



Ohio Legislative Service Commission

Final Analysis

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Am. Sub. H.J.R. 12 130th General Assembly (As Adopted by the General Assembly)

Reps. Huffman and Sykes, Amstutz, Anielski, Ashford, Baker, Brown, Burkley, Clyde, Duffey, Grossman, Hackett, C. Hagan, Hayes, Kunze, Letson, McClain, McGregor, Patmon, Scherer, Schuring, Stebelton, Wachtmann, Batchelder

Sens. Faber, Coley, Bacon, Balderson, Beagle, Burke, Eklund, Gardner, Gentile, Hite, LaRose, Lehner, Peterson, Sawyer, Schiavoni, Turner, Widener

Adopted: December 17, 2014; approved by the voters on November 3, 2015; effective January 1, 2021

RESOLUTION SUMMARY

Ohio Redistricting Commission

- Replaces the Apportionment Board with the Ohio Redistricting Commission, and makes the Commission responsible for redistricting the state for the General Assembly.
- Specifies that the Commission consists of the Governor, the Auditor of State, the Secretary of State, and four persons appointed by majority and minority leaders in the General Assembly.
- Requires the legislative leaders in the Senate and the House of Representatives of each of the two largest political parties represented in the General Assembly, acting jointly by political party, to appoint a co-chairperson of the Commission.
- Requires the Governor to convene the Commission only in years ending in the numeral one, unless the Commission is convened by a court to draw judicially invalidated districts or the Commission must draw new districts following the expiration of a plan adopted under the proposal's impasse procedure.
- Prescribes procedural requirements for meetings of the Commission.

* This update notes the approval by voters and the effective date.

- Requires the General Assembly to make the appropriations it determines are necessary in order for the Commission to perform its duties.

Method of selecting a district plan

- Requires the Commission to adopt a district plan by a specified bipartisan vote of four members.
- Specifies that, if the Commission fails to adopt a final district plan not later than September 1, the Commission must introduce a district plan by a simple majority vote and must hold a public hearing on the plan.
- Requires the Commission, not later than September 15, to adopt a final district plan, either by the bipartisan vote described above or by a simple majority vote.
- Specifies that if the Commission adopts a plan by that bipartisan vote, the plan remains effective until the next year ending in the numeral one, unless a court convenes the Commission to redraw judicially invalidated districts.
- Provides generally that if the Commission adopts a plan by a simple majority vote, the plan remains effective until two general elections for the House of Representatives have occurred under the plan.
- Specifies that if, before a year ending in the numeral one, the Commission adopts another plan by a simple majority vote to replace a plan adopted under the impasse procedure, the newly adopted plan remains effective until a year ending in the numeral one, unless the Commission is reconstituted and convened by a court to draw judicially invalidated districts.
- Requires a plan adopted by a simple majority vote to include a statement explaining what the Commission determined to be the statewide preferences of the voters of Ohio and the manner in which the statewide proportion of districts in the plan whose voters, based on statewide state and federal partisan general election results during the last ten years, favor each political party corresponds closely to those preferences.
- Allows a member of the Commission who does not vote in favor of the plan to submit a declaration of the member's opinion concerning that statement.
- Requires, after a plan adopted by a simple majority vote ceases to be effective after two general elections for the House of Representatives, that the Commission convene not earlier than July 1 of the following year to adopt a new General



Assembly district plan using the same population and political subdivision boundary data as were used to draw the previous plan.

District standards

- Establishes new constitutional standards for the drawing of General Assembly districts.

Legal challenges

- Specifies that, if any section of the Constitution relating to redistricting, any General Assembly district plan, or any district is determined to be invalid by an unappealed final order of a court of competent jurisdiction, then the Commission must be reconstituted and convene to adopt a district plan that conforms with the provisions of the Constitution that are then valid.
- Prohibits a court, in any circumstance, from ordering the implementation or enforcement of any plan that has not been approved by the Commission.
- Prohibits a court from ordering the Commission to adopt a particular General Assembly district plan or to draw a particular district.
- Prescribes the available remedies in the event that the Ohio Supreme Court determines that a General Assembly district plan adopted by the Commission does not comply with the constitutional district standards.

Miscellaneous

- Repeals the current constitutional provision describing the district plans in effect until January 1, 1973.

