

IN THE SUPREME COURT OF OHIO

<p>STATE OF OHIO EX REL. KEITH POOL, <i>Relator,</i></p> <p>v.</p> <p>CITY OF SHEFFIELD LAKE and MAYOR DENNIS BRING, <i>Respondents.</i></p>	
<p>AFFIDAVIT OF OFFICER KEITH POOL</p>	

I, Keith Pool, having been duly sworn, state as follows:

1. I am over the age of 18 and competent to testify to the facts below based on my personal knowledge.
2. I am a resident of Sheffield Lake, Ohio.
3. I am employed as a police officer for the City of Sheffield Lake's Division of Police and have been employed in that capacity since September 9, 2020.
4. Before serving as a police officer for the City of Sheffield Lake, I worked as a School Resource Officer in Sheffield Village for eight years. I am proud to dedicate my life to serving the public and my community.
5. At the time I was hired, I was the only Black police officer working in the Sheffield Lake Division of Police. Since then, the Division of Police has hired a second Black officer.
6. On June 25, 2021, when I was in the booking area at the police station, I saw that someone had put my raincoat on the booking desk. I had just purchased the raincoat to wear while performing my duties as a police officer in inclement weather.

7. The backs of the Division of Police raincoats are labeled "POLICE" so that we can wear them on duty.
8. When I reached the booking desk, I saw that someone had put a piece of paper with the typed words "Ku Klux Klan" over the "POLICE" label on my coat.
9. I was upset and offended that someone would put a Ku Klux Klan sign on my raincoat because everyone knows what the Ku Klux Klan has done (and still does) to Black people.
10. I wondered if this Ku Klux Klan sign was supposed to be a threat.
11. Then Chief Anthony Campo came into the room and told the detective present to go look at what he put on my coat, and then other officers came in and saw it.
12. He was laughing and acting like this was some kind of joke, and he tried to get me and other Division of Police employees who were there to go along with it.
13. I did not think Chief Campo's Ku Klux Klan sign was funny at all. I was shocked, horrified, and upset that my boss would put a Ku Klux Klan sign on my coat. I perceived his actions as racist. But I controlled my emotions because I did not want to make Chief Campo mad.
14. A few minutes later, Chief Campo sat down on a chair by the nearby printer, where I could see him, and put what looked like a paper Ku Klux Klan hat on his head. Other employees were still there.
15. I was shocked, horrified, and upset about my boss wearing a Ku Klux Klan hat right in front of me. I perceived his actions as racist. But I again controlled my emotions because I did not want to make Chief Campo mad.
16. Chief Campo told me I should wear "one of these" (a Ku Klux Klan hat like he was wearing) when I went out on my next call. I was shocked, horrified, and upset that my boss was "joking" about me wearing a Ku Klux Klan hat. But I again controlled my emotions because I did not want to make Chief Campo mad.
17. On July 30, 2021, my attorney submitted the public-records request attached as Exhibit A on my behalf.
18. The City of Sheffield Lake and Mayor/Safety Director Dennis Bring did not provide any "Face in Hole" records that Chief Campo made at the station, which I requested in the public-records request.

19. "Face in Hole" images are created on the "Face in Hole" app or website by uploading photos of people's faces to insert into another image where there is a white "hole" for the face. The website is: <https://www.faceinhole.com/scenarios>.
20. During the time I worked with Chief Campo, from September 9, 2020 to June 29, 2021, he regularly made "Face in Hole" pictures on his office computer at the station that he posted on bulletin boards or gave to employees, and these pictures made fun of employees' race, ethnic background, religion, culture, and sexual orientation.
21. I know that the "Face in Hole" records I requested exist because I have seen them. Chief Campo showed the "Face in Hole" pictures to Division of Police employees (including me). He posted them on official department bulletin boards. And he left them on people's desks. For some of the most offensive images, he would show them to people and then shred them on the shredder in the police department.
22. Chief Campo regularly made "Face in Hole" pictures on the computer in his office and printed them out on the police station's printer/copier (the same one he used to print the Ku Klux Klan sign he put on my raincoat).
23. I do not know where Chief Campo obtained the images of me and other Division of Police employees that he used for the "Face in Hole" pictures.
24. I have personally seen "Face in Hole" signs that Chief Campo made and displayed in the police department making fun of me and other people for their race or ethnic background.
25. One example of a "Face in Hole" Chief Campo made to make fun of someone for their race is attached as Exhibit B, and it depicts me, calling me "The Raccoon Reaper." Raccoon or coon is an extremely offensive racial slur directed at Black people. Chief Campo displayed Exhibit B on the official police-department bulletin board for approximately 3 weeks in the fall of 2020.
26. Another example of a "Face in Hole" sign Chief Campo made to make fun of someone for their ethnic background is attached as Exhibit C, and it depicts an officer who is Latino on a bottle of hot sauce. Chief Campo displayed Exhibit C on an official police department bulletin board for at least a couple of weeks after I started working there on September 9, 2020. I do not know how long that image was on the bulletin board before I started working there.
27. I have personally seen multiple "Face in Hole" signs that Chief Campo made and displayed in the police department making fun of an officer's religion.

