

March 12, 2019

Ohio Office of Attorney General
30 E. Broad St., 14th Floor
Columbus, OH 43215

Dear Ohio Attorney General Dave Yost or designee,

Whereas, in all relevant requests below, "Buckeye Firearms Association staff, lobbyists and/or representatives" may include but are not limited to the following individuals and contact information:

- a. Dean Rieck, 614-882-8823, drieck@buckeyefirearms.org
- b. Jim Irvine, 440-503-3011, jirvine@buckeyefirearms.org
- c. Sean Maloney, 513-484-0142, smaloney@buckeyefirearms.org
- d. Rick Kaleda, 330-979-3585, rkaleda@buckeyefirearms.org
- e. Linda Walker, 614-668-9777, lwalker@buckeyefirearms.org
- f. Joe Eaton, 513-267-6088, jeaton@buckeyefirearms.org
- g. Rick Jones, 740-352-4436, rjones@buckeyefirearms.org
- h. Buckeye Firearms Association, 614-715-4867, PO Box 357, Greenville, OH 45331,

Pursuant to Ohio's open records law, R.C. §§ 149.43-149.44, I am requesting the following records:

1. All Executive Correspondence (GAR-CM-01) between Attorney General Dave Yost, the Office of the Attorney General, any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
2. All General Correspondence (GAR-CM-02) between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
3. All Transient Documents (GAR-CM-05) between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
4. All Postal Records, Registered Mail, Insured Mail Logs, and Metered Records (GAR-OES-09) between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General,

and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.

5. All Telephone Logs, Bills, and Call Records (GP-M-03) between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, and/or the phone number 614-715-4867, between Jan. 14, 2019 and March 6, 2019.
6. All Minutes of Agency Staff Meetings (GAR-RPM-08) including Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
7. All Visitor's Log (GAR-RPM-10) records containing any staff, lobbyists, and/or representatives of the Buckeye Firearms Association between between Jan. 14, 2019 and March 6, 2019.
8. All "Responses: Informal Opinions, Advisory Letters, Memoranda" (OW-AGO-10) between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
9. All Amicus Brief Files (OW-AGO-05) filed by the Office of Attorney General to the U.S. Supreme Court between Jan. 14, 2019 and March 6, 2019.
10. All Court Case Files (OW-AGO-13) generated in service to the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
11. All Special Projects Files (OW-AGO-17) generated in service to the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.
12. All Working Group Files (OW-AGO-19) on gun and firearms issues generated between Jan. 14, 2019 and March 6, 2019.
13. All Calendars, Appointment Books and Itineraries (OW-AGO-25) that include the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.

14. All Phone System Recordings (OW-AGO-26) of any call between Attorney General Dave Yost, the Office of the Attorney General, and/or any staff or representatives of the Office of the Attorney General, and the Buckeye Firearms Association and/or any staff, lobbyists, or representatives of the Buckeye Firearms Association, between Jan. 14, 2019 and March 6, 2019.

I request that these records be sent to my email address, ddewitt@ohiodems.org, in order to reduce costs. If, for some reason, that is not possible, I am willing to provide blank CD's or DVD's or USB. As the custodian of these records, I am sure you are aware that requestors have the right to choose the medium on which the records are copied. R.C. § 149.43(B)(6).

Please note that that materials stored on private computers or in private emails may constitute a public record if it documents the organization, functions, policies, procedures, operations or other activities of the public office. *State ex rel. Glasgow v. Jones*, 119 Ohio St.3d 391, 2008-Ohio-4788, ¶ 23 (relator conceded that e-mail messages created or received by her in her capacity as state representative that document her work-related activities constitute records subject to disclosure under R.C. 149.43 regardless of whether it was her public or her private e-mail account that received or sent the e-mail messages).

If you or your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. I agree to pay reasonable copying and postage fees of not more than \$10. If the cost would be greater than this amount, please notify me before making any copies. Please provide a receipt indicating the charges for each document.

I would request your response within ten (10) business days. If any portion of this request requires extended time to prepare, please produce materials as available rather than delaying production of the entire request.

If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. I understand that some of these records contain personal identifying information, such as Social Security numbers, that will need to be redacted before production. To the extent any requested document contains such information that, by law, you cannot produce in a public records request, I will accept a redacted copy of such documents with the impermissible information redacted. If any requested document is not being produced under the assertion of any legal privilege, I request that you also produce a privilege log that clearly identifies the item and the specific legal privilege being asserted to deny production.

Please be advised that I am prepared to pursue whatever legal remedy necessary to obtain access to the requested records. I would note that violation of the open records

law can result in the award of court costs and reasonable attorney fees. See R.C. § 149.43(C).

Thank you for your assistance in this matter. Please do not hesitate to contact me if you should have any questions.

Sincerely,

David DeWitt
Deputy Communications Director
Ohio Democratic Party
340 E. Fulton St.
Columbus, OH 43215