May 21, 2014

Jon Husted
Ohio Secretary of State
180 E. Broad St., Ste 103
Columbus, Ohio 43215

Dear Secretary Husted:

This is a request for access to public records under section 149.43 of the Ohio Revised Code, the Public Records Act. Under the provisions of that statute, I request that the following documents be produced for my, or my agent's, personal examination within fourteen (14) days of the date of receipt of this request:

(1) All documents, including all e-mails, text messages, electronic communications of any kind, sent to, authored by or received by Bradley A. Smith, from January 1, 2014 to the present.

(2) All documents, including all e-mails, text messages, electronic communications of any kind, sent to, authored by or received by Jack Christopher, from January 1, 2014 to the present.

(3) All documents related to all election matters, including the re-elections of Governor Kasich, Attorney General DeWine, and the Secretary, including any and all ballot access correspondence about minor parties, including the Libertarian Party of Ohio, the Green Party of Ohio, the Constitution Party of Ohio, and the Socialist Party of Ohio, and all e-mails, text messages, electronic communications of any kind, sent or received by Jon Husted, from September 1, 2013 to the present.

(4) Any and all documents (in whatever form, including all electronic communications) concerning Gregory Felsoci, John Musca, Matt Borges, the Ohio Republican Party, Brooke Bodney, Governor Kasich, John Zieger, Steve Tigges, Marion Little, any lawyers affiliated with the the law firm of Zeiger, Tigges & Little, the Libertarian Party of Ohio, Kevin Knedler, Charles Earl, Steven Linnabary, Aaron Harris, Chad Monnin, and/or anyone else affiliated with the Libertarian Party of Ohio, by whatever source, created, received, or distributed from September 1, 2013 to the present.
If there is any information that will be excluded or any materials that will be redacted pertaining to my request, I want to know those categories and under what privacy law or other provisions they are withheld or redacted.

Should any portion of this request be denied, in part or in whole, Ohio law requires written justification for its denial, along with a citation of the appropriate Public Records Act exemption (or other law) that applies for each record, or portion thereof, that is withheld.

If any of the records requested are under seizure by another agency, I request copies of the receipts and/or inventories provided by the seizing authority.

Please produce these items in an electronic PDF format or alternatively in the format in which they are kept.

As you are probably aware, the Public Records Act requires you to promptly prepare the records I am requesting and to make them available for my, or my agent's, personal inspection at all reasonable times during regular business hours within fourteen (14) days of the date of receipt of this request.

I thank you for your prompt attention to this request. If you have any questions, I may be reached at (614-236-6590) or (mbrown@law.capital.edu).

Sincerely,

/s/ Mark R. Brown

Mark R. Brown