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CONTENT AND OPERATION

Ohio Redistricting Commission

The joint resolution proposes an amendment to the Ohio Constitution to create the Ohio Redistricting Commission to replace the Apportionment Board as the body responsible for drawing General Assembly districts.

Composition

Under the resolution, the Ohio Redistricting Commission consists of the following seven members:ⁱ

- The Governor;
- The Auditor of State;
- The Secretary of State;
- One person appointed by the Speaker of the House of Representatives;
- One person appointed by the President of the Senate;
- One person appointed by the Minority Leader of the House;
- One person appointed by the Minority Leader of the Senate.

The legislative leaders in the Senate and the House of each of the two largest political parties represented in the General Assembly, acting jointly by political party, must appoint one member of the Commission to serve as a co-chairperson.

Currently, the Apportionment Board is responsible for drawing General Assembly districts. The Apportionment Board consists of the Governor, the Auditor of State, the Secretary of State, one person chosen by the Speaker of the House and the leader in the Senate of the political party of which the Speaker is a member, and one person chosen by the legislative leaders in the two houses of the political party of which the Speaker is not a member.ⁱⁱ

Organizational procedures

The resolution requires the Governor to convene the Ohio Redistricting Commission only in a year ending in the numeral one, unless the Commission is convened by a court to draw judicially invalidated districts or the Commission must draw new districts following the expiration of a plan adopted under the proposal's



impasse procedure (see "**Method of selecting a district plan**," below). Under the resolution, district boundaries must not be changed at any other time.

The Constitution currently requires the Governor to convene the Apportionment Board between August 1 and October 1 of a year ending in the numeral one, and to give the Board two weeks advance notice of the date, time, and place of the meeting.

At the Commission's first meeting, the proposal requires the Commission to set a schedule for the adoption of procedural rules for the operation of the Commission.

Under the resolution, a simple majority of the Commission generally is required for any organizational action by the Commission. A majority vote of the Commission, including at least one member of the Commission who is a member of each of the two largest political parties represented in the General Assembly, is required to adopt rules of the Commission, to hire staff for the Commission, or to expend funds. However, if the Commission is unable to agree by that vote on the manner in which funds should be expended, each co-chairperson of the Commission has the authority to expend ½ of the funds that have been appropriated to the Commission. Finally, a specified bipartisan vote generally is required to adopt a district plan (see "**Method of selecting a district plan**," below).

The Commission must release a proposed district plan to the public. The proposed plan must be drafted according to the constitutional requirements. After introducing a General Assembly district plan but before adopting a final plan, the Commission must conduct a minimum of three public hearings across the state to present the proposed plan and to seek public input regarding the proposed plan. All meetings of the Ohio Redistricting Commission must be open to the public. Meetings must be broadcast by electronic means of transmission using a medium readily accessible to the general public.

Four weeks after the adoption of a General Assembly district plan, the Commission is automatically dissolved.

Finally, under the resolution, the General Assembly must make the appropriations it determines are necessary in order for the Commission to perform its duties.ⁱⁱⁱ

Method of selecting a district plan

In order to adopt a final district plan, the resolution requires the affirmative vote of four members of the Commission, including at least two members of the Commission who represent each of the two largest political parties represented in the General Assembly. A member of the Commission is considered to represent a political party if



the member was appointed to the Commission by a member of that party or if, in the case of the Governor, the Auditor, or the Secretary of State, the person is a member of that party.

The Commission must adopt a final General Assembly district plan not later than September 1 of a year ending in the numeral one. The plan becomes effective upon filing with the Secretary of State, which the Commission must do promptly.^{iv}

If the Commission fails to adopt a final district plan by that deadline, the Commission must introduce a district plan by a simple majority vote of the Commission. Then, the Commission must hold a public hearing concerning the introduced plan. Members of the Commission should attend the hearing; however, only a quorum of the members of the Commission is required to conduct the hearing. At the hearing, the public may offer testimony, and the Commission may adopt amendments to the introduced plan.

After that hearing is held, and not later than September 15 of that year, the Commission must adopt a final district plan, either by the bipartisan vote described above or by a simple majority vote. If the Commission adopts a plan by that bipartisan vote, the plan remains effective until the next year ending in the numeral one, unless a court convenes the Commission to redraw judicially invalidated districts.

