

IN THE SUPREME COURT OF OHIO

<p>STATE OF OHIO EX REL. KEITH POOL, <i>Relator,</i></p> <p>v.</p> <p>CITY OF SHEFFIELD LAKE and MAYOR DENNIS BRING, <i>Respondents.</i></p>	
<p>VERIFIED PETITION FOR WRIT OF MANDAMUS</p>	

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Counsel for Relator Keith Pool

Relator Keith Pool respectfully alleges as follows:

PARTIES

1. Relator Keith Pool resides in Sheffield Lake, Ohio.
2. Respondent City of Sheffield Lake is a political subdivision of the State of Ohio located in Cuyahoga County and a “public office” within the meaning of the Ohio Public Records Act, R.C. 149.43.
3. Respondent Dennis Bring is the Mayor of the City of Sheffield Lake and the Director of the City’s Department of Public Safety, which includes the Division of Police. Respondent Bring, as Mayor and Director of Public Safety, is a “person responsible” for the City of Sheffield Lake’s public records within the meaning of the Public Records Act.
4. As the public office and person responsible for the public records this office holds, Respondents are obligated by the Public Records Act to promptly prepare public records and either produce copies or make records available for inspection and copying upon request under R.C. 149.43(B).

JURISDICTION AND VENUE

5. This Court has jurisdiction over this Petition under the Ohio Constitution at Article IV, Section 2, which establishes the Court’s original jurisdiction over petitions for writs of mandamus; Supreme Court Rule 17, which governs original actions brought before the Court; R.C. 2731.02 *et seq.*, which governs mandamus actions;

and the Public Records Act, R.C. 149.43, which confers the right upon all members of the public to seek public records.

6. Venue is proper under R.C. 2731.02 and R.C. 149.43(C).

FACTS

7. Relator Keith Pool is a police officer employed by the City of Sheffield Lake, where he has worked since September 9, 2020. He takes pride in working to protect the safety of his community. *See* Affidavit of Keith Pool at ¶¶ 3–4 (attached to this petition as Ex. 1).
8. When Officer Pool was hired, he was the only Black employee in the Division of Police. *Id.* at ¶ 5.

The Incident of June 25, 2021

9. On June 25, 2021, Officer Pool walked to the desk in the booking area, where he observed a folded piece of paper placed on top of his raincoat. The paper was placed over the “POLICE” logo, as if to replace it, and it contained three typed words: “Ku Klux Klan.” *Id.* at ¶¶ 6–8, 37; Ex. 1-F, Surveillance video from City of Sheffield Lake police station on June 25, 2021 (depicting then-Chief Campo taking the Ku Klux Klan sign from the department copier, folding it, and placing it on Relator’s coat).
10. Officer Pool was upset by this Ku Klux Klan label and wondered whether it was intended to convey a threat. *Id.* at ¶¶ 9–10.

11. Then-Chief of Police Anthony Campo, Officer Pool's superior officer and boss, told another officer, who was present, go to look at what he placed on Officer Pool's coat, referring to the Ku Klux Klan label. *Id.* at ¶ 11.
12. The following is a still image from the surveillance video (Ex. 1-F) showing Mr. Campo placing the KKK sign on Officer Pool's raincoat:



13. Mr. Campo, apparently believing his KKK sign was humorous, chided and cajoled Officer Pool and his fellow employees in the vicinity to join in Mr. Campo's amusement at this "joke." *Id.* at ¶ 12.
14. Officer Pool was not amused in the least. He was shocked and upset. *Id.* at ¶ 13.
15. Continuing with the "joke," Mr. Campo fashioned and placed upon his head a pointy white hat meant to represent the headwear worn by Ku Klux Klan members. *Id.* at ¶ 14, 38; Ex. 1-G, surveillance video from City of Sheffield Lake

police station on June 25, 2021 (depicting then-Chief Campo making and wearing Ku Klux Klan hat).