28. I have personally seen a "Face in Hole" sign that Chief Campo made and displayed in the police department referring to an employee as a "fag."
29. I recall seeing other "Face in Hole" signs that Chief Campo created and displayed in the police department in addition to the ones mentioned above. This was a regular occurrence from the time I joined the department in 2020.
30. Mayor Bring regularly came into the police station on days when Chief Campo's "Face in Hole" signs were posted on bulletin boards.
31. The City and Mayor Bring did not provide any of the "Face in Hole" records I requested, but I know they exist because I saw them in the police department.
32. In my public-records request, I asked for all memoranda Chief Campo distributed to officers in the last two years. The City of Sheffield Lake and Mayor Bring did not produce all of these memoranda.
33. I know this because I have received and read memoranda that the City did not provide in response to my public-records request.
34. The City and Mayor Bring did not provide Chief Campo's April 14, 2021 memorandum to all patrol officers attached as Exhibit D in response to my public-records request.
35. The City and Mayor Bring did not provide Chief Campo's April 15, 2021 memorandum to all patrol officers attached as Exhibit E in response to my public-records request.
36. I remember seeing other memoranda issued by Chief Campo that would be responsive to my public-records request, but the City and Mayor Bring did not provide those memoranda.
37. The video attached as Exhibit F was provided by an attorney representing the City of Sheffield Lake in response to my public-records request, and it appears to be a copy of the surveillance video showing the events of June 25, 2021 when Chief Campo put the "Ku Klux Klan" sign on my coat.
38. The video attached as Exhibit G was provided by an attorney representing the City of Sheffield Lake in response to my public-records request, and it appears to be a copy of the surveillance video showing the events of June 25, 2021 when Chief Campo made and put on a Ku Klux Klan hat and told me I had to wear it on my next call.

39. I have reviewed the Petition for Mandamus and verify that the facts it contains are true and correct.

I declare the preceding facts to be true under penalty of perjury.

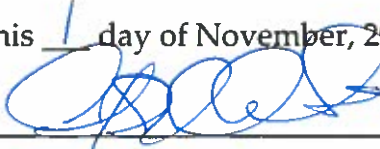
Dated: November 1, 2021



Keith Pool

State of Ohio)
) SS.
County of Cuyahoga)

Sworn and subscribed before me this 1 day of November, 2021.



Notary Public, State of Ohio
My commission does not expire.

July 30, 2021

Via email to mayorbring@gmail.com

Mayor Dennis Bring
City of Sheffield Lake City Hall
609 Harris Road
Sheffield Lake, OH 44054

Re: Public-records request on behalf of Keith Pool

Dear Mayor Bring:

This is a public-records request to the City of Sheffield Lake for the following:

- (1) The complete personnel or employment records (including records of training and discipline) for former-Chief of Police Anthony Campo, including his letter of resignation/retirement;
- (2) Records of complaints or grievances/appeals alleging any wrongdoing by Anthony Campo, along with the records created during the grievance/appeal process, including any notes of meetings with the grievant(s) and any communications related to the grievance/appeal;
- (3) Complaints received by Mayor Bring about Mr. Campo and any communications related to these complaints;
- (4) The complete personnel or employment records (including records of training and discipline) for Officer Keith Pool;
- (5) City employment policies, specifically including equal-opportunity employment policies, in effect from 2018 through the present;
- (6) Video recordings of Mr. Campo at the police department on June 25, 2021, specifically including but not limited to video of him (1) wearing a makeshift Ku Klux Klan hat and placing a "Ku Klux Klan" sign on Officer Pool's jacket;

