

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 JESSICA SAVOIE</p>	

I, Jessica Savoie, 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 an attorney licensed to practice in Ohio and Louisiana.
3. I represent Relator Keith Pool.
4. On July 30, 2021, I sent a public-records request on Officer Pool's behalf to the City of Sheffield Village, through Mayor and Safety Director Dennis Bring. I copied Law Director David Graves and James Climer, whom Mr. Graves had advised was the City's outside counsel. The document attached to this affidavit as Exhibit A is a true and correct copy of the public-records request I sent July 30, 2021.
5. The document attached as Exhibit B is a true and correct copy of the letter I received via email from Ms. Herman on August 20, 2021 to accompany the first release of public records.
6. The document attached as Exhibit C is a true and correct copy of the letter I received via email from Ms. Herman on August 27, 2021 to accompany the second release of public records.

7. On September 7, 2021, I spoke to Ms. Herman by telephone and asked when Mr. Pool could expect to receive the rest of the public records responsive to his July 30, 2021 public-records request. Ms. Herman advised that she would provide the remaining responsive records by September 21, 2021.
8. The document attached as Exhibit D is a true and correct copy of an email I sent to Ms. Herman on September 7, 2021.
9. The document attached as Exhibit E is a true and correct copy of an email I received from Ms. Herman on September 7, 2021.
10. Neither Ms. Herman nor anyone representing the City of Sheffield Lake provided additional records by September 21, 2021.
11. The document attached as Exhibit F is a true and correct copy of an email I sent to Ms. Herman on September 22, 2021.
12. The document attached as Exhibit G is a true and correct copy of an email I received from Ms. Herman on September 23, 2021.
13. The document attached as Exhibit H is a true and correct copy of the letter I received from Ms. Herman via email on September 24, 2021 to accompany the third (and, to date, final) release of public records.
14. The document attached as Exhibit I is a true and correct copy of a letter I sent to Ms. Herman via email on September 29, 2021, which accurately lists the records I had received.
15. Ms. Herman did not respond to my September 29, 2021 emailed letter (Exhibit I) or otherwise confirm that the City of Sheffield Lake had provided all responsive records.
16. Ms. Herman sent me public records on behalf of her client, the City of Sheffield Lake, on August 20, 2021; August 27, 2021; and September 24, 2021. Other than on these dates, I have received no public records from the City of Sheffield Lake or their outside attorneys, Ms. Herman and Mr. Climer.
17. The document attached as Exhibit J, which is stamped "CAMPO 00418," is a true and correct copy of a document I received from Amy Herman, outside counsel for the City of Sheffield Lake (and James Climer's colleague), on September 24, 2021 in response to the public-records request. (The record was stamped when I received it.)

18. The document attached as Exhibit K, which is stamped "CAMPO 000105," is a true and correct copy of a document I received from Ms. Herman, on September 24, 2021 in response to the public-records request. (The record was stamped when I received it.)
19. The document attached as Exhibit L, which is stamped "CAMPO 000104," is a true and correct copy of a document I received from Ms. Herman on September 24, 2021 in response to the public-records request. (The record was stamped when I received it.)
20. The document attached as Exhibit M, which is stamped "CAMPO 000103," is a true and correct copy of a document I received from Ms. Herman on September 24, 2021 in response to the public-records request. (The record was stamped when I received it.)
21. The video attached to Officer Pool's affidavit as Exhibit 1-F is a true and correct copy of a video I received from Ms. Herman on August 27, 2021 in response to the public-records request.
22. The video attached to Officer Pool's affidavit as Exhibit 1-G is a true and correct copy of a video I received from Ms. Herman on August 27, 2021 in response to the public-records request.
23. Neither the City of Sheffield Lake, Mayor Bring, Law Director Graves, Ms. Herman, nor Mr. Climer have ever advised that they were withholding any records responsive to Officer Pool's public-records request nor that any such records were destroyed.
24. No one has cited to any exemptions from the Public Records Act nor cited any legal authority to justify the City of Sheffield Lake withholding records responsive to Officer Pool's public-records request and/or denying any part of the request. *See* Exhibits B, C, and H.
25. The City of Sheffield Lake has not produced the memoranda attached to the petition with Officer Pool's affidavit as Ex. 1-D and Ex. 1-E.
26. The City of Sheffield Lake has not produced any "Face in Hole" pictures.
27. The City of Sheffield Lake has not provided:
 - a. Records of training provided to Mr. Campo and Officer Pool regarding equal employment opportunity and diversity issues (Items Nos. 1 and 4);

