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September 20, 2016

VIA CERTIFIED MAIL

Kevin M. Butler, Director of Law
City of Lakewood Law Department
12650 Detroit Avenue
Lakewood, Ohio 44107

Re: Public Records Requests – PRR 226 to PRR 323

Dear Law Director Butler:

This communication serves as both a public records request and documentation of the repeated failure of the City of Lakewood to comply with the Ohio Public Records Act.

Over the past 19 months, I have submitted over 225 public records requests to your public office. Under most circumstances, you and the City of Lakewood have failed to provide prompt copies within a reasonable period of time. Those requests that have been answered routinely fail to comply with R.C. Chapter 149. As a result, I am copying the Ohio Attorney General's Office and the Ohio Auditor of the State to ensure that you and your public office properly respond to each of these requests in accordance with R.C. Chapter 149.

Provide the records responsive to each request to bjessi@sbcglobal.net in an electronic medium (i.e., WORD, PDF, XLS, etc.) and at no cost. **Where the request seeks correspondence or communications you must provide the actual correspondence or communication in an electronic medium.** Upon information and belief, the City of Lakewood has the practice of copying and pasting portions of a correspondence or communication rather than providing the actual document. Each request seeks, and you must provide, the actual correspondence or communication.

Please note that each item listed below is a distinct request, which is why they have been assigned separate PRR numbers. Your office must respond to each request separately and identify which records are responsive to each request – i.e., do not provide the records in a single disorganized fashion or “document dump” – as they have been assigned separate PRR numbers.

Please note that your standard, “We do not organize all records, documents, writings, drafts and notes based on _____” is not a valid denial of a public records request as the statute requires your public office to give me the opportunity to revise the request by informing me how the City of Lakewood ordinarily maintains and accesses its records. R.C. 149.43(B)(2). You have not done so. Moreover, the City of Lakewood cannot simply refuse to

produce public records because the requested public record is not kept within the walls of City Hall. For example, I am aware that the city employees and officials (including you as a prior city council member) use their personal and business email addresses to hold and create records while performing a public function for their public office and, as a result, those records are under the public office's jurisdiction and must be produced.

Where you believe the City of Lakewood has already responded to a specific records request, please identify the date that you believe your office responded to that request and provide a copy of the response, attaching the documents responsive to that request.

It cannot be overstated that the City of Lakewood must interpret the Ohio Public Records Act broadly in favor of disclosure in responding to these requests. Where the City of Lakewood denies any part of a public records request, the statute requires the City of Lakewood to give me the opportunity to revise the denied request, by informing me how the office ordinarily maintains and accesses its records. Thus, the Public Records Act expressly promotes cooperation to clarify and narrow requests that are ambiguous or overly broad, in order to craft a successful, revised request.

Where the City of Lakewood believes that any information in a public records request is exempt from the duty to permit public inspection or copying, the public office must either notify me of any redaction or make the redaction plainly visible. If a public record contains information that is exempt from the duty to permit public inspection or to copy the public record, the City of Lakewood shall make available all of the information within the public record that is not exempt. Therefore, your office may redact only that part of a record subject to an exception or other valid basis for withholding. In addition, if the City of Lakewood denies a request, in part or in whole, your public office must provide me with an explanation, including legal authority, setting forth why the request was denied.

As a failure to properly respond to the below public records requests may result in litigation, the City of Lakewood is put on notice that it has an absolute duty under both the Federal and Ohio Rules of Civil Procedure to preserve information that may be relevant to a lawsuit – including electronic information or data. A violation of this duty can result in severe sanctions, including the entry of a default judgment. Electronic information systems may automatically remove or delete information as routine functions of their operating system. While the Federal and Ohio Rules of Civil Procedure may prohibit a court from imposing sanctions if the electronically stored information is lost as a result of the routine, good-faith operation of the City of Lakewood's electronic information system, such a "safe haven" does not mean that the City of Lakewood is permitted to exploit this routine function to thwart its discovery obligations. To the contrary, whenever a duty to preserve information is imposed, as has been done now, intervention in the routine operation of an information system is an essential element of that obligation. By allowing the City of Lakewood to continue to destroy stored information that it is required to preserve, the City of Lakewood exposes itself to potentially severe sanctions. Simply stated, now that the City of Lakewood reasonably anticipates litigation it must suspend its routine document retention/destruction policy and put in place a "litigation hold" to ensure the preservation of relevant documents.