- (7) Images of Officer Pool or any other City employee created using “www.facein角度.com” or any “Face in Hole” app, including any documents printed and maintained in the Division of Police and any image files saved and/or downloaded to the Division of Police computer used by Mr. Campo or on the printer/copier Mr. Campo used to print such images;
- (8) Images or records Mr. Campo created referring to Black Lives Matter or “BLM;”
- (9) Memoranda or other directives issued by Mr. Campo;
- (10) Communications between Mr. Campo and Mayor Bring regarding Officer Pool, including written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform;
- (11) Communications between Mr. Campo and any sergeant in the police department regarding Officer Pool, including all written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform;
- (12) Communications between Mr. Campo and Officer Pool, including all written or electronic communications of any type, such as emails, text messages, instant messages, or communications using any social-media platform.

For requests 4-12, please limit the time period of the response to the past two years. For requests 1-3, please provide the complete records kept by the City (regardless of time periods designated in any collective-bargaining agreement).

Consistent with R.C. 149.43(B)(1) and *State ex rel. Wadd v. City of Cleveland*, 81 Ohio St. 3d 50, 54 (1998), kindly provide the requested records by **August 13, 2021**. We will accept records productions on a rolling basis as the records are compiled.

Per R.C. 149.43(B)(6), please provide the records in their native electronic format to me by email at jsavoie@peifferwolf.com. If responsive records are too large to transmit by email, you may provide a link to a file-sharing site. If you do not have access to a file-sharing site, we invite you to contact us by phone so our office can arrange for you to upload the records to our firm’s file-sharing site at no cost.

Thank you for your time and attention.

Sincerely,



Jessica S. Savoie

cc: Ashlie Case Sletvold
David Graves (via email to dgraves1854@gmail.com)
James Climer (via email to jclimer@mrrlaw.com)

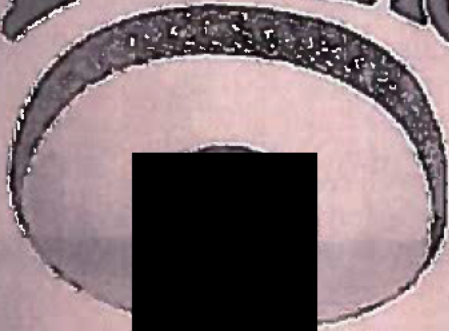
THE RACCOON
REAPER



EXHIBIT

1-B

TAPATÍO.



SALSA PICANTE

Hot Sauce
5 FL. OZ. - 148 ml

To: Patrol Division

04/14/21

Today on my way to work around 8:45AM I observed a couch on the tree lawn at 745 Irving Park. Bulk trash pick up is not until 04/27/21.

At 2:30 I noticed it was still there. I would have thought our day shift patrol would have patrolled Irving Park and seen this big ole couch sitting there, silly me.

I should have taped a comp time card to it, someone would have surely seen it.

Chief Tony Campo



TO: PATROL DIVISION

04/15/21

RE: PATROLING WITH YOUR EYES OPEN

A.K.A. LAZINESS

A CAR WAS PARKED IN A FRONT YARD OF A RESIDENCE ON HARRIS ROAD FOR OVER TWO DAYS, I DROVE BY IT EVERY TIME I LEFT THE STATION.

NO-ONE ELSE HERE SAW IT ? THE CAR SAT THERE FOR TWO DAYS, THAT'S SIX SHIFTS AND NO-ONE SAW IT ? IT WOULD STILL BE SITTING THERE IF I DIDN'T SEND SOMEONE TO DEAL WITH IT. I GUESS I MISSED THE PART OF THE CONTRACT THAT SAYS EMPLOYEES CAN BE LAZY AND IGNORE THE ORDINANCES THEY TOOK AN OATH TO ENFORCE, **PATHETIC.**

THE CHIEF