

A hand holding a magnifying glass over a dark background. The magnifying glass is positioned over the text, and the hand is visible on the right side of the frame.

KEEP AN EYE ON YOUR GOVERNMENT:

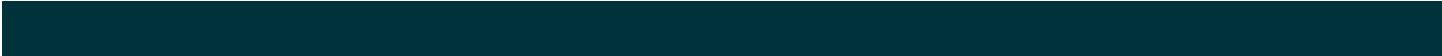
THE ACTIVIST'S
HOW-TO-GUIDE ON
OHIO PUBLIC RECORDS
AND
OPEN MEETINGS LAWS

Please note: The material provided here is for basic informational purposes only. It is not meant to be, nor should it be taken as, legal advice. You should not rely on this information instead of seeking the advice of an attorney. The legal issues surrounding civil rights and civil liberties are complex, and a person's rights may vary from case to case depending on subtle details. Only a lawyer who has taken the time to become fully aware of the facts in a given case can provide you with sound legal advice.

If you feel your rights have been violated, contact an attorney at once. The law imposes time limits on most actions to vindicate your rights, so it is important to act quickly. If you do not know how to reach an attorney, call the lawyer referral service of your local bar association. They will be able to direct you to a lawyer experienced in the type of law involved in your case.

TABLE OF CONTENTS

Introduction	1
Ohio Public Records Law	2
Overview.....	2
How To Do It: Step-By-Step	5
Sample Request to Receive Records	7
Sample Request to Inspect Records	8
Frequently Asked Questions	9
Rights and Responsibilities of a Public Office.....	12
If Your Request is Denied	13
Ohio Open Meetings Law.....	15
Additional Resources	17
Endnotes	18



INTRODUCTION

Did you know? You can write a request for information – whether it’s budgets, police reports, policies, emails, bail schedules – and in many cases the government agency is required by law to hand it over. That’s all thanks to Ohio’s Public Records Act, which is a crucial tool for activists and advocates in holding our government accountable.

In fact, this very law is the reason we have been able to gather the information and evidence needed to launch many campaigns and lawsuits. As just two examples, public records requests have allowed us to [uncover predatory practices](#) in Ohio’s mayor’s courts (2018), and [achieve statewide reform](#) to prevent courts from jailing those who can’t afford to pay their fines (2014).

Similarly, thanks to Ohio’s Open Meetings Act, government bodies are required to make many of their meetings public.

But these laws, collectively known as Sunshine Laws, are just pieces of paper unless everyday Ohioans take advantage of them.

That’s why we’ve made this step-by-step guide: to inform you and empower you to use these invaluable tools. Ohio government can truly be one made by the people and for the people when it is open to the public. You have a fundamental right to know whether government officials are improving the welfare of the community in which you live. If you determine that your officials have not used your tax dollars appropriately, you have the right to demonstrate that sentiment at a rally, through a petition, with a full-fledged campaign, in letters to your legislators, or in your ballot at the next election. This keeps public officials accountable to you, the constituents that they serve.

Use this guide to help you keep an eye on your government!

[ACLUOHIO.ORG/PUBLICRECORDS](https://acluohio.org/publicrecords)

OHIO PUBLIC RECORDS LAW

OVERVIEW

? **What is a public record?** Records include writings, documents, correspondence, papers, text files, computer files, emails, annals, archives, records, journals, logs, notes, and/or minutes.

To be considered a public record subject to public records laws, it must meet all three of these criteria:

1. Have information stored on a fixed medium (paper, computer, film, etc.);
2. Be created, received, or sent under the jurisdiction of a public office; and
3. Document the organization, functions, procedures, policies, operations, decisions, or other activities of the office.

THE FOLLOWING ARE GENERALLY CONSIDERED PUBLIC RECORDS:

- Policies
- Budgets
- Emails
- Meeting minutes
- Police dash cam and body cam footage¹, once the investigation is complete
- Routine offense and incident reports² and 911 calls
- Bond schedules and other court procedures
- Law enforcement investigatory records, once the trial of the underlying criminal case at issue is completed³
- Personal calendars of public officials that deal with work-related activities⁴
- Settlement agreements and other contracts
- Video footage from prisons⁵

? **What are some exceptions?**

Not all records are subject to public records requests. The following are examples of records that are exempted from public records law, meaning public agencies don't have to release them to you:

- Medical and DNA records.
- Trial preparation records.
- Confidential information within law enforcement investigatory records.
- Records of probation/parole proceedings.
- Youth services records.
- Mediation communications and Civil Rights Commission proceedings.
- Residential and familial records of law enforcement.
- Intellectual property records and trade secrets.
- Adoption records.
- Records prohibited from release by state and federal law.
- Security and infrastructure records.

