

THE SUPREME COURT OF OHIO

IN RE:

SUP. CT. CASE NO. 2012-1186

Judicial Campaign Complaint against

Jeanette Moll (0066786)

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE
CASE NO. 12-045

RESPONDENT'S MEMORANDUM CONTRA TO COMPLAINANT'S MOTION
TO SUPPLEMENT THE RECORD, OR ALTERNATIVELY, TO REMAND

David F. Axelrod, Esq.
Michael W. Karam
Attorneys for Petitioner, Lynn Rife
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Axelrod, Todd & Laliberte LLP
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614-545-6356 (facsimile)

Steven C. Hollon
Secretary of the Commission
65 South Front Street
Columbus, OH 43215-3431
614-387-9370
614-387-9379 (facsimile)

Jeanette M. Moll
Respondent, Pro Se
jmollesq@gmail.com
Jeanette M. Moll LLC
803B Market Street
Zanesville, OH 43701
(740)297-4700
(740)297-7782 (facsimile)

FILED
AUG 14 2012
CLERK OF COURT
SUPREME COURT OF OHIO

Now comes the Respondent Jeanette Moll and respectfully moves for the Commission to deny Complainant's Lynn Rife's Motion to Supplement the Record, or Alternatively, to Remand.

Respondent states that at the conclusion of her testimony before the hearing panel, Commissioner Bressler asked Respondent if she could have contact with the County Republican Chairs, County Republican headquarters, and all other organizations where the literature in questioned was used "to make sure that this material that we've had testimony today is sitting on – we had testimony that the material was sitting on a desk in Stark County...to make sure none of that material is out there anymore." (Transcript p. 299, ln 4-14) The Respondent assured the hearing panel that she would go to the Stark County Republican Headquarters to independently investigate this issue within 24 hours of the hearing as Respondent was scheduled to be in Canton the following morning (Transcript p. 294, ln 15-20). Moreover, the Complainant, in her closing argument, requested a cease and desist order.

Thus, based upon the foregoing, the Respondent did in fact go to the Stark Republican Headquarters in less than 24 hours and inquire of its two employees regarding the literature.

Further, the hearing panel then filed recommendations that included a cease and desist order requiring the Respondent "file an affidavit...affirming that she has contacted every

Republican Party headquarters that exists in the Fifth Appellate District and...requested and received in return written or emailed assurance from each person contacted...that a search was made and no undistributed copies of Complainant's Exhibit 1 were found."

The Hearing Panel further recommended "that Respondent be instructed to visit the Stark County Republican Headquarters and personally inspect the available literature to ensure that no copies remain in that office."

The Respondent complied with this recommendation at the time she filed her Objections which was prior to the actual cease and desist order being granted.

Thus, the three affidavits that Complainant now has issue with were filed in response to the oral questioning of the hearing panel, Complainant's own request for an order, and the recommendation of the hearing panel.

Complainant now seeks to introduce new testimony and evidence regarding matters that are alleged to have happened the day before such hearing, that were in the personal knowledge of the Complainant, and which Complainant herself was available to testify to. Moreover, the Complainant chose not to take the stand at the hearing after she failed repeatedly to comply with the discovery requests of Respondent's counsel. This is nothing more than a back door attempt to supplement the record without being subject to cross examination or the discovery requests of the Respondent.

Moreover, there is no showing that the Respondent has any personal knowledge relating to the alleged telephone conversation and facsimile set forth in Complainant's Motion. In fact, Respondent was not even aware of these alleged occurrences until receiving Complainant's Motion after the close of business hours on Friday, August 10, 2012.

Respondent states that at the hearing before the panel on July 6, 2012, she had personal knowledge that the witness, Deborah Feichter, had presented false or misleading testimony. Respondent was personally aware that the Stark County Republican headquarters never had a 6 inch stack of the literature in question. As noted above, Respondent stated on the record, under oath, that she would personally go to the Stark County Republican Headquarters the next day and ensure that there was none of the literature at issue there. Respondent did just that.

Additionally, Respondent spoke with the Executive Director of the Stark County Republican Party, Elisa Leonard, about the testimony of Deborah Feichter and was told that it was false. Further, Ms. Leonard offered that both she and her intern were willing to do affidavits to state the same.

