

**IN THE SUPREME COURT OF OHIO**

STATE EX REL. MARK H. CURTIS, ) Supreme Court Case No.  
10472 Woodchuck Ct. )  
Twinsburg, OH 44087 )  
)  
Relator, ) **ORIGINAL ACTION IN**  
) **MANDAMUS – Expedited Election**  
v. ) **Case Under S.Ct. Prac. R. 12.08**  
)  
SUMMIT COUNTY BOARD OF )  
ELECTIONS, )  
470 Grant Street )  
Akron, OH 44311 )  
)  
Respondent.

---

**VERIFIED COMPLAINT FOR A WRIT OF  
MANDAMUS – EXPEDITED ELECTION CASE**

---

David T. Andrews (0062064)  
(COUNSEL OF RECORD)  
581 Boston Mills Road, Suite 400  
Hudson, Ohio 44236  
Phone: 330-463-3660  
Fax: 330-463-3661  
Email: [dandrews@dayketterer.com](mailto:dandrews@dayketterer.com)

COUNSEL FOR RELATOR

Sherri Bevan Walsh  
Summit County Prosecutor  
53 University Avenue  
Sixth Floor  
Akron, OH 44308

COUNSEL FOR RESPONDENT

## **COMPLAINT FOR WRIT OF MANDAMUS**

**NOW COMES** Relator, Mark H. Curtis (hereafter, “Relator”) and for his Verified Complaint for a Writ of Mandamus, asks this Court to issue a writ of mandamus ordering the Summit County Board of Elections (hereafter “Respondent”) to review and consider Relator’s Part Petition which was submitted as part of his Nominating Petition and Statement of Candidacy for election to the office of Member of the Board of Education of Twinsburg City School District (hereafter “Twinsburg School Board”), for the general election to be held on November 3, 2015.

The single legal issue herein is whether Respondent had a clear legal duty to consider Relator’s Part Petition 1 (hereafter “Petition 1”), where the circulator of Petition 1 attested that there were twenty (20) signatures from qualified electors on the Petition and the circulator did not include in that count a twenty-first (21<sup>st</sup>) signature that had been crossed out by the signer when the signer was informed that he must be a registered voter to sign the petition. Relator prays that this Court grant the requested relief.

Relator makes the following averments:

### **JURISDICTION**

1. This Court has authority and jurisdiction to issue a writ of mandamus pursuant Article IV, Section 2 of the Ohio Constitution and S.Ct.Prac.R. 12.1.

### **THE PARTIES**

2. Relator is a qualified elector who presently resides at 10472 Woodchuck Court in the City of Twinsburg, Ohio, within the territory of the Twinsburg City School District.

3. Respondent is the Summit County Board of Elections, consisting of four members who are each appointed to a four year term by the Ohio Secretary of State under R.C. 3501.06.

4. Under Ohio law, R.C. 3501.11, Respondent has a clear legal duty to review, examine and certify the sufficiency and validity of petitions and nominating papers and a clear legal duty, under R.C. 3501.39, to approve and accept any nominating petition that complies with the requirements of the Ohio Revised Code.

### **FACTUAL ALLEGATIONS**

5. On or about April 11, 2015, Relator began circulating nominating petitions for his candidacy for election to the Twinsburg School Board. (Curtis Affidavit, attached hereto).

6. On April 13, 2015, Relator approached Earl Shaffer (hereafter "Shaffer"), a resident of 10460 Woodchuck Court in Twinsburg, Ohio to request that Shaffer sign Relator's Petition 1. (Curtis Affidavit and Shaffer Affidavit, attached hereto).

7. Shaffer signed his name on line 7 of Petition 1. As Shaffer was signing Petition 1, Relator asked Shaffer if he was a registered voter. Shaffer responded that he was not a registered voter at his current address and immediately stopped filling out the remainder of line 7, leaving the "City," "County," and "Date of Signing" spaces blank. Shaffer then struck through his name. Another individual later signed within line 7 of Petition 1, below the crossed out signature of Shaffer. (Curtis Affidavit and Shaffer Affidavit).

8. On June 26, 2015 Relator filed with Respondent a Nominating Petition and Statement of Candidacy for Member of the Twinsburg City School District, which consisted of six part petitions, including Petition 1. (Curtis Affidavit).

9. Respondent refused to review the signatures on Petition 1 and declared Petition 1 invalid. Respondent reviewed the signatures on five additional part petitions submitted by Relator and determined that there were signatures from sixty-six (66) qualified electors. (Curtis Affidavit).

10. On August 17, 2015, Respondent, at its regularly scheduled meeting, voted to refuse to certify Relator's candidacy, determining that Relator's petitions fell short of the required seventy-five (75) signatures of qualified electors. (Curtis Affidavit).

11. On the evening of August 17, 2015 Relator was notified of Respondent's action. Relator was informed that Petition 1 was invalidated in its entirety and none of the signatures affixed thereto were validated by Respondent. Relator was further informed that Petition 1 was invalidated in its entirety because the circulator of Petition 1 had written that there were twenty (20) signatures from qualified electors on Petition 1 and that Respondent had determined there were twenty-one (21) signatures on Petition 1. (Curtis Affidavit).