For a complete list of all exceptions, see [Ohio Revised Code §149.43\(A\)\(1\)\(a-cc\)](#).

If a public record contains private information such as social security numbers or driver's license numbers, the public office may redact (black out) that information before releasing it. The office must tell you the reason for the redaction.

? **What agencies and offices can I request records from?**

Under Ohio's laws you can make a request to any state or local "public office." Public offices are defined as: any state agency, public institution, political subdivision, or other organized body, office, agency, institution, or entity established by the laws of this state for the exercise of any function of government.

Some examples include: school boards, jails, city councils, police departments, the Department of Rehabilitation and Correction, the Bureau of Motor Vehicles, and the Department of Child and Family Services.

? **Do I have to be a U.S. citizen or Ohio resident to make a request?**
No. Any person may request public records by contacting an appropriate person within the public office, regardless of your citizenship status or where you live.

? **What should my request look like?**
No specific language or format is necessary. Requests may be made by letter, email, phone, or in-person, but requests should be clear and specific enough for the public office to reasonably identify the desired public records. For sample records requests, see pages 7 and 8.

? **What are my options for viewing the records? Can the office send me the records?**
You can either go to the public office and view the records in person, or request that the records be sent to you.

If you are viewing the records in person, you are entitled to prompt inspection of the records at a reasonable time during regular business hours; whether the appointment is “prompt” is determined on a case-by-case basis. You can also designate another person to inspect the records for you.

? **What does it cost to make a request?**
Sending a public records request is free, but you must pay for the actual costs to obtain the records (e.g. printed pages, disc). For this reason we recommend asking for a cost estimate ahead of time so you aren’t surprised by a large bill. An office cannot charge you for the cost for the office’s time or effort in fulfilling the request.

HOW TO DO IT: STEP-BY-STEP

1 Determine the recipient of your public records request:

- Think of which government agency has the information you are requesting.
- Call the office's phone number and ask for the name and contact information of the person who handles public records requests.
- If you send a request to a director of a government agency, be sure to carbon copy administrative staff to ensure receipt of your records request.

2 How to get the information that you want:

- Have a clear goal for what you want to do with the information. A clear goal means that you are more likely to have a targeted records request that only includes information you need. You do not want to be buried in unnecessary documents because your request was too broad.
- You do not have to disclose to the public office why you want the records.
- Be specific, but not overly so.
- Ask for smaller amounts of information at a time. You can always make another request at a later date.

3 Make your request in writing.

- This ensures both parties know what information is being requested. You are entitled to make a records request by phone or in person, but having it in writing may help avoid problems later.

4 Send the request by mail, fax, or email.

- Feel free to call the office and ask which manner would be easiest to process, but don't feel obligated to do this.
- You may send your request by certified mail, a method that will alert you when the public office receives your request.

5 Be courteous to the office from which you are requesting information.

- Write down the names of the people with whom you interact. You can directly contact these people for updates.
- Establishing a healthy professional relationship with public records officers is important. These individuals can be allies in helping you obtain the information you desire.
- Be reasonable about the time frame and amount of work your request will require. Setting reasonable expectations can aid in quickly and thoroughly processing your request.

6 Be proactive!

- Within one week of sending your request, confirm that the public office has received it.
- Within two weeks, confirm that the public office is processing your request. Ask if you will be charged and what the fee may be. If desired, ask for a date by which you should receive a response.

7 If you didn't receive a response or your request was denied, you have a few options.

- Be aware that courts have not yet specified how quickly public offices must respond to your request. If your request was denied, it is best to get the reason for denial in writing.
- If you are confident that the information you are requesting is indeed a public record and either the public office has denied your request with explanation or it has ignored multiple inquiries for an update, then you have the option to file a complaint form in the Court of Claims, or file a writ of mandamus in common pleas court, court of appeals, or the Ohio Supreme Court. If you choose to pursue a mandamus action, it must be filed within 10 years of the cause of action.

8 Advocate!

- It is your right to share the records you receive.

SAMPLE REQUEST TO RECEIVE RECORDS

The following public records request has been annotated to demonstrate why each piece of the letter is important to include.

April 1, 2019

Sheriff John Smith
Maple County Sheriff's Office
100 Maple Street
Maple, Ohio 12345

Include the date so you are certain of when you sent the request.