After the hearing panel recommended a cease and desist order, Respondent again spoke to Elisa Leonard regarding affidavits to comply with such recommendation for written confirmations. Respondent stated to Ms. Leonard that she would draft the affidavits but that Ms. Leonard and Garrett Goehring, her Intern, needed to be sure that they were accurate. Respondent sent the draft affidavits by e-mail to Elisa Leonard on July 17,

2012 stating "Let me know if these are not completely accurate" (Exhibit A). On July 17, 2012, Ms. Leonard responded that her full legal name was "Elisabeth" and confirmed "everything you stated is accurate" (Exhibit A).

Respondent and Ms. Leonard had further e-mail correspondence regarding the fact that the affidavits had to be sworn to and signed before a Notary. In fact, both Elisa Leonard and Garrett Goehring, her Intern, signed and swore before third party notaries in Stark County, outside the presence of the Respondent, that their statements were true and accurate. At all times they had the ability to make any changes necessary to ensure that such statements were completely accurate as requested by the Respondent.

Respondent has no personal knowledge of what may or may not have occurred at the Stark County Republican headquarters on July 5, 2012. Respondent was not there and has never claimed to have been there on July 5, 2012. The Respondent submitted affidavits in compliance with the hearing panel's recommendation.

Since receiving the Complainant's Motion after 8:00 p.m. on Friday, August 10, 2012, the Respondent has had telephone and in person conversations with Elisa Leonard, the Executive Director of the Stark County Republican Party, in addition to e-mails and text messages to try to determine the facts surrounding Ms. Rife's affidavit. The Respondent does not have any contact information for Garrett Goehring other than the Stark County Republican Headquarters which was not open until Monday, August 13, 2012. Mr. Goehring was not scheduled to be in until the afternoon of August 13, 2012.

The Respondent has requested amended affidavits from both Ms. Leonard and Mr. Goehring to correct any misstatements they may have made. Such amended affidavits are attached here as Exhibits E and F. Respondent states that she has never had personal knowledge as to what may or may not have occurred at the Stark County Republican Headquarters on July 5, 2012 and was completely unaware of matters raised for the first time by Ms. Rife in her affidavit until receipt of the same at approximately 8:30 p.m. on Friday, August 10, 2012. Respondent's affidavit is attached hereto as Exhibit D.

Respondent notes that Complainant takes issue specifically with Respondent's statement in a letter that "there was no literature on display on July 5, 2012 as Elisabeth Leonard had destroyed it previously per her request." Respondent notes that Complainant's own affidavit evidences the fact that Complainant was not present at the Stark County Republican Headquarters on July 5, 2012 such that she has no personal knowledge as to what may or may not have been "on display." Further, Complainant does not purport to have any personal knowledge as to the other matters testified to by Deborah Feitcher to include whether Ms. Feitcher was at the Stark County Headquarters on July 5, 2012 and how much of the literature at issue was available. Complainant is, instead, seeking to present matters wholly outside the record of the instant case.

Respondent has at no time "threatened perjury charges." Respondent notes that all witnesses were sworn in at the hearing. Thus, the witnesses were advised of the requirement to be truthful. Respondent has had no conversation, before or after the

hearing, in any form with Deborah Feitcher. Moreover, Respondent sent a letter to the Franklin County Prosecuting Attorney asking “that you investigate this perjury.”

(Complainant’s Exhibit 1) It should be noted that asking for an investigation is not a threat. Moreover, Respondent’s personal knowledge is that the witness was untruthful and/or misleading before the hearing panel. Respondent, therefore, has sought to ensure the integrity of the judiciary by bringing this matter to the attention of the appropriate authority to investigate.

