

**IN THE STATE OF OHIO
SUPREME COURT**

STATE EX. REL. VANESSA WELLS : CASE NO.
Relator : JUDGE
-vs- : **VERIFIED COMPLAINT FOR
MANDAMUS**
LAKOTA LOCAL SCHOOLS :
BOARD OF EDUCATION :
and :
ADAM ZINK :
(in his official capacity only) :
Respondents :

VERIFIED COMPLAINT FOR MANDAMUS

RELATOR

State ex rel Vanessa Wells
3074 Madison Rd
Cincinnati, OH 45209

Attorneys for Relator

Matthew-Miller Novak (0091402)
Steven C. Davis (0065838)
BARRON PECK BENNIE & SCHLEMMER
3074 Madison Rd
Cincinnati, Ohio 45209
P: 513-721-1350
F: 513-721-5029
E: MMN@BPBSLaw.com

RESPONDENTS

**Lakota Local Schools
Board of Education**
5572 Princeton Rd
Liberty Township, OH 45011-9726

Adam Zink
(In his official capacity only)
5572 Princeton Rd
Liberty Township, OH 45011-9726

Attorney for Respondents

Brodi Conover (0092082)
BRICKER & ECKLER LLP
2 East Mulberry Street
Lebanon, Ohio 45036
P: 513-870-6700
F: 513-870-6699
E: bconover@bricker.com

Relator STATE EX. REL. VANESSA WELLS states the following for her claims against Respondents LAKOTA LOCAL SCHOOLS BOARD OF EDUCATION and ADAM ZINK:

INTRODUCTION

1. This is an original action in mandamus under the Ohio Open Records Act (“ORA”), R.C. § 149.39, to compel Respondents to produce responsive records that Relator is entitled to obtain under the ORA. Specifically, the Relator requested Respondents’ legal invoices, and Respondent responded by sending invoices that were unlawfully redacted under this Court’s precedent. In addition, Relator requested a demand letter that had been sent to the Respondents’ attorney, and the Respondents are refusing to produce this demand letter even though the Respondent’s attorney is contracted to represent the Respondents regarding communications between the Respondents and opposing parties.

PARTIES

2. STATE EX REL VANESSA WELLS (“WELLS”) is a resident of Butler County, she was denied records she requested from Respondents, and she has standing to bring this Action under the ORA.

3. Respondent LAKOTA LOCAL SCHOOLS BOARD OF EDUCATION (the “BOARD”) is a public body as defined under the ORA, and it is situated in Butler County, Ohio.

4. Respondent ADAM ZINK (“ZINK”) is the Board’s treasurer, he is the records custodian, and he is named here in his official capacity.

5. For clarity, when referring to both BOARD and ZINK collectively, this Complaint will refer to them as “Respondents.”

JURISDICTION AND VENUE

6. This Court has original jurisdiction to hear this matter because WELLS brings this Action in mandamus. *R.C. § 2731.02*.

BACKGROUND INFORMATION

7. WELLS is a parent in Respondents' District.

8. Recently, a considerable amount of controversy has occurred within the Respondents' District.

9. Specifically, the Superintendent's ex-wife released certain information regarding the Superintendent's personal life that caused parents to have concerns regarding child safety and morality within the BOARD'S District.

10. At least one Board member, Ms. Darbi Boddy, advocated for the removal of the Superintendent.

11. The Superintendent claimed that Ms. Boddy was attempting to assassinate his character.

12. Additionally, in certain correspondence sent to the media by his attorney, Ms. Lisa Tuck ("Tuck"), the Superintendent, alleged that the BOARD did not take the proper steps to protect him. <https://www.wcpo.com/news/education/letter-from-lakota-superintendent-says-resignation-is-due-to-hostile-work-environment-caused-by-board-member>

13. All these occurrences, and other related occurrences, were reported by various media sources, and they are matters of great public concern.

14. WELLS became aware that Ms. Tuck, the Superintendent's attorney, sent a demand letter pertaining to the controversy to Respondents' attorney, Mr. Brodi Conover

("Conover"), at Brickler and Eckler, the law firm under contract with BOARD to handle disputes of this nature.

15. In fact, Respondents employ Conover to act as its legal counsel as an advisor during BOARD meetings.

16. Respondents contract with Conover to defend it concerning litigation filed against it, including Open Meetings cases and Open Records cases that others have filed against BOARD.

17. Respondents contract with Conover to respond to Open Records requests and, when the Board denies those requests, Conover is the particular individual who frequently sends the denial correspondence on behalf of the Board.

18. Conover was advising and representing the Respondents on multiple matters related to the employment relationship between the BOARD and the Superintendent, including but not limited to matters involving public scrutiny, open records requests, and communications between the BOARD and Ms. Tuck, the Superintendent's attorney.

19. Upon information and belief, Ms. Tuck likely sent certain communications to Conover instead of directly to the BOARD because it is widely known that Conover represents the BOARD.

20. Ms. Tuck would thus have had the duty to communicate to the **BOARD** through Conover in order to comply with her ethical obligation to refrain from improper ex parte communications.

21. Conover also frequently acts as BOARD's records custodian.

22. Through Conover, the BOARD began engaging in a routine and standard practice of improperly denying requests for records clearly falling within the Open

Records Act in order to evade transparency regarding this particular matter involving its Superintendent.

23. Here, WELLS has made a number of requests for records clearly falling within the Open Records Act, which requests were either denied or otherwise unlawfully redacted.

24. Specifically, on January 19, 2022, WELLS sent an email, as an anonymous requester, to the email address for a records request designated by Respondent ZINK, as well as to Mr. Brodi Conover requesting all “invoices & documents from the date of January 1, 2022 until the current date of January 19, 2023 from all board/attorneys in Lakota Local school district.” (Exhibit 1).

25. Mr. Conover, acting as BOARD’s records custodian, responded to the request by producing a particular record, in electronic pdf format. (Id.)

26. The record sent in response includes certain invoices (the “Invoices”) from several law firms, including Mr. Conover’s current law firm, Bricker & Eckler, as well as Mr. Conover’s prior law firm, Frost, Brown & Todd.

27. However, Mr. Conover redacted almost all information contained within the Invoices, including but not limited to the names of the billing attorneys, the hourly rates for each of the entries, the hours spent on tasks, none of which information contain any information falling with the attorney/client privilege.

28. Although the billing narratives themselves and certain communication summaries *might* contain information which could appropriately be protected, Respondents instead apparently dragged the redaction editing tool across both privileged and non-privileged information without any legitimate regard for the particular portions of the Invoices which fall within the Open Records Act.

29. Because of this overbroad and haphazard practice, WELLS did not receive any Open Record information regarding the rates charged, the total hours of work, the identity of the responsible attorney, or other information from the Invoices which are a matter of public record.

30. Notably, it is apparent from the records produced that the Invoices from the law firms of Ennis Britton and Frost, Brown & Todd do not contain any narrative summaries.

31. It is also apparent from the Invoices that the rates and hours entered are in separate columns, distinct from the narrative entries (even if those narratives are privileged), and that information should have been produced without redaction.

32. WELLS also received no response from Conover explaining why he redacted information, a matter which is not privileged.

33. Therefore, WELLS has not received a proper public record of billing information to which she is entitled, and Respondents have redacted information that was not privileged and was capable of production.

34. Moreover, Respondents denied WELLS certain other information she requested and to which she was entitled.

35. Specifically, on January 5, 2023, WELLS sent another anonymous request for “all email or regular mail communication between the law firm of Elizabeth Tuck and all current Lakota school board members, as well as legal counsel for the current board members, from the months of September 2022 until the current date of Jan 1, 2023 in regards to Matthew Miller & his employment at Lakota school district as the superintendent.” (Exhibit 2).

36. Mr. Conover again refused to produce the requested information.

37. Notably, Mr. Conover did not deny that such records existed.

38. Moreover, upon information and belief, a demand letter was sent to the BOARD, and that the BOARD discussed this demand letter in a subsequent executive session.

39. However, Mr. Conover claimed that communications that an opposing counsel has sent to the Respondent BOARD, through its Counsel, are not public records.

40. Specifically, Mr. Conover wrote “[i]f you are seeking communications between two non-public entities (that is, two separate private law firms), those records are not a public record because they are not created, received, or otherwise under the jurisdiction of a public office.” (Id.)

41. According to Mr. Conover, even when he is acting as authorized legal counsel on behalf of the Respondent BOARD, communications to the BOARD concerning BOARD business related to his representation are not considered to be records of the BOARD.

42. Essentially, Respondents are attempting to use their agent/attorney to circumvent the Open Records Act by directing the BOARD’s attorney to withhold communications sent by third parties to the BOARD.

43. Contrary to the position of the BOARD, if the Superintendent’s attorney sent Mr. Conover communications, such as a demand letter, resignation letter, or other communication, such communications are correctly considered public records that Mr. Conover maintains as Respondents’ Counsel to perform his duties to and for the Respondents as their legal Counsel regarding potential litigation against it.

