

Case No. _____

**Supreme Court
of the State of Ohio**

14-1141

STATE OF OHIO *ex rel.*
OHIO REPUBLICAN PARTY,

Relator,

v.

EDWARD FITZGERALD, County Executive, County of Cuyahoga,

and

COUNTY OF CUYAHOGA and KOULA CELEBREZZE,

Respondents.

Original Action in Mandamus

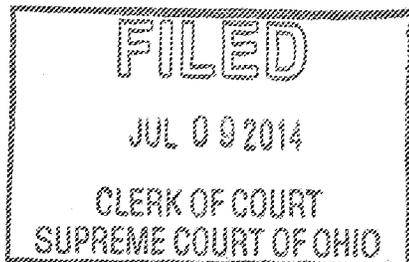
VERIFIED COMPLAINT FOR WRIT OF MANDAMUS

Counsel for Relator:

Curt C. Hartman (0064242)
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgpoint Drive, Suite 8
Cincinnati, OH 45230
(513) 752-2878
hartmanlawfirm@fuse.net

Daniel P. Carter (0074848)
LAW FIRM OF DANIEL P. CARTER
1400 West Sixth Street, Suite 300
Cleveland, OH 44113
(216) 392-4509
dpc@dpcarterlaw.com

Christopher P. Finney (0038998)
FINNEY LAW FIRM LLC
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6655
chris@finneylawfirm.com



Supreme Court of the State of Ohio

STATE OF OHIO *ex rel.*
OHIO REPUBLICAN PARTY
c/o Curt C. Hartman, Legal Counsel
7394 Ridgepoint Drive, Suite 8
Cincinnati, OH 45230,

Relator,

v.

EDWARD FITZGERALD,
County Executive, Cuyahoga County, Ohio
Courthouse Square
310 W. Lakeside Avenue, Suite 700
Cleveland, OH 44113,

and

COUNTY OF CUYAHOGA
% Timothy McGinty,
Cuyahoga County Prosecutor's Office
The Justice Center, Courts Tower
1200 Ontario Street, 9th Floor
Cleveland, Ohio 44113

and

KOULA CELEBREZZE
% Cuyahoga County Dep't of Public Works
2100 Superior Viaduct
Cleveland, OH 44113,

Respondents.

Case No. _____

VERIFIED COMPLAINT
FOR WRIT OF MANDAMUS

Comes now the State of Ohio, by and through the Ohio Republican Party ("Relator"), and, in support of its claim for the issuance of a writ of mandamus, alleges as follows:

1. This is an action for a writ of mandamus pursuant to the Public Records Act, R.C. § 149.43, and/or pursuant to Chapter 106 of the Cuyahoga County Code, to compel the public

office and the public officials responsible for the public records at issue herein to comply fully with their legal obligations to promptly provide copies of requested public records to Relator.

2. For, as the Ohio Supreme Court has repeatedly recognized and declared, “[t]he rule in Ohio is that public records are the people’s records, and that the officials in whose custody they happen to be are merely trustees for the people; therefore anyone may inspect such records at any time, subject only to the limitation that such inspection does not endanger the safety of the record, or unreasonably interfere with the discharge of the duties of the officer having custody of the same.” *Dayton Newspapers, Inc. v. City of Dayton*, 45 Ohio St.2d 107, 109, 341 N.E.2d 576 (1976).

3. Yet notwithstanding this well-established pronouncement concerning to whom public records belong and the right of the public to have access to their records, Respondents herein have not only failed to provide access to the specific public records at issue herein but, instead, have elected to ignore such a request and their legal obligations.

4. The public records sought and at issue in this case are:

- a. key card swipe data for parking facilities and county buildings for Respondent Edward Executive FitzGerald, the County Executive of the County of Cuyahoga, documenting when Respondents Fitzgerald enters and/or exits such facilities or buildings.

5. The same category and type of public records at issue herein have readily been provided with respect to other employees or officials of the County of Cuyahoga but, when such records were requested with respect to Respondent FitzGerald, Respondents have not only refused to provide such records but have completely ignored the request, failing to respond affirmatively or negatively and in writing. *See* paragraphs 27 to 31, *infra*.