12. On August 19, 2015, Relator submitted a letter to Respondent requesting reconsideration of Respondent's decision to refuse to certify Relator's candidacy. (Curtis Affidavit).

13. In response to Relator's August 19, 2015 request, Relator was informed that Respondent would accept argument and consider the matter at Respondent's August 28, 2015 meeting. (Curtis Affidavit).

14. On August 28, 2015, Relator presented argument to Respondent, but Respondent declined to reconsider its August 17, 2015 decision to refuse to consider Petition 1. (Curtis Affidavit).

15. On August 31, 2015, Relator filed this Complaint. The filing of this Complaint on August 31, 2015 allows for timely consideration of this matter, pursuant to S.Ct.Prac.R. 12.08, prior to the November 3, 2015 election. As such, Relator's Complaint is timely.

**CLAIM FOR RELIEF:  
REQUEST FOR THE ISSUANCE OF A WRIT OF MANDAMUS**

16. Relator incorporates as if fully rewritten herein all of the allegations contained in paragraphs 1 through 15 above.

17. For a writ of mandamus to issue, Relator must establish the following elements:

- i. A clear legal right to the requested relief;
- ii. A clear legal duty on the part of respondents to grant it; and
- iii. The lack of an adequate remedy in the ordinary course of the law.

*State ex rel. Allen v. Warren Cty. Bd. of Elections*, 115 Ohio St.3d 186, 2007-Ohio-4752, 874 N.E.2d 507, ¶ 8.

18. Relator has a clear legal right to the requested relief and Respondents have a clear legal duty to grant it. R.C. 3501.39(A) requires Respondent to accept Relator's Petition 1, unless the petition violates the requirements of Chapter 3513 of the Revised Code or other requirements established by law. Relator's Petition 1 does not violate the requirements of Chapter 3513 of the Revised Code or other requirements established by law.

19. Respondent alleges that Relator's Petition 1 violated R.C. 3501.38(E)(1). Specifically, Respondent alleges that there were twenty-one (21) signatures on Petition 1 and the circulator's statement indicates there were twenty (20) signatures on Petition 1, thereby invalidating Petition 1 as set forth in *Rust v. Lucas Cty. Bd. Of Elections*, 108 Ohio St. 3d 139 (2005).

20. Respondent's position is clearly contrary to law. The *Rust* court held that if the number of signatures indicated by the circulator is less than the actual number of signatures, the entire part petition must be invalidated. However, in *Rust* no signatures were stricken. Here, the undisputed evidence is that (a) Mr. Shaffer was not a qualified elector; (b) Mr. Shaffer made this fact know to the circulator; and (c) Mr. Shaffer struck through his name in an effort to remove it from consideration.

21. R.C. 3501.38(E) provides that:

"On each petition paper the circulator shall indicate the number of signatures contained on it, and shall sign a statement made under penalty of election falsification that he witnessed the affixing of every signature and that all signers were to the best of his knowledge and belief qualified to sign . . ."

22. Shaffer signed Petition 1, but after being informed that he must be a registered voter to sign the nominating petition, Shaffer struck his signature. Relator, as the circulator of Petition 1, correctly omitted Shaffer's signature from the signature count on the circulator's statement and attested that there were twenty (20) signatures from qualified electors on Petition 1.

23. Respondent's position is that Relator's Petition 1 would be valid only if Relator had committed election falsification by attesting that there were twenty-one (21)

signatures from qualified electors when Relator knew that there were only twenty (20) such signatures, is clearly contrary to law and an abuse of Respondent's discretion.

24. Because of the proximity of the November 3, 2015 election, Relator has no adequate remedy in the ordinary course of law. *State ex rel. Ohio Liberty Council v. Brunner*, 125 Ohio St.3d 315, 2010-Ohio-1845, 928 N.E.2d 410, ¶ 27.

25. Relator's Petition 1 is in full compliance with Chapter 3513 of the Ohio Revised Code and other applicable Ohio law. As such, Respondent has a clear legal duty to review and examine the signatures thereon and, upon verification of a total of seventy-five (75) signatures from qualified electors on all part petitions, a duty to accept and certify Relator's Nominating Petitions and to place his name on the general election ballot for the office of Member of the Twinsburg City School District Board of Education.

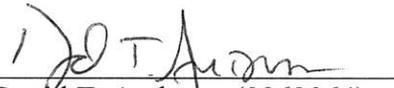
**NOW WHEREFORE**, Relator Mark H. Curtis respectfully requests that the Court grant the following relief:

- A) Grant a Writ of Mandamus to compel the Summit County Board of Elections to review and examine the signatures on Part Petition 1 and if the valid signatures from qualified electors, in combination with the 66 other signatures already qualified, exceeds the seventy-five (75) signature requirement, that Relator's name be placed on the November 3, 2015 general election ballot for the office of Member of the Twinsburg City School District Board of Education;
- B) Issue an Order granting expedited consideration of this important election matter under S.Ct.Prac.R. 12.08 and granting a peremptory or alternative writ,

if necessary, to ensure that Relator will not be unfairly deprived of his legal right to run as a candidate for the office of Member of the Twinsburg City School District Board of Education;

- C) An award of costs, including reasonable attorneys' fees, in an amount to be determined by the Court; and
- D) Any further relief that may be just and appropriate under the circumstances.