COUNT I – WRIT OF MANDAMUS—OPEN RECORDS ACT

44. WELLS restates all previous paragraphs.

45. A public body cannot avoid disclosure of public records merely because it has a private entity it hires to maintain those records. *State ex rel. Toledo Blade Co. v. Ohio Bur. of Workers' Comp.*, 106 Ohio St.3d 113, 2005-Ohio-3549; *State ex rel. Cincinnati Enquirer v. Krings*, 93 Ohio St.3d 654, 2001-Ohio-1895; *State ex rel. Gannett Satellite Information Network v. Shirey*, 78 Ohio St.3d 400, 403-404, 1997-Ohio-206, 678 N.E.2d 557.

46. This Court has recently held that when a public body hires a private attorney, it constitutes a delegation of that public body's duties to prosecute and defend itself against lawsuits, which necessarily involves hiring and supervising attorneys, and **documents in that attorney's possession are public records**. See *State ex rel. Ames v. Dublikar, Beck, Wiley & Mathews*, Slip Opinion No. 2022-Ohio-3990, ¶18, citing, *State ex rel. Armatas v. Plain Twp. Bd. of Trustees*, 163 Ohio St.3d 304, 2021-Ohio-1176, 170 N.E.3d 19; see also, *State ex rel. Findlay Publ'g Co. v. Hancock Cnty. Bd. of comm'rs*, 1997-Ohio-353, 80 Ohio St. 3d 134, 137, 684 N.E.2d 1222 (holding that a confidential settlement agreement is still a public record when in the possession of a private attorney for the public body, otherwise a public body could thwart public disclosure by having an attorney possess every document the public body wants to keep confidential).

47. It is also well-established and long held that notice to a client's attorney is imputed to the client. *Am. Exp. & Inland Coal Corp. v. Matthew Addy Co.*, 112 Ohio St. 186, 147 N.E. 89 (1925).

48. Moreover, under the Ohio Rules of Professional Responsibility, a client's file in the possession of an attorney, is the property of the client—not the attorney.

49. Thus, if a client requests its file from an attorney, that attorney actually has the ethical duty to promptly produce that file to the client under Ohio's Rules of Professional Responsibility.

50. Moreover, even when a client terminates an attorney/client relationship (or vice versa), the attorney is required to *promptly* deliver all "**correspondence**, pleadings, deposition transcripts, exhibits, physical evidence, expert reports, and other items reasonably necessary to the client's representation." *See Ohio Rules of Professional Responsibility 1.16(d) (emphasis added), see also, Comment [8A]* instructing that an attorney may not even charge a client for producing all papers to which the client is entitled.

51. Therefore, when an attorney represents a public body, and that public body delegates its legal duties to the private attorney, any document he possesses in his client's file is the property of the public body—not the attorney.

52. Consequently, a public body's client file is public property, it is not the attorney's property, and it is subject to production under the Open Records Act unless it is otherwise privileged or exempted under the Act.

53. Here, Respondents hired Mr. Conover and his Firm as its general legal Counsel.

54. As a standard and routine part of this representation, Mr. Conover is tasked with creating and receiving communications relating to Respondents' business, the BOARD has the right to monitor Mr. Conover's activities, and Respondents have an absolute right to access any information in Mr. Conover's possession, because such information is actually owned by Respondents.

55. Indeed, any communications are imputed to Respondents under the fundamental concepts of agency law.

56. Moreover, these communications are part of the Respondents' client file.

57. Therefore, these communications belong to the public under the Open Records Act regardless of whether Respondents continue to employ Mr. Conover in the future, and these communications are under Respondents' "control."

58. Respondents cannot evade transparency by circumventing the Open Records Act and instructing Mr. Conover to not produce records from its file when those records are communications in Respondents' client file, Respondents' property, and under Respondents' control.

59. If such a practice were appropriate, any public body could hire private Counsel to do its work and hoard all records, including but not limited to demand letters, settlement agreements, and other information relating to the public body's activities and decisions.

60. This Court has made it evident to public bodies that once it delegates its duties to a private attorney, information possessed by that attorney are public records.

61. In addition, a public body cannot redact portions of its attorney's invoices which are not narrative entries containing privileged information.

62. Thus, Respondents are not permitted to redact portions of their invoices that contain non-narrative entries, such as "attend Board meeting" or "attend oral argument."

63. This Court has also held that public bodies cannot lawfully redact the name of an attorney billing an entry or the rate applied to an entry. *State ex rel. Anderson v. Vermilion*, 134 Ohio St.3d 120, 2012-Ohio-5320.

64. Here, Respondents have either outright refused to produce documents in the possession of its attorney, or Respondents have otherwise unlawfully redacted information that is public.

65. WELLS is entitled to a writ of mandamus ordering Respondents to produce information under their control, and she is further entitled to statutory damages, costs, and her reasonable attorney fees.

WHEREFORE, WELLS respectfully requests that this Court find for her and award her the following relief:

- a. Mandamus ordering production of the public records Wells requested;
- b. Attorneys' fees;
- c. Statutory damages;
- d. Costs; and
- e. Any and all other relief this Court deems proper.

Respectfully Submitted,

/s/ Matt Miller-Novak

Matthew Miller-Novak (0091402)
Steven C. Davis, Esq. (0065838)
Barron, Peck, Bennie & Schlemmer
3074 Madison Road
Cincinnati, Ohio 45209
(513) 721-1350
SCD@BPBSLaw.com
MMN@BPBSLaw.com

VERIFICATION

I, Vanessa Wells, verify that the information contained in this Complaint is true to the best of my knowledge.

Vanessa A. Wells
Vanessa Wells

This Verification was signed in my presence in Butler County, OH, on this 6th day of February, 2023.

M. Novak
Notary



Matthew E. Miller-Novak, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.

From: **Conover, Brodi** <BConover@bricker.com>
Date: Thu, Jan 19, 2023 at 9:14 AM
Subject: RE: Records Request for Legal invoices
To: Gods Good <forheisgood77@gmail.com>
Cc: publicrecordsrequest@lakotaonline.com <publicrecordsrequest@lakotaonline.com>

Good morning –

Attached are all legal invoices for 2022. We'll look for any invoices that have come in since the start of the year and provide those to you soon.

Please note that certain information in the invoices has been redacted because of the attorney-client privilege. See *State ex rel. Dawson v. Bloom-Carroll Local School Dist.*, 131 Ohio St.3d 10, 2011-Ohio-6009, 959 N.E.2d 524; *State ex rel. Anderson v. Vermilion*, 134 Ohio St.3d 120, 2012-Ohio-5320, 980 N.E.2d 975. In addition, banking account numbers have been redacted pursuant to R.C. 149.45.

Thanks,

Brodi

Brodi J. Conover

Partner

bconover@bricker.com

t: 513.870.6693

From: Gods Good <forheisgood77@gmail.com>
Sent: Thursday, January 19, 2023 9:10 AM
To: Conover, Brodi <BConover@bricker.com>; publicrecordsrequest@lakotaonline.com;
adam.zink@lakotaonline.com
Subject: Records Request for Legal invoices

This message originated outside your organization.



Brodi,

Good morning, I am requesting all legal invoices & documents from the date of January 1,2022 until the current date of January 19, 2023 from all board/attorneys in Lakota Local school district.

I look forward to a timely response.

Thank you



Ennis Britton Co., L.P.A.
Attorneys at Law

INVOICE

Invoice # 15795
Date: 01/01/2022

Cincinnati • Cleveland • Columbus

1714 West Galbraith Road
Cincinnati, OH 45239

Lakota Local School District
5572 Princeton Road
Liberty Township, Ohio 45011

Lakota Local School District-Employment Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	12/08/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	12/09/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	12/10/2021	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					Quantity Subtotal	2.6
					Subtotal	\$702.00

Lakota Local School District-General Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					Quantity Subtotal	0.4
					Subtotal	\$108.00

Lakota Local School District-Student Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Service	12/08/2021				
Service	12/10/2021				
				Quantity Subtotal	1.2
				Subtotal	\$324.00

Lakota Local School District-BWC Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	12/01/2021					
Service	12/10/2021					
				Quantity Subtotal		0.6
				Subtotal		\$162.00

Lakota Local School District-Radio Station Matter

Type	Date	Description	Quantity	Rate	Total
Expense	12/03/2021				
				Subtotal	\$613.72
				Quantity Total	4.8
				Total	\$1,909.72

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
15795	01/31/2022	\$1,909.72	\$0.00	\$1,909.72
			Outstanding Balance	\$1,909.72

Total Amount Outstanding \$1,909.72

Please make all checks payable to Ennis Britton Co., L.P.A. and send to the following address with a copy of this invoice: 1714 West Galbraith Road, Cincinnati, Ohio 45239. Note: If you are making a partial payment, please specify which matters you are paying for.