6. This Court possesses subject matter jurisdiction over this original action pursuant to Article IV, Section 2 of the Ohio Constitution.

7. Relator Ohio Republican Party is one of the two major political parties in the State of Ohio. According to information available on the website of the Ohio Secretary of State, over 1.3 million voters in the State of Ohio selected a Republican Party ballot at the primary election held in May 2014.

8. Respondent County of Cuyahoga is a county within the State of Ohio and, as the voters thereof have adopted a charter form of government, is a body politic and corporate capable of suing and being sued, pleading and being impleaded. *See* R.C. § 301.22.

9. Respondent Edward Fitzgerald is the County Executive of the County of Cuyahoga.

10. Pursuant to Article II of the Charter of Cuyahoga County, Edward Fitzgerald is the chief executive officer of the County of Cuyahoga and has all the powers and duties of an administrative nature relative to the County. Accordingly, Edward Fitzgerald is a person responsible for the public records at issue in this case, as well as being the official in charge of the County of Cuyahoga.

11. According to the Public Records Policy of the Cuyahoga County Department of Public Work – which is published on the internet at http://publicworks.cuyahogacounty.us/pdf_publicworks/en-US/publicRecordsNotice.pdf – Koula Celebrezze is the public records manager for the Cuyahoga County Department of Public Works. Accordingly, Koula Celebrezze is a person responsible for the public records at issue in this case.

***Public Record Request:
Seeking Disclosure of Key-Card Data of County Executive Edward FitzGerald***

12. In a newspaper article appearing in *The Cleveland Plain Dealer* on or about May 1, 2014, it was reported that “Cuyahoga County Executive Ed FitzGerald refuses to make public records detailing when he enters and leaves county premises.”

13. The foregoing article is available via the internet at www.cleveland.com/cuyahoga-county/index.ssf/2014/05/ed_fitzgerald_secretive_over_records_of_comings_and_goings_at_cuyahoga_county_buildings_citing_secur.html, and a copy is attached hereto as Exhibit A.

14. As indicated in the foregoing article, “The refusal by FitzGerald to release records of his key card swipes is an abrupt departure from the county’s past practice. For a decade or longer, the county has recognized the key-card data as public and provided the records for county employees and elected officials, including judges.”

15. For, as also indicated in the foregoing article, the key-card data would allow taxpayers or others “to analyze how FitzGerald has balanced demands between his taxpayer financed job and his run for governor.”

16. Thus, in an effort to obtain these public records so as to be able to conduct such an analysis, Chris Schrimpf, on behalf of Relator Ohio Republican Party, sought the same records by tendering, via e-mail, a public records request to, *inter alios*, Respondent Koula Celebrezze.

17. Specifically, in an e-mail dated May 22, 2014, Mr. Schrimpf requested, on behalf of Relator Ohio Republican Party, the following public records:

The county’s key card swipe data that shows when an employee enters or leaves a county building for [the following individuals: Ed FitzGerald, Nate Kelly, Larry Bender, Nailah Byrd and Andrea Rocco].

18. A copy of Mr. Schrimpf’s e-mail of May 22, 2014, is attached hereto as Exhibit B.

19. Subsequently, Mr. Schrimpf on June 2, 2014, transmitted another e-mail to Emily Lundgard (who is the Director of Communications for the County of Cuyahoga) wherein he referenced his earlier request, *i.e.*, Exhibit B, and then specifically re-requested the public records at issue in this case:

Looking for the key card swipe data for County Executive FitzGerald. I am seeking to obtain the information that you previously denied the Cleveland Plain Dealer.

20. A copy of Mr. Schrimpf's e-mail of June 2, 2014, is attached hereto as Exhibit C.

21. And to ensure clarity to his request, Mr. Schrimpf transmitted a third e-mail on June 9, 2014, to the recipients of his earlier e-mail wherein he stated:

[Previously], I submitted a public records request seeking the key card swipe data for County Executive FitzGerald.... Within that earlier request, I indicated that it was being tendered via the Cuyahoga County Public Records Ordinance. So as to ensure there is no confusion with respect to either request, I am writing to clarify that both requests (that of May 22 and of June 2) were submitted not only based upon the Cuyahoga County Public Records Ordinance (Chapter 106 of the Cuyahoga County Code), but also pursuant to Section 12.06 of the Cuyahoga County Charter (“[r]ecords of the County shall be open to the public as provided by general law”) and pursuant to the Ohio Public Records Act (R.C. 149.43).