- b. Complaints received by Mayor Bring about Mr. Campo and any communications related to these complaints (Item No. 3);
- c. Images of Officer Pool or any other City employee created using "www.faceinhole.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 (Item No. 7);
- d. Images or records Mr. Campo created referring to Black Lives Matter or "BLM" (Item 8);
- e. Communications between Mr. Campo and Mayor Bring regarding Officer Pool (Item No. 10);
- f. Communications between Mr. Campo and any sergeant in the police department regarding Officer Pool (Item No. 11);
- g. Communications between Mr. Campo and Officer Pool (Item No. 12).

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


Dated: November 11, 2021



 Jessica Savoie

State of Ohio)
) SS.
 County of Cuyahoga)

Sworn and subscribed before me this 11th 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.faceinhole.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)



MAZANEC, RASKIN & RYDER Co., L.P.A.

ATTORNEYS AND COUNSELLORS AT LAW

Celebrating 40 Years of Excellence

Amy K. Herman
Email: aherman@mrrlaw.com
Direct Dial: (440) 287-8296

August 20, 2021

VIA EMAIL: jsavoie@peifferwolf.com

Jessica S. Savoie, Esq.
Peiffer, Wolf, Carr, Kane & Conway
1422 Euclid Ave., Suite 1610
Cleveland, OH 44115

Re: Public Records Request - Keith Pool / City of Sheffield Lake

Dear Ms. Savoie:

Please allow this correspondence to serve as an initial response to your Public Records request issued July 30, 2021 on behalf of Keith Pool. The following requested information is included: video recordings from June 25, 2021 of Mr. Campo and Officer Pool and the hiring policies of the Sheffield Lake Police Department.

The requested file has been redacted pursuant to Ohio Revised Code Section 149.43 and relevant law. Specifically, the records have been redacted as to:

- any and all Social Security Numbers pursuant to the Federal Privacy Act, 5 U.S.C. §522a and §149.43(A)(1)(dd);
- any and all Driver's License Numbers pursuant to §149.43(A)(1)(dd);
- all Checking and Savings Account Numbers pursuant to §149.43(A)(1)(dd); and
- OPERS Personal History Record pursuant to §145.27(A).

Additionally, redactions have been made for dates of birth, employee addresses, personal telephone numbers, personal e-mail addresses, emergency contact information, and names of minor children.

Please be advised that we are still in the process of compiling and reviewing additional documentation in order to provide a complete response to your request. The employment files of Anthony Campo and Keith Pool will be provided within 2 business days. The remainder of the supplemental documentation will be provided within a reasonable amount of time.

Reply to: **Cleveland**
100 FRANKLIN'S ROW, 34305 SOLON ROAD
CLEVELAND, OH 44139
PHONE 440.248.7906 FAX 440.248.8861
WEB MRRLAW.COM

Columbus
175 SOUTH THIRD STREET, SUITE 1000
COLUMBUS, OH 43215
PHONE 614.228.5931 FAX 614.228.5934
WEB MRRLAW.COM



Jessica S. Savoie, Esq.
August 20, 2021
Page 2

If you have any questions, or if you would like to discuss the file further, please feel free to contact me to do so.

Very truly yours,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Amy K. Herman

Amy K. Herman

AKH/tll

Attachment

cc: James A. Climer, Esq.
David M. Graves, Esq.



MAZANEC, RASKIN & RYDER Co., L.P.A.