Vendor: 2035 - ENNIS BRITTON CO LPA

Vendor Acct: EIN

Check No. 393498

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
0015795	2207008	05	001	2310	418	0000	000000	000	00	000	1,296.00
0015795	2207008	05	001	2310	418	0000	000000	000	00	000	613.72
										TOTAL	1,909.72

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 393498

56-91/422

DATE

1/27/2022

PAY


One Thousand, Nine Hundred Nine and 72/100 Dollars

\$*****1,909.72

TO **ENNIS BRITTON CO LPA**
THE **1714 WEST GALBRAITH ROAD**
ORDER **CINCINNATI, OH 45239**
OF

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

ENNIS BRITTON CO LPA
1714 WEST GALBRAITH ROAD
CINCINNATI, OH 45239



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1714 West Galbraith Road
Cincinnati, OH 45239

Lakota Local School District
5572 Princeton Road
Liberty Township, Ohio 45011

Lakota Local School District-Employment Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	01/04/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/10/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/11/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/18/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/19/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/26/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/26/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	01/27/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
				Quantity Subtotal		10.3
					Subtotal	\$2,044.00

Lakota Local School District-General Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	01/03/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Service	01/10/2022					
Service	01/11/2022					
Expense	01/31/2022					
					Quantity Subtotal	2.0
					Subtotal	\$576.80

Lakota Local School District-Student Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	01/13/2022					
					Quantity Subtotal	0.2
					Subtotal	\$56.00

Lakota Local School District-BWC Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	01/03/2022					
Service	01/07/2022					
Service	01/10/2022					
Service	01/12/2022					
Service	01/18/2022					
Service	01/19/2022					
					Quantity Subtotal	2.6
					Subtotal	\$728.00
					Quantity Total	15.1

Total \$3,404.80

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
15958	03/03/2022	\$3,404.80	\$0.00	\$3,404.80
			Outstanding Balance	\$3,404.80
			Total Amount Outstanding	\$3,404.80

Please make all checks payable to Ennis Britton Co., L.P.A. and send to the following address with a copy of this invoice: 1714 West Galbraith Road, Cincinnati, Ohio 45239. Note: If you are making a partial payment, please specify which matters you are paying for.

Vendor: 2035 - ENNIS BRITTON CO LPA

Vendor Acct: EIN

Check No. 393621

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
0015958	2207008	05	001	2310	418	0000	000000	000	00	000	3,388.00
0015958	2207008	05	001	2310	418	0000	000000	000	00	000	16.80
										TOTAL	3,404.80

LAKOTA LOCAL SCHOOLS

Message:

**** ARCHIVE COPY ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 393621

56-91/422

DATE

2/9/2022

PAY


Three Thousand, Four Hundred Four and 80/100 Dollars

\$*****3,404.80

TO ENNIS BRITTON CO LPA
 THE 1714 WEST GALBRAITH ROAD
 ORDER CINCINNATI, OH 45239
 OF

NON-NEGOTIABLE

**** ARCHIVE COPY ****

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

ENNIS BRITTON CO LPA
 1714 WEST GALBRAITH ROAD
 CINCINNATI, OH 45239



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1714 West Galbraith Road
Cincinnati, OH 45239

Lakota Local School District
5572 Princeton Road
Liberty Township, Ohio 45011

Lakota Local School District-Employment Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	02/01/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/08/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/15/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
				Quantity Subtotal		3.6
					Subtotal	\$1,008.00

Lakota Local School District-General Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	02/01/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/04/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/11/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/12/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/14/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Service	02/23/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Quantity Subtotal 2.7

Subtotal \$756.00

Lakota Local School District-Student Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	02/25/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Quantity Subtotal 1.3

Subtotal \$364.00

Lakota Local School District-BWC Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	02/04/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/09/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	02/24/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Quantity Subtotal 1.8

Subtotal \$504.00

Lakota Local School District-Diane Brunzman-Consulting Fee

Type	Date	Description	Quantity	Rate	Total
Expense	02/01/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
				Subtotal	\$4,120.00
				Quantity Total	9.4
				Total	\$6,752.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due	
16125	03/30/2022	\$6,752.00	\$0.00	\$6,752.00	
				Outstanding Balance	\$6,752.00
				Total Amount Outstanding	\$6,752.00

Please make all checks payable to Ennis Britton Co., L.P.A. and send to the following address with a copy of this invoice: 1714 West Galbraith Road, Cincinnati, Ohio 45239. Note: If you are making a partial payment, please specify which matters you are paying for.

Vendor: 2035 - ENNIS BRITTON CO LPA

Vendor Acct: EIN


Check No. 394280

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT	
0016125	2207008	05	001	2310	418	0000	000000	000	00	000	6,752.00	
											TOTAL	6,752.00

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 394280

56-91/422

DATE

3/10/2022

PAY

Six Thousand, Seven Hundred Fifty-Two and 00/100 Dollars

\$*****6,752.00

TO ENNIS BRITTON CO LPA
THE 1714 WEST GALBRAITH ROAD
ORDER CINCINNATI, OH 45239
OF

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

ENNIS BRITTON CO LPA
1714 WEST GALBRAITH ROAD
CINCINNATI, OH 45239



Cincinnati • Cleveland • Columbus

1714 West Galbraith Road
Cincinnati, OH 45239

Lakota Local School District
5572 Princeton Road
Liberty Township, Ohio 45011

Lakota Local School District-Employment Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	03/02/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/08/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
				Quantity Subtotal		0.9
					Subtotal	\$252.00

Lakota Local School District-General Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	03/02/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/07/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/07/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/08/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/21/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Expense	03/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	03/30/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

matter						
Service	03/31/2022					
					Quantity Subtotal	2.9
					Subtotal	\$815.00

Lakota Local School District-Student Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	03/28/2022					
Service	03/29/2022					
					Quantity Subtotal	0.4
					Subtotal	\$112.00
					Quantity Total	4.2
					Total	\$1,179.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due	
16297	05/01/2022	\$1,179.00	\$0.00	\$1,179.00	
				Outstanding Balance	\$1,179.00
				Total Amount Outstanding	\$1,179.00

Please make all checks payable to Ennis Britton Co., L.P.A. and send to the following address with a copy of this invoice: 1714 West Galbraith Road, Cincinnati, Ohio 45239. Note: If you are making a partial payment, please specify which matters you are paying for.

Vendor: 2035 - ENNIS BRITTON CO LPA

Vendor Acct: EIN

Check No. 395052

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT	
0016297	2207008	05	001	2310	418	0000	000000	000	00	000	1,176.00	
0016297	2207008	05	001	2310	418	0000	000000	000	00	000	3.00	
											TOTAL	1,179.00

LAKOTA LOCAL SCHOOLS

Message:

**** ARCHIVE COPY ****

Warrant Check

LAKOTA
LOCAL SCHOOLS
LAKOTA LOCAL SCHOOLS
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

First Financial Bank
 Cincinnati, OH

No. 395052

56-91/422

DATE

4/21/2022

PAY

\$*****1,179.00

One Thousand, One Hundred Seventy-Nine and 00/100 Dollars

TO ENNIS BRITTON CO LPA
 THE 1714 WEST GALBRAITH ROAD
 ORDER CINCINNATI, OH 45239
 OF

NON-NEGOTIABLE

**** ARCHIVE COPY ****

LAKOTA
LOCAL SCHOOLS
LAKOTA LOCAL SCHOOLS
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

ENNIS BRITTON CO LPA
 1714 WEST GALBRAITH ROAD
 CINCINNATI, OH 45239



Cincinnati • Cleveland • Columbus

1714 West Galbraith Road
Cincinnati, OH 45239

Lakota Local School District
5572 Princeton Road
Liberty Township, Ohio 45011

Lakota Local School District-Employment Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	04/22/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/22/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/26/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
				Quantity Subtotal		1.35
					Subtotal	\$378.00

Lakota Local School District-General Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	04/12/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/13/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/22/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/22/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/26/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

on complaint matter						
Expense	04/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/28/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					Quantity Subtotal	2.3
					Subtotal	\$650.90

Lakota Local School District-Student Matters

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	04/07/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/25/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	04/29/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					Quantity Subtotal	0.8
					Subtotal	\$224.00

Lakota Local School District-Diane Brunzman-Consulting Fee

Type	Date	Description	Quantity	Rate	Total	
Expense	04/29/2022	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
					Subtotal	\$4,120.00
					Quantity Total	4.45
					Total	\$5,372.90

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
16479	05/31/2022	\$5,372.90	\$0.00	\$5,372.90
			Outstanding Balance	\$5,372.90
			Total Amount Outstanding	\$5,372.90

Please make all checks payable to Ennis Britton Co., L.P.A. and send to the following address with a copy of this invoice: 1714 West Galbraith Road, Cincinnati, Ohio 45239. Note: If you are making a partial payment, please specify which matters you are paying for.