Below please find my public records requests, which your public office must respond to within a reasonable period of time. It is well settled that a 72-hour timeframe to respond would

constitute “without delay” and “with reasonable speed.” To that end, I expect a complete response within 72 hours. If the public records requests are not responded to within a reasonable period of time, I will have no choice but to seek mediation through the Ohio Attorney General’s public records mediation program or file an action in mandamus against your public office and/or yourself. The defined terms used below shall have the same meaning as set forth in my March 15, 2015 requests.

I have attached hereto the 89-page Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 which report is referenced in several of my public records requests below. Also attached are three emails from Kevin Butler to City Council dated June 22, 2015 at 12:22PM, July 10, 2015 at 2:39PM and July 17, 2015 at 3:37PM which emails are referenced in several of my public records requests below.

- PRR226 A copy of the “updated meeting schedule” referred to by Director of Law Kevin M. Butler (“Butler”) in his July 17, 2015 email to City Council at 3:37PM as being provided by Monique. Specifically, the “tightened” scheduled referred to under the heading “Master Agreement” in that email.
- PRR227 All records, correspondence, emails and communications – electronic or otherwise – from Butler to City Council members, or to any one City Council member, from March 1, 2015, through September 20, 2016, containing the term “communications strategy.”
- PRR228 All records, correspondence, emails and communications – electronic or otherwise – from Butler to City Council from January 14, 2015 through September 20, 2016 containing the subject “Re: Hospital matters: a general update”.
- PRR229 All records, correspondence, emails and communications – electronic or otherwise – from any City Council member to any other City Council member from March 1, 2015, through September 20, 2016 containing the term “communications strategy,” including those emails in response to or discussing Butlers’ emails to City Council dated June 22, 2015, at 12:22PM, July 10, 2015, at 2:39PM, and July 17, 2015, at 3:37 PM.
- PRR230 All records, correspondence, emails and communications – electronic or otherwise – from any City Council member to any other City Council member from March 1, 2015, through September 20, 2016, which forwards an email containing the term “communications strategy,” including, but not limited to, those in response to, or discussing, Butler’s emails to City Council dated June 22, 2015, at 12:22PM, July 10, 2015, at 2:39PM, and July 17, 2015, at 3:37 PM.
- PRR231 All records, correspondence, emails and communications – electronic or otherwise – from Butler to City Council members, or any one City Council member, from March 1, 2015, through September 20, 2016, containing the term “master agreement,” including, but not limited to, those similar to Butler’s emails

dated June 22, 2015, at 12:22PM, July 10, 2015 at 2:39PM, and July 17, 2015, at 3:37 PM.

- PRR232 All records, correspondence, emails and communications – electronic or otherwise – from any City Council member to any other City Council member from March 1, 2015, through September 20, 2016, containing the term “master agreement,” including, but not limited to, those in response to or discussing Butler’s emails to City Council dated June 22, 2015 at 12:22PM, July 10, 2015, at 2:39PM, and July 17, 2015, at 3:37 PM.
- PRR233 All records, correspondence, emails and communications – electronic or otherwise – from any City Council member to any other City Council member from March 1, 2015, through December 7, 2015, containing the term “draft definitive agreement.”
- PRR234 All records, correspondence, emails and communications – electronic or otherwise – from any City Council member to any other City Council member from March 1, 2015, through December 7, 2015, containing the term “new definitive agreement”
- PRR235 All email responses or replies to Butler from any member of City Council from March 1, 2015, through December 7, 2015, which are responses or replies to Butler’s email to City Council dated July 17, 2015, at 3:37 PM.
- PRR236 All email responses or replies to Butler from any member of City Council from March 1, 2015, through December 7, 2015, which are responses or replies to Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR237 All email responses or replies to Butler from any member of City Council from March 1, 2015, through December 7, 2015, which are responses or replies to Butler’s email to City Council dated June 22, 2015, at 12:22 PM.
- PRR238 All email responses or replies to Butler from any City of Lakewood employee which are responses or replies to Butler’s email to City Council dated July 17, 2015, at 3:37 PM.
- PRR239 All email responses or replies to Butler from any City of Lakewood employee which are responses or replies to Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR240 All email responses or replies to Butler from any City of Lakewood employee which are responses or replies to Butler’s email to City Council dated June 22, 2015, at 12:22 PM.
- PRR241 All records, correspondence, emails and communications – electronic or otherwise – containing the names of the “new people involved” in the “communications strategy” and/or “initiative” referred to in Butler’s email to City Council dated July 10, 2015, at 2:39 PM.