16. The following is a still image from the surveillance video (Ex. 1-G) showing Mr. Campo wearing the KKK hat with Officer Pool in the foreground (holding his raincoat) and two other employees present:



17. Mr. Campo wore this makeshift Ku Klux Klan hat while sitting in a location where Officer Pool and other employees could see him. Ex. 1 at ¶ 14.
18. Officer Pool was upset at seeing his boss adorn himself with this racist symbol. *Id.* at ¶ 15.
19. Mr. Campo told Officer Pool that Officer Pool should wear a KKK hat when he went on his next call. *Id.* at ¶ 16.

20. The union raised concerns to Respondent Bring by submitting a public-records request on June 29, 2021. *See* Ex. 2, Affidavit of Jessica Savoie at ¶ 17 and Ex. 2-J, letter from George Gerken to D. Bring, CAMPO 00418.
21. Respondent Bring informed Mr. Campo that he would be placed on administrative leave pending an investigation into the June 25, 2021 incident. *See* Ex. 2 at ¶ 18 and Ex. 2-K, letter from D. Bring to A. Campo, CAMPO 000105.
22. Later that day, Mr. Campo submitted his notification of retirement, which Respondent Bring accepted. *See* Ex. 2 at ¶ 19 and Ex. 2-L, letter from A. Campo to Sheffield Lake Finance Director, CAMPO 000104; Ex. 2 at ¶ 20 and Ex. 2-M, letter from D. Bring to A. Campo, CAMPO 000103.

Officer Pool's July 30, 2021 public-records request

23. On July 30, 2021, Officer Pool, through counsel, made a public-records request to Respondent City of Sheffield Lake, directed to Respondent Bring, for the following categories of records:
 - (1) The complete personnel or employment records (including records of training and discipline) for former-Chief of Police Anthony Campo, including his letter of resignation/retirement;
 - (2) Records of complaints or grievances/appeals alleging any wrongdoing by Anthony Campo, along with the records created during the grievance/appeal process, including any notes of meetings with the grievant(s) and any communications related to the grievance/appeal;
 - (3) Complaints received by Mayor Bring about Mr. Campo and any communications related to these complaints;

- (4) The complete personnel or employment records (including records of training and discipline) for Officer Keith Pool;
- (5) City employment policies, specifically including equal-opportunity employment policies, in effect from 2018 through the present;
- (6) Video recordings of Mr. Campo at the police department on June 25, 2021, specifically including but not limited to video of him (1) wearing a makeshift Ku Klux Klan hat and placing a "Ku Klux Klan" sign on Officer Pool's jacket;
- (7) Images of Officer Pool or any other City employee created using "www.faceinhole.com" or any "Face in Hole" app, including any documents printed and maintained in the Division of Police and any image files saved and/or downloaded to the Division of Police compute used by Mr. Campo or on the printer/copier Mr. Campo used to print such images;
- (8) Images or records Mr. Campo created referring to Black Lives Matter or "BLM;"
- (9) Memoranda or other directives issued by Mr. Campo;
- (10) Communications between Mr. Campo and Mayor Bring regarding Officer Pool, including written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform;
- (11) Communications between Mr. Campo and any sergeant in the police department regarding Officer Pool, including all written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform;
- (12) Communications between Mr. Campo and Officer Pool, including all written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform.

See public-records request from J. Savoie on behalf of Relator to D. Bring dated Jul.

30, 2021 (attached as Ex. 2-A and Ex. 1-A).

24. Officer Pool specified that Respondents could limit Items 4–12 to records from the past two years but asked for all records for Items 1–3, regardless of time periods designated in any collective-bargaining agreement for maintaining such records in a personnel file or for disciplinary purposes. *Id.*
25. After providing two partial responses on August 20 and August 27, 2021, Respondents’ outside counsel agreed in a September 7, 2021 telephone discussion with Relator’s counsel to complete Respondents’ response to the public-records request by September 21, 2021. Ex. 2, Aff. of J. Savoie, ¶ 7; Ex. 2-D, email from J. Savoie to A. Herman, Sep. 7, 2021.
26. Respondents’ attorney subsequently advised via email: “I believe we can have the remaining responsive documents to you no later than September 21, 2021.” Ex. 2, Aff. of J. Savoie, ¶ 9; Ex. 2-E, email from A. Herman to J. Savoie, Sep. 7, 2021.
27. Despite having provided Officer Pool with a date certain (September 21, 2021) for completing the response to his July 30, 2021 public-records request, Respondents provided no additional records by the promised date. Ex. 2, Aff. of J. Savoie, ¶ 10.
28. On September 22, 2021, Officer Pool’s counsel sent a follow-up email to Respondents’ counsel advising that continued delay was unreasonable and requesting the City’s complete response to the public-records request by September 24, 2021. Ex. 2, Aff. of J. Savoie, ¶ 11; Ex. 2-F, email from J. Savoie to A. Herman, Sep. 22, 2021.