Respectfully submitted,



David T. Andrews (0062064)  
581 Boston Mills Rd., Suite 400  
Hudson, Ohio 44236  
Phone: 330-463-3660  
Fax: 330-463-3661  
Email: [dandrews@dayketterer.com](mailto:dandrews@dayketterer.com)

COUNSEL FOR RELATOR



registered in the near future. Another individual later signed within line 7 of Petition 1, below the crossed out signature of Shaffer.

5. After all twenty lines on Petition 1 were filled, I completed the “Circulator’s Statement” and attested that I was the circulator of the petition containing 20 signatures and that I witnessed the affixing of every signature and that all signers were to the best of my knowledge and belief qualified to sign. I did not include Mr. Shaffer’s signature within the signature count because I did not believe him to be a qualified elector and he had stricken his signature from the top portion of line 7 on Petition 1.

6. On June 26, 2015 I filed with the Summit County Board of Elections my Nominating Petition and Statement of Candidacy for Member of the Twinsburg City School District, which consisted of six part petitions, including Petition 1. (Exhibit A-1 to A-2).

7. On August 17, 2015, the Summit County Board of Elections, at its regularly scheduled meeting, voted to refuse to certify my candidacy, determining that my nominating petitions fell short of the required 75 signatures of qualified electors.

8. On the evening of August 17, 2015 I was informed of the Board of Election’s action. I was told that Petition 1 was invalidated in its entirety and none of the signatures affixed thereto would be counted or validated. I was further informed that that Petition 1 was invalidated in its entirety because I had stated the incorrect number of signatures on Petition 1. The Board of Elections representative stated that I had written that there were 20 signatures from qualified electors on Petition 1 and that the Board of Elections had determined there were 21 signatures on Petition 1.

9. On August 19, 2015, a letter was submitted on my behalf requesting reconsideration of the Board of Election's decision to refuse to certify my candidacy. (Attached hereto as Exhibit B).

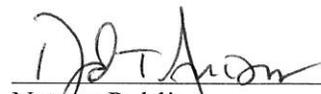
10. In response to the August 19, 2015 request, I was informed that the Board of Elections would consider the matter at their August 28, 2015 meeting and I could attend and present my arguments.

11. On August 28, 2015, I attended the Board of Elections meeting and I, along with my attorney, presented my argument to the Board of Elections. After approximately 20 minutes of discussion and debate the Board of Elections declined to reconsider its August 17, 2015 decision to refuse to consider Petition 1.

I have carefully read the foregoing statement and swear that is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Mark H. Curtis

SWORN TO AND SUBSCRIBED BEFORE ME this 31<sup>st</sup> day of August, 2015.

  
\_\_\_\_\_  
Notary Public

**DAVID T. ANDREWS, Attorney At Law**  
Notary Public - State of Ohio  
My commission has no expiration date.  
Section 147.03 R.C.

150707

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

*Invalid*

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODCHUCK CT., TWINSBURG, Ohio 44087; and I am a qualified elector in the school district.  
(Name of Candidate)  
(Street and Number, if any, or Rural Route Number)  
(City or Village) (Zip Code)

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in Summit County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the 3rd day of November, 2015.  
(Fill in the appropriate date)

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 6th day of APRIL, 2015.  
[Signature]  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:  
(Name of Candidate)

NAME	RESIDENCE

2015 JUN 26 PM 1:37  
BOARD OF ELECTIONS  
AKRON, OHIO

*3450 CB [Signature]*

**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.  
(Fill in the appropriate date)

**Signatures on this petition must be from only one county and must be written in ink.**

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
1.	<i>Dianna Curtis</i>	10472 Woodchuck Ct.	Twinsburg	Summit	4/11/15
2.	<i>Kathleen Thyer</i>	3515 Navilus Tr Reminderville	Reminderville	Summit	4/11/15
3.	<i>[Signature]</i>	11259 Heritage Dr Twinsburg	Twinsburg	Summit	4/11/15
4.	<i>Beth Ann Blackwell</i>	9791 Firelands Dr	Twinsburg	Summit	4/11/15
5.	<i>Paul Baker</i>	2932 Grand St Twinsburg, OH	Twinsburg	Summit	4/11/15

**EXHIBIT**  
tabbler  
A-1

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
6.	<i>[Signature]</i>	1647 Woodchuck CT	Twinsburg	Summit	4-13-15
7.	<i>[Signature]</i>	10460 Woodchuck	Twinsburg	Summit	4-13-15
8.	<i>[Signature]</i>	1491 Ailing Drive	Twinsburg	Summit	4-13-15
9.	<i>[Signature]</i>	1495 Iris Glen Dr.	Twinsburg	Summit	4-13-15
10.	<i>[Signature]</i>	10326 Smugglers	Reminderville	Summit	4/15/15
11.	<i>[Signature]</i>	1282 Waldo Way	Twinsburg	Summit	4/15/15
12.	<i>[Signature]</i>	10418 Bedeadow Dr.	Twinsburg	Summit	4/15/15
13.	<i>[Signature]</i>	10258 SETMEADOW DR.	Twinsburg	Summit	4/15/15
14.	<i>[Signature]</i>	1771 Lockwood Ave	Twinsburg	Summit	4/17/15
15.	<i>[Signature]</i>	11327 Heritage	Twinsburg	Summit	4-18-15
16.	<i>[Signature]</i>	11254 Hartog Dr	Twinsburg	Summit	4.22.15
17.	<i>[Signature]</i>	9586 Sheerway	Twinsburg	Summit	4/22/15
18.	<i>[Signature]</i>	9584 "	"	"	"
19.	<i>[Signature]</i>	3000 Country Club	Twinsburg, Ohio		
20.	<i>[Signature]</i>	9888 Butler Dr.	Twinsburg	Summit	4/22/15
	<i>[Signature]</i>	1111 Meadowood	Twinsburg	Summit	4/22/15