- PRR242 All records, correspondence, emails and communications – electronic or otherwise – containing the “emerging ideas” referred to in Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR243 All records, correspondence, emails and communications – electronic or otherwise containing, or referring to, Dru Siley’s “progress of visioning the hospital site” referred to in Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR244 All records, correspondence, emails and communications – electronic or otherwise – of “the proposal” referred to in Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR245 All records, correspondence, emails and communications – electronic or otherwise – containing the “follow-up email from [Butler] later that attaches the documents [Butler]” referenced in the second to last sentence of Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR246 All “documents [Butler] reference[d]” in Butler’s email to City Council dated July 10, 2015, at 2:39 PM.
- PRR247 All drafts of the “‘facts as we know them’ piece” which were “circulated” to City Council and referred to in Butler’s email to City Council July 17, 2015, at 3:37 PM.
- PRR248 All drafts of the document that were provided to City Council which document was subsequently placed on the web page: <http://www.onelakewood.com/frequently-asked-questions-about-lakewood-hospital/>. These drafts were specifically referred to in Butler’s email to City Council on July 17, 2015, at 3:37 PM under the heading “Communications Strategy”.
- PRR249 All drafts of the document that were provided to City Council which document was subsequently placed on the web page <http://www.onelakewood.com/frequently-asked-questions-about-lakewood-hospital/>
- PRR250 All drafts of the document that were provided to City Council which document was subsequently submitted by Butler to the Lakewood Observer and posted to the Lakewood Observer website: <http://lakewoodobserver.com/read/2015/09/15/qa-with-the-citys-law-director-about-lakewood-hospital>. These drafts were specifically referred to in Butler’s email to City Council July 17, 2015, at 3:37 PM.
- PRR251 All drafts of the document that was provided to City Council which document was subsequently submitted by Butler to the Lakewood Observer and posted to the Lakewood Observer website:

<http://lakewoodobserver.com/read/2015/09/15/qa-with-the-citys-law-director-about-lakewood-hospital>.

- PRR252 All records, emails, notes, and communications – electronic or otherwise – of any discussion among Council members, Butler and /or any city employee about the print or online version of the article on page 5 the Lakewood Observer dated September 15, 2015 http://media.lakewoodobserver.com/issue_pdfs/Observer_Vol_11_Issue_19.pdf and posted as follows:
<http://lakewoodobserver.com/read/2015/09/15/citys-rights-will-be-determined-by-the-court>.
- PRR253 All records of the “updates to the master agreement” referred to in Butler’s email to City Council dated June 22, 2015, at 12:22 PM.
- PRR254 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by David Anderson to any member of City Council or city employee from July 17, 2015, to December 10, 2015.
- PRR255 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by Cindy Marx to any member of City Council or city employee from July 17, 2015, to December 10, 2015.
- PRR256 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by Shawn Juris to any member of City Council or city employee from July 17, 2015, to December 10, 2015.
- PRR257 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by Mary Madigan to any member of City Council or city employee from July 17, 2015, to December 10, 2015.
- PRR258 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by Ryan Nowlin to any member of City Council or city employee from July 17, 2015, to December 10, 2015.
- PRR259 All records of the “strategic negotiating points” referred to in Butler’s email to City Council dated July 17, 2015, at 3:37 PM, which were provided by Tom Bullock to any member of City Council or city employee from July 17, 2015, to December 10, 2015.