29. Respondents' counsel responded on September 23, 2021, advising that counsel's law firm had been working with an outside information-technology vendor to gather records and promising that Respondents would provide a complete response by September 24, 2021. Ex. 2, Aff. of J. Savoie, ¶ 12; Ex. 2-G, email from A. Herman to J. Savoie, Sep. 23, 2021.
30. On September 24, 2021, Respondents produced additional documents, but the production did not include all records responsive to the request. Ex. 2, Aff. of J. Savoie, ¶¶ 13, 14, 16, 23–26; Ex. 1, Aff. of Keith Pool, ¶¶ 18–36.
31. Despite having provided Officer Pool with a second date certain (September 24, 2021) for completing the response to his July 30, 2021 public-records request, Respondents still have not provided all responsive records. Ex. 2, Aff. of J. Savoie, ¶¶ 13, 14, 16, 23–26; Ex. 1, Aff. of Keith Pool, ¶¶ 18–36.
32. In their responses of August 20, August 27, and September 24, 2021, Respondents provided, through outside counsel, the following records:
 - (1) Personnel files of Anthony Campo (CAMPO 000001–260) and Keith Pool (CAMPO 000261–300);
 - (2) Sheffield Lake's written policies on hiring (CAMPO 000301–44), uniforms (CAMPO 000347–48 and 000353–54), tobacco use (CAMPO 000349–52), and patrol rifle program (CAMPO 000355–58);
 - (3) Undated memorandum from Anthony Campo regarding department firearms (CAMPO 000359–60);
 - (4) Emails from individuals to Dennis Bring (mayorbring@gmail.com) regarding the incident of June 25, 2021 in which Anthony Campo

placed a "KKK" sign on Officer Keith Pool's raincoat and in which Mr. Campo also made and wore a makeshift Ku Klux Klan hat in Officer Pool's presence (and emails from Mayor Bring responding to or forwarding these emails) (CAMPO 000361-363, 366-73, 382-97, 405-06, 409-13, 425);

- (5) OPBA letter of agreement (CAMPO 000364-65);
- (6) Copies of summons received in *Maiya McCoy, et al. v. City of Sheffield Lake Police Department, et al.* (CAMPO 000374-79, 414-17);
- (7) Email exchange between Dennis Bring and Richard Geran dated November 26, 2018, which was forwarded to Anthony Campo (CAMPO 000380-81);
- (8) Email exchange between Dennis Bring and Brandy Randolph dated 8/20/2020 and 8/23/2020 (CAMPO 000398-00);
- (9) Sheffield Lake's City Council Meeting minutes from August 25, 2020 (CAMPO 000401-04);
- (10) Email exchange between cityofsheffieldlake@gmail.com and Lisa Parker dated July 1, 2021 (CAMPO 000407-08);
- (11) Public-records request from George Gerken dated June 29, 2021 (CAMPO 000418);
- (12) Letters from Dennis Bring to Anthony Campo dated June 29, 2021 (CAMPO 000419 and CAMPO 000421);
- (13) Letter from Anthony Campo to Tammy Smith dated June 29, 2021 (CAMPO 000420);
- (14) Email from phastingslead@gmail.com to Anthony Campo dated November 13, 2019 with no content in body of email (CAMPO 000422);
- (15) Emails from Anthony Campo to Brandy Randolph dated August 20, 2020 (CAMPO 000423) and May 21, 2017 (CAMPO 000426), and from Anthony Campo to Heather Cloutier dated September 2, 2020 (CAMPO 000424);

(16) Email from David Graves to James Burge dated July 7, 2021 (CAMPO 000427).

(17) Video and photograph files from June 25, 2021.