As this clarification should not have affected the ability or legal obligation of Cuyahoga County and its officials to produce the requested records, I would appreciate it if you would advise as to when I might reasonably expect a response. As I noted in my e-mail to you of June 2, this request seeks the same records which Cuyahoga County has already refused to provide *The Cleveland Plain Dealer*. Thus, while it might have taken two months before the County responded to the *Plain Dealer*'s request, as the request of June 2 seeks the same records, the question is simply whether Cuyahoga County is going to stand steadfast and continue its refusal to produce responsive public records or whether it now recognizes and appreciates its legal obligations to make all responsive records available to the public.

22. A copy of Mr. Schrimpf's e-mail of June 9, 2014, is attached hereto as Exhibit D.

23. To date, Respondents have failed to respond whatsoever to request for public records sought by the Relator and at issue herein.

24. To date, no individual on behalf of the Respondents has responded whatsoever to the public records request tendered on behalf of the Relator and at issue herein.

25. Stated otherwise, the Respondents have failed even to respond, affirmatively or negatively, to the public records request tendered on behalf of the Relator and at issue herein.

26. Respondents have had more than a reasonable opportunity and time in which to respond to the public records request at issue herein and to provide the responsive public records. Respondents' failure to respond whatsoever to the public records request at issue herein and their failure to produce responsive records constitutes a denial of the Relator's public records request.

Respondents Are Readily Capable of Promptly Responding

27. Respondents are readily capable of responding to and providing the requested public records herein.

28. For Mr. Schrimpf tendered a public records request wherein he sought the same type of records as those at issue herein, *i.e.*, key card swipe data for parking and county buildings, for the various members of the county council of the County of Cuyahoga.

29. A copy of the exchange between Mr. Schrimpf, seeking such records, and the County's response providing such records is attached hereto to as Exhibit E.

30. As indicated in this exchange, *i.e.*, Exhibit E, Mr. Schrimpf requested the swipe card data relative to the members of the county council of the County of Cuyahoga on June 10, 2014, at 3:33 *p.m.*, and the County promptly provided such records the next morning, *i.e.*, June 11, 2014, at 10:26 *a.m.*

31. Thus, based upon information and belief, the Respondents are capable of readily and promptly producing the public records sought by the Relator and at issue herein.

Writ of Mandamus Is Appropriate

32. Section 12.06 of the Charter of the County of Cuyahoga provides that "[r]ecords of the County shall be open to the public as provided by general law."

33. The records at issue herein constitute “public records” as defined in Section 149.43 of the Ohio Revised Code and in Section 106.02(D) of the Cuyahoga County Code.

34. The records at issue herein were created or received by or come under the jurisdiction of the Respondents.

35. The records at issue herein serve to document the organization, functions, policies, decisions, procedures, operations, or other activities of the Respondents and/or the office of the Cuyahoga County Executive, the County of Cuyahoga (including the County’s Public Works Department).

36. The public records at issue herein are not subject to any exemption, in whole or in part, from disclosure under the Ohio Public Records Act.

37. The Ohio Public Records Act mandates that “a public office or person responsible for public records shall make copies of the requested public record available at cost and within a reasonable period of time.” R.C. § 149.43(B)(1).

38. Section 106.05(C) of the Cuyahoga County Code mandates that “[r]ecords shall be made available promptly for inspection or copying.”

39. The Ohio Public Records Act mandates that “a public office or person responsible for public records shall organize and maintain public records in a manner that they can be made available for inspection or copying in accordance with [R.C. § 149.43(B)].” R.C. § 149.43(B)(2).