RE: Public Records Request

It is not necessary in Ohio to cite this law, but it does not hurt to show the public office that you are well aware of your rights.

Dear Sheriff Smith:

Pursuant to Ohio's open record laws, Revised Code § 149.43, the following is a formal request for public records in the possession of the Maple County Sheriff's Office. We hereby request copies of the following:

Specific information and specific time frame.

- The jail roster or other document showing the names, length of stay, and/or charges facing persons in Maple County Jail between January 1, 2018 and February 1, 2018.
- All policies and procedures that refer or relate to the use of force against people held in the Maple County Jail.

Remember that a number of different types of items can be classified as "records."

For purposes of this request, "records" means any and all writings, documents, correspondence, papers, text files, computer files, emails, annals, archives, records, journals, logs, notes, and/or minutes.

Please send the requested records to Jane Doe, 1234 Main St., Town, Ohio 12345, within fourteen days of the receipt of this letter.

Don't be afraid to give the public office a reasonable deadline for a response.

We look forward to receiving copies of these documents via United States mail. If there is any cost related to the production of these documents, please notify me before incurring that cost.

If there are any questions related to this request, please contact me via email at jane.doe@email.com or via telephone at (123) 456-7890.

Include your contact information in case the office needs to contact you. If your request is overly broad, the duty of the public office is to work with you to narrow the request.

Thank you in advance for your assistance.

Sincerely,

Be courteous!

Jane Doe

cc: Name1
Name2
Name3

If you send your request to multiple people, it is customary to list the "carbon copies" of the recipients.

SAMPLE REQUEST TO INSPECT RECORDS

April 1, 2019

Mr. John Smith
Ohio Department of Education
25 South Front Street
Columbus, Ohio 43215

RE: Request to Inspect Records

Dear Mr. Smith,

Pursuant to Ohio's open records law, Revised Code § 149.43, the following is a formal request to inspect public records in the possession of the Ohio Department of Education. I hereby request to inspect copies of the following:

- The minutes from the Maple County School Board meeting, which took place on March 1, 2019.

For the purposes of this request, "records" means any and all writings, documents, correspondence, papers, text files, computer files, emails, annals, archives, records, journals, logs, notes, and/or minutes.

Please make those records available by Monday, May 15, 2019. Unless you advise me to come at a different time or on a different date, I will be at your office to inspect the records at 10:00 a.m. on Monday, April 15, 2019.

If you deny any part of this request, please provide your reason in writing along with the legal authority that supports your assessment.

If there are any questions related to this request, please contact me, Jane Doe, via email at jane.doe@aemail.com or telephone at (123) 456-7890.

Thank you in advance for your assistance.

Sincerely,

Jane Doe

FREQUENTLY ASKED QUESTIONS

? If parts of a record include exempted material, can the office withhold the entire record instead of just redacting parts of it?
Generally the office must redact the exempted material but produce all other portions of the record. The office must explain why the redaction was necessary. For example, a person’s court case file may include their social security number. The social security number would simply need to be redacted.

? Are text messages and email messages from private accounts considered public records?
The Ohio Supreme Court has yet to determine whether text messages are generally public records.

The Ohio Supreme Court also has yet to determine whether a public employee’s emails to or from private email accounts are public records. But, according to the [Ohio Attorney General’s Sunshine Law manual](#), “the issue is analogous to mailing a record from one’s home, versus mailing it from the office – the location from which the item is sent does not change its status as a record.”

? What about requests to federal agencies or other states?
Each state has its own public records law. This guide applies only to Ohio.

Federal agencies, such as Immigration and Customs Enforcement (ICE) or Housing and Urban Development (HUD), are subject to a federal law called Freedom of Information Act (FOIA). For more information on submitting a FOIA request, see <https://www.foia.gov/how-to.html>.

? Is the Governor subject to public records requests?
Generally, yes. But the Governor’s communications (emails, etc.), may not be. The Ohio Supreme Court decided that the governor has a qualified executive privilege that generally protects communications to or from the governor when the communications are for the purpose of making gubernatorial policy and decisions. If the person requesting the information can show a specific need for the protected records and that the need for information is more important than keeping the decision confidential, then the information can be made public.⁶

? **Can private entities ever be subject to the Public Records Act?**

Only public agencies are subject to public records laws, but in rare cases private entities can be as well.