Ex. 2, Aff. of J. Savoie, ¶ 14; Ex. 2-I, letter from J. Savoie to A. Herman, Sep. 29, 2021.

33. On September 29, 2021, Office Pool's counsel asked Respondents' counsel via letter whether Respondents' response to Relator's request was complete. *See* Ex. 2-I, letter from J. Savoie to A. Herman, Sep. 29, 2021.
34. Respondents' counsel never responded to this letter or otherwise advised regarding whether the City's response to Officer Pool's July 30, 2021 public-records request was complete. Ex. 2, Aff. of J. Savoie, ¶ 15.

Respondents' deficient response

35. Despite twice providing a date certain by which their public-records response would be completed, Respondents have demonstrably failed to provide all records responsive to Officer Pool's July 30, 2021 request.
36. Respondents have not provided any of the following records:
- a. Records of training provided to Mr. Campo and Officer Pool regarding equal employment opportunity and diversity issues (Items Nos. 1 and 4);
 - b. Complaints received by Mayor Bring about Mr. Campo and any communications related to these complaints (Item No. 3);
 - c. Images of Officer Pool or any other City employee created using "www.facein角度.com" or any "Face in Hole" app, including any

documents printed and maintained in the Division of Police and any image files saved and/or downloaded to the Division of Police computer used by Mr. Campo or on the printer/copier Mr. Campo used to print such images (Item No. 7);