Moreover, the same letter asked the Franklin County Prosecuting Attorney to “investigate the involvement of your Assistant Prosecuting Attorney Sue Ann Reulbach in this incident.” Respondent had reason to believe that a current Franklin County Prosecuting Attorney had misused her position in the presentation of the foregoing false and/or misleading witness testimony. Once again, a request for an investigation is not a threat. Complainant alleges the Sue Ann Reulbach is retired and the Respondent should have known this. Respondent relied upon the Attorney Directory of the Supreme Court of Ohio which lists Ms. Reulbach as “Active” and as a Franklin County Prosecuting Attorney (Exhibit B). Respondent has no personal knowledge of Ms. Reulbach or her current employment. Respondent sought to ensure the integrity of the judiciary by raising the issue of this potential misuse of office with the appropriate authority. Respondent has never had any conversation in any form with Ms. Reulbach prior to sending her courtesy copies of pleading by e-mail on August 14, 2012 due to her now being listed as an attorney for Complainant. (Respondent notes that she has filed no notice of appearance nor has a substitution of counsel been filed.)

Respondent sought to fully comply with all the hearing panel recommendations as soon as they were issued. Respondent has fully complied and more with what was ordered in the cease and desist order. Respondent took the additional step of sending letters to not just the Republican headquarters within the 5th district but instead she personally contacted every Republican Party. Moreover, she sent her letters to the Republican parties by certified mail, return receipt requested, and has provided this Court with written confirmation that all 15 county Republican parties have been put on notice to no longer use the literature at issue. She also wrote to every organization at which the literature at issue was used and requested written confirmation that they are no longer using it.

Moreover, when Respondent had knowledge that the Canton Repository had used the picture of her as a Magistrate during the pendency of this matter, she immediately took action as set forth in Respondent's Notice of Filing of Supplemental Affidavit filed on August 6, 2012. Respondent called the Canton Repository three times the next day, spoke to the Editor, and sent them a certified letter to request that they stopped using the photograph in question without the required title, court, and dates. Based on her actions, this matter was resolved the same day.

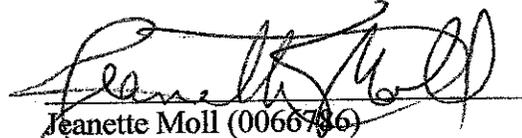
In short, Respondent has done all she can to comply with the recommendations and orders relating to this matter.

Respondent states that this Motion has been filed for no purpose other than to prolong the pendency of this matter for the purpose of obtaining an advantage for another judicial candidate such that it should be denied. This is further demonstrated by the Affidavit of Complainant Lynn Rife which details that she “was employed by the Ohio Democratic Party for more than ten years, 1981 to 1992.” She, in fact, served as the “Executive Political Director” for the Ohio Democratic Party. She further acknowledges once again that she is “a supporter for the re-election of Judge Patricia A. Delaney, Fifth District Court of Appeals.”

Complainant states that she “learned that Jeanette Moll sent a letter dated July 22, 2012 to Franklin County Prosecuting Attorney Ron O’Brien requesting an investigation of perjury against hearing witness Deborah Feichter.” She attaches a copy of the same yet, despite the fact that the Respondent sent a copy of the letter to the Franklin County Prosecuting Attorney to Complainant’s attorney, she chose instead to file a copy of a blind copy sent to Judge Patricia Delaney (See Complainant’s Exhibit 1 and Exhibit C). This further demonstrates that Complainant continues to work in cooperation with the political opponent of the Respondent for the purposes of this grievance. Thus, once again evidencing the fact that this grievance was filed solely for the purpose of obtaining an advantage for another judicial candidate.

Respondent respectfully requests the Court deny the Motion to Supplement the Record,
or in the alternative, to Remand.

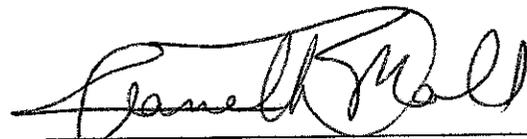
Respectfully submitted,



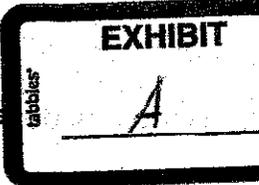
Jeanette Moll (0066786)
803 Market Street
Zanesville, OH 43701
740-297-4700
jmollesq@gmail.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was duly served upon Attorney David F. Axelrod, Esq at 614-545-6356, Steven Hollon at 614-387-9379 and D. Allan Asbury at 614-387-9509 by facsimile on August 7, 2012. Additionally, a courtesy copy was e-mailed to Sue Ann Ruelbach at sarsar 6@hotmail.com.



