



January 5, 2022

VIA EMAIL

Public Records Officer
Stark County Board of Commissioners
110 Central Plaza South, Suite 240
Canton, OH 44702
sldonald@starkcountyohio.gov

Re: Public Records Act Request

Dear Public Records Officer:

Pursuant to the Ohio Public Records Act (PRA), Ohio Rev. Code § 149.43, and other applicable Ohio law, American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office promptly produce the following records:

1. All electronic communications (including emails, complete email chains, calendar invitations, text messages, and similar electronic messaging applications (such as Signal, WhatsApp, Twitter DMs), etc., and any attachments thereto) between (a) Stark County Commissioner Bill C. Smith, Janet Weir Creighton, or Richard Regula, and (b) any entity or individual listed below.
 - i. Matt Braynard, Ian Camacho, Caroline Craze, Ken Bennett, and/or anyone communicating on behalf of Look Ahead America (including, but not limited to, anyone communicating from an address ending in @LookAheadAmerica.org)
 - ii. Douglas Frank (including, but not limited to, the email address drdouglasfrank@protonmail.com)
 - iii. Ohio State Representative Jennifer Gross
 - iv. Ken Blackwell (kennethblackwell693@gmail.com) and/or anyone communicating on behalf of America First Policy Institute (including, but not limited to, anyone communicating from an address ending in @americafirstpolicy.com)
 - v. James Blanchard (jhb@jbacapital.com)
 - vi. Tom Zawitowski and/or anyone communicating on behalf of We the People Convention
 - vii. Former National Security Advisor Mike Flynn (including, but not limited to, an address ending in @generalflynn.com) and/or anyone communicating on behalf of America's Future (including,



- but not limited to, anyone communicating from an address ending in @americasfuture.net)
- viii. Ivan Raiklin (ivan.raiklin@gmail.com or socialmediaraiklin@gmail.com)
 - ix. Velma Ann Ruth, Patrick Cabbage, and/or Mark Still (mark@pearlconsolidated.com), or anyone communicating on behalf of Patriot Caucus (including, but not limited to, anyone communicating from an address ending in @patriot-caucus.com)
 - x. Cleta Mitchell (including, but not limited to, cleta@cletamitchell.com, cmitchell@foley.com, or an address ending in @bradleyfdn.org)
 - xi. Jenna Ellis and/or anyone communicating on behalf of Liberty University's Falkirk Center (including, but not limited to, anyone communicating from an address ending in @falkirkcenter.com), Thomas More Society (including, but not limited to, anyone communicating from an address ending in @thomasmoresociety.org), or American Greatness Fund (including, but not limited to, anyone communicating from an address ending in @americangreatnessfund.com)
 - xii. Colonel Phil Waldron (including, but not limited to, phil@onewarrior.com or p@bonfiresearch.org), Russell Ramsland (including, but not limited to, ryuks9sq@alliedspecialops.us), J. Keet Lewis, and/or anyone communicating on behalf of Allied Security Operations Group (including, but not limited to, anyone communicating from an address ending in @alliedspecialops.us)
 - xiii. Christina Bobb, Chanel Rion, or anyone communicating from an address ending in @oann.com, or Voices and Votes, including anyone communicating from an email address ending in @voicesandvotes.org)
 - xiv. Mike Lindell (mike@mypillow.com) and/or his attorney, Kurt Olsen
 - xv. Phill Kline (phillklineva@gmail.com), Jacqueline Timmer, Tom Breth, or anyone communicating on behalf of the American Voter's Alliance (including, but not limited to, anyone communicating from an address ending in @got-freedom.org)
 - xvi. Seth Keshel
 - xvii. Jeff O'Donnel
 - xviii. Al Hartman, Jenny Limcher, or anyone communicating on behalf of Hartman REIT (@hi-reit.com)

For part 1 of this request, please provide all responsive records from January 1, 2021, through the date this request is initially received by your office.

- 2. All electronic communications (including emails, complete email chains, calendar invitations, text messages and similar electronic messaging applications (such as Signal, WhatsApp, Twitter DMs), etc., and any attachments thereto) sent by Stark County Commissioner Bill C. Smith, Janet

Weir Creighton, or Richard Regula containing any of the following search terms:

Search Terms:

- i. Dominion
- ii. “Dominion Voting Systems”
- iii. “Voting machine*”
- iv. “Voter machine*”
- v. Maricopa
- vi. Arizona
- vii. “Election audit”

In an effort to accommodate Stark County and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited item 2 of this request to emails sent by the listed officials. To be clear, however, American Oversight still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both Commissioner Bill Smith’s response to an email containing the search term “Dominion” and the initial received message are responsive to this request and should be produced.

For part 2 of this request, please provide all responsive records from February 1, 2021, through June 1, 2021.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and

transcripts, notes, or minutes of any meetings, telephone conversations or discussions.

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.
- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.¹ If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information

¹ Ohio Rev. Code § 149.43(B)(1).

gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.²

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Sarah Colombo at records@americanoversight.org or (202) 869-5244.

Sincerely,

/s/ Sarah Colombo
Sarah Colombo
on behalf of
American Oversight

² American Oversight currently has approximately 15,580 page likes on Facebook and 109,300 followers on Twitter. American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 3, 2022), American Oversight (@weareoversight), Twitter, <https://twitter.com/weareoversight> (last visited Jan. 3, 2022).