40. Section 106.04 of the Cuyahoga County Code mandates “[a]ll public offices within the scope of Chapter 106 of the Cuyahoga County Code shall organize and maintain all their public records so that they are readily available for inspection and copying in accordance with the Ohio Public Records Law and the Public Records Policy of Cuyahoga County.”

41. The Ohio Public Records Act mandates that “[i]f a [public records] request is ultimately denied, in part or in whole, the public office or the person responsible for the requested public record shall provide the requester with an explanation, including legal authority, setting forth why the request was denied.” R.C. § 149.43(B)(3).

42. Section 106.05(D) of the Cuyahoga County Code mandates that “[i]f a public records request is denied, in part or in whole, the public office shall provide the requestor with an explanation for the denial as provided for in Section 149.43(B)(3) of the Ohio Revised Code.”

43. The Ohio Public Records Act mandates that with respect to providing the explanation with legal authority for the denial of a public records request, “[i]f the initial request was provided in writing, the explanation also shall be provided to the requester in writing.” R.C. § 149.43(B)(3).

44. The Ohio Public Records Act mandates that “a public office or person responsible for public records shall transmit a copy of a public record to any person by United States mail or by any other means of delivery or transmission within a reasonable period of time after receiving the request for the copy.” R.C. § 149.43(B)(7).

45. To date, Respondents have failed to comply with the legal duties imposed upon them by the Public Records Act including, without limitation:

-
- (i) failing to make copies of the requested public record available to Relator at cost and within a reasonable period of time (as mandated by Section 149.43(B)(1) of the Ohio Revised Code) or to promptly provide the requested public record to Relator at cost (as mandated by Sections 106.05(C) and 106.06(A) of the Cuyahoga County Code);
 - (ii) failing to organize and maintain the requested public record in a manner that they can be made available for inspection or copying in accordance with Section 149.43(B) of the Ohio Revised Code (as mandated by Section 149.43(B)(2) of the Ohio Revised Code and by Section 106.04 of the Cuyahoga County Code);

- (iii) in denying the Relator's public records request, failing to provide Relator with an explanation, including legal authority, setting forth why the request was denied (as mandated by Section 149.43(B)(3) of the Ohio Revised Code and by Section 106.05(D) of the Cuyahoga County Code);
- (iv) in denying the Relator's public records request which was tendered in writing, failing to provide Relator with a written explanation, including legal authority, setting forth why the request was denied (as mandated by Section 149.43(B)(3) of the Ohio Revised Code);
- (v) failing to transmit to Relator copies of the requested public records by United States mail or by any other means of delivery or transmission within a reasonable period of time after receiving the request for the copy (as mandated by Section 149.43(B)(7) of the Ohio Revised Code).

46. As noted above, the Respondents have failed to respond, affirmatively or negatively, to the public records request tendered on behalf of the Relator and at issue herein.

47. Respondents have failed to comply with their legal obligations and duties under the Ohio Public Records Act and the Cuyahoga County Code.

48. Relator has a clear legal right to obtain copies of the requested public records and Respondents have a clear legal duty to promptly make the requested records available to Relator for inspection and copying.

49. Relator has no adequate remedy in the ordinary course of law and the Ohio Public Records Act specifically provides for the issuance of a writ of mandamus to compel a public office or the person responsible for the requested public records to comply with the legal obligations under the Ohio Public Records Act.

50. There is no legally valid excuse for the continual refusal of Respondents to provide the public records requested on behalf of the Relator and at issue herein.

51. There is no legally valid excuse for the failure of the Respondents to respond, either affirmatively or negatively, to the Relator's public records request within a reasonable period of time.

52. Thus, Relator is entitled to the issuance of a writ of mandamus compelling the Respondents to comply with all of their legal duties under the Ohio Public Records Act.

53. The issuance of a writ of mandamus will serve the public interest and provide a public benefit by encouraging and promoting compliance in the future by public officials with the mandates of the Public Records Act, as well as court decisions thereon.