A private entity may be found to be a “functional equivalent” of a public office, and thus subject to the Public Records Act, if there is clear and convincing evidence that it meets these conditions:

1. The entity performs a government function.
2. The entity has a high level of government funding.
3. The government is involved in or regulates the day-to-day activities of the entity.
4. The entity was created by the government to avoid the requirements of the Public Records Act.

Courts determine functional equivalency on a case-by-case basis. There is no set number of factors the private entity must meet in order to qualify as a functional equivalent. For example, the Ohio Supreme Court found that although Otterbein University is a private entity, its police department is a public office and subject to the Public Records Act.⁷ A court also found that Cuyahoga Community College Foundation, a private nonprofit that fundraises for scholarships to Cuyahoga Community College, is subject to the Public Records Act.⁸

On the other hand, a court found that Oriana House, a private entity that controlled the daily operations of the public Summit County Community-Based Correctional Facility, only met two of the four criteria and therefore is not subject to public records requests.⁹ A court also found that the Transition Executive Committee (“TEC”), which worked with the Cuyahoga County government, was not subject to the Public Records Act.¹⁰

? **What if a public office contracts with a private entity to perform government work? Is it subject to the Public Records Act?**

In these cases the resulting records may be public records even if they are solely in the possession of the private entity if all of the following three conditions are met:

1. The private entity prepared the records to perform responsibilities normally belonging to the public office.
2. The public office is able to monitor the private entity’s performance.
3. The public office may access the records itself.

Under these circumstances, the public office is subject to requests for these public records, and the private entity itself may become responsible for public records.

The ACLU of Ohio maintains that private prisons are subject to public records requests. You may want to send duplicate requests to both the private prison and the Ohio Department of Rehabilitation and Correction.

- ?** **Do I have to tell the public office who I am?**
No. You are not required to state your name or the motive behind your request (unless required by a specific statute), nor must you provide a signature to see the records. But practically, in order for the office to communicate with you, you may want to provide your email address or phone number.
- ?** **What if an office requests I fill out a form?**
Some offices will ask you to fill out their specific public records request form. Using their form may mean you'll get the records more quickly, but remember that you can always refuse to share your name on the request, or you can submit your request a different way entirely.
- ?** **What format will the records be in?**
The law allows you to specify in which format you want to receive the records: copied on paper, in the same medium the office keeps them (e.g. compact disc), or on a medium the office can "reasonably manage." Although offices aren't always required to produce the documents via email, you may request this and in practice they often will.
- ?** **How fast will I get the records?**
The Public Records Act doesn't explicitly state how long a public office can take to comply with your request, except that it must be "reasonable." Courts have indicated "reasonable" might be somewhere between one and four months, depending on the request.¹¹ Nevertheless, it's best practice to request the office send you the records in a certain amount of time (two weeks is generally good); the public office just isn't required to comply.
- ?** **Will I get the metadata?**
Only if you specifically request it. If you do not specifically request it, you are not entitled to it for the documents requested.¹² (Metadata is data about the data, e.g. document changes or explanations of the specific structure or presentation of the information.)

RIGHTS & RESPONSIBILITIES OF A PUBLIC OFFICE

In handling records requests, a public office:

- Must maintain records in a manner that can be made available for inspection and copying during regular business hours at no cost.
- Must make available a copy of the records retention schedule.
- Must respond to requests with reasonable speed and without delay, but it is not required to respond immediately.
- Is not obligated to create new records in response to a request or format records in a way most convenient to the requester.
- May require payment for copies of records in advance.
- May limit the number of records requested that the office will physically deliver to ten per month unless the requester certifies in writing the requested record is not for commercial purposes.
- May physically deliver records by United States mail or another delivery service.
- May not destroy, mutilate, or otherwise dispose of records except as provided by law or under the rules of the records commissions.
- May not deny a request because it will interrupt office business, unless it unreasonably interferes (e.g. request is so broad that retrieving it would prevent the office from functioning).
- Must provide an explanation if a request is denied in part (redactions) or in whole (entire documents) and cite the legal authority for doing so.
- Must explain to the requester why a request cannot be filled if it is overly broad or vague and then attempt to remedy the situation by giving the requester the opportunity to revise his/her initial request.
- Must ensure that all elected public officials are trained in public records law.

IF YOUR REQUEST IS DENIED

If you feel that your request was wrongfully denied, you have two options. Each option has pros and cons. Keep in mind you can only use one option, not both.

FILE A COMPLAINT FORM WITH THE OHIO COURT OF CLAIMS

The Ohio legislature created this process in 2016. It was designed to be easy to navigate without a lawyer. Note that, depending on the outcome, you may need to pay court costs.