**CIRCULATOR STATEMENT** – Must be completed and signed by circulator  
 I, MARK H CURTIS, declare under penalty of election falsification that  
 (Printed Name of Circulator)  
 reside at the address appearing below my signature; that I am the circulator of the foregoing petition  
 containing 20 signatures; that I witnessed the affixing of every signature; that all signers were to  
 (Number)  
 the best of my knowledge and belief qualified to sign; and that every signature is to the best of my  
 knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact  
 acting pursuant to section 3501.382 of the Revised Code.

2015 JUNE 22 PM 11:37  
 BOARD OF ELECTIONS  
 AKRON, OHIO

3450  
 03/04/15

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

*[Signature]*  
 (Signature of Circulator)  
 10472 WOODCHUCK CT  
 (Permanent residence address)  
 TWINSBURG, OH 44087  
 (City or Village, State and Zip Code)

County Board of Elections  
 Form 3-T Nominating Petition For Board of Education

Statement of Candidacy of \_\_\_\_\_  
 Candidate for \_\_\_\_\_  
 Filed \_\_\_\_\_

**Certificate of Validity**  
 REVISED CODE 3501.11

We, the undersigned members of the Board of Elections of this county, certify that we have reviewed and examined the foregoing petition and find it to be sufficient and valid, and caused our signatures and official seal to be affixed at \_\_\_\_\_, Ohio,  
 This \_\_\_\_\_ day of \_\_\_\_\_, 2015

Chairperson \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Director \_\_\_\_\_ (seal)

**EXHIBIT**  
 A-2

150707  
2  
10/11/15  
10/11/15

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY  
BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

10/11/15  
O INK  
DHC

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODSTOCK CT., TWINSBURG, Ohio 44087; and I am a qualified elector in the school district.  
(Name of Candidate) (Street and Number, if any, or Rural Route Number) (City or Village) (Zip Code)

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in SUMMIT County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the 3 day of November, 2015.  
(Fill in the appropriate date)

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 2nd day of APRIL, 2015.  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:  
(Name of Candidate)

NAME	RESIDENCE

2015 JUN 26 PM 1:37  
BOARD OF ELECTIONS  
AKRON, OHIO  
3450 US/DM

**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.  
(Fill in the appropriate date)

**Signatures on this petition must be from only one county and must be written in ink.**

SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
1. Ronald E. Stuver <i>Ronald E. Stuver</i>	1987 Trailwood Dr.	Twinsburg	Summit	4/2/15
2. <i>Terrie A Andrews</i>	3161 Neille Ln	Twinsburg	Summit	4-18-15
3. <i>Debra Anderson</i> <i>Elic</i>	2702 Myrick Ln	Twinsburg	Summit	4-24-15
4. <i>Paul Mass</i> PAUL MASS	2702 MYRICK	TWINSBURG	SUMMIT	4-24-15
5. <i>Matthew Andrews</i> MATTHEW ANDREWS	3161 Neille Ln	Twinsburg	Summit	5-23-15

**EXHIBIT**  
A-3

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
6.	PAT VARRICCHIO Pat Varricchio	3171 Nettle Ln	Twinsburg	Summit	6/20/15
7.	Tom Whitney	1001 Forest Lake	Twinsburg	Summit	6/21/15
8.	Anita Whitney Anita Whitney	1001 Forest Lake Dr	Twinsburg	Summit	6/21/15
9.	Narelle Foster	1285 Bridget Ln	Twinsburg	Summit	6/24/15
10.	Michael Varricchio Michael Varricchio	3171 Nettle Ln.	Twinsburg	Summit	6/24/15
11.					
12.					
13.					
14.					
15.					
16.					
17.					
18.					
19.					
20.					

2015 JUNE 26 PM 1:37  
 BOARD OF ELECTIONS  
 AKRON, OHIO

2450  
 mm/SS

**CIRCULATOR STATEMENT – Must be completed and signed by circulator.**  
 I, DAVID ANDREWS, declare under penalty of election falsification that I  
(Printed Name of Circulator)  
 reside at the address appearing below my signature; that I am the circulator of the foregoing petition  
 containing 10 signatures; that I witnessed the affixing of every signature; that all signers were to  
(Number)  
 the best of my knowledge and belief qualified to sign; and that every signature is to the best of my  
 knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact  
 acting pursuant to section 3501.382 of the Revised Code.