Vendor: 2035 - ENNIS BRITTON CO LPA

Vendor Acct: EIN


Check No. 396117

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT	
0016479	2207008	05	001	2310	418	0000	000000	000	00	000	5,372.90	
											TOTAL	5,372.90

LAKOTA LOCAL SCHOOLS

Message:

**** ARCHIVE COPY ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 396117

56-91/422

DATE

5/17/2022

PAY


Five Thousand, Three Hundred Seventy-Two and 90/100 Dollars

\$*****5,372.90

TO ENNIS BRITTON CO LPA
 THE 1714 WEST GALBRAITH ROAD
 ORDER CINCINNATI, OH 45239
 OF

NON-NEGOTIABLE

**** ARCHIVE COPY ****

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

ENNIS BRITTON CO LPA
 1714 WEST GALBRAITH ROAD
 CINCINNATI, OH 45239

2200592



P.O. Box 5716
Cincinnati, OH 45201-5716
(513) 651-6800
Facsimile (513) 651-6981
www.frostbrowntodd.com

Lakota Board of Education
Matthew Miller, Ph.D.
Superintendent
5572 Princeton Road
Liberty Township, OH 45011

Fed # 61-0722001
February 28, 2022
Bill # 210266945

Account [REDACTED]

RE: General School Law

For Professional Services Rendered Through January 31, 2022	5,952.00
TOTAL THIS BILL:	5,952.00

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: [REDACTED] – Routing Number: [REDACTED] – Swift Number: [REDACTED]



Date **Tmkr** **Narrative** **Hours**

01/05/22

01/07/22

01/07/22

01/07/22

01/08/22

01/10/22

01/10/22

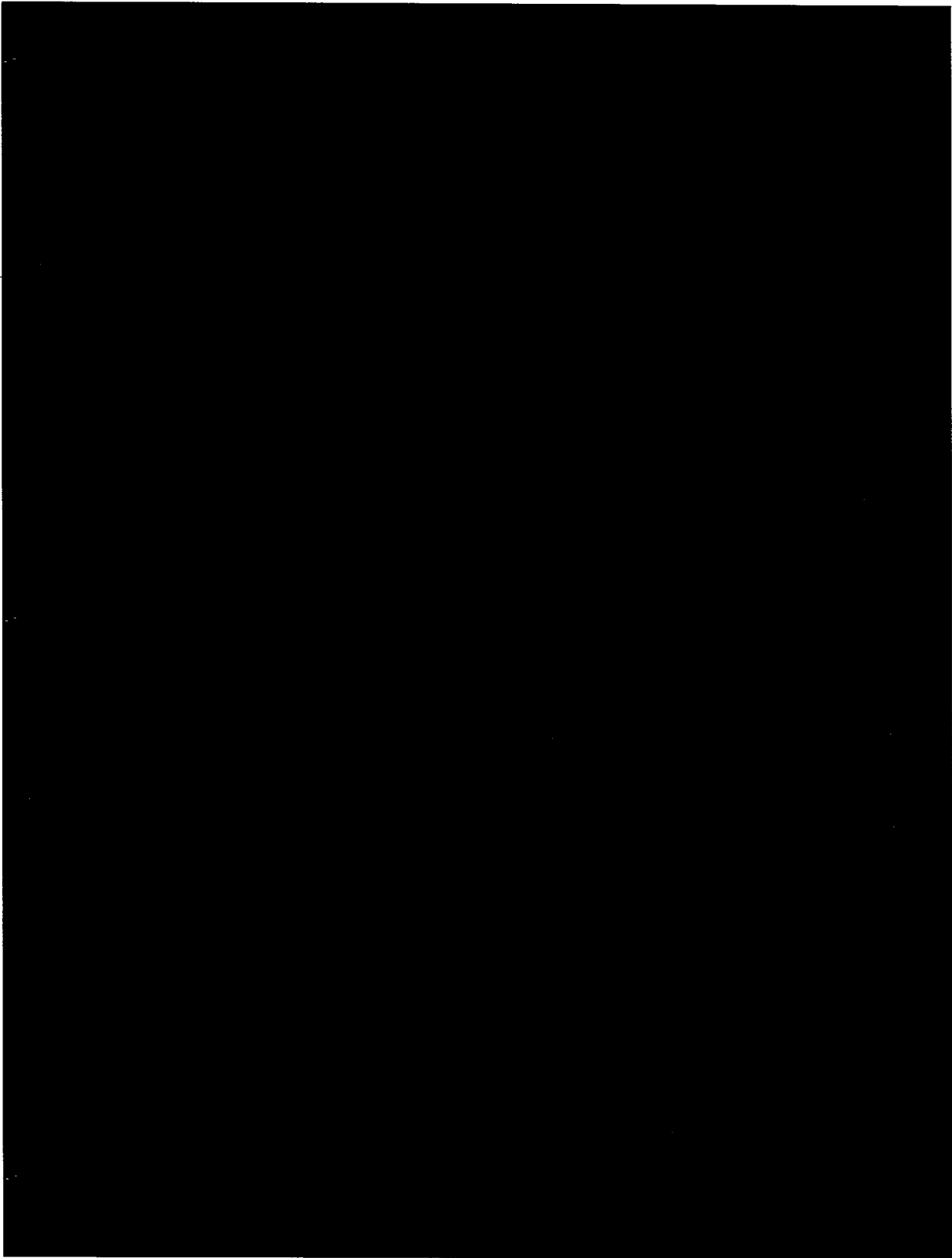
01/24/22

01/24/22

01/24/22

01/24/22

01/25/22





Date	Tmkr	Narrative	Hours
01/25/22			
01/25/22			
01/26/22			
01/27/22			
Total Hours:			19.20

Vendor: 2341 - FROST BROWN TODD LLC

Vendor Acct: EIN

Check No. 394655

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
210266945	2200592	05	001	2310	418	0000	000000	000	00	000	5,952.00
TOTAL											5,952.00

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****

Warrant Check

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 394655

56-91/422

DATE

3/24/2022

PAY

Five Thousand, Nine Hundred Fifty-Two and 00/100 Dollars

\$*****5,952.00

TO **FROST BROWN TODD LLC**
 THE **PO BOX 5716**
 ORDER **CINCINNATI, OH 45201-5716**
 OF

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****

 **LAKOTA LOCAL SCHOOLS**
 5572 PRINCETON ROAD
 LIBERTY TOWNSHIP, OH 45011-9726
 1-513-874-5505

FROST BROWN TODD LLC
PO BOX 5716
CINCINNATI, OH 45201-5716

 **Frost
Brown Todd** LLC
ATTORNEYS

P.O. Box 5716
Cincinnati, OH 45201-5716
(513) 651-6800
Facsimile (513) 651-6981
www.frostbrowntodd.com

**Lakota Board of Education
Matthew Miller, Ph.D.
Superintendent
5572 Princeton Road
Liberty Township, OH 45011**

Fed # 61-0722001
March 31, 2022
Bill # 210273242
Account # XXXXXXXXXX

RE: General School Law

For Professional Services Rendered Through February 28, 2022	14,875.00
TOTAL THIS BILL:	14,875.00

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: XXXXXXXXXX - Routing Number: XXXXXXXXXX - Swift Number: XXXXXXXXXX



Date **Tmkr** **Narrative** **Hours**

02/01/22

02/02/22

02/03/22

~~02/03/22~~

02/03/22

02/07/22

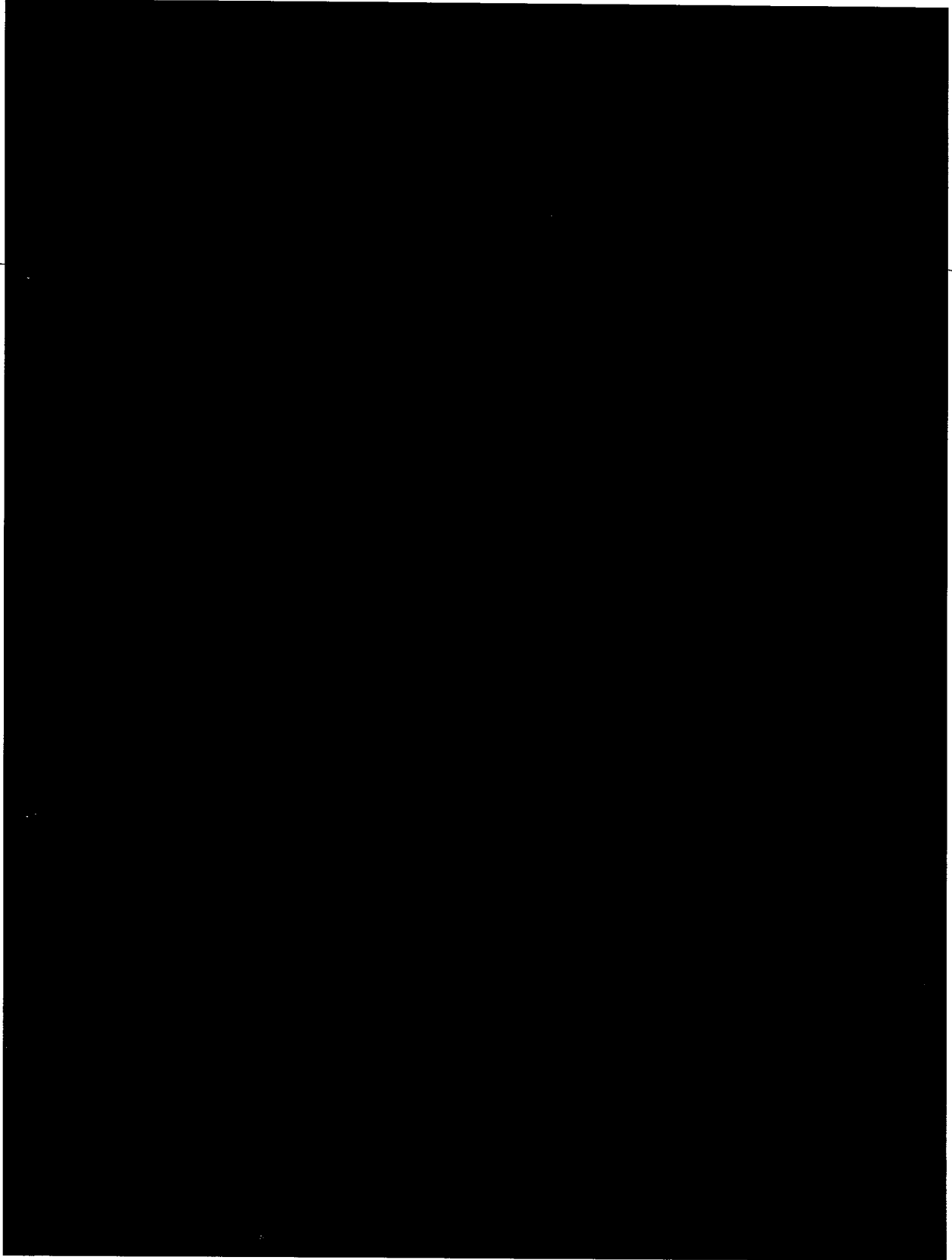
02/10/22

02/11/22

02/12/22

02/13/22

02/15/22





Date	Tmkr	Narrative	Hours
02/15/22			
02/18/22			
02/21/22			
02/21/22			
02/22/22			
02/22/22			
02/22/22			
02/23/22			
02/23/22			
02/23/22			
02/24/22			
02/24/22			