- d. Images or records Mr. Campo created referring to Black Lives Matter or “BLM” (Item 8);
- e. Communications between Mr. Campo and Mayor Bring regarding Officer Pool (Item No. 10);
- f. Communications between Mr. Campo and any sergeant in the police department regarding Officer Pool (Item No. 11);
- g. Communications between Mr. Campo and Officer Pool (Item No. 12).

Ex. 2, Aff. of J. Savoie, ¶ 27.

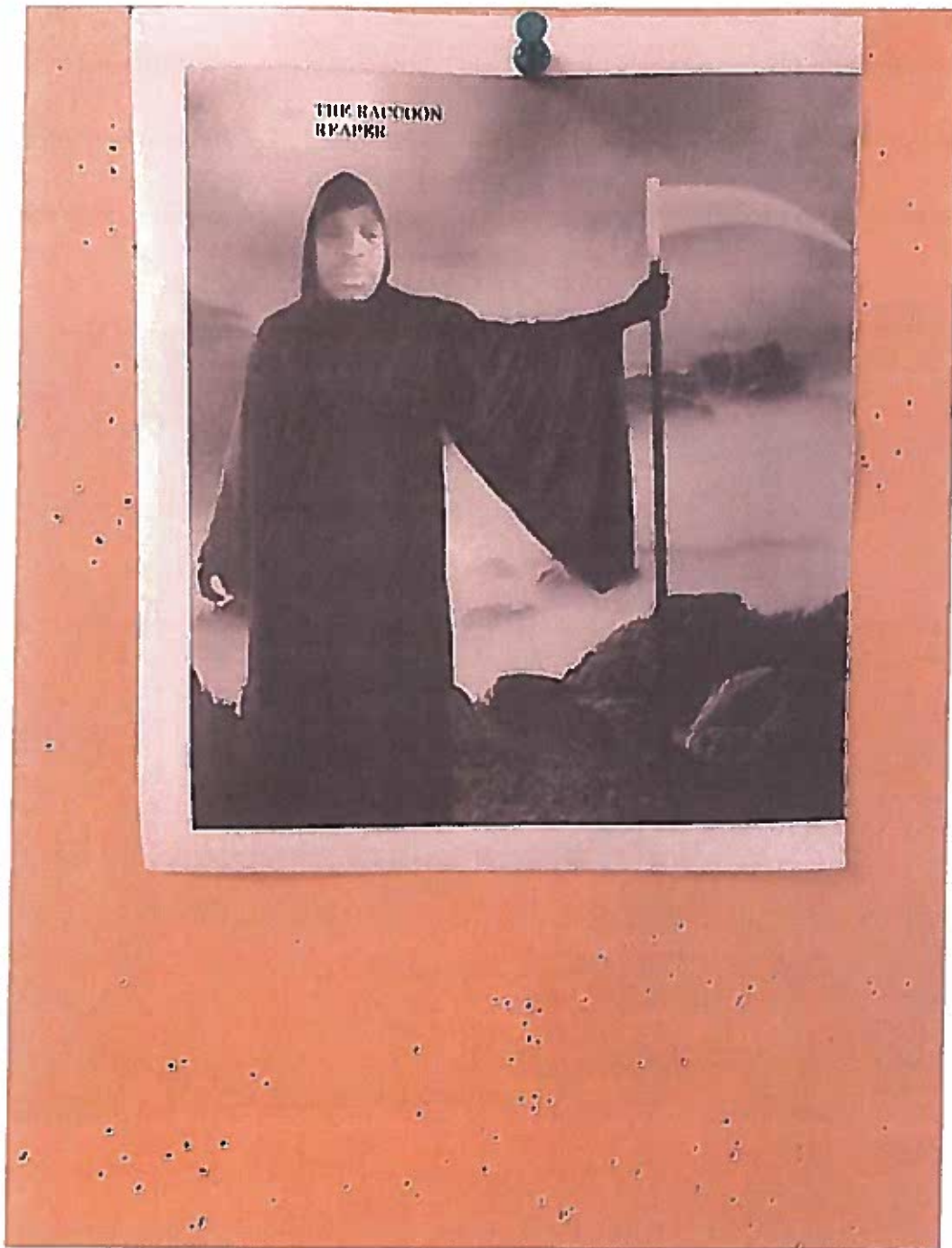
37. For each category for which Respondents did not provide records, Respondents have not asserted any legal exemption to justify withholding the records and have not advised that the records were destroyed or otherwise do not exist. Ex. 2, Aff. of J. Savoie, ¶¶ 23–24; Ex. 2-B, letter from A. Herman to J. Savoie dated Aug. 20, 2021; Ex. 2-C, letter from A. Herman to J. Savoie dated Aug. 27, 2021; Ex. 2-H, letter from A. Herman to J. Savoie dated Sep. 24, 2021.
38. Officer Pool has personal knowledge that additional records responsive to his request exist or existed, but Respondents have not produced these records, have not asserted any legal exemption to justify withholding the records, and have not advised that the records were destroyed. Ex. 1, Aff. of Keith Pool, ¶¶ 18–36; Ex. 2, Aff. of J. Savoie, ¶¶ 23–24.