If the Commission adopts a plan by a simple majority vote, the plan remains effective until two general elections for the House of Representatives have occurred under the plan. However, if, before a year ending in the numeral one, the Commission adopts another plan by a simple majority vote to replace a plan adopted under the impasse procedure, the newly adopted plan remains effective until a year ending in the numeral one, unless the Commission is reconstituted and convened by a court to draw judicially invalidated districts.

A plan adopted by a simple majority vote must include a statement explaining what the Commission determined to be the statewide preferences of the voters of Ohio and the manner in which the statewide proportion of districts in the plan whose voters, based on statewide state and federal partisan general election results during the last ten years, favor each political party corresponds closely to those preferences, as described in the procedure for drawing districts (see "**District standards**," below). At the time the plan is adopted, a member of the Commission who does not vote in favor of the plan may submit a declaration of the member's opinion concerning that statement.

When a plan adopted by a simple majority vote ceases to be effective before a year ending in the numeral one, not earlier than July 1 of the year following the year in which the plan ceased to be effective, the Commission must be reconstituted, convene,



and adopt a new General Assembly district plan. The Commission must draw the new plan using the same population and political subdivision boundary data as were used to draw the previous plan.^v

Existing law requires a majority vote of the Apportionment Board to adopt a district plan, and requires the Governor to cause a district plan to be published no later than October 5 of the year in which it is made.^{vi}

District standards

The table below compares the Ohio Constitution's current requirements for drawing General Assembly districts with the requirements proposed by the resolution.

Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
District population requirements	<p>Permits the General Assembly to designate a method for determining the population of the state for purposes of calculating the ratios of representation in the General Assembly, if the federal decennial census is unavailable.</p> <p>Requires the population of each House of Representatives district to be substantially equal to the ratio of representation in the House of Representatives, and generally prohibits a House of Representatives district from containing a population of less than 95% nor more than 105% of the ratio of representation.</p> <p>Specifies that a reasonable effort must be made to draw a county that has between 90% and 95% or 105% and 110% of the ratio of representation in the House of Representatives as a single district.^{vii}</p> <p>Requires the population of each Senate district to be substantially equal to the ratio of representation in the Senate, and prohibits any Senate district from containing a population of less than 95% nor more than 105% of the ratio of representation.^{viii}</p>	<p>Same as the current Constitution, but eliminates the option to draw a county that has a population of between 90% and 95% or 105% and 110% of the ratio of representation in the House of Representatives as a single district.^x</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
	Specifies that each House of Representatives district is entitled to a single representative in each General Assembly and that each Senate district is entitled to a single senator in each General Assembly. ^{ix}	
Legal requirements for districts	No provision.	Requires any plan adopted by the Commission to comply with all applicable provisions of the constitutions of Ohio and the United States and of federal law. ^{xi}
General requirements for House districts	Requires every House of Representatives district to be compact and composed of contiguous territory, and the boundary of each district to be a single nonintersecting continuous line. ^{xii}	Requires every House of Representatives district to be composed of contiguous territory, and the boundary of each district to be a single nonintersecting continuous line. ^{xiii}
Procedure for drawing House districts	<p>Specifies that, to the extent consistent with population requirements, the boundary lines of districts must be so drawn so as to delineate an area containing one or more whole counties.</p> <p>Specifies that, where population requirements cannot feasibly be attained by forming a district from a whole county or counties, the district must be formed by combining the areas of governmental units giving preference, in the order named, to counties, townships, municipalities, and city wards.</p> <p>Specifies that, where governmental units must be divided to meet population requirements, only one such unit may be divided between two districts, giving preference in the selection of a unit for division to a township, a city ward, a city, and a village in the order named.^{xiv}</p> <p>Requires a county having at least one House of Representatives ratio of</p>	<p>Requires House of Representatives districts to be created and numbered in the following order of priority, to the extent that such order is consistent with the foregoing standards.^{xix}</p> <p>(1) Proceeding in succession from the largest to the smallest, each county containing population greater than 105% of the ratio of representation in the House must be divided into as many House districts as it has whole ratios of representation. Any fraction of the population in excess of a whole ratio must be a part of only one adjoining House district.</p> <p>(2) Each county containing population of not less than 95% nor more than 105% of the ratio of representation in the House must be designated a House district.</p> <p>(3) The remaining territory of the state must be divided into House districts by combining the areas of</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
	<p>representation to have as many House of Representatives districts wholly within the boundaries of the county as it has whole ratios of representation, and requires any fraction of the population in excess of a whole ratio to be a part of only one adjoining House of Representatives district.^{xv}</p> <p>Requires each county containing population substantially equal to one ratio of representation in the House of Representatives, but in no event less than 95% of the ratio nor more than 105% of the ratio to be designated a representative district.^{xvi}</p> <p>Requires a reasonable effort to be made to create a House of Representatives district consisting of a whole county, when the county has a population of between 90% and 110% of the ratio of representation.^{xvii}</p> <p>Proceeding in succession from the largest to the smallest, requires each remaining county containing more than one whole ratio of representation to be divided into House of Representatives districts, with the remaining territory within such county containing a fraction of one whole ratio of representation included in one representative district by combining it with adjoining territory outside the county.^{xviii}</p>	<p>counties, municipal corporations, and townships. Where feasible, no county may be split more than once.</p> <p>Provides that in general, a county, municipal corporation, or township is considered to be split if any contiguous portion of its territory is not contained entirely within one district.</p> <p>Specifies that if a municipal corporation or township has territory in more than one county, the contiguous portion of that municipal corporation or township that lies in each county must be considered to be a separate municipal corporation or township for the purposes of drawing House districts.</p> <p>Provides that if a municipal corporation or township that is located in a county that contains a municipal corporation or township that has a population of more than one ratio of representation is split because it is not possible for the Commission to comply with all of the requirements for drawing House districts, the municipal corporation or township must be considered to be a separate municipal corporation or township for the purposes of drawing House districts.</p> <p>Requires House districts to be drawn so as to split the smallest possible number of municipal corporations and townships whose contiguous portions contain a population of more than 50%, but less than 100%, of one ratio of representation.</p> <p>Specifies that where the above requirements cannot feasibly be attained by forming a House district</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
		<p>from whole municipal corporations and townships, not more than one municipal corporation or township may be split per House district.^{xx}</p> <p>Requires the Commission, if it is not possible for the Commission to comply with all of the requirements for drawing House districts in drawing a particular district, to take the first action listed below that makes it possible for the Commission to draw that district:</p> <p>(1) The Commission must create the district by splitting two municipal corporations or townships whose contiguous portions do not contain a population of more than 50%, but less than 100%, of one ratio of representation.</p> <p>(2) The Commission must create the district by splitting a municipal corporation or township whose contiguous portions contain a population of more than 50%, but less than 100%, of one ratio of representation.</p> <p>(3) The Commission must create the district by splitting, once, a single county that contains a population of not less than 95%, but not more than 105%, of the ratio of representation.</p> <p>(4) The Commission must create the district by including in two districts portions of the territory that remains after a county that contains a population of more than 105% of the ratio of representation has been divided into as many House districts as it has whole ratios of representation.</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
		<p>Specifies that if the Commission takes an action listed immediately above, the Commission must include in the district plan a statement explaining which action the Commission took and the reason the Commission took that action.</p> <p>Specifies that if the Commission takes an action listed immediately above in drawing a district and includes the required statement in the district plan, the Commission must not be considered to have violated the applicable requirement for that district, for the purpose of a court's analysis.^{xxi}</p> <p>Requires the Commission to attempt to draw a General Assembly district plan that meets all of the following standards:</p> <ul style="list-style-type: none"> • No district plan shall be drawn primarily to favor or disfavor a political party. • The statewide proportion of districts whose voters, based on statewide state and federal partisan general election results during the last ten years, favor each political party must correspond closely to the statewide preferences of the voters of Ohio. • General Assembly districts must be compact. <p>Specifies that nothing in those provisions permits the Commission to violate the other General Assembly district standards described in the resolution.^{xxii}</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
<p>General requirements for Senate districts</p>	<p>Requires Senate districts to be composed of three contiguous House of Representatives districts.^{xxiii}</p>	<p>Requires Senate districts to be composed of three contiguous House of Representatives districts.^{xxiv}</p> <p>Requires every Senate district to be composed of contiguous territory, and the boundary of each district to be a single nonintersecting continuous line.^{xxv}</p>
<p>Procedure for drawing Senate districts</p>	<p>Requires a county having at least one whole Senate ratio of representation to have as many Senate districts wholly within the boundaries of the county as it has whole Senate ratios of representation, and requires any fraction of the population in excess of a whole ratio to be a part of only one adjoining Senate district.</p> <p>Specifies that counties having less than one Senate ratio of representation, but at least one House of Representatives ratio of representation, must be part of only one Senate district.^{xxvi}</p>	<p>Same as the current Constitution, but specifies that if it is not possible for the Commission to draw House districts that comply with all of the requirements of Article XI and that make it possible for the Commission to comply with those requirements, the Commission must draw Senate districts so as to commit the fewest possible violations of those requirements.</p> <p>Specifies that if the Commission complies with the above procedure in drawing Senate districts, the Commission must not be considered to have violated the applicable requirement in drawing those districts, for the purpose of a court's analysis.^{xxvii}</p>
<p>Senators whose terms will not expire</p>	<p>Specifies that, when district boundaries are changed, a senator whose term will not expire within two years of the time the plan of apportionment is made must represent, for the remainder of the term for which the senator was elected, the Senate district that contains the largest portion of the population of the district from which the senator was elected, and requires the district to be given the number of the district from which the senator was elected.</p>	<p>Generally retains the current constitutional provision for numbering a Senate district when the term of the senator who represents the district does not immediately expire.</p> <p>Requires the district plan itself to designate which senator will represent a district if more than one senator would represent that district.^{xxix}</p>