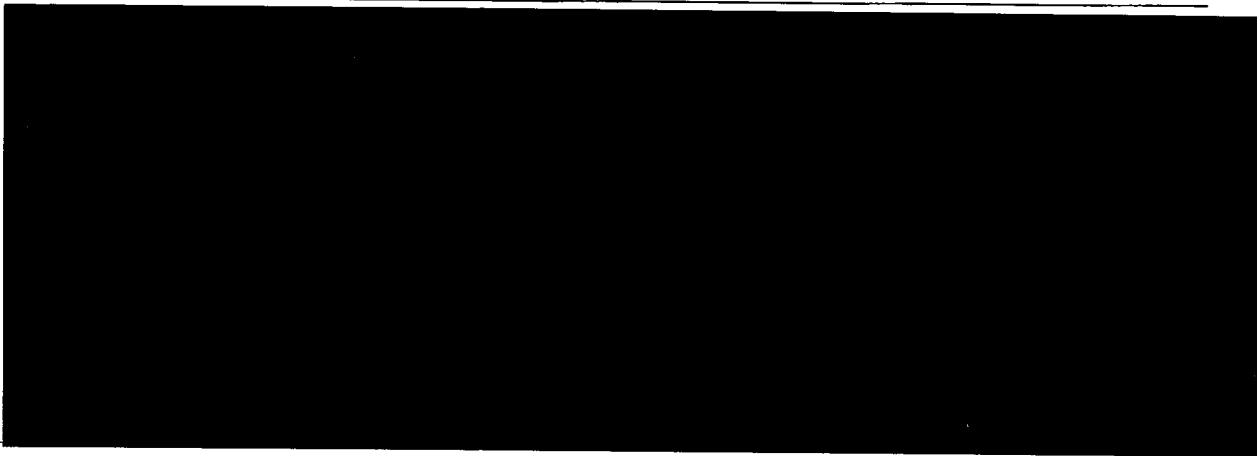


Date	Tmkr	Narrative	Hours
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02/24/22

02/24/22

02/25/22



Total Hours:

43.70

Vendor: 2341 - FROST BROWN TODD LLC

Vendor Acct: EIN

Check No. 395058

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
210273242	2200592	05	001	2310	418	0000	000000	000	00	000	10,048.00
210273242	2200592	05	001	2310	418	0000	000000	000	00	000	4,827.00
										TOTAL	14,875.00

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 395058

56-91/422

DATE

4/21/2022

PAY


\$*****14,875.00

Fourteen Thousand, Eight Hundred Seventy-Five and 00/100 Dollars

TO FROST BROWN TODD LLC
THE PO BOX 5716
ORDER CINCINNATI, OH 45201-5716
OF

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

FROST BROWN TODD LLC
PO BOX 5716
CINCINNATI, OH 45201-5716

 **Frost
Brown Todd** LLC
ATTORNEYS

P.O. Box 5716
Cincinnati, OH 45201-5716
(513) 651-6800
Facsimile (513) 651-6981
www.frostbrowntodd.com

**Lakota Board of Education
Matthew Miller, Ph.D.
Superintendent
5572 Princeton Road
Liberty Township, OH 45011**

Fed # 61-0722001
April 30, 2022
Bill # 210280263
Account # XXXXXXXXXX

RE: General School Law

For Professional Services Rendered Through March 31, 2022	6,548.50
Other Charges Through March 31, 2022	4.20
TOTAL THIS BILL:	6,552.70

All amounts are in USD
Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC
Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202
Account Number: XXXXXXXXXX – Routing Number: XXXXXXXXXX – Swift Number: XXXXXXXXXX



Date	Tmkr	Narrative	Hours
03/01/22			
03/03/22			
03/03/22			
03/03/22			
03/04/22			
03/10/22			
03/10/22			
03/11/22			
03/11/22			
03/14/22			
03/14/22			
03/14/22			
03/23/22			



Date	Tmkr	Narrative	Hours
03/24/22			
03/24/22			
03/28/22			
03/28/22			
03/30/22			
03/30/22			
03/30/22			
03/31/22			
03/31/22			
03/31/22			
03/31/22			
03/31/22			
Total Hours:			18.00

SUMMARIZED DISBURSEMENTS



Description	Qty	Per Unit	Amount
Reproduction	42.00	0.10	4.20
TOTAL			\$4.20

2200592/114

Frost Brown Todd LLC ATTORNEYS

P.O. Box 5716
Cincinnati, OH 45201-5716
(513) 651-6800
Facsimile (513) 651-6981
www.frostbrowntodd.com

Lakota Board of Education
Matthew Miller, Ph.D.
Superintendent
5572 Princeton Road
Liberty Township, OH 45011

Fed # 61-0722001
May 31, 2022
Bill # 210286786

Account # XXXXXXXXXX

RE: General School Law

For Professional Services Rendered Through April 30, 2022	11,977.00
Other Charges Through April 30, 2022	30.28

TOTAL THIS BILL: 12,007.28

Outstanding Bills (see page 2 for details – if already paid please disregard) 6,552.70

TOTAL AMOUNT DUE: 18,559.98

All amounts are in USD
Please send remittance information to AccountsReivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC
Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202
Account Number: XXXXXXXXXX – Routing Number: XXXXXXXXXX – Swift Number: XXXXXXXXXX