To submit a complaint, complete the Public Records Access Formal Complaint Form, available at <https://ohiocourtclaims.gov/pdf/forms/public-records-complaint-form.pdf>, and attach all required documents.

You can file the complaint form one of three ways: online at <http://www.efileoh.com/>, or by mailing it to or filing it in-person at Ohio Court of Claims, The Thomas J. Moyer Ohio Judicial Center, 65 South Front Street, 3rd Floor, Columbus, Ohio 43215. You must pay a \$25 filing fee via credit card (if filing online), via check or money order (if filing by mail or in-person), or with cash (if filing in-person). If you prevail, this filing fee may be returned to you.

Once the clerk of court reviews your complaint and determines it should proceed, a staff attorney will contact you and begin reviewing your request. The staff attorney will contact the public office to find out why your request was denied. Often this simple inquiry resolves the problem. If the problem is still not resolved, your complaint will be referred for formal mediation.

If mediation still does not resolve the problem, your complaint will be assigned to a “special master” who will issue a formal legal ruling. If the special master rules in your favor you will be able to receive the records. If you disagree with the special master’s decision you may file an appeal in the appropriate court of appeals.

For more information on the Ohio Court of Claims process visit <https://ohiocourtclaims.gov/public-records-faq.php>.

For exact text of the law covering this process, visit <http://codes.ohio.gov/orc/2743.75>.

FILE A MANDAMUS ACTION IN COURT

A mandamus action is a lawsuit that asks the court to compel the public office to release records. This lawsuit can be filed in the court of common pleas of the county in which you were denied, the court of appeals for that appellate district, or the Ohio Supreme Court, within ten years of the original denied request. This option likely requires getting a lawyer.

If you are successful, a court may award you money for court costs and reasonable attorney's fees (the costs you spent bringing the lawsuit). However you won't receive punitive damages (compensation for the harm you suffered). If the Court determines you should have used an alternative means to a mandamus action, they may reduce the amount of fees awarded.

Be aware, though, that a court may determine the mandamus action is frivolous, and if so, the court may require you to pay all court costs, expenses, and reasonable attorney's fees to the public office.

In cases where a public official removes, destroys, mutilates, damages, transfers public records, or threatens to do so, [Ohio Revised Code 149.351\(B\)\(2\)](#) allows for you to recover up to \$10,000 and reasonable attorney's fees.

Keep in mind that recent court decisions may make it more difficult for requestors to obtain attorney's fees, and frequent records requests could lead to fines.¹³

OHIO OPEN MEETINGS LAW

Government bodies must:

- Ensure meetings are open to the public. This does not give the public the right to speak at a meeting. If public comment is allowed, it can be restricted for length of time and required to be on topic.
- Establish a reasonable method for notifying the public in advance of meeting dates and times.
- Keep full and accurate minutes of meetings. Minutes are public records that must be made available for inspection.

What is considered a “public body”?

A decision-making body of any state political entity, subdivision, or school district that may include regularly constituted committees and subcommittees.

What is considered a “meeting”?

To count as a meeting for the purposes of the Open Meetings Law it must meet all three criteria:

1. Is a prearranged discussion (does not have to be in person); and
2. Includes a majority of the members of a public body; and
3. Involves the discussion of public business.

The Ohio Supreme Court has held the Open Meetings Act applies regardless of whether the discussion occurs face to face, over the telephone, by video conference, or electronically by email, text, tweet, or other form of communication.¹⁴

What about executive session?

Executive session is a conference that takes place between members of a public body but from which the public is excluded. Ohio law allows for executive session to be held in specific circumstances.

Executive sessions may only be held during an open meeting, and they must begin and end during the meeting. An executive session can only be called when there is a motion (with the specific, permissible topic of the motion stated), a second, and a roll call vote with a majority of the quorum voting in favor. While there is no requirement to keep the minutes of executive sessions, materials from the sessions (e.g. handouts) are public records.

What topics can be discussed during an executive session?

Permissible topics to be discussed during an executive session are:

- Considerations of appointment, discipline, promotion, and compensation for a public official or investigations or charges against a public official.
- Purchase or sale of property.
- Discussion with the public body's attorneys regarding pending litigation.
- Collective bargaining matters.
- Hospital trade secrets.
- Veterans Service Commission applications.
- Confidential matters under state and federal law.
- Security arrangements and emergency response protocols.

What should I do if a meeting is improperly held?