All records of the “strategic negotiating points” referred to in Butler’s email to email to City Council dated July 17, 2015, at 3:37 PM, which were provided by

Sam O'Leary to any member of City Council or city employee from July 17, 2015, to December 10, 2015.

- PRR260 All correspondence and communications – electronic or otherwise – from Robyn Smyers and/or any Thomson Hine attorney to Paul Calorusso and/or John Bodine from June 1, 2015, through December 1, 2015, limited to the services Huron Consulting LLC rendered to the City of Lakewood in 2015.
- PRR261 All correspondence and communications – electronic or otherwise – from John Bodine and/or Paul Calorusso to Robyn Smyers and/or any Thomson Hine attorney from June 1, 2015, through December 1, 2015, limited to the services Huron Consulting LLC services rendered to the City of Lakewood in 2015.
- PRR262 The electronic calendar of Butler from January 1, 2010, through the date of the response to this request.
- PRR263 The electronic calendar of Mayor Mike Summers (“Summers”) from January 1, 2010 through December 31, 2013.
- PRR264 All correspondence and communications – electronic or otherwise—to or from Butler and any member of City Council in the months of November and December 2015.
- PRR265 All records, emails, notes, and communications – electronic or otherwise – regarding Summers’ resignation as a trustee of Lakewood Hospital Association (“LHA”).
- PRR266 All records, emails, notes, and communications – electronic or otherwise – of Tom Bullock’s resignation or termination as a trustee of LHA.
- PRR267 All records, emails, notes, and communications – electronic or otherwise – of Mary Madigan’s resignation or termination as a trustee of LHA.
- PRR268 All records, emails, notes, and communications – electronic or otherwise – regarding Summers’ Thursday, October 22, 2015. 4:15PM - 4:45PM private meeting referred to on his calendar.
- PRR269 All records, emails, notes, and communications – electronic or otherwise – of Summers’ Thursday, October 22, 2015 5:30PM - 7:00PM private meeting referred to on his calendar.
- PRR270 All records, emails, notes, minutes and communications of any meeting or discussion of any “communications strategy” by or among members of City Council from March 1, 2015, though the date of your response to this request.
- PRR271 The records of training provided to Dan O'Malley as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.

- PRR272 The records of training provided to Shawn Juris as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR273 The records of training provided to Cindy Marx as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR274 The records of training provided to David Anderson as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to statewide or local office receive three hours of Public Records training for each term of office.
- PRR275 The records of training provided to Sam O’Leary as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR276 The records of training provided to John Litton as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR277 The records of training provided to Ryan Nowlin as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR278 The records of training provided to Mary Madigan as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to statewide or local office receive three hours of Public Records training for each term of office.
- PRR279 The records of training provided to Butler as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to local office receive three hours of Public Records training for each term of office.
- PRR280 The records of training provided to Tom Bullock as a member of City Council pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to statewide or local office receive three hours of Public Records training for each term of office.
- PRR281 The records of training provided to Summers as a member of City Council and as Mayor of Lakewood pursuant to R.C. 109.43(B) and 149.43(E)(1) that require that officials elected to statewide or local office receive three hours of Public Records training for each term of office
- PRR282 Records of certifications by the Ohio Attorney General of the training received R.C. 109.43(B) and 149.43(E)(1) for City of Lakewood elected officials from January 1, 2009 through September, 2016.