RECAP OF OUTSTANDING BILLS

Bill Date	Bill Number	Balance
04/30/22	210280263	6,552.70
	TOTAL	\$6,552.70



Date **Tmkr** **Narrative** **Hours**

04/01/22

04/01/22

04/01/22

04/04/22

04/06/22

04/07/22

04/07/22

04/11/22

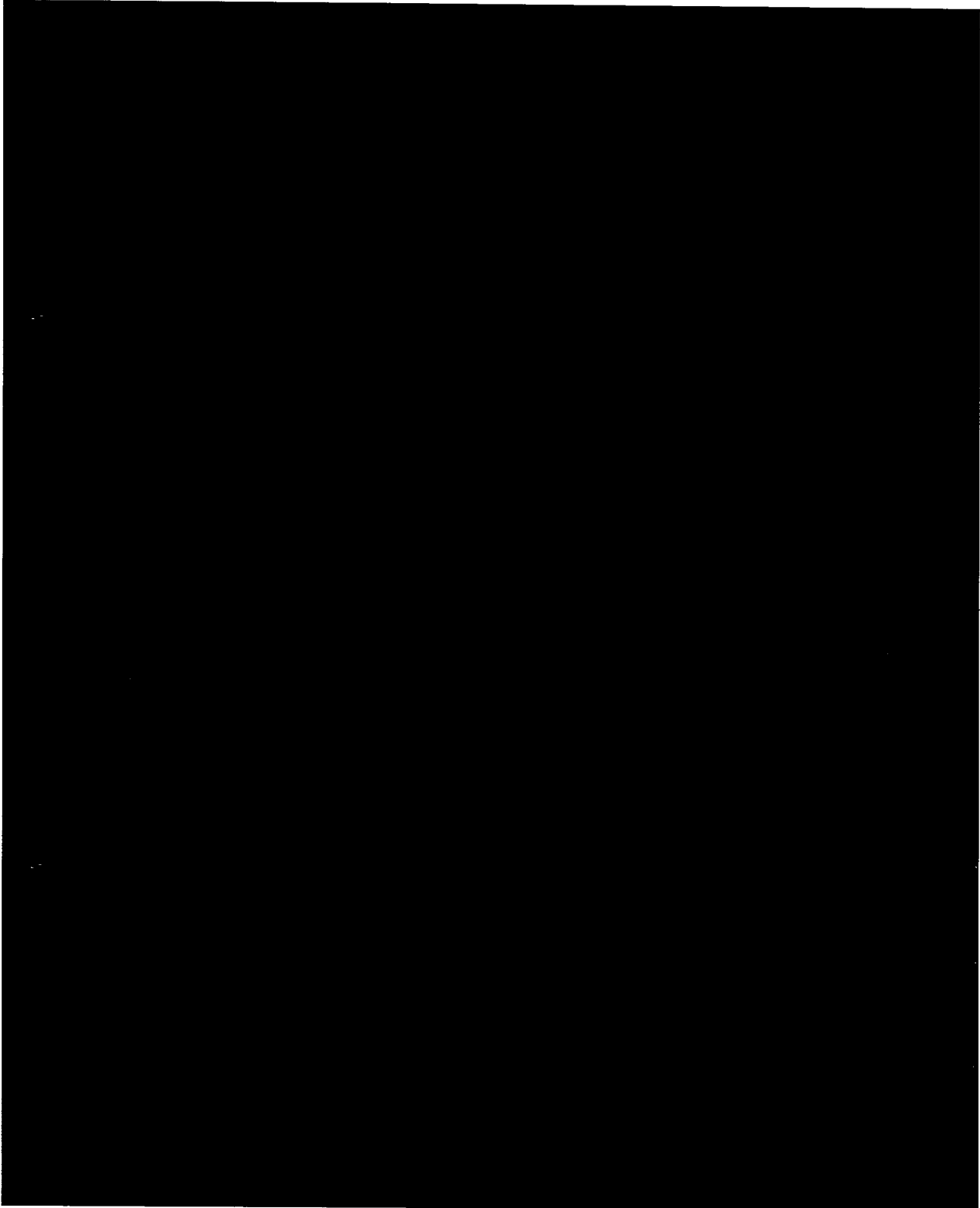
04/11/22

04/14/22

04/18/22

04/19/22

04/21/22





Date	Tmkr	Narrative	Hours
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04/21/22

04/25/22

04/25/22

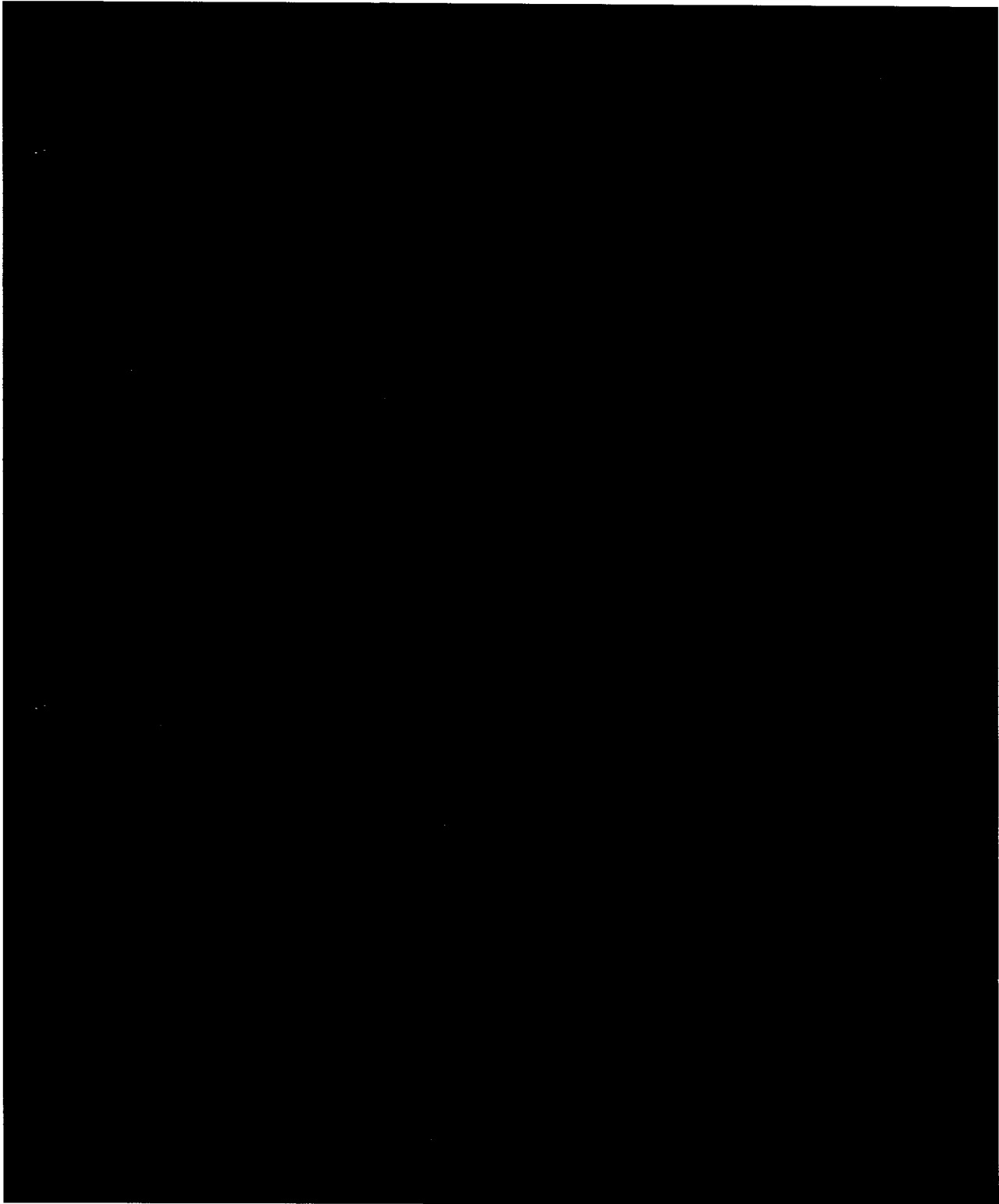
04/27/22

04/27/22

04/27/22

04/27/22

04/27/22



Date	Tmkr	Narrative	Hours
04/27/22			
04/28/22			
04/28/22			
04/28/22			
04/29/22			
Total Hours:			40.60

SUMMARIZED DISBURSEMENTS

Description	Qty	Per Unit	Amount
Reproduction	66.00	0.10	6.60
Reproductions Duplex	96.00	0.08	7.68
Color Reproductions Duplex	64.00	0.25	16.00
TOTAL			\$30.28

Vendor: 2341 - FROST BROWN TODD LLC

Vendor Acct: EIN

Check No. 396597

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
210286786	2200592	05	001	2310	418	0000	000000	000	00	000	5,173.00
210280263	2200592	05	001	2310	418	0000	000000	000	00	000	6,552.70
210286786	2200592	05	001	2310	418	0000	000000	000	00	000	6,834.28
										TOTAL	18,559.98

LAKOTA LOCAL SCHOOLS

TOTAL 18,559.98

Message:

**** ARCHIVE COPY ****

Warrant Check



LAKOTA LOCAL SCHOOLS
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 396597

56-91/422

DATE

6/14/2022

PAY

\$*****18,559.98

Eighteen Thousand, Five Hundred Fifty-Nine and 98/100 Dollars

TO FROST BROWN TODD LLC
THE PO BOX 5716
ORDER CINCINNATI, OH 45201-5716
OF

NON-NEGOTIABLE

**** ARCHIVE COPY ****



LAKOTA LOCAL SCHOOLS
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

FROST BROWN TODD LLC
PO BOX 5716
CINCINNATI, OH 45201-5716

**Frost
Brown Todd** LLC
ATTORNEYS

P.O. Box 5716
Cincinnati, OH 45201-5716
(513) 651-6800
Facsimile (513) 651-6981
www.frostbrowntodd.com

**Lakota Board of Education
Matthew Miller, Ph.D.
Superintendent
5572 Princeton Road
Liberty Township, OH 45011**

Fed # 61-0722001
July 1, 2022
Bill # 210293324

Account # [REDACTED]

RE: General School Law

For Professional Services Rendered Through May 31, 2022	10,620.00
TOTAL THIS BILL:	10,620.00

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: [REDACTED] – Routing Number: [REDACTED] – Swift Number: [REDACTED]

Date	Tmkr	Narrative	Hours
05/02/22	[REDACTED]	[REDACTED]	[REDACTED]
05/03/22	[REDACTED]	[REDACTED]	[REDACTED]
05/04/22	[REDACTED]	[REDACTED]	[REDACTED]
05/04/22	[REDACTED]	[REDACTED]	[REDACTED]
05/04/22	[REDACTED]	[REDACTED]	[REDACTED]
05/05/22	[REDACTED]	[REDACTED]	[REDACTED]
05/06/22	[REDACTED]	[REDACTED]	[REDACTED]
05/08/22	[REDACTED]	[REDACTED]	[REDACTED]
05/08/22	[REDACTED]	[REDACTED]	[REDACTED]

Date	Tmkr	Narrative	Hours
05/09/22	[REDACTED]	[REDACTED]	[REDACTED]
05/09/22	[REDACTED]	[REDACTED]	[REDACTED]
05/09/22	[REDACTED]	[REDACTED]	[REDACTED]
05/09/22	[REDACTED]	[REDACTED]	[REDACTED]
05/10/22	[REDACTED]	[REDACTED]	[REDACTED]
05/10/22	[REDACTED]	[REDACTED]	[REDACTED]
05/11/22	[REDACTED]	[REDACTED]	[REDACTED]
05/12/22	[REDACTED]	[REDACTED]	[REDACTED]
05/12/22	[REDACTED]	[REDACTED]	[REDACTED]
05/18/22	[REDACTED]	[REDACTED]	[REDACTED]
05/20/22	[REDACTED]	[REDACTED]	[REDACTED]
05/20/22	[REDACTED]	[REDACTED]	[REDACTED]