Topic	Article XI, Ohio Constitution	Am. Sub. H.J.R. 12
	Specifies that, if more than one senator whose term will not so expire would represent the same district by following these provisions, the persons responsible for apportionment, by a majority vote, must designate which senator will represent the district and designate which district the other senator or senators will represent for the balance of their term or terms. ^{xxviii}	
Preservation of previous district boundaries	Requires district boundaries established by the preceding apportionment to be adopted to the extent reasonably consistent with the population requirements. ^{xxx}	No provision.
Political subdivision boundaries to be used	Notwithstanding the fact that the boundaries of political subdivisions within a district may be changed, requires the Commission to create district boundaries by using the boundaries of political subdivisions as they exist at the time of the federal decennial census on which the redistricting is based, or if the census is unavailable, on a basis the General Assembly specifies. ^{xxxii}	Same as the current Constitution. ^{xxxii}

Legal challenges

Under the resolution, if any section of the Constitution relating to redistricting, any General Assembly district plan, or any district is determined to be invalid by an unappealed final order of a court of competent jurisdiction, then the Commission must be reconstituted and convene to adopt a district plan that conforms with the provisions of the Constitution that are then valid. Currently, the Constitution requires new districts to be drawn if provisions of the Constitution or a district plan are determined to be invalid by either the Ohio Supreme Court or the U.S. Supreme Court.

The proposal prohibits a court, in any circumstance, from ordering the implementation or enforcement of any plan that has not been approved by the Commission. And, the resolution prohibits a court from ordering the Commission to adopt a particular General Assembly district plan or to draw a particular district.



The resolution also prescribes the available remedies in the event that the Ohio Supreme Court determines that a General Assembly district plan adopted by the Commission does not comply with the constitutional district standards, other than the standards concerning political parties, party preferences, and compactness.

First, if the Court determines that a district plan contains one or more isolated violations of those standards, the court must order the Commission to amend the plan to correct the violations.

Further, the proposal specifies that if the court finds that it is necessary to amend not fewer than six House districts to correct violations of those requirements, to amend not fewer than two Senate districts to correct violations of those requirements, or both, the court must declare the plan invalid and order the Commission to adopt a new plan.

Third, if, in considering a district plan adopted by a simple majority of the Commission under the proposal's impasse procedure (see "**Method of selecting district plans**," above), the Court determines that both of the following are true, the Court must order the Commission to adopt a new district plan:^{xxxiii}

- The plan significantly violates those standards in a manner that materially affects the ability of the plan to contain districts whose voters favor political parties in an overall proportion that corresponds closely to the statewide political party preferences of the voters of Ohio, as described in the procedure for drawing districts (see "**District standards**," above).
- The statewide proportion of districts in the plan whose voters, based on statewide state and federal partisan general election results during the last ten years, favor each political party does not correspond closely to the statewide preferences of the voters of Ohio.