39. As detailed below, Officer Pool has personal knowledge of at least two categories of records that exist but that Respondents did not produce in response to his request: the “Face in Hole” images Mr. Campo created (Item 7, for which Respondents produced no records) and memoranda or directives issued by Mr. Campo (Item 9, for which Respondents produced some but not all records). *See* Ex. 1, Aff. of Keith Pool, ¶¶ 18–36.

“Face in Hole” images (Item 7)

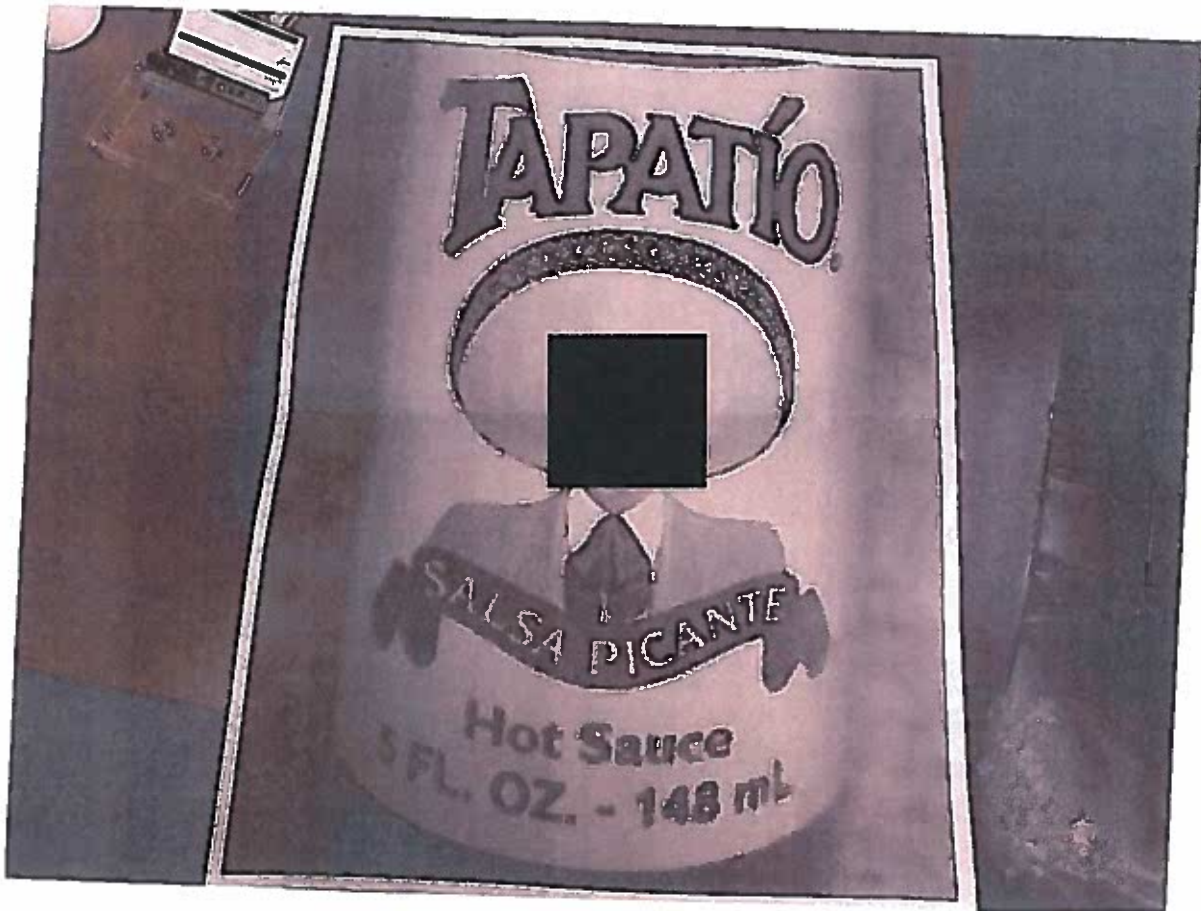
40. As Chief of Police for Respondent City of Sheffield Lake, Mr. Campo regularly created images using a website or application called “Face in Hole,” available at <https://www.faceinhole.com/scenarios>, while he was working at the police station. Ex. 1, Aff. of Keith Pool, ¶ 20.
41. “Face in Hole” functions like a crude version of Photoshop: it allows users to select a photo image with a white “hole” where the subject’s face would be and allows the user to upload an image of a face to situate within the “hole.” *Id.* at ¶ 19. *See also* <https://www.faceinhole.com/scenarios>.
42. Officer Pool has seen “Face in Hole” images Mr. Campo created on his Division of Police computer and printed on a Division of Police printer/copier because Mr. Campo publicly posted or displayed the “Face in Hole” images on Division of Police bulletin boards, placed them on employees’ desks, and otherwise gave them to employees.. *Id.* at ¶¶ 20–22.

43. Most, if not all, of the “Face in Hole” images Mr. Campo created were offensive in nature, making fun of employees based on their race, ethnic background, religion, culture, and sexual orientation. *Id.* at ¶ 20. They included, but are not limited to, the following Face-in-Holes:
- a. Face-in-Holes mocking employees’ race or ethnic background, *Id.* at ¶¶ 24–26;
 - b. Face-in-Holes mocking an employee’s religion, *Id.* at ¶ 27; and
 - c. A Face-in-Hole containing a homophobic slur and an employee’s face, *Id.* at ¶ 28.
44. With the most offensive “Face in Hole” images, Mr. Campo would print and show them to Division of Police employees and then shred them in the Division of Police shredder. *Id.* at ¶ 21.
45. The “Face in Hole” image attached as Exhibit 1-B and shown below is a Face-in-Hole Mr. Campo created and posted publicly on the Division of Police bulletin board. The image, which includes Officer Pool’s face, depicts him as the grim reaper and includes the caption “The Raccoon Reaper.”



See Ex. 1, ¶ 25.