Any person can ask for an injunction in the county court of common pleas.

An injunction compels the public body to refrain from prohibited behavior, to conduct meetings in accordance with the law, and/or to correct past damage.

The injunction must be filed within two years of the violation. In addition, any action taken or legislation enacted by a public body in violation of this section is void. Seek out an attorney if you choose to pursue an injunction.

ADDITIONAL RESOURCES

Visit www.acluohio.org/PublicRecords for more information, including a pre-recorded webinar, cards advertising this guide, and this guide itself.

The Ohio Attorney General's office provides a thorough guide to Sunshine Laws:

- <http://www.ohioattorneygeneral.gov/YellowBook>
- Additionally, the office holds training sessions on Sunshine Laws throughout the year all over Ohio, open to elected officials and the public: <http://www.ohioattorneygeneral.gov/Legal/Sunshine-Laws/Sunshine-Law-Training>.

View the exact text of Ohio's Sunshine Laws at:

- <http://codes.ohio.gov/orc/149.43> (Public Records Act)
- <http://codes.ohio.gov/orc/121.22> (Open Meetings Act)

Ohio Coalition for Open Government

- <http://ohioopengov.com/>
- Requires a paid membership
- Includes a hotline to Baker and Hostetler law office for public records request assistance

MuckRock

- <https://www.muckrock.com/>
- This site hosts a collection of government records previously requested through records requests, as well as tools for making requests to other states and the federal government.

Ohio Sunshine Laws apply only to the records and meetings of Ohio state and local bodies. Other laws, such as the Freedom of Information Act (FOIA), regulate federal records.

- The US Department of Justice provides an online guide to FOIA: <https://www.foia.gov/>
- MuckRock (above) also provides helpful resources for submitting FOIA requests.

ENDNOTES

1. *State ex rel. Cincinnati Enquirer v. Ohio Dept. of Pub. Safety*, 2016-Ohio-7987 (2016).
2. *State ex. Rel. Miller v. Pinkney*, 149 Ohio St.3d 662, 2017-Ohio-1335 (2017).
3. *State ex rel. Caster v. Columbus*, 151 Ohio St.3d 425, 2016-Ohio-8394 (2016).
4. *State ex rel. McCaffrey v. Mahoning Cty. Prosecutor's Office*, 133 Ohio St.3d 139, 2012-Ohio-4246, 976 N.E.2d 877 (2012).
5. *State ex rel. Rogers v. Dep't of Rehab. & Corr.*, Slip Opinion No. 2018-Ohio-5111. Court ordered unredacted release of video showing incident taking place at state prison, as it did not constitute security record or infrastructure record exemptions.
6. *State ex rel. Dann v. Taft*, 109 Ohio St.3d 364, 2006-Ohio-1825, 848 N.E.2d 472 (2006).
7. *State ex rel. Schiffbauer v. Banaszak*, 142 Ohio St.3d 535, 2015-Ohio-1854, 33 N.E.3d 52 (2015).
8. *Sheil v. Horton*, No. 107329 (Ohio Ct. App. 2018).
9. *State ex rel. Oriana House, Inc. v. Montgomery*, 110 Ohio St.3d 456, 2006-Ohio-4854, 854 N.E.2d 193 (2006).
10. *State ex rel. ACLU of Ohio v. Cuyahoga Cty. Bd. of Comm'rs*, 128 Ohio St.3d 256, 2011-Ohio-625, 943 N.E.2d 553 (2011). While the body was composed of public officials, the Court held that it was a private body not funded by the government. Additionally, the Court maintained that while the organization made recommendations to a government entity, it could not force the government to act, and so it was not required to perform any specific function by the government.
11. *Kesterson v. Kent State Univ.*, Slip Opinion No. 2018-Ohio-5108. Four months was an unreasonable amount of time for University's document production. *State ex rel. Shaughnessy v. Cleveland* (149 Ohio St.3d 612). City's disclosures of requested records were timely when they were produced 31 business days after initial request.
12. See endnote 4.
13. *State ex rel. Bardwell v. Cuyahoga Cty. Bd. of Comm'rs*, 127 Ohio St. 3d 202, 2010-Ohio-5073, 937 N.E.2d 1274 (2010). The Ohio Supreme Court affirmed a lower court's ruling to impose \$1,050 in Rule 11 sanctions against an individual for filing a mandamus action complaint in bad faith.
14. *White v. King*, 147 Ohio St.3d 74, 2016-Ohio-2770 (2016).

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