ATTORNEYS AND COUNSELLORS AT LAW

Celebrating 40 Years of Excellence

Amy K. Herman
Email: aherman@mrrlaw.com
Direct Dial: (440) 287-8296

August 27, 2021

VIA EMAIL: jsavoie@peifferwolf.com

Jessica S. Savoie, Esq.
Peiffer, Wolf, Carr, Kane & Conway
1422 Euclid Ave., Suite 1610
Cleveland, OH 44115

Re: Public Records Request - Keith Pool / City of Sheffield Lake

Dear Ms. Savoie:

Please allow this correspondence to serve as an initial response to your Public Records request issued July 30, 2021 on behalf of Keith Pool. Included within this set of documents are the personnel files of both Anthony Campo and Keith Pool.

The requested files have been redacted pursuant to Ohio Revised Code Section 149.43 and relevant law. Specifically, the records have been redacted as to:

- any and all Social Security Numbers pursuant to the Federal Privacy Act, 5 U.S.C. §522a and §149.43(A)(1)(dd);
- any and all Driver's License Numbers pursuant to §149.43(A)(1)(dd);
- all Checking and Savings Account Numbers pursuant to §149.43(A)(1)(dd); and
- OPERS Personal History Record pursuant to §145.27(A).

Additionally, redactions have been made for dates of birth, employee addresses, personal telephone numbers, personal e-mail addresses, emergency contact information, and names of minor children.

Please be advised that we are still in the process of compiling and reviewing additional documentation in order to provide a complete response to your request. The remainder of the supplemental documentation will be provided within a reasonable amount of time.

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COLUMBUS, OH 43215
PHONE 614.228.5931 FAX 614.228.5934
WEB MRRLAW.COM



Jessica S. Savoie, Esq.
August 27, 2021
Page 2

If you have any questions, or if you would like to discuss the file further, please feel free to contact me to do so.

Very truly yours,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Amy K. Herman

Amy K. Herman

AKH/tll

Attachment

cc: James A. Climer, Esq.
David M. Graves, Esq.

From: [Tina Loeffler](#) on behalf of [Amy Herman](#)
To: [Jessica Savoie](#)
Cc: dgraves1854@gmail.com; [Jim Climer](#); [Amy Herman](#)
Subject: Re: Keith Pool / City of Sheffield Lake (Response to Public Records Request)
Date: Friday, August 27, 2021 2:16:01 PM
Attachments: [Supp Response to Public Records Req.pdf](#)
[Attachments.html](#)

Attached please find correspondence directed to your attention from Attorney Amy Herman in reference to the subject matter, attaching a sharefile below containing supplemental Sheffield Lake responsive documents to the Public Records Request. Should you wish to discuss further, please contact Attorney Herman directly. Thank you.

Citrix Attachments Expires February 23, 2022

Sheffield Lake Supp Responsive Docs.zip19.4 MB

[Download Attachments](#)

Tina Loeffler uses Citrix Files to share documents securely.

Tina L. Loeffler
Assistant to Attorneys Kathleen M. Minahan & Amy K. Herman

Direct: 440-248-7906 Ext 115
tloeffler@mrrlaw.com



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100 Franklin's Row
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From: [Jessica Savoie](#)
To: [Amy Herman](#)
Cc: [Jim Climer](#); [Ashlie Case Sletvold](#)
Subject: RE: Another phone number to reach you at?
Date: Tuesday, September 7, 2021 1:53:00 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Amy,

I'm glad we could connect on our respective cell phones. Thanks for explaining the current status, and we look forward to receiving the City of Sheffield Lake's complete production by September 21.

Jessica Savoie
Of Counsel

PEIFFERWOLF
— CARR KANE & CONWAY —

1422 Euclid Avenue, Suite 1610
Cleveland, OH 44115
Main: 216-340-1803 | **Fax:** 216-258-0161

Gender pronouns: she/her/hers

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From: Amy Herman <aherman@mrrlaw.com>
Sent: Tuesday, September 7, 2021 1:34 PM
To: Jessica Savoie <jsavoie@peifferwolf.com>
Cc: Jim Climer <jclimer@mrrlaw.com>
Subject: Another phone number to reach you at?