46. The "Face in Hole" image attached as Exhibit 1-C is a Face-in-Hole Mr. Campo created and posted publicly on a bulletin board in the police station, and it depicts a Latino employee of Respondent City of Sheffield Lake Division of Police on a bottle of Tapatio Salsa Picante hot sauce wearing a sombrero and a moño charro:



See Ex. 1, ¶ 26.

47. Respondents did not produce these or other "Face in Hole" images in response to Relator's July 30, 2021 public-records request. *Id.* at ¶ 31; Ex. 2, Aff of J. Savoie at ¶ 23.

48. Officer Pool recalls seeing other “Face in Hole” images—in addition to the ones listed above— publicly displayed or distributed by Mr. Campo at the Division of Police. Ex. 1, Aff. of Keith Pool, at ¶ 29.
49. Respondent Bring, who is the Mayor and Safety Director for the City of Sheffield Lake, regularly came to the station on days when Mr. Campo had posted “Face in Hole” images on bulletin boards. *Id.* at ¶ 30.
50. The fact that these records exist and that Respondents did not produce them means that Respondents’ response to Officer Pool’s July 30, 2021 public-records request is incomplete.
51. These records are public records under the Public Records Act because they document the activities of the Division of Police, including former Chief of Police Campo’s actions and decisions to harass employees based on protected characteristics including race, ethnic background, religion, culture, and sexual orientation— while using Division of Police time and resources.
52. These records were not Mr. Campo’s private, personal records because Mr. Campo often publicly posted these records on Division of Police bulletin boards, making them visible to all employees and anyone who went to the police station.
53. These records were also not Mr. Campo’s personal records because he often distributed these records to Division of Police employees in a public manner.

Memoranda or Directives Issued by Mr. Campo (Item 9)

54. Officer Pool has personal knowledge that Mr. Campo created and distributed memoranda and directives that Respondents have not produced in response to his request.
55. Mr. Campo created and distributed the memorandum attached as Exhibit 1-D within the two-year period for which Officer Pool requested records. *See* Ex. 1, ¶ 34. The memorandum, dated April 14, 2021, provided as follows:

To: Patrol Division 04/14/21

Today on my way to work around 8:45AM I observed a couch on the tree lawn at 745 Irving Park. Bulk trash pick up is not until 04/27/21.

At 2:30 I noticed it was still there. I would have thought our day shift patrol would have patrolled Irving Park and seen this big ole couch sitting there, silly me.

I should have taped a comp time card to it, someone would have surely seen it.

Chief Tony Campo

Ex. 1-D.

56. Mr. Campo created and distributed the memorandum attached as Exhibit 1-E within the two-year period for which Officer Pool requested records. *See* Ex. 1,

¶ 35. This memorandum, dated April 15, 2021, provides as follows:

TO: PATROL DIVISION 04/15/21

RE: PATROLING WITH YOUR EYES OPEN

A.K.A. LAZINESS

A CAR WAS PARKED IN A FRONT YARD OF A RESIDENCE ON HARRIS ROAD FOR OVER TWO DAYS, I DROVE BY IT EVERY TIME I LEFT THE STATION.

NO-ONE ELSE HERE SAW IT ? THE CAR SAT THERE FOR TWO DAYS, THAT'S SIX SHIFTS AND NO-ONE SAW IT ? IT WOULD STILL BE SITTING THERE IF I DIDN'T SEND SOMEONE TO DEAL WITH IT. I GUESS I MISSED THE PART OF THE CONTRACT THAT SAYS EMPLOYEES CAN BE LAZY AND IGNORE THE ORDINANCES THEY TOOK AN OATH TO ENFORCE, **PATHETIC.**

THE CHIEF

Ex. 1-E.

57. Respondents did not produce the memoranda above (and attached to this petition as Ex. 1-D and 1-E to Officer Pool's Affidavit) in response to Officer Pool's July 30, 2021 public-records request. *See* Ex. 1, ¶¶ 34–35.

58. Officer Pool recalls seeing the memoranda referenced above and additional memoranda that Respondents did not provide in response to his July 30, 2021 public-records request. *See* Ex. 1, ¶ 36.
59. These records are public records under the Public Records Act because they document the activities of the Division of Police and the decisions of its chief in directing employees in their work.
60. The fact that these records exist and that Respondents did not produce them means that Respondents' response is incomplete.

