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**BEFORE THE
FEDERAL ELECTION COMMISSION**

Declaration of Jane M. Timken

I, Jane M. Timken, declare under penalty of perjury that the following is true and accurate.

1. I am the Chairman of the Ohio Republican Party State Central & Executive Committee.

My business address is 211 South Fifth Street, Columbus, Ohio, 43215. The statements in this declaration are based on my personal knowledge.

2. I was elected Chairman of the Ohio Republican Party State Central & Executive Committee ("ORP") on January 6, 2017.

3. I was elected as the first female Chairman.

4. The primary reason for my candidacy for ORP Chairman was to remedy the mismanagement, lack of transparency and incompetence of the previous Chairman.

5. Several failures of the previous Chairman were well-known:

- a. Failure to raise operational funds for the ORP.
- b. Failure to disclose financial and operational decisions to stakeholders.
- c. Compliance practices at the ORP were inadequate and not structured appropriately.

6. Several other problems became known as I assumed leadership of the ORP.

- a. Failure to employ adequate business practices in the operation of the ORP.
- b. Assumption of significant debt and a mortgage on the ORP building.
- c. Inability to meet payroll obligations, healthcare for employees and other obligations.
- d. No document retention policy and failure to maintain records.
- e. Actions involving the FactGem issue before the FEC.

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19. This investigation revealed that ORP did not “use [] FactGem’s software products in connection with elections in which there were federal candidates on the ballot.” See Conciliation Agreement at ¶10.
20. This investigation also revealed that ORP did not create or enhance voting lists during the Federal Election Activity Period. See Conciliation Agreement at ¶12.
21. The FactGem project paid for by ORP was never used in any Federal election.
22. At best, the FactGem project known as Project Ruby, was voter identification activity conducted solely in connection with a non-Federal election held on a date on which no Federal election was held, and it was not used in a subsequent election in which a Federal candidate appeared on the ballot.
23. This investigation also revealed that ORP has no email or other records related to:
- a. Negotiation of the contract with FactGem
 - b. Reason payments were made to FactGem
 - c. Reason ORP stopped paying FactGem.
24. ORP informed the Commission of its struggle to obtain information despite its best efforts and diligent investigation.
25. On June 25, 2019, the Commission authorized the Office of the General Counsel to enter pre-probable cause conciliation.
26. After receiving the Conciliation Agreement, additional investigation revealed that no individual currently employed by the ORP has any knowledge regarding any possible allocation of costs to different products contained in the Agreement with FactGem.
27. ORP has provided to the Commission all the information we have available.
28. If the Commission requires additional information their only recourse is to contact the former Chairman of ORP who signed the FactGem Agreement and managed that program.

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