Hi Jessica,

Is there another number I can reach you at by chance? I think the problem is on your end.

Thanks,

Amy K. Herman
Associate Attorney
Direct Dial: 440.287.8296
aherman@mrrlaw.com

Cleveland Office
100 Franklin's Row





34305 Solon Road
Cleveland, OH 44139
Phone: 440.248.7906
Fax: 440.248.8861
www.mrrlaw.com



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From: [Amy Herman](#)
To: [Jessica Savoie](#)
Cc: [Jim Climer](#); [Ashlie Case Sletvold](#); [David Graves](#); [Tina Loeffler](#)
Subject: Re: Keith Pool v. City of Sheffield Lake (Claim No.: 200152) (File #: 210163)
Date: Tuesday, September 7, 2021 2:26:10 PM

Dear Jessica,

Since our conversation a few minutes ago I learned from our office administrator that Spectrum is having regional connection issues. I have a feeling that is why we had such difficulty connecting. My cell carrier is Verizon, and you can reach me at any time on that number.

As we just discussed, all documents have been preserved pursuant to your firm's request. In light of the breadth of documents requested and our the requirements under the Ohio Public Records Act codified at R.C. 149.43, I believe we can have the remaining responsive documents to you no later than September 21, 2021.

Finally, in response to your specific inquiry of August 18, 2021 regarding information redacted from the personnel file of Mr. Campo, the information redacted from the undated letter from Mr. Campo to Tammy Smith was redacted pursuant to R.C. 149.43(A)(8).

Please do not hesitate to contact me with any additional questions or concerns.

Thank you,

Amy K. Herman
Associate Attorney
Direct Dial: 440.287.8296
aherman@mrrlaw.com



Cleveland Office
100 Franklin's Row
34305 Solon Road
Cleveland, OH 44139
Phone: 440.248.7906
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From: [Jessica Savoie](#)
To: [Amy Herman](#); [Jim Climer](#)
Cc: [Ashlie Case Sletvold](#); mayorbring@gmail.com; dgraves1854@gmail.com
Subject: Public-records request by Keith Pool to City of Sheffield Lake on July 30, 2021: request for production of all responsive documents by September 24
Date: Wednesday, September 22, 2021 1:54:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Amy,

On September 7, you told me that the City of Sheffield Lake would provide its complete response to our public-records request by September 21 and that you hoped to make partial rolling productions before then. We have not received any records since September 7.

Almost two months have elapsed since our July 30 public-records request. The City of Sheffield Lake is responsible under the Ohio Public Records Act, R.C. 149.43(B)(1), for “promptly” preparing and making public records available to a requester. The City is likewise required by R.C. 149.43(B)(2) to “organize and maintain public records in a manner that they can be made available for inspection or copying” within a reasonable period of time.

The City of Sheffield Lake’s continued delay in producing records is unreasonable. Its failure to produce records is especially unreasonable because it has enlisted outside counsel and an e-discovery vendor to respond to the request.

You previously advised that the City of Sheffield Lake has not completed the production because your firm is working with a third-party e-discovery vendor to retrieve, review, and redact these public records. This does not explain the delay. E-discovery vendors routinely perform searches and produce electronically stored information to counsel within several days. (After all, outside vendors are accustomed to gathering electronically stored information at a pace that allows parties to meet discovery-response deadlines of 30 days.) The City has had ample time to gather its records and complete any statutorily authorized redactions in the 54 days since we sent the public-records request.

Please produce the remaining records responsive to our public-records request of July 30 by the close of business on Friday, September 24. If we do not receive the complete production by then, we will proceed with filing a petition for mandamus relief next week.