The resolution relocates but otherwise retains provisions specifying that the Ohio Supreme Court has exclusive, original jurisdiction in all cases arising under Article XI and that a new redistricting plan made as a result of a legal challenge must allow 30 days for persons to change residence in order to be eligible for election. Relocated but otherwise continuing law also specifies that the various provisions of Article XI are intended to be severable, and that the invalidity of one or more of the provisions does not affect the validity of the remaining provisions.^{xxxiv}

Finally, the resolution eliminates a requirement that the Governor give the Apportionment Board two weeks advance written notice of the date, time, and place of any meeting held pursuant to a court order invalidating a district plan.^{xxxv}



Miscellaneous

The resolution repeals the current constitutional provision that describes the district plans that were in effect until January 1, 1973.^{xxxvi}

Effective date

The resolution places the proposal on the ballot on November 3, 2015. If adopted by a majority of electors voting on it, the proposal takes effect January 1, 2021.

HISTORY

ACTION	DATE
Introduced	11-13-14
Reported, H. Policy & Legislative Oversight	12-04-14
Adopted House (80-4)	12-04-14
Reported, S. Rules	12-11-14
Adopted Senate (28-1)	12-11-14
House concurred in Senate amendments (82-8)	12-17-14
House concurred in Senate amendments upon reconsideration (81-7)	12-17-14

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ⁱ Ohio Const. Art. XI, Sec. 1(A).

ⁱⁱ Ohio Const. Art. XI, Sec. 1(A).

ⁱⁱⁱ Ohio Const. Art. XI, Sec. 1.

^{iv} Ohio Const. Art. XI, Sec. 1.

^v Ohio Const. Art. XI, Sec. 8.

^{vi} Ohio Const. Art. XI, Sec. 1.

^{vii} Ohio Const. Art. XI, Sec. 3 and 9.

^{viii} Ohio Const. Art. XI, Sec. 4.

^{ix} Ohio Const. Art. XI, Sec. 5.

^x Ohio Const. Art. XI, Sec. 3(A) and (B).

^{xi} Ohio Const. Art. XI, Sec. 3(B).

^{xii} Ohio Const. Art. XI, Sec. 7.

^{xiii} Ohio Const. Art. XI, Sec. 3(B).

^{xiv} Ohio Const. Art. XI, Sec. 7.

^{xv} Ohio Const. Art. XI, Sec. 8.

^{xvi} Ohio Const. Art. XI, Sec. 10.

^{xvii} Ohio Const. Art. XI, Sec. 9.

^{xviii} Ohio Const. Art. XI, Sec. 10.

^{xix} Ohio Const. Art. XI, Sec. 3(C).

^{xx} Ohio Const. Art. XI, Sec. 3(D).



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- xxi Ohio Const. Art. XI, Sec. 3(E).
 - xxii Ohio Const. Art. XI, Sec. 6.
 - xxiii Ohio Const. Art. XI, Sec. 11.
 - xxiv Ohio Const. Art. XI, Sec. 4.
 - xxv Ohio Const. Art. XI, Sec. 3.
 - xxvi Ohio Const. Art. XI, Sec. 11.
 - xxvii Ohio Const. Art. XI, Sec. 4(B)(3).
 - xxviii Ohio Const. Art. XI, Sec. 12.
 - xxix Ohio Const. Art. XI, Sec. 5.
 - xxx Ohio Const. Art. XI, Sec. 7.
 - xxxi Ohio Const. Art. XI, Sec. 6.
 - xxxii Ohio Const. Art. XI, Sec. 7.
 - xxxiii Ohio Const. Art. XI, Sec. 9.
 - xxxiv Ohio Const. Art. XI, Secs. 9 and 10. (Relocated from Secs. 13 and 15.)
 - xxxv Ohio Const. Art. XI, Sec. 14.
 - xxxvi Repeal of existing Ohio Const. Art. XI, Sec. 14.