Date	Tmkr	Narrative	Hours
05/20/22	[REDACTED]	[REDACTED]	[REDACTED]
05/23/22	[REDACTED]	[REDACTED]	[REDACTED]
05/23/22	[REDACTED]	[REDACTED]	[REDACTED]
05/23/22	[REDACTED]	[REDACTED]	[REDACTED]
05/23/22	[REDACTED]	[REDACTED]	[REDACTED]
05/24/22	[REDACTED]	[REDACTED]	[REDACTED]
05/24/22	[REDACTED]	[REDACTED]	[REDACTED]
05/25/22	[REDACTED]	[REDACTED]	[REDACTED]
05/26/22	[REDACTED]	[REDACTED]	[REDACTED]
05/26/22	[REDACTED]	[REDACTED]	[REDACTED]
05/26/22	[REDACTED]	[REDACTED]	[REDACTED]
05/27/22	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours: 27.30



Vendor: 2341 - FROST BROWN TODD LLC

Vendor Acct: EIN

Check No. 397395

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
210293324	2300199	05	001	2310	418	0000	000000	000	00	000	10,620.00
TOTAL											10,620.00

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****
Warrant Check



LAKOTA LOCAL SCHOOLS
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 397395

56-91/422

DATE

7/27/2022

PAY

Ten Thousand, Six Hundred Twenty and 00/100 Dollars

\$*****10,620.00

TO FROST BROWN TODD LLC
THE PO BOX 5716
ORDER OF CINCINNATI, OH 45201-5716

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****



LAKOTA LOCAL SCHOOLS
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

FROST BROWN TODD LLC
PO BOX 5716
CINCINNATI, OH 45201-5716



BRICKER & ECKLER LLP
100 South Third Street
Columbus, Ohio 43215-4291
Phone 614.227.2300
Fax 614.227.2390
www.bricker.com

COLUMBUS | CLEVELAND
CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806200

LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)
ATTN ACCOUNTS PAYABLE
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011

INVOICE SUMMARY

For Legal Services Rendered Through: May 31, 2022

Attorney: Lampe, David J.

Invoice Date: 07/01/22

Matter Name
General Representation

Matter ID
155619

Matter Amount
\$ 3,270.00

Total Due This Invoice: \$ 3,270.00

Previous Balance Outstanding: \$ 0.00

PAYMENT DUE UPON RECEIPT

PD # 2300198

PLEASE INCLUDE INVOICE NUMBER AND CLIENT ID WITH YOUR PAYMENT

Please Remit Payment To:

Via US Mail:

Bricker & Eckler, LLP
L-4070
Columbus, OH 43260-4070

Via Wire/ACH

The Huntington National Bank
41 S. High St., Columbus, OH 43215
ABA Routing: [REDACTED]
Account: [REDACTED]
Remittance Email: paymentinfo@bricker.com

If you have any questions regarding this invoice, please contact either Heather Wiley at 614-227-8888
AccountsReivable@bricker.com or the responsible attorney for this matter.

We greatly value your business. If you have any concerns, compliments, or feedback about the level of service and responsiveness you received, please contact Jim Flynn at 614-227-8855 or jflynn@bricker.com.



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100 South Third Street
Columbus, Ohio 43215-4291
Phone 614.227.2300
Fax 614.227.2390
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CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806200
PAGE 1

LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)
ATTN ACCOUNTS PAYABLE
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011

PRIVATE AND CONFIDENTIAL

For Legal Services Rendered Through: May 31, 2022

Matter: General Representation
Matter ID: 155619

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>
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05/02/22

05/03/22

05/04/22

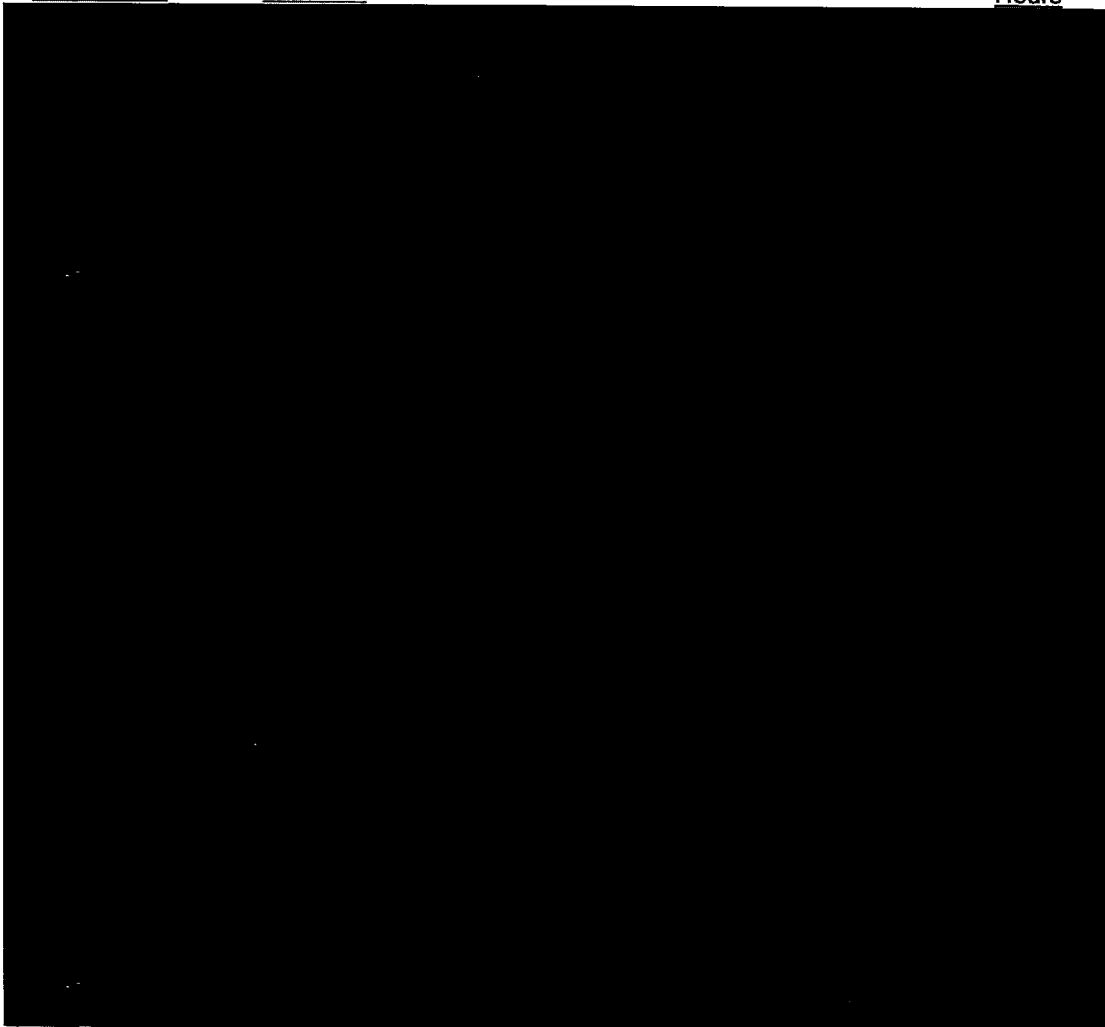
05/05/22

05/06/22

05/10/22

05/12/22

05/17/22





BRICKER & ECKLER LLP

100 South Third Street
Columbus, Ohio 43215-4291
Phone 614.227.2300
Fax 614.227.2390
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COLUMBUS | CLEVELAND
CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806200
PAGE 2

05/18/22

05/23/22

05/24/22

05/25/22

05/27/22

05/31/22



Total Hours/Fees 10.90 \$ 3,270.00

Total This Invoice \$ 3,270.00



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Columbus, Ohio 43215-4291
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Fax 614.227.2390
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CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806192

LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)
ATTN ACCOUNTS PAYABLE
5572 PRINCETON RD
LIBERTY TOWNSHIP, OH 45011-9726

INVOICE SUMMARY

For Legal Services Rendered Through: May 31, 2022

Attorney: Anthony, Laura G.

Invoice Date: 07/01/22

Matter Name
Special Education

Matter ID
136013

Matter Amount
\$ 5,002.00

Total Due This Invoice: \$ 5,002.00

Previous Balance Outstanding: \$ 0.00

PAYMENT DUE UPON RECEIPT

PO#
2300198

PLEASE INCLUDE INVOICE NUMBER AND CLIENT ID WITH YOUR PAYMENT

Please Remit Payment To:

Via US Mail:

Bricker & Eckler, LLP
L-4070
Columbus, OH 43260-4070

Via Wire/ACH

The Huntington National Bank
41 S. High St., Columbus, OH 43215
ABA Routing: [REDACTED]
Account: [REDACTED]
Remittance Email: paymentinfo@bricker.com

If you have any questions regarding this invoice, please contact either Heather Wiley at 614-227-8888
AccountsReivable@bricker.com or the responsible attorney for this matter.

We greatly value your business. If you have any concerns, compliments, or feedback about the level of service and responsiveness you received, please contact Jim Flynn at 614-227-8855 or jflynn@bricker.com.