D. T. Andrews  
(Signature of Circulator)  
3161 Nettle Ln.  
(Permanent residence address)  
Twinsburg OH 44087  
(City or Village, State and Zip Code)

**WHOEVER COMMITS ELECTION  
 FALSIFICATION IS GUILTY OF A  
 FELONY OF THE FIFTH DEGREE.**

**County Board of Elections**  
 Form 3-T Nominating Petition For Board of  
 Education

Statement of Candidacy of \_\_\_\_\_  
 Candidate for \_\_\_\_\_  
 Filed \_\_\_\_\_

**Certificate of Validity**  
 REVISED CODE 3501.11

We, the undersigned members of the Board of  
 Elections of this county, certify that we have reviewed  
 and examined the foregoing petition and find it to be  
 sufficient and valid, and caused our signatures and  
 official seal to be  
 affixed at \_\_\_\_\_, Ohio,  
 This \_\_\_\_\_ day of \_\_\_\_\_,

Chairperson \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Director \_\_\_\_\_ (seal)

**EXHIBIT**  
A-4

150707  
3

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

13 votes  
0 inv

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODHUCK CT, TWINSBURG, Ohio 44087; and I am a qualified elector in the school district.

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in SUMMIT County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the 3 day of November, 2015.

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 2 day of APRIL, 2015. [Signature]  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:

NAME	RESIDENCE

2015 JUN 26 PM 1:37  
BOARD OF ELECTIONS  
AKRON OHIO  
3450 55 PM

**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

**Signatures on this petition must be from only one county and must be written in ink.**

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
1.	<u>[Signature]</u> <small>DAVID ANDREWS</small>	<u>3161 NEILLE LN</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/2/15</u>
2.	<u>[Signature]</u>	<u>1987 Trailwood Dr</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/3/15</u>
3.	<u>[Signature]</u>	<u>1987 Trailwood Dr</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/3/15</u>
4.	<u>[Signature]</u>	<u>1987 Trailwood Dr</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4-3-15</u>
5.	<u>[Signature]</u>	<u>1979 Trailwood</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/15</u>

**EXHIBIT**  
A-5

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
6.	<i>[Signature]</i>	9657 STERLING CT.	TWINSBURG	SUMMIT	04/07/2015
7.	<i>May Beth Williams</i>	9615 Windsor Way	Twinsburg	Summit	4/11/2015
8.	<i>Maras Williams</i>	9615 Windsor Way	Twinsburg	Summit	4/11/2015
9.	<i>[Signature]</i>	10100 Andover	Twinsburg	Summit	7/19/15
10.	<i>Tina Davis</i>	10265 Luman Ln.	Twinsburg	Summit	4/15/15
11.	<i>Robert Feller</i>	1749 MORRIS DR	Twinsburg	Summit	4/15/15
12.	<i>Mike Can Caswell</i>	10551 Kerwick Ct Reminderville, OH 45202	Reminderville	Summit	4/15/15
13.	<i>[Signature]</i>	3108 Warren Lane	Twinsburg	Summit	4/20/15
14.					
15.					
16.					
17.					
18.					
19.					
20.					

2015 JUN 6 11:31 AM  
 AKRON OHIO  
 COUNTY CLERK'S OFFICE

3450

*[Handwritten Signature]*

**CIRCULATOR STATEMENT** – Must be completed and signed by circulator  
 I, Ronald E. Stover, declare under penalty of election falsification that I  
 (Printed Name of Circulator)  
 reside at the address appearing below my signature; that I am the circulator of the foregoing petition  
 containing 13 signatures; that I witnessed the affixing of every signature; that all signers were to  
 (Number)  
 the best of my knowledge and belief qualified to sign; and that every signature is to the best of my  
 knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact  
 acting pursuant to section 3501.382 of the Revised Code.

Ronald E. Stover  
 (Signature of Circulator)  
987 Trailwood Drive  
 (Permanent residence address)  
Twinsburg, OH 44087  
 (City or Village, State and Zip Code)

**WHOEVER COMMITS ELECTION  
 FALSIFICATION IS GUILTY OF A  
 FELONY OF THE FIFTH DEGREE.**

**County Board of Elections**  
 Form 3-T Nominating Petition For Board of  
 Education

Statement of Candidacy of \_\_\_\_\_  
 Candidate for \_\_\_\_\_  
 Filed \_\_\_\_\_

**Certificate of Validity**  
 REVISED CODE 3501.11

We, the undersigned members of the Board of  
 Elections of this county, certify that we have reviewed  
 and examined the foregoing petition and find it to be  
 sufficient and valid, and caused our signatures and  
 official seal to be  
 affixed at \_\_\_\_\_, Ohio,  
 This \_\_\_\_\_ day of \_\_\_\_\_,  
 Chairperson \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Director \_\_\_\_\_ (seal)

**EXHIBIT**  
 A-6

150707  
4  
16  
1  
16

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY  
BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

16  
H  
H

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODCHUCK CT, TWINSBURG, Ohio OHIO; and I am a qualified elector in the school district.  
(Name of Candidate) (Street and Number, if any, or Rural Route Number) (City or Village) (Zip Code)

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in SUMMIT County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the \_\_\_\_\_ day of November, 2015.  
(Fill in the appropriate date)