Jeanette M. Moll (0066786)



Jeanette Moll <jmollesq@gmail.com>

affidavits

12 messages

Jeanette Moll <jmollesq@gmail.com>

To: eleonard@starkgop.org

Tue, Jul 17, 2012 at 2:22 PM

Let me know if these are not completely accurate.

After notarized, please mail to 803 Market Street
Zanesville, Oh 43701

and fax to
740-297-7782

2 attachments

grievance aff of elisa.doc
29K

grievance aff of garrett.doc
28K

Elisa <eleonard@starkgop.org>

Reply-To: eleonard@starkgop.org

To: Jeanette Moll <jmollesq@gmail.com>

Tue, Jul 17, 2012 at 2:30 PM

Jeanette I have no problem with that at all, everything you stated is accurate. The only thing is I changed
Elisa -> to Elisabeth since that is my legal name. I can have these signed tomorrow and in the mail
Thursday, does that work?

From: Jeanette Moll [mailto:jmollesq@gmail.com]

Sent: Tuesday, July 17, 2012 2:22 PM

To: eleonard@starkgop.org

Subject: affidavits

[Quoted text hidden]

Jeanette Moll <jmollesq@gmail.com>

To: eleonard@starkgop.org

Tue, Jul 17, 2012 at 2:37 PM

Sorry, I thought of one more thing and added a sentence about the 7th to yours.
[Quoted text hidden]

grievance aff of elisa.doc
29K

status, effective September 1, 2007.

Corporate

Corporate status is available to attorneys not admitted to practice law in Ohio who are employed full-time by a non-governmental Ohio employer. See, **Gov. Bar R. VI, Sec. 3.**

Certified

A certified attorney is not admitted to practice in Ohio but is temporarily certified to practice law for a legal service or public defender program. See, **Gov. Bar R. IX** or contact the **Bar Admissions Office** (614.387.9340).

Foreign Legal Consultant

A foreign legal consultant is admitted to practice in a foreign country but not in Ohio and is authorized to provide limited legal services in Ohio. See, **Gov. Bar R. XI** or contact the **Bar Admissions Office** (614.387.9340).

Ex-Corporate

Person previously registered for corporate status.

Ex-Certified

Person previously certified pursuant to **Gov. Bar R. IX.**

Ex-Foreign Legal Consultant

Person previously certified as a foreign legal consultant pursuant to **Gov. Bar R. XI.**

Not Registered

Refers to an attorney who is not registered with the Office of Attorney Services in accordance with **Gov. Bar R. VI.**

Not Required

Refers to an attorney who is not required to register with the Office of Attorney Services. Please contact the **Office of Attorney Services** at 614.387.9320 for additional information.

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(g) 614-545-630
(f) 614-515-6356

Jeanette M. Moll, LLC
Attorneys & Counselors at Law
P.O. Box 461
Zanesville, OH 43701
740-297-4700 Office
740-297-7782 Fax



FAX

To: D. AXELROD

From: J. MOLL

Re: PLEASE DISREGARD PRIOR
OBJECTIONS MAILED TO YOU AS THEY
HAD TO BE RE-FORMATED. ALSO
NOTE LETTER TO P.A. O'BRIEN RE: PERJURY

Number of Pages including Cover page: 49

Date: 7/24/12

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THE SUPREME COURT OF OHIO

IN RE: :
Judicial Campaign Complaint against : CASE NO. 2012-1186
Jeanette Moll (0066786) :
: AFFIDAVIT

STATE OF OHIO
COUNTY OF MUSKINGUM, ss:

Jeanette Moll, being duly cautioned and sworn, states the following:

1. On July 7, 2012, I was in Canton, Ohio for campaign related activities.
2. I met with the Stark County Republican Party Executive Director, Elisa Leonard, at 9:00 a.m. on July 7, 2012 at a location other than the Headquarters. I spoke with Ms. Leonard about the testimony of Deborah Feitcher before the hearing panel on the previous afternoon.
3. Ms. Leonard was present with a number of other people at the time of the foregoing conversation. I believe one of the people present was Garrett Goehring, her Intern. Ms. Leonard offered to provide me with affidavits from both her and Mr. Goehring regarding the happenings at the Headquarters on July 5, 2012 and the literature at issue. I told her I would let her know if I needed that.
4. Later in the morning on July 7, 2012, I met Ms. Leonard at the Headquarters. I personally went through the Headquarters with the Executive Director, Elisa Leonard, to ensure there were no remaining pieces of the small blue literature I had used at the start of my campaign.