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COLUMBUS | CLEVELAND
CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806192
PAGE 1

LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)
ATTN ACCOUNTS PAYABLE
5572 PRINCETON RD
LIBERTY TOWNSHIP, OH 45011-9726

PRIVATE AND CONFIDENTIAL

For Legal Services Rendered Through: May 31, 2022

Matter: Special Education
Matter ID: 136013

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>
05/03/22			
05/04/22			
05/07/22			
05/09/22			
05/10/22			
05/11/22			
05/17/22			



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COLUMBUS | CLEVELAND
CINCINNATI | DAYTON
MARIETTA | BARNESVILLE

EMPLOYER ID NUMBER 31-4359739

CLIENT: LAKOTA LOCAL SCHOOL DISTRICT (BUTLER)

CLIENT ID: 040472
INVOICE DATE: July 01, 2022
INVOICE NO.: 806192
PAGE 2

05/18/22

05/19/22

05/20/22

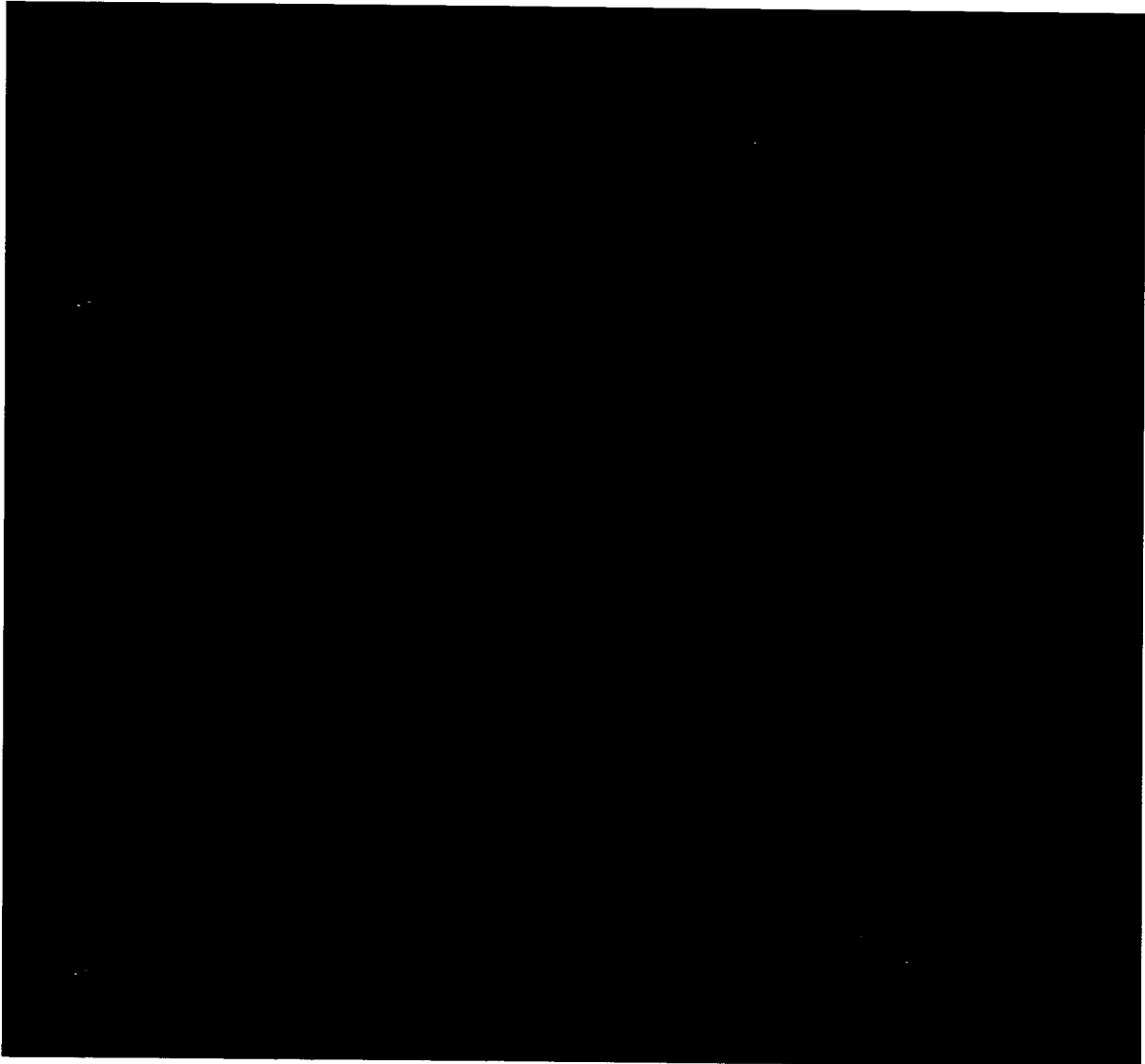
05/22/22

05/23/22

05/24/22

05/26/22

05/26/22



Total Hours/Fees 16.40 \$ 5,002.00

Total This Invoice \$ 5,002.00

Vendor: 806 - BRICKER & ECKLER LLP

Vendor Acct: EIN

Check No. 397220

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
0806192	2300198	05	001	2310	418	0000	000000	000	00	000	5,002.00
0806200	2300198	05	001	2310	418	0000	000000	000	00	000	3,270.00
										TOTAL	8,272.00

LAKOTA LOCAL SCHOOLS

Message:

**** **ARCHIVE COPY** ****
Warrant Check

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

First Financial Bank
Cincinnati, OH

No. 397220

56-91/422

DATE

7/7/2022

PAY

\$*****8,272.00

Eight Thousand, Two Hundred Seventy-Two and 00/100 Dollars

TO **BRICKER & ECKLER LLP**
THE **L-4070**
ORDER **COLUMBUS, OH 43260-4070**
OF

NON-NEGOTIABLE

**** **ARCHIVE COPY** ****

 **LAKOTA LOCAL SCHOOLS**
5572 PRINCETON ROAD
LIBERTY TOWNSHIP, OH 45011-9726
1-513-874-5505

BRICKER & ECKLER LLP
L-4070
COLUMBUS, OH 43260-4070

----- Forwarded message -----

From: **Conover, Brodi** <BConover@bricker.com>

Date: Wed, Jan 11, 2023 at 9:08 PM

Subject: RE: Records Request NEW

To: <forheisgood77@gmail.com>

Cc: publicrecordsrequest@lakotaonline.com <publicrecordsrequest@lakotaonline.com>

Good evening –

As I mentioned last week, the District conducted a search of its records for any communications between Elizabeth Tuck and Board members from July 1, 2022. Those records that existed were provided to you and are reattached here for your convenience. If you are seeking communications between the Board and its attorneys, any of those communications are protected by the attorney-client privilege. *State ex rel. Leslie v. Ohio Hous. Fin. Agency*, 105 Ohio St.3d 261, 2005-Ohio-1508, 824 N.E.2d 990.

If you are seeking communications between two non-public entities (that is, two separate private law firms), those records are not a public record because they are not created, received, or otherwise under the jurisdiction of a public office.

Thanks,

Brodi

Brodi J. Conover

Partner

bconover@bricker.com

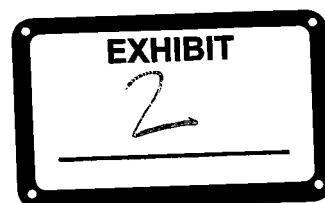
t: 513.870.6693

From: Gods Good <forheisgood77@gmail.com>

Sent: Thursday, January 5, 2023 12:43 PM

To: Conover, Brodi <BConover@bricker.com>

Subject: Re: Records Request NEW



This message originated outside your organization.

Mr. Conover,

Thank you. To clarify, I am requesting all email or regular mail communication between the law firm of Elizabeth Tuck and all current Lakota school board members, as well as legal counsel for the current board members; from the months of September 2022 until the current date of Jan 1, 2023 in regards to Matthew Miller & his employment at Lakota school district as the superintendent.

Including, but not limited to the most recent investigation done by Jackson Lewis, notices, legal documents, letters to preserve, cease and desist & all other attachments and communication in regards to Matthew Miller.

Thank you

On Thu, Jan 5, 2023 at 11:00 AM Conover, Brodi <BConover@bricker.com> wrote:

Good morning –

Your request, as presented, is overly broad because it does not include any time limitation on it. See, e.g., *State ex rel. Kesterson v. Kent State Univ.*, 156 Ohio St.3d 22, 2018-Ohio-5110 (a proper request for communications includes a sender, recipient, reasonable time period, and specific topic).

That said, in an effort to be transparent and exceed its obligations under the Public Records Act, the District conducted a search of its records since July 1, 2022 for all email communications from Elizabeth Tuck to Board members. The records attached are responsive.

Thanks,

Brodi

Brodi J. Conover

Partner

bconover@bricker.com

t: 513.870.6693

From: Gods Good <forheisgood77@gmail.com>

Sent: Wednesday, January 4, 2023 1:13 PM

To: Conover, Brodi <BConover@bricker.com>; adam.zink@lakotaonline.com

Subject: Records Request NEW

This message originated outside your organization.

Hello, I am requesting any and all legal documentation or notices (whether email or regular mail) sent from the law firm of Elizabeth Tuck/ matt Miller to all members of the lakota school board. Thank you in advance for a timely response.