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 18<sup>th</sup> day of APRIL, 2015.  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:  
(Name of Candidate)

NAME	RESIDENCE

2015 JUN 25 PM 1:36  
BOARD OF ELECTIONS  
AKRON, OHIO

3450 SS MM

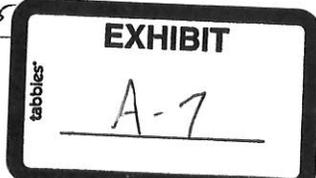
**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.  
(Fill in the appropriate date)

**Signatures on this petition must be from only one county and must be written in ink.**

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
1.	Jennifer Charlton	1723 Lockwood Oval	Twinsburg	Summit	4/19/15
2.	Cathy K	1830 Parker Lane	Twinsburg	Summit	5/12/15
3.	Timothy A. Criddle	9081 Ravenna Rd	Twinsburg	Summit	5/12/15
4.	Margaret Delia Chance	9423 Gettysburg Dr	Twinsburg	Summit	5/12/15
5.	Frederic J. King	1128 Siltwinbrook Dr	Twinsburg	Summit	6/5/15

1/16



	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
6.	<i>[Signature]</i>	1128 SHARON BROOK DR	TWINSBURG	Summit	6/5/15
7.	<i>[Signature]</i>	10338 Ardover Dr	Twinsburg	Summit	6/20/15
8.	<i>[Signature]</i>	1494 Jennifer Dr	Twinsburg	Summit	6-20-15
9.	<i>[Signature]</i> BEN K HERRMAN	9220 GERMANSBURG DR.	TWINSBURG	Summit	6/20/15
10.	<i>[Signature]</i>	8904 JAKBROOK CIR	Twinsburg	Summit	6/20/15
11.	<i>[Signature]</i>	1561 McCausland	TWINSBURG	Summit	6/20/15
12.	<i>[Signature]</i> Calle Cribley	10366 Bellpaud Dr.	Twinsburg	Summit	6/20/15
13.	<i>[Signature]</i> Laura Brady	7461 Butler Ln	Twinsburg	Summit	6/20/15
14.	<i>[Signature]</i>	7503 W. Drakee Ln	Hudson	Summit	6-20-15
15.	<i>[Signature]</i> L. D. DAVIS	9719 E. Idkum	T-burg	Summit	6-20-15
16.	<i>[Signature]</i> Sharon Sanders	10203 Forest Lake	T-burg	Sum	6-20-15
17.	<i>[Signature]</i> Larry Sanders	10003 Forest Lake	T-burg	SUMMIT	6-20-15
18.	<i>[Signature]</i> Christine Lyden	2707 Belling Dr.	T-burg	"	"
19.	<i>[Signature]</i> Christine Lyden	2904 Alling Dr	T-burg	SUMMIT	6/20/15
20.	<i>[Signature]</i>	2844 Alling Dr	T-burg	Summit	6-20-15

11-  
16-  
17-  
18-

**CIRCULATOR STATEMENT** – Must be completed and signed by circulator  
 I, MARK H. CURTIS, declare under penalty of election falsification that I  
 (Printed Name of Circulator)  
 reside at the address appearing below my signature; that I am the circulator of the foregoing petition  
 containing 20 signatures; that I witnessed the affixing of every signature; that all signers were to  
 (Number)  
 the best of my knowledge and belief qualified to sign, and that every signature is to the best of my  
 knowledge and belief the signature of the person whose signature it purports to be or of an attorney  
 acting pursuant to section 3501.382 of the Revised Code.

2015 JUN 25 PM 1:06  
 BOARD OF ELECTIONS  
 AFRON OHIO

*[Handwritten Signature]*  
 3450

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

*[Signature]*  
 (Signature of Circulator)  
 10472 WOODCHUCK CT. ~~Twinsburg~~ OH 44087  
 (Permanent residence address)  
 TWINSBURG, OH 44087  
 (City or Village, State and Zip Code)

County Board of Elections  
 Form 3-T Nominating Petition For Board of Education

Statement of Candidacy of \_\_\_\_\_  
 Candidate for \_\_\_\_\_  
 Filed \_\_\_\_\_

**Certificate of Validity**  
 REVISED CODE 3501.11

We, the undersigned members of the Board of Elections of this county, certify that we have reviewed and examined the foregoing petition and find it to be sufficient and valid, and caused our signatures and official seal to be affixed at \_\_\_\_\_, Ohio,  
 This \_\_\_\_\_ day of \_\_\_\_\_

Chairperson \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Member \_\_\_\_\_  
 Director \_\_\_\_\_ (seal)

**EXHIBIT**  
 A-8

150707  
5

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

11/20/15  
9/12/15  
5/12

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODCHUCK CT, TWINSBURG, Ohio 44087; and I am a qualified elector in the school district. 11 VAL  
9 INV

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in SUMMIT County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the \_\_\_\_\_ day of November, 2015.