- PRR283 Records of the City of Lakewood income tax collections for January 1, 2015 through August 31, 2015.
- PRR284 Records of the City of Lakewood income tax collections for January 1, 2016, through August 31, 2016.
- PRR285 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculations that estimate or establish the economic and/or financial value of the Letter of Intent or the Master Agreement.
- PRR286 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculations created by or provided to any public relations firm that estimate or establish the economic and/or financial value of the Letter of Intent or the Master Agreement.
- PRR287 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculations used by any city employee or elected city official for any purpose that estimate or establish the economic and/or financial value of the Letter of Intent or the Master Agreement.
- PRR288 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculations created by or used by City employees Jenn Pae and/or Colin McEwen for any purpose that estimate or establish the economic and/or financial value of the Letter of Intent or the Master Agreement.
- PRR289 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculation created by or used by Colin McEwen or Barbara Paynter for a Press Release issued on January 15, 2015, about Lakewood Hospital that estimate or establish the economic and/or financial value of the Letter of Intent.
- PRR290 All records, emails, notes, and communications – electronic or otherwise – of any communication between any city employee or elected city official that concerns the estimation of the economic and/or financial value of the Letter of Intent or the Master Agreement and any economic development benefits from those transactions.
- PRR291 All records, emails, notes, and communications – electronic or otherwise – including spreadsheets or calculations created or used by any city employee limited to the economic development functions or department of the City that estimate or establish the economic and/or financial value of the Letter of Intent or the Master Agreement and any economic development benefits from such transactions.
- PRR292 All records, emails, notes, and communications – electronic or otherwise – created by or used by any City employee or elected city official that describe, discuss or refer to any matter related to the Ohio Ethics Commission limited to

Lakewood Hospital, Lakewood Hospital Association, Lakewood Hospital Foundation, the Letter of Intent, and/or the Master Agreement.

- PRR293 All records, emails, notes, and communications – electronic or otherwise – created by or used by any City employee or elected city official that describe, discuss or refer to any matter related to the Ohio Auditor of State limited to Lakewood Hospital, Lakewood Hospital Association, Lakewood Hospital Foundations, the Letter of Intent, and/or the Master Agreement.
- PRR294 All records, emails, notes, and communications – electronic or otherwise –created by or used by any City employee or elected city official that describe, discuss or refer to any legal complaints, legal process or legal action to be taken or actually taken against any person within the last year. This request is limited to legal actions where the City of Lakewood is not a party.
- PRR295 All records, emails, notes, and communications – electronic or otherwise – created by or used by any City employee or elected city official that describe, discuss or refer to the case of *Uldricks v. O'Bryan*, Cuyahoga No. CV-16-864146 (Judge Michael P. Donnelly). This request is limited to legal actions where the City of Lakewood is not a party.
- PRR296 All records, emails, notes, and communications – electronic or otherwise –from any city employee or elected city official to any Cuyahoga County employee or Cuyahoga County elected official regarding the Cleveland Clinic, the Lakewood Hospital Foundation or the Lakewood Hospital Foundation from January 1, 2014, through September 16, 2016.
- PRR297 All records that substantiate the detail of the \$11,842,752 of 2015 “Operating Grants and Contributions” on page 12 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015: https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf
- PRR298 All records that substantiate the detail of the \$5,459,955 of 2014 “Operating Grants and Contributions” on page 12 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015: https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf
- PRR299 All records that substantiate the detail of the \$5,553,183 of 2015 “Capital Grants and Contributions” on page 12 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015: https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf

- PRR300 All records that substantiate the detail of the \$1,215,014 of 2014 "Capital Grants and Contributions" on page 12 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR301 All records that substantiate the \$3,286,870 increase that was "due to capital contributions from the master agreement with Lakewood Hospital Association" referred to on page 14 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR302 All records that substantiate the amount of "capital contributions from the master agreement with Lakewood Hospital Association" referred to on page 14 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR303 All records that substantiate the \$6,382,797 increase that was "due to receipts from the sale of Lakewood Hospital to Cleveland Clinic as recognition of early termination of lease agreements" referred to on page 14 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR304 All records that substantiate the "receipts from the sale of Lakewood Hospital to Cleveland Clinic as recognition of early termination of lease agreements" referred to on page 14 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR305 All records that substantiate the receipt of the "\$6.6 million as recognition of early termination of the 1996 lease" as an asset "transferred to the City from (LHA) on December 22, 2015" referred to on page 19 of the Independent Auditor's Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015:
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.