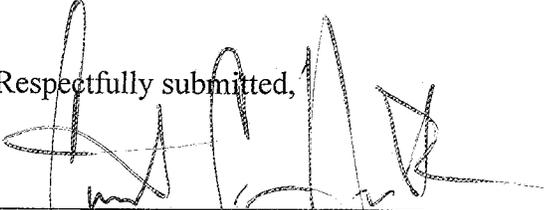
54. Furthermore, the issuance of a writ of mandamus will serve the public interest and provide a public benefit by subjecting the organization, functions, policies, decisions, procedures, operations, or other activities of the Respondents to public exposure, review and criticism.

55. Furthermore, “[t]he public has an unquestioned interest in the qualifications of potential applicants for positions of authority in public employment.” *State ex rel. Consumer News Serv., Inc. v. Worthington City Bd. of Ed.*, 97 Ohio St.3d 58, 2002-Ohio-5311 ¶53.

56. Thus, “[t]he requested records may be relevant to the electorate's consideration of [Fitzgerald's] candidacy for public office.” *State ex rel. Highlander v. Rudduck*, 103 Ohio St.3d 370, 2004-Ohio-4952 ¶22.

WHEREFORE, the State of Ohio, by and on relation to the Relator, hereby applies to this Court for the issuance of a peremptory writ of mandamus or, alternatively, an alternative writ of mandamus, compelling the Respondents to produce forthwith copies of all of the public records at issue herein, *see* paragraph 4, *supra*, together with an award of costs, and any other relief to which Relator may be entitled in law or in equity.

Respectfully submitted,


Curt C. Hartman (0064242)
The Law Firm of Curt C. Hartman
7394 Ridgepoint Drive, Suite 8
Cincinnati, OH 45230
(513) 752-2878
hartmanlawfirm@fuse.net

Daniel P. Carter (0074848)
LAW FIRM OF DANIEL P. CARTER
1400 West Sixth Street, Suite 300
Cleveland, OH 44113
(216) 392-4509
dpc@dpcarterlaw.com

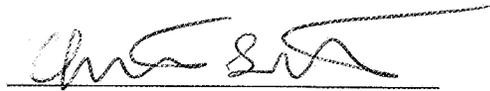
Christopher P. Finney (0038998)
FINNEY LAW FIRM LLC
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6655
chris@finneylawfirm.com

Attorneys for Relator

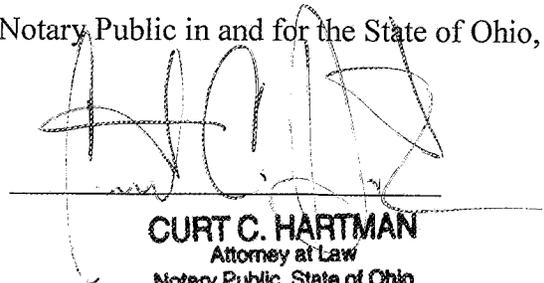
VERIFICATION

State of Ohio, County of Franklin) ss:

Comes now, Chris Schrimpf, communications director for Relator Ohio Republican Party, having been duly cautioned and sworn, and declares that he has personal knowledge of the factual allegations above and such allegations are true and accurate.



Sworn to and subscribed before me, a Notary Public in and for the State of Ohio, on this the 9th day of July 2014.



CURT C. HARTMAN
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date. Section 147.03 O.R.C

EXHIBIT A

THE PLAIN DEALER



Ed FitzGerald secretive over records of comings and goings at Cuyahoga County buildings, citing security



Cuyahoga County Executive Ed FitzGerald has refused to share records that show when he enters and leaves county facilities.

(By Peggy Turbett, The Plain Dealer)

By **Andrew J. Tobias, Northeast Ohio Media Group**
<http://connect.cleveland.com/staff/andrewjtobias/posts.html>
on **May 01, 2014 at 11:52 AM**, updated **May 02, 2014 at 7:54 AM**

CLEVELAND, Ohio – Cuyahoga County Executive Ed FitzGerald refuses to make public records detailing when he enters and leaves county premises, citing security concerns as the reason for secrecy.

FitzGerald's office and Sheriff Frank Bova cited recent threats made by eight people against FitzGerald, but declined requests from Northeast Ohio Media Group to provide details or documents that might substantiate their claim.