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 18<sup>th</sup> day of APRIL, 2015. [Signature]  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:

NAME	RESIDENCE

2015 JUN 25 PM 1:36  
BOARD OF ELECTIONS  
AKRON, OHIO  
3450 25/10/15

**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

**Signatures on this petition must be from only one county and must be written in ink.**

	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
✓ 1.	<u>[Signature]</u>	<u>1771 Lockwood Oval</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/18/15</u>
✓ 2.	<u>[Signature]</u>	<u>1044 Bellaway Drive</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/18/15</u>
✓ 3.	<u>[Signature]</u>	<u>1795 Lockwood Dr</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/18/15</u>
✓ 4.	<u>[Signature]</u>	<u>1795 Lockwood Oval</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/18/15</u>
MS 5.	<u>RICHARD CHARLTON</u>	<u>1723 LOCKWOOD OVAL</u>	<u>TWINSBURG</u>	<u>Summit</u>	<u>4/18/15</u>

**EXHIBIT**  
A-9



150707  
6

**NOMINATING PETITION AND STATEMENT OF CANDIDACY  
FOR MEMBER OF THE BOARD OF EDUCATION  
CITY, LOCAL OR EXEMPTED VILLAGE SCHOOL DISTRICT**

To be filed with the Board of Elections not later than 4 p.m. of the 90<sup>th</sup> day before the general election.  
Revised Code 3501.38, 3513.254, 3513.261, 3513.263

**NOTE - THE CANDIDATE MUST FILL IN, SIGN AND DATE THIS STATEMENT OF CANDIDACY BEFORE PETITIONS ARE CIRCULATED.**

**STATEMENT OF CANDIDACY**

I, MARK H. CURTIS, the undersigned, hereby declare under penalty of election falsification that my voting residence address is 10472 WOODCHUCK CT, TWINSBURG, Ohio 44687; and I am a qualified elector in the school district.

I further declare that I desire to be a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District in SUMMIT County, Ohio, for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, at the general election to be held the \_\_\_\_\_ day of November, \_\_\_\_\_.

I further declare that I am an elector qualified to vote for the office I seek.

Dated this 21<sup>ST</sup> day of APRIL, 2015.  
[Signature]  
(Signature of Candidate)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

I, \_\_\_\_\_, hereby designate the persons named below as a committee to represent me:

NAME	RESIDENCE

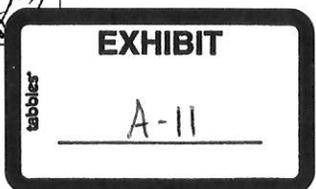
**NOMINATING PETITION**

We, the undersigned, qualified electors of the State of Ohio, whose voting residence is in the county, city, village, or township set opposite our names, hereby nominate MARK H. CURTIS as a candidate for election to the office of Member of the Board of Education of the TWINSBURG CITY School District for the: (check one)  full term, or  unexpired term ending \_\_\_\_\_, to be voted for at the next general election, and certify said person is, in our opinion, well qualified to perform the duties of the office or position to which the person desires to be elected.

**Signatures on this petition must be from only one county and must be written in ink.**

SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
<u>[Signature]</u>	<u>10157 LUMAN LANE</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/22/15</u>
<u>[Signature]</u>	<u>10265 Luman Lane</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>4/22/15</u>
<u>[Signature]</u>	<u>3150 Nauticus Tr</u>	<u>Amundeville</u>	<u>Summit</u>	<u>4/20/15</u>
<u>[Signature]</u>	<u>10785 Hill</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>5/18/15</u>
<u>[Signature]</u>	<u>1399 Silverdale Circle</u>	<u>Twinsburg</u>	<u>Summit</u>	<u>5/18/15</u>

2015 JUN 26 PM 1:36  
 BOARD OF ELECTIONS  
 AKRON, OHIO  
 3-150-8/10m



	SIGNATURE	VOTING RESIDENCE ADDRESS STREET AND NUMBER	CITY, VILLAGE OR TOWNSHIP	COUNTY	DATE OF SIGNING
6.	<i>Robert P. ...</i>	1727 Maplewood	Twinsburg	Summit	5/18
7.	<i>Jan ...</i>	10326 Smugglers	Twinsburg	Summit	5/20
8.	<i>Stephen ...</i>	10366 Belleau Dr.	Twinsburg	Summit	5/19
9.	<i>[Signature]</i>	9398 Monticello Dr.	Twinsburg	Summit	5/20
10.	<i>Leander ...</i>	4398 Monticello Dr.	Twinsburg	Summit	5/20
11.	<i>[Signature]</i>	3071 Darin Ln.	Twinsburg	Summit	5-26
12.	<i>Stark ...</i>	3071 DARLEN LN	Twinsburg	Summit	5-20
13.	<i>Angie ...</i>	10471 Woodchuck Ct	Twinsburg	Summit	5-24
14.	<i>[Signature]</i>	9719 East Hillwood	Twinsburg	Summit	5-26
15.	<i>Bob ...</i>	3143 Liberty Ledges	Twinsburg	Summit	5/27
16.	<i>Kent ...</i>	2995 Pirates Cove	Twinsburg	Summit	6/3
17.	<i>Jon ...</i>	10147 Pirates Trail	Twinsburg	Summit	6/3
18.	<i>Kinda ...</i>	10147 Pirates Trail	Twinsburg	Summit	6/3
19.	<i>Angie ...</i>	10147 PIRATES TRAIL	Twinsburg	Summit	6/3
20.	<i>[Signature]</i>	8033 Noyan Meadows	Twinsburg	Summit	6/3

MR  
MR  
MR  
MR

**CIRCULATOR STATEMENT – Must be completed and signed by circulator.**

I, MARK H. CURTIS, declare under penalty of election falsification that I  
 (Printed Name of Circulator)  
 reside at the address appearing below my signature; that I am the circulator of the foregoing petition  
 containing 20 signatures; that I witnessed the affixing of every signature; that all signers were  
 (Number)

the best of my knowledge and belief qualified to sign; and that every signature is to the best of my  
 knowledge and belief the signature of the person whose signature it purports to be or of an attorney in fact  
 acting pursuant to section 3501.382 of the Revised Code.

