr. Ronan's hearing, and Mr. Ronan respectfully moves the Board to disqualify her.

Boards of Elections are governed by Ohio's ethics laws "enumerated in Ohio Revised Code Chapters 102 and 2921 as well as in the Ohio Ethics Commission's advisory opinions and in case law." Ohio Secretary of State Ethics Policy, <https://www.ohiosos.gov/globalassets/elections/eoresources/general/ethicspolicy.pdf>, at page 1. "All members and employees of the Ohio boards of elections shall familiarize themselves with Ohio ethics laws and comply with Ohio ethics laws at all times." *Id.* (emphasis added). Compliance is mandatory.

Under Ohio's ethics laws and the Secretary of State's Ethics Policy, "Members and employees of the boards of elections should avoid actions and associations that create an appearance of impropriety, that undermine public confidence in Ohio elections officials, or that interfere with the performance of duties by Ohio elections officials." *Id.* at 3 (emphasis added). Because Ms. Freedhoff chairs FCRP, which has publicly supported Mr. Ronan's opponent in the primary election at issue by donating cash to his campaign, her participation in removing Mr. Ronan would create "an appearance of impropriety" and partiality that "undermine[s] public confidence in Ohio elections officials." She must accordingly be disqualified from participating in all aspects of Mr. Ronan's hearing.

While the "appearance of impropriety" created by FCRP's contribution to Mr. Ronan's opponent alone requires Ms. Freedhoff's disqualification, two additional ethical restrictions on board members' participation in matters affecting "business associates" also disqualify her. Campaign finance records reveal that Mr. Carey's campaign on December 31, 2025 paid to FCRP, which Ms. Freedhoff chairs, \$10,807.12. *See* Itemized Disbursements, Committee: Carey Victory Fund, <https://docquery.fec.gov/cgi-bin/forms/C00790691/1939947/sb/ALL>. Mr. Carey, FCRP and Ms. Freedhoff thus have an established business/economic relationship. Mr. Carey is a "business associate" of FCRP, and thus likewise a business associate of FPRC's chair, Ms. Freedhoff.

As explained by the Secretary of State, "[m]embers and employees of the boards of elections shall not participate in the consideration of any matter involving ... business associates or other individuals or entities with whom they have a close association." Ohio Secretary of State's Ethics Policy, *supra*, at 3 (emphasis added). Further, "[m]embers or employees of the board of elections shall not participate in the consideration of any matter in which they have a personal or economic interest." *Id.* This latter restriction includes matters that affect the personal or economic interests of a member's "business associate," too. *Id.*

Under either and both of these "business associate" prohibitions, Ms. Freedhoff must be disqualified from participating in Mr. Ronan's case. Ms. Freedhoff's FCRP has not only donated

money to Mr. Carey's campaign, it has received disbursements from Mr. Carey's campaign totaling over ten thousand dollars. Mr. Carey's campaign can only be described as a "business associate" of FCRP and Ms. Freedhoff. The large payment from Mr. Carey's campaign to FCRP reveals that FCRP and Ms. Freedhoff have an "economic interest" in Mr. Carey's success. And even if Ms. Freedhoff were not herself to have an economic interest, Mr. Carey's campaign will benefit from a decision removing Mr. Ronan from the ballot. Because Mr. Carey is a business associate of FCRP, which Ms. Freedhoff chairs, Ms. Freedhoff cannot participate in any matter that might benefit Mr. Carey's "personal or economic" interest. Removing Mr. Ronan would clearly benefit Mr. Carey's "personal or economic" interest. Ms. Freedhoff is accordingly disqualified.

Even were these "business associate" prohibitions not to technically apply, the financial connections between FCRP (chaired by Ms. Freedhoff) and Mr. Carey's campaign – with donations flowing to Mr. Carey's campaign and disbursements flowing from his campaign to FCRP – cannot be ignored. They reinforce the "appearance of impropriety" that would permeate any involvement Ms. Freedhoff might have in the case. For this reason, Ms. Freedhoff must be disqualified.

For all these reasons, Mr. Ronan respectfully moves to disqualify Ms. Freedhoff from participating in his case.

Respectfully submitted,

Mark R. Brown

Attorney for Samuel Ronan

Cc:

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BRICKER GRAYDON WYATT, LLP

Counsel for Marc A. Schare

**Ronan v. LaRose, et. al**

# **Exhibit E**



**Welcome to the Franklin County Republican Party Website.  
We are committed to promoting conservative values,  
supporting strong candidates, and serving the people of  
Franklin County.**





## **OUR 2026 ENDORSED CANDIDATES**

**Governor - Vivek Ramswamy  
Attorney General - Keith Faber**

**Auditor - Frank LaRose**

**Treasurer - Kristina Roegner**

**Secretary of State - Robert Sprague**

**U. S. Senate - Jon Husted**

**U.S. Congress - Mike Carey**

**Ohio Supreme Court - Dan Hawkins**

**Ohio Supreme Court - Colleen O'Donnell**



**Ohio Senate D15 - Joe Healy**  
**Ohio Senate D25 - Don Roberts**

**House District 1 - Joel A. Greff**  
**House District 3 - Bernadine Kennedy-Kent**  
**House District 5 - Richard Cole**  
**House District 6 - Matthew Jackson**  
**House District 7 - William Mercier**  
**House District 8 - Kelly Hunter-Kalagidis**  
**House District 9 - Bruce Euans**  
**House District 10 - Denise D'Angelo**  
**House District 11 - Shawn Kaeser**  
**House District 12 - Brian Stewart**

**State Central Committee Members**

**SD 03 - Michelle Anderson**  
**SD 03 - Clayton Henson**  
**SD 15 - Ron O'Brien**  
**SD 16 - Meredith Freedhoff**  
**SD 16 - Josh Brown**  
**SD 25 - Susie O'Brien**  
**SD 25 - Jim Burgess**

**All Incumbent Franklin County Central**

**Ronan v. LaRose, et. al**

# **Exhibit F**



← **Post**

**Ohio Secretary of State**  @OHSecofState ...

Secretary LaRose has decided a tie vote of the Franklin County Board of Elections in favor of a protest against the candidacy of Samuel Ronan, who was seeking the Republican nomination for the office of U.S. Representative in the 15th Congressional District. The board has been informed that Mr. Ronan is no longer a certified candidate for the May 5, 2026 Primary Election, and the board has been instructed to provide proper notice with all ballots that votes for this candidate will not be counted.

3:13 PM · Mar 19, 2026 · 592 Views

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