The refusal by FitzGerald to release records of his key card swipes is an abrupt departure from the county's past practice. For a decade or longer, the county has recognized the key-card data as public and provided the records for county employees and elected officials, including judges.

FitzGerald's insistence on secrecy also comes as the Democrat is running for governor and frequently criticizing Republican Gov. John Kasich for the lack of transparency at JobsOhio, the state's privatized economic development agency.

In 2012, Democrats criticized Kasich for not releasing his future schedule in response to their records requests. A Kasich spokesman at the time cited security concerns.

Cuyahoga County this week denied a Northeast Ohio Media Group public records request first made on Feb. 26 for key card swipe data showing when FitzGerald over the past year had entered and exited county buildings and parking areas.

NEOMG requested the key-card data as part of an effort to analyze how FitzGerald has balanced demands between his taxpayer financed job and his run for governor. The news outlet on Feb. 26 also requested a copy of FitzGerald's official appointment calendar, which the county provided last week.

In denying the request for FitzGerald's key card data, county officials cited an exemption in Ohio law that allows governments to withhold records that "[contain] information directly used for protecting or maintaining the security of a public office against attack, interference, or sabotage," or "to prevent, mitigate, or respond to acts of terrorism."

In a written statement issued through the county's press office, Bova said: "It is my assessment that releasing the requested data could pose a significant risk to his personal safety. The County Law Department agrees with this assessment."

FitzGerald frequently appears in public without a security detail at events that are promoted and scheduled in advance.

A search of media reports shows one documented threat against FitzGerald during his previous career as a Cuyahoga County assistant prosecutor. An Elyria military veteran in 2007 was convicted of retaliation – the conviction was later overturned on appeal – after he told a VA psychiatrist during a counseling session that he was thinking about beating FitzGerald, a judge and a police detective, "to a pulp."

FitzGerald and the others had been involved in a case that saw the veteran falsely accused of setting off an explosive device in 2002 at what is now Progressive Field.

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EXHIBIT B

Chris Schrimpf

From:
Sent: Thursday, May 22, 2014 5:04 PM
To: 'kcelebrezze@cuyahogacounty.us'; 'msegulin@cuyahogacounty.us'
Subject:

Pursuant to Cuyahoga County Public Records Ordinance, I would like to request the county's key card swipe data that shows when an employee enters or leaves a county building for individuals listed below. It is my understanding that this information has been made readily available in the past. I look forward to your prompt attention to this matter.

Names

Ed FitzGerald
Nate Kelly
Larry Bender
Nailah Byrd
Andrea Rocco

Thanks
Chris Schrimpf

Chris Schrimpf
Communications Director
Ohio Republican Party

Paid for by the Ohio Republican Party. www.ohiogop.org. Not authorized by any candidate or candidate's committee.

EXHIBIT C

Chris Schrimpf

From:
Sent: Monday, June 02, 2014 4:28 PM
To: 'elundgard@cuyahogacounty.us'
Subject:

Emily – I submitted a request earlier to the County, but I wanted to request it to you as well. I am looking for the key card swipe data for County Executive FitzGerald. I am seeking to obtain the information that you previously denied the Cleveland Plain Dealer. I am hoping you will release this public record. I look forward to your prompt reply.

Thank you.

Chris Schrimpf

Chris Schrimpf
Communications Director
Ohio Republican Party

Paid for by the Ohio Republican Party. www.ohiogop.org. Not authorized by any candidate or candidate's committee.

EXHIBIT D

Chris Schrimpf

From: Chris Schrimpf <Schrimpf@ohiogop.org>
Sent: Monday, June 09, 2014 9:01 AM
To: elundgard@cuyahogacounty.us
Cc: kcelebrezze@cuyahogacounty.us; Msegulin@cuyahogacounty.us
Subject: public records request

Emily –

Via an e-mail dated June 2, I submitted a public records request seeking the key card swipe data for County Executive FitzGerald. Within that e-mail, I referenced an earlier request that I had also tendered. That earlier request was on May 22 and was directed to Koula Celebrezze and Mary Segulin. Within that earlier request, I indicated that it was being tendered via the Cuyahoga County Public Records Ordinance. So as to ensure there is no confusion with respect to either request, I am writing to clarify that both requests (that of May 22 and of June 2) were submitted not only based upon the Cuyahoga County Public Records Ordinance (Chapter 106 of the Cuyahoga County Code), but also pursuant to Section 12.06 of the Cuyahoga County Charter (“[r]ecords of the County shall be open to the public as provided by general law”) and pursuant to the Ohio Public Records Action (R.C. 149.43).