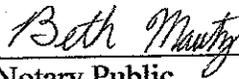
5. There were two large stacks of my new literature with photos of me as an attorney located on the tables at the entrance of the headquarters.
6. There were no pieces of the small blue literature on display or available at the Stark County Headquarters on July 7, 2012, less than 24 hours after the hearing in this matter.
7. I was not present at the Stark County Republican Headquarters on July 5, 2012. I have no personal knowledge of what may or may not have occurred then.
8. Based upon the hearing panel recommendation, I called Ms. Leonard to let her know that I would need the affidavits. I offered to draft the affidavits but stressed the importance of them being completely accurate so that if anything contained in the drafts needed changed, to let me know.
9. I e-mailed the draft affidavits to Ms. Leonard on July 17, 2012 with the message "Let me know if these are not completely accurate."
10. I received an e-mail response that Ms. Leonard's full legal name needed changed but that otherwise "everything you stated is accurate."
11. Ms. Leonard subsequently faxed me an unnotarized affidavit.
12. I exchanged more e-mails with Ms. Leonard regarding having the affidavits sworn to and notarized. I e-mailed Ms. Leonard that "They have to be notarized at the time they are signed."
13. I made arrangements through a third party to pick up Ms. Leonard's affidavit in Canton and later received Mr. Goehring's affidavit as well.
14. I was not present when either affidavit was sworn to and signed before a Notary in Stark County.
15. I was unaware of any incident involving the Stark County Republican Headquarters sending the literature at issue by facsimile on July 5, 2012 or any other date prior to the receipt of Complainant's pleadings at approximately 8:30 p.m. on August 10, 2012. Thus, I had previously asked neither Ms. Leonard nor Mr. Goehring any questions relating to the same. Neither told me anything relating to this prior to the filing of their original affidavits.

16. I believed at the time I filed the original affidavits of Ms. Leonard and Mr. Goehring that they were completely accurate and had no personal knowledge otherwise.



Jeanette Moll

Sworn to before me this 13th day of August, 2012.



Notary Public



BETH MAUTZ
Notary Public, State of Ohio
My Commission Expires
September 18, 2016



THE SUPREME COURT OF OHIO

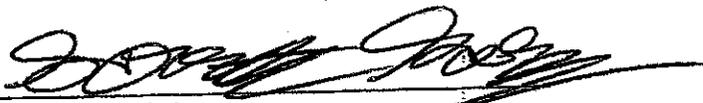
IN RE: :
Judicial Campaign Complaint against :
Jeanette Moll (0066786) :
: AFFIDAVIT

STATE OF OHIO
COUNTY OF STARK, ss:

Garrett Goehring, being duly cautioned and sworn, states the following is true to the best of his knowledge without any further investigation or inquiry:

1. I am the Intern to the Executive Director at the Stark County Republican Party
2. I am aware of the small blue piece of literature that Jeanette Moll initially used in her campaign.
3. I know that on or about mid-June, Jeanette Moll asked the Executive Director to be sure that all the small blue pieces of literature were no longer used and to destroy the remaining pieces.
4. I know that the few small blue literature pieces located at that time were destroyed however, a piece or two of the literature was placed in a reference file.
5. On July 5, 2012, there were no small blue pieces of literature on display at the Stark County Republican Headquarters. There were two large stacks of Jeanette Moll's new literature with her photos as an attorney available on the tables at the entrance of the headquarters
6. I have no personal knowledge of any pieces of the small blue literature being given to anyone in person on July 5, 2012 and I was at the Headquarters throughout the day.