- PRR306 All records that substantiate the detail of that portion of the \$11,770,174 of revenues of the Lakewood Hospital Fund that were “due to receipts from the sale of Lakewood Hospital to Cleveland Clinic as recognition of early termination of the 1996 lease agreements” referred to on page 16 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR307 All records that substantiate that “[o]n December 22, 2015 the city received title from LHA for the medical office building located at 14601 Detroit Avenue, the parking garage located at 1422 Belle Avenue and the Community Health Center located at 1450 Belle Avenue” referred to on page 88 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR308 All records that substantiate that “LHA returned control of seven residential properties on Belle Avenue and St. Charles Avenue to the City and these properties are recorded as an asset held for resale at year end.” referred to on page 88 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR309 All title reports and title insurance policies created or received in 2015 Or 2016 for the medical office building located at 14601 Detroit Avenue, the parking garage located at 1422 Belle Avenue and the Community Health Center located at 1450 Belle Avenue”.
- PRR310 All title reports or title insurance policies created or received in 2015 or 2016 evidencing “LHA returned control of seven residential properties on Belle Avenue and St. Charles Avenue to the City and these properties are recorded as an asset held for resale at year end.” referred to on page 88 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR311 All records that substantiate that “the City will retain ownership of the existing Lakewood Hospital site and all other property currently leased to LHA” referred to on page 88 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015 https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR312 All records that substantiate that the “existing Lakewood Hospital site and all other property currently leased to LHA” referred to on page 88 of the Independent Auditor’s Report as part of the City of Lakewood, Ohio Comprehensive Annual

Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf is listed as an asset on the Independent Auditor's Report in 2014 and 2015.

- PRR313 All records that substantiate the \$9,051,162 of "Actual" "Charges for Services" referred to on page 88 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR314 All records that substantiate or reconcile the discrepancy between the \$9,070,118 of "Total Revenues" referred to on page 88 of the Independent Auditor's Report and the total revenues of \$11,770,174 referred to on page 16 of the Independent Auditor's Report.
- PRR315 The list or schedule of property substantiating the \$6,217,842 of "Land" on page 18 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR316 The list or schedule of property substantiating the total 2015 "Land Improvements" of \$6,240,503 on page 18 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR317 The list or schedule of property substantiating the total 2014 "Land Improvements" of \$3,347,296 on page 18 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR318 The list or schedule of property substantiating the total 2015 "Buildings and Improvements" of \$24,914,353 on page 18 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015
https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.
- PRR319 The list or schedule of property substantiating the total 2014 "Buildings and Improvements" of \$23,374,641 on page 18 of the Independent Auditor's report as part of the City of Lakewood, Ohio Comprehensive Annual Financial Report for the Year Ending December 31, 2015

https://ohioauditor.gov/auditsearch/Reports/2016/City_Lakewood_15-Cuyahoga.pdf.

- PRR320 All records, emails, notes, and communications – electronic or otherwise – from any city employee or elected city official to Richard Uldricks from May 13, 2016 to September 20, 2016.
- PRR321 All records, emails, notes, and communications – electronic or otherwise – from any city employee or elected city official to Richard Uldricks regarding the substance or the content of the following post:
<http://www.lakewoodcitizen.com/?s=nastiness>.
- PRR322 All records of use of public computers by Richard Uldricks.
- PRR323 All records of use of public computers by Richard Uldricks to create and post the following: <http://www.lakewoodcitizen.com/?s=nastiness>.

Thank you for your kind attention to this request. Your cooperation is greatly appreciated.

Sincerely,



Brian J. Essi

cc: Ohio Attorney General Mike DeWine, Public Records Unit
(mediation@ohioattorneygeneral.gov)
Ohio Auditor of State Dave Yost, Open Government Unit (ogu@auditor.state.oh.us)
Mike Summers, Mayor (mike.summers@lakewoodoh.net)
Dru Siley, Director of Planning and Development (dru.siley@lakewoodoh.net)
Sam O'Leary, President of Council (sam.oleary@lakewoodoh.net)
David W. Anderson, Vice-President of Council (david.anderson@lakewoodoh.net)
John Litten, Councilmember (john.litten@lakewoodoh.net)
Dan O'Malley, Councilmember (dan.omalley@lakewoodoh.net)
Thomas Bullock, Councilmember (tom.bullock@lakewoodoh.net)
Cindy Marx, Councilmember (ryan.nowlin@lakewoodoh.net)
Ryan Nowlin, Councilmember (ryan.nowlin@lakewoodoh.net)