*[Signature]*

(Signature of Circulator)

10472 WOODCHUCK CT.  
 (Permanent residence address)

Twinsburg, OH 44087  
 (City or Village, State and Zip Code)

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.**

BOARD OF ELECTIONS  
 AKRON, OHIO  
 JUN 11 11:36 AM

*M/CS 3750*

**County Board of Elections**  
 Form 3-T Nominating Petition For Board of Education

Statement of Candidacy of \_\_\_\_\_  
 Candidate for \_\_\_\_\_

Filed \_\_\_\_\_

**Certificate of Validity**  
 REVISED CODE 3501.11

We, the undersigned members of the Board of Elections of this county, certify that we have reviewed and examined the foregoing petition and find it to be sufficient and valid, and caused our signatures and official seal to be affixed at \_\_\_\_\_, Ohio,  
 This \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_  
 Chairperson  
 Member  
 Member  
 Member  
 Member  
 Director (seal)

**EXHIBIT**  
 A-12  
 tabbles



THE LAW OFFICE OF  
Dianne M. Curtis, LLC

August 19, 2015

SUMMIT COUNTY BOARD OF ELECTIONS  
470 Grant Street  
Akron, Ohio 44311

2015 AUG 19 PM 1:07  
SUMMIT COUNTY  
BOARD OF ELECTIONS  
AKRON, OHIO

RE: Twinsburg School Board Candidacy of Mark H. Curtis

Dear Sir or Madam,

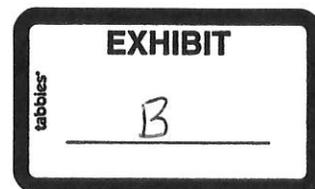
On June 26, 2015, Mark H. Curtis filed his Nominating Petitions and Statement of Candidacy with this Board seeking certification as a candidate for the Twinsburg School Board. On August 17, 2015, Mr. Curtis received a call that the Board, after review of his petitions, determined that he could not be certified as a candidate. Various signature issues were cited.

Please accept this filing as notice of Mr. Curtis's challenge to that decision and request for a hearing on the matter. Mr. Curtis acknowledges, after further review, that certain signatures were invalid as duplicates or non-registered voters. However, Mr. Curtis believes that his petitions meet the statutory minimum requirements for certification and respectfully requests to be heard on the matter.

You can reach me at my office at 234-738-4414 or Mr. Curtis directly at 216-701-5861. Thank you for your prompt attention to this very discerning matter.

Sincerely,

Dianne M. Curtis, Esq.  
(#0088120)



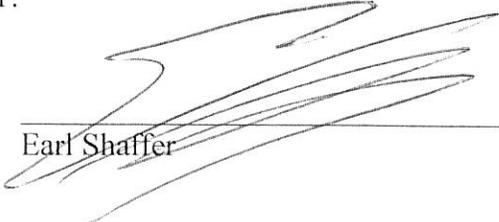
BOARD OF ELECTIONS  
SUMMIT COUNTY, OHIO

STATE OF OHIO            )  
                                  )        SS  
COUNTY OF SUMMIT        )

I, EARL SHAFFER, first being duly cautioned and sworn deposes and states as follows:

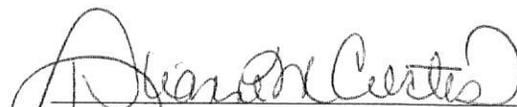
1. I am Earl Shaffer and I reside at 10460 Woodchuck Court, Twinsburg Ohio 44087.
2. On April 13, 2015, I was approached by my neighbor, Mark Curtis, to sign his Nominating Petition for Twinsburg School Board. I signed the Nominating Petition and started to write my address on the petition as well.
3. Mr. Curtis explained that I need to be a registered voter to sign the petition. I am not a registered voter at my current address in Summit County.
4. I struck through my name in an effort to remove it for consideration on the petition. Mr. Curtis and I had a mutual understanding that my signature would not be counted on the petition and that I should contact him if my voting status changes.

FURTHER AFFIANT SAYETH NAUGHT.

  
Earl Shaffer

Before me, a Notary Public in and for said county and state, personally appeared the above-named Earl Shaffer, who acknowledged that he did sign the foregoing instrument, and that the same is his free act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my seal at Twinsburg, Ohio, this 26<sup>th</sup> day of August, 2015.

  
Notary Public

**Dianna M. Curtis**  
Resident **Summit County**  
Notary Public, **State of Ohio**  
My Commission Expires: 10/16/2016