7. When I signed my prior affidavit for Jeanette Moll, I did not recall having sent a copy of the small blue literature to a person by facsimile on July 5, 2012. I now recall that a woman called in and stated that her friend was unable to take her copy of the Jeanette Moll small blue literature piece to Columbus. She further stated that her friend had previously obtained a piece of Jeanette Moll's small blue literature from elderly woman at the Stark County Republican Headquarters; and that she needed it faxed to her because there was no Republican Headquarters in Delaware County, at which she could obtain the piece. She then described to me the small blue literature piece in great detail. She asked that I fax a copy of that specific piece to her and I faxed the back page to her.
8. I never spoke with Jeanette Moll regarding this incident prior to August 13, 2012.
9. Jeanette Moll was not at the Stark County Republican Headquarters on July 5, 2012.
10. I state that neither I nor the Stark County Republican Headquarters has any remaining copies of the small blue literature and that all copies have been destroyed. I further state that the only piece of literature being used for Jeanette Moll's campaign at the Stark County Republican Headquarters is the new piece with photos of her as an attorney.

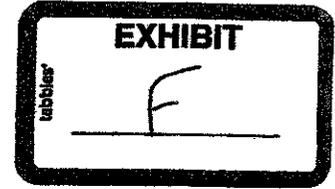

Garrett Goehring

Sworn to before me this 13 day of August, 2012.


Notary Public



Tracy L. Davis,
Notary Public, State of Ohio
My Commission Expires
11/14/2016



THE SUPREME COURT OF OHIO

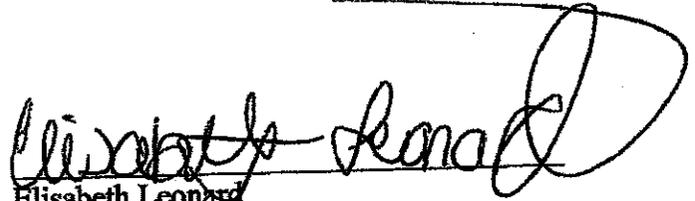
IN RE: :
Judicial Campaign Complaint against :
Jeanette Moll (0066786) :
: AFFIDAVIT

STATE OF OHIO
COUNTY OF STARK, ss:

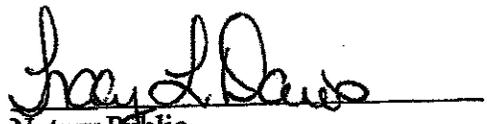
Elisabeth Leonard, being duly cautioned and sworn, states the following is true to the best of her knowledge without any further investigation or inquiry:

1. I am the Executive Director at the Stark County Republican Party and I am charged with running the Stark County Republican Headquarters.
2. I am aware of the small blue piece of literature that Jeanette Moll initially used in her campaign.
3. The Stark County Republican Headquarters had a few of the small blue pieces of literature that were left over from the Votes from Women dinner and one other event at one time.
4. At no time did the Stark County Republican Headquarters have a 6 inch stack of such literature.
5. The most pieces the Headquarters would have ever had at one time would have been less than 50 or less than an inch.
6. On or about mid-June, Jeanette Moll asked me to be sure that all the small blue pieces of literature were no longer used and to destroy the remaining pieces.

7. I disposed of the few small blue literature pieces I located at that time however, a piece or two were placed in a reference file.
8. On July 5, 2012, to my personal knowledge, there were no small blue pieces of literature on display at the Stark County Republican Headquarters. There were two large stacks of Jeanette Moll's new literature with her photos as an attorney available on the tables at the entrance of the headquarters.
9. I have no personal knowledge of any pieces of the small blue literature being given to anyone in person on July 5, 2012 and I was at the Headquarters throughout the day.
10. I state that neither I nor the Stark County Republican Headquarters has any remaining copies of the small blue literature and that all copies have been destroyed. I further state that the only piece of literature being used for Jeanette Moll's campaign by the Stark County Republican Party is the new piece with photos of her as an attorney.
11. I further state that on July 7, 2012, Jeanette Moll and I ensured that there were no remaining pieces of the small blue literature at the Stark County Republican Headquarters.


Elisabeth Leonard

Sworn to before me this 13 day of August, 2012.


