



IN THE SUPREME COURT OF OHIO

State ex rel. DONALD CASTER. :
 Relator, : Case No. 2014-1621
 v. : ORIGINAL ACTION IN
 MANDAMUS (Public Records)
 CITY OF COLUMBUS, Ohio, et al. :
 Respondents :

AFFIDAVIT OF JONATHAN C. SCHIRG

STATE OF OHIO)
)SS
 COUNTY OF FRANKLIN)

I, Jonathan C. Schirg, having been duly cautioned and sworn, state as follows:

1. I have been employed by the City of Columbus, Division of Police since April 2013. My job title is Management Analyst II, and I am the supervisor of the Division's Public Records Unit, which is responsible for responding to requests for public records. I have been authorized to practice law in Ohio since 2010. In connection with my employment, I have attended multiple seminars in the area of public records law, and I have reviewed the statutory and case law concerning public records.

2. In connection with my employment and the instant litigation, I have reviewed the Division's records on the homicide investigation of Julie Popovich. The records are contained in homicide investigation file 05-72. Based on my observations and understanding, homicide investigation file 05-72 contains confidential law enforcement investigatory records, including records of the specific confidential investigatory techniques, procedures, and specific investigatory work product in this homicide investigation; the personal notes, working papers, memoranda, evidentiary findings, and

similar materials compiled by the law enforcement investigators in anticipation of criminal proceedings, including FBI investigators; records and information the release of which is prohibited by state or federal law, including information obtained through a state or national crime data base and social security numbers; and the identities, addresses, telephone numbers, and social security numbers of witnesses and confidential sources. The file contains information, including FBI records, which indicates that identification of witnesses and confidential sources could endanger their life or physical safety.

3. The City is willing to make homicide investigation file 05-72 available for an in camera inspection without disclosure to Plaintiff.

FURTHER AFFIANT SAYETH NAUGHT.



Jonathan C. Schirg

SWORN TO BEFORE ME and subscribed in my presence this 8th day of June, 2015.



Laura M. Kulina
Notary Public, State of Ohio
My Commission Expires 08-10-2019



Notary Public