With kind regards,

Jessica

Jessica Savoie
Of Counsel

PEIFFERWOLF
— CARR KANE & CONWAY —

1422 Euclid Avenue, Suite 1610
Cleveland, OH 44115



Main: 216-340-1803 | **Fax:** 216-258-0161

Gender pronouns: she/her/hers

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From: [Amy Herman](#)
To: [Jessica Savoie](#); [Jim Climer](#)
Cc: [Ashlie Case Sletvold](#); dgraves1854@gmail.com
Subject: RE: Public-records request by Keith Pool to City of Sheffield Lake on July 30, 2021: request for production of all responsive documents by September 24
Date: Thursday, September 23, 2021 12:14:05 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image005.png](#)

Dear Jessica,

I am in receipt of your September 22, 2021 email. Your extensive public records request and preservations letters, which were both provided on the same day, necessitated the involvement of an e-discovery vendor in light of the nature and broad scope of the requests.

As of the writing of this email, multiple videos and nearly 350 pages of documents have already been produced. In order to comply with your request, over 3,000 documents had to be reviewed for responsiveness and then redacted based upon the exemptions outlined in R.C. 149.43.

Please be advised that you can expect the remainder of the responsive documents by the close of business tomorrow. Please do not hesitate to contact me if you have any questions or concerns.

Thank you,

Amy K. Herman
Associate Attorney
Direct Dial: 440.287.8296
aherman@mrrlaw.com



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From: Jessica Savoie [mailto:jsavoie@peifferwolf.com]

Sent: Wednesday, September 22, 2021 1:55 PM

To: Amy Herman <aherman@mrrlaw.com>; Jim Climer <jclimer@mrrlaw.com>

Cc: Ashlie Case Sletvold <asletvold@peifferwolf.com>; mayorbring@gmail.com;
dgraves1854@gmail.com

Subject: Public-records request by Keith Pool to City of Sheffield Lake on July 30, 2021: request for production of all responsive documents by September 24

Amy,

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The City of Sheffield Lake’s continued delay in producing records is unreasonable. Its failure to produce records is especially unreasonable because it has enlisted outside counsel and an e-discovery vendor to respond to the request.

You previously advised that the City of Sheffield Lake has not completed the production because your firm is working with a third-party e-discovery vendor to retrieve, review, and redact these public records. This does not explain the delay. E-discovery vendors routinely perform searches and produce electronically stored information to counsel within several days. (After all, outside vendors are accustomed to gathering electronically stored information at a pace that allows parties to meet discovery-response deadlines of 30 days.) The City has had ample time to gather its records and complete any statutorily authorized redactions in the 54 days since we sent the public-records request.

Please produce the remaining records responsive to our public-records request of July 30 by the close of business on Friday, September 24. If we do not receive the complete production by then, we will proceed with filing a petition for mandamus relief next week.

With kind regards,

Jessica

Jessica Savoie
Of Counsel



1422 Euclid Avenue, Suite 1610
Cleveland, OH 44115
Main: 216-340-1803 | **Fax:** 216-258-0161

Gender pronouns: she/her/hers

peifferwolf.com



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MAZANEC, RASKIN & RYDER Co., L.P.A.

ATTORNEYS AND COUNSELLORS AT LAW

Celebrating 40 Years of Excellence

Amy K. Herman
Email: aherman@mrrlaw.com
Direct Dial: (440) 287-8296

September 24, 2021

VIA EMAIL: jsavoie@peifferwolf.com

Jessica S. Savoie, Esq.
Peiffer, Wolf, Carr, Kane & Conway
1422 Euclid Ave., Suite 1610
Cleveland, OH 44115

Re: Public Records Request - Keith Pool / City of Sheffield Lake

Dear Ms. Savoie:

Please allow this correspondence to serve as an additional response to your Public Records request issued July 30, 2021 on behalf of Keith Pool. For purposes of clarity, we have Bates numbered all the documentation that was previously sent and are re-sending those marked documents along with the new production you are receiving today. The additional documentation produced today includes Bates numbers CAMPO_000347 to CAMPO_000427.