VIOLATIONS OF THE OHIO PUBLIC RECORDS ACT

61. Under R.C. 149.43(B)(1), a public office or person responsible for public records shall make copies of requested public records available to the requester within a reasonable period of time.
62. One hundred and four days have passed between Relator's request and the date of this petition.
63. One hundred and four days is not a reasonable delay to provide public records, particularly when a municipality is working with an outside law firm and information-technology vendor to respond to the public-records request.
64. One hundred and four days is not a reasonable delay to provide public records, particularly when a municipality has the option of offering to make the records

available to the requester to review instead of undertaking the copying and production.

65. Well-informed public officials would not withhold public records they knew to exist nor instruct or permit the municipality's outside counsel to do so.
66. Well-informed public officials would not withhold public records without asserting a legally valid exemption or instructing the municipality's outside counsel to do so.
67. Well-informed public officials would not continue to entrust a public office's statutory public-records duties to an outside law firm that failed to timely provide existing records as required by R.C. 149.43.
68. A writ of mandamus compelling production of these records would serve the public interest because "[i]t has long been the policy of this state, as reflected in the Public Records Act and as acknowledged by this [C]ourt, that open government serves the public interest and our democratic system." *State ex rel. Dann v. Taft*, 109 Ohio St.3d 364, 2006-Ohio-1825, 848 N.E.2d 472, ¶ 20.
69. The records Relator requested may not lawfully be withheld by Respondents nor their attorneys because, in Ohio, "public records are the people's records, and the officials in whose custody they happen to be are merely trustees for the people[.]" *Patterson v. Ayers*, 171 Ohio St. 369, 371, 171 N.E.2d 508 (1960) (citation omitted).

70. Relator Keith Pool, who has been subject to egregious acts of race-based discrimination while employed by Respondent City of Sheffield Lake, has a compelling interest in seeking records exposing the scope of the hostile work environment he and others endured and learning whether and to what extent Respondents sought to train Mr. Campo regarding appropriate workplace behavior or hold Mr. Campo accountable over the course of Mr. Campo's long career at the City of Sheffield Lake.
71. A writ of mandamus would further the Public Records Act's purpose of exposing government activity to public scrutiny, which is essential to maintaining a properly functioning democracy. *State ex rel. Morgan v. Strickland*, 121 Ohio St.3d 600, 2009-Ohio-1901, 906 N.E.2d 1105, ¶ 9 (citation omitted). Respondents should be subjected to scrutiny to determine their role in enabling Mr. Campo to discriminate against Relator and other employees during his years as Chief of Police.
72. Relator had a clear legal right to receive the requested records.
73. Respondents likewise had a clear legal duty to provide the records in response to Relator's request, and, indeed, they have never asserted a legal exemption to shield from release any item Relator requested.
74. R.C. 149.43(B)(3) requires: "If a request is ultimately denied, in part or in whole, the public office or person responsible for the requested public record shall

provide the requester with an explanation, including legal authority, setting forth why the request was denied. If the initial request was provided in writing, the explanation also shall be provided to the requester in writing." Respondents have never provided a written explanation for any denial, let alone one citing to legal authority to support their failure to produce the requested records, thus violating R.C. 149.43(B)(3).

PRAYER FOR RELIEF

Based on the foregoing, Relator therefore requests that the Court:

- Issue a peremptory writ of mandamus directing Respondents to make responsive records available promptly;
- Award statutory damages, attorneys' fees, and costs;
- Order any other relief available under R.C. 149.43 and any other relief as the Court deems appropriate, including the issuance of an alternative writ; and
- If the Court finds that its decision process would be aided by oral argument, Relator respectfully requests such argument.

Dated: November 11, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on November 11, 2021, this document and its attached exhibits were filed via mail and that courtesy copies in advance of the Clerk of Court's service of the summons and petition were emailed to Respondent Dennis Bring at mayorbring@gmail.com and Sheffield Lake Law Director David Graves at dgraves1854@gmail.com.



Ashlie Case Sletvold
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