As this clarification should not have affected the ability or legal obligation of Cuyahoga County and its officials to produce the requested records, I would appreciate it if you would advise as to when I might reasonably expect a response. As I noted in my e-mail to you of June 2, this request seeks the same records which Cuyahoga County has already refused to provide *The Cleveland Plain Dealer*. Thus, while it might have taken two months before the County responded to the *Plain Dealer*'s request, as the request of June 2 seeks the same records, the question is simply whether Cuyahoga County is going to stand steadfast and continue its refusal to produce responsive public records or whether it now recognizes and appreciates its legal obligations to make all responsive records available to the public.

Thank you,
Chris Schrimpf

Chris Schrimpf
Communications Director
Ohio Republican Party

EXHIBIT E

Chris Schrimpf

From: Trevor McAleer [mailto:tmcaleer@cuyahogacounty.us]
Sent: Wednesday, June 11, 2014 10:26 AM
To: Chris Schrimpf
Cc: Culek, Christina; Joseph Nanni; King, Michael; Schmotzer, Jeanne
Subject: Re: Public Records Request
Attachments: Dan Brady Card Activity_1.xls; C Ellen Connally Card Activity_1.xls; Yvonne Conwell Card Activity_1.xls; Michael Gallagher Card Activity_1.xls; Chuck Germana Card Activity_1.xls; Dave Greenspan Card Activity_2.xls; Anthony Hairston Card Activity_1.xls; Pernel Jones Card Activity_1.xls; Dale Miller Card Activity_1.xls; Jack Schron Card Activity_1.xls; Sunny Simon Card Activity_1.xls; Julian Rogers Card Activity_1.xls; GALLAGHER_1.xls; GERMANA_1_1.xls; GREENSPAN_1_1.xls; GREENSPAN_2_1.xls; HAIRSTON_1.xls; JONES_1.xls; MILLER_1.xls; ROGERS_1.xls; SIMON_1.xls; BRADY_1_1.xls; BRADY_2_1.xls; CONNALLY_1.xls; CONWELL_1.xls

Mr. Schrimpf -

Per your request below, attached is the swipe-card data for parking and county building entrances for County Council members.

A couple of important notes are that the County Council office building does not have swipe cards access, but the Council Chambers building (Justice Center) does, so that is what is provided. It's also important to note that Councilman Jack Schron does not pay for parking through the County, so he does not have a parking swipe record. Councilwoman Yvonne Conwell obtained parking through the County starting late 2013 so her parking swipe starts on September 25, 2013. You're not required to have parking through the County as a County employee or public official.

The attached data is from April 2013 to April 2014. That's the data that I had available. If you want a different time frame I will have to get this from the County's Public Works Department and the County's IT Dept.

Thanks

Trevor

Trevor A. McAleer

Legislative Budget Advisor
Cuyahoga County Council
323 W. Lakeside, 4th Floor, Room 400
Cleveland, Ohio 44113
ph: 216-698-6472
fx: 216-698-2040
tmcaleer@cuyahogacounty.us
web: <http://council.cuyahogacounty.us/>





Before printing this message, think carefully about the necessity. Printing wastes electricity and increases your carbon footprint; while wasting toner and paper.

>>> Chris Schrimpf <Schrimpf@ohiogop.org> 6/10/2014 3:33 PM >>>

Ms. Schmotzer – Pursuant to Cuyahoga County's Public Record Ordinance and County Charter I would like to obtain electronic records of the swipe-card data that would indicate when a County Councilperson enters a county building. I would like this data for each member of County Council. Thank you for your cooperation. Please let me know any questions you may have.

Chris Schrimpf

Chris Schrimpf
Communications Director
Ohio Republican Party

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