Notary Public



Tracy L. Davis,
Notary Public, State of Ohio
My Commission Expires
11/14/2016



Jeanette Mo

**affidavits**

6 messages

Jeanette Moll <jmollesq@gmail.com>
To: eleonard@starkgop.org

Sun, Aug 12, 2012 at 11:32 PM

Elisa -

Based on our conversations on the evening of Friday, August 10 and the morning of Saturday, August 11, 2012, I have prepared amended affidavits for you and Garrett.

Please ensure that they are completely accurate and reflect all necessary facts. I can make any changes needed or you can write in changes.

Please, once they are completely accurate, have them sworn to and signed before a Notary.

I need them to be overnighted to my husband, Gary, at:

Rea & Associates
5775 Perimeter Dr., Suite 200
Dublin, OH 43017-3224

He will go to the Columbus office on Tuesday and ensure that they are filed with the Supreme Court.

Please call if you have any questions.

Thank you,

Jeanette Moll
740-408-0431

2 attachments

grievance aff of garrett2.doc
30K

grievance aff of elisa2.doc
29K

Elisa <eleonard@starkgop.org>
Reply-To: eleonard@starkgop.org
To: Jeanette Moll <jmollesq@gmail.com>

Mon, Aug 13, 2012 at 1:19 PM

Can you please add- "The following statements are to the best of my knowledge without any further investigation or inquiry." Or something to that effect, I just want to avoid another "gotchya" moment. Everything stated is to the best of our knowledge and I want to make sure that is reflected. My main concern is with point 8 in mine and 5 in Garrett's I would like that to say the above statement at the very least. It is true but after the other stunt I feel much better if that was included. I am attaching mine with the comments; please accept them how you want. I will be going over Garrett's with him and if there are any more changes we will let you know.

Regards,

Elisa

From: Jeanette Moll [mailto:jmollesq@gmail.com]
Sent: Sunday, August 12, 2012 11:32 PM
To: eleonard@starkgop.org
Subject: affidavits

[Quoted text hidden]



grievance aff of elisa2.doc
30K

Jeanette Moll <jmollesq@gmail.com>
To: eleonard@starkgop.org

Mon, Aug 13, 2012 at 2:46 PM

I made changes as requested. If you need any other changes to either, you will either need to make them yourself or write them in as I will be on the road. If there are written changes, please initial the changes at the time they are signed and notarized.

Thank you.

[Quoted text hidden]



grievance aff of elisa2.doc
30K

Elisa <eleonard@starkgop.org>
Reply-To: eleonard@starkgop.org
To: Jeanette Moll <jmollesq@gmail.com>

Mon, Aug 13, 2012 at 3:02 PM

Please read this change: The story was a little more detailed than before and Garrett denoted it to me and the change was made.

7. When I signed my prior affidavit for Jeanette Moll, I did not recall having sent a copy of the small blue literature to a person by facsimile on July 5, 2012. I now recall that a person called in and stated that her friend was unable to take her copy of the small blue literature piece to Columbus. She further stated that her friend had previously obtained a piece of Jeanette Moll's small blue literature from elderly woman at the Stark County Republican Headquarters; and that she needed it faxed to her because there was no Republican Headquarters in Delaware County where she could obtain the piece. She asked that I fax a copy to her and I faxed the back page to her.

This is the only other change that was made.

From: Jeanette Moll [mailto:jmollesq@gmail.com]
Sent: Monday, August 13, 2012 2:46 PM
To: eleonard@starkgop.org
Subject: Re: affidavits

[Quoted text hidden]

Jeanette Moll< jmollesq@gmail.com>
To: "<eleonard@starkgop.org>" <eleonard@starkgop.org>

Mon, Aug 13, 2012 at 3:27 PM

Ok

Sent from my iPhone

[Quoted text hidden]

Elisa< eleonard@starkgop.org>
Reply-To: eleonard@starkgop.org
To: Jeanette Moll <jmollesq@gmail.com>

Mon, Aug 13, 2012 at 4:47 PM

Attached are the affidavits, they have been mailed and should arrive tomorrow by noon.

From: Jeanette Moll [mailto:jmollesq@gmail.com]
Sent: Monday, August 13, 2012 3:28 PM

[Quoted text hidden]

[Quoted text hidden]

 **SKMBT_50012081314530.pdf**
100K