The requested files have been redacted pursuant to Ohio Revised Code Section 149.43, attorney-client privilege and relevant law. Specifically, the records have been redacted as to:

- any and all Social Security Numbers pursuant to the Federal Privacy Act, 5 U.S.C. §522a and §149.43(A)(1)(dd);
- any and all Driver's License Numbers pursuant to §149.43(A)(1)(dd);
- all Checking and Savings Account Numbers pursuant to §149.43(A)(1)(dd); and
- OPERS Personal History Record pursuant to §145.27(A).

Additionally, redactions have been made for dates of birth, employee addresses, personal telephone numbers, personal e-mail addresses, emergency contact information, and names of minor children.

If you have any questions, or if you would like to discuss the file further, please do not hesitate to contact me.

Reply to: **Cleveland**
100 FRANKLIN'S ROW, 34305 SOLON ROAD
CLEVELAND, OH 44139
PHONE 440.248.7906 FAX 440.248.8861
WEB MRRLAW.COM

Columbus
175 SOUTH THIRD STREET, SUITE 1000
COLUMBUS, OH 43215
PHONE 614.228.5931 FAX 614.228.5934
WEB MRRLAW.COM



Jessica S. Savoie, Esq.
September 24, 2021
Page 2

Very truly yours,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Amy K. Herman

Amy K. Herman

AKH/tll

Attachment

cc: James A. Climer, Esq.
David M. Graves, Esq.

September 29, 2021

Via email to jlimer@mrrlaw.com and aherman@mrrlaw.com

Jim Climer and Amy Herman
Mazanec, Raskin & Ryder
100 Franklin's Row
34305 Solon Road
Cleveland, OH 44139

Dear Mr. Climer and Ms. Herman,

In response to our public-records request to the City of Sheffield Lake dated July 30, 2021, a copy of which is attached, we have received the following documents from your office on August 20, 2021; August 27, 2021; and September 24, 2021:

- Personnel file of Anthony Campo (CAMPO 000001–260);
- Personnel file of Keith Pool (CAMPO 000261–300);
- Sheffield Lake Hiring Policies (CAMPO 000301–44);
- Uniforms policy (CAMPO 347–48);
- Tobacco use policy (CAMPO 349–52);
- Uniforms policy (CAMPO 353–54);
- Document titled Patrol Rifle Program (CAMPO 355-58);
- Undated memorandum from Anthony Campo regarding department firearms (CAMPO 359–60);
- Emails from individuals to Dennis Bring (mayorbring@gmail.com) regarding the incident of June 25, 2021 in which Anthony Campo placed a “KKK” sign on Officer Keith Pool’s raincoat and in which Mr. Campo also made and wore a makeshift Ku Klux Klan hat in Officer Pool’s presence (and emails from Mayor Bring responding to or forwarding these emails) (CAMPO 361–363, 366–73, 382–97, 405–06, 409–13, 425);
- OPBA letter of agreement (CAMPO 364–65);
- Copies of summons received in *Maiya McCoy, et al. v. City of Sheffield Lake Police Department, et al.* (CAMPO 374–79, 414–17);

Peiffer Wolf Main Office
1519 Robert C. Blakes Sr. Dr.
New Orleans, LA 70130
Main: (504) 523-2434

Los Angeles
(415) 766-3545
Cleveland
(216) 589-9280

San Francisco
(415) 766-3544
St. Louis
(314) 669-3600

New York
(585) 310-5140

Austin



- Email exchange between Dennis Bring and Richard Geran dated November 26, 2018, which was forwarded to Anthony Campo (CAMPO 380–81);
- Email exchange between Dennis Bring and Brandy Randolph dated 8/20/2020 and 8/23/2020 (CAMPO 398–00);
- Sheffield Lake’s City Council Meeting minutes from August 25, 2020 (CAMPO 000401–04);
- Email exchange between cityofsheffieldlake@gmail.com and Lisa Parker dated July 1, 2021 (CAMPO 407–08);
- Public-records request from George Gerken dated June 29, 2021 (CAMPO 418);
- Letter from Dennis Bring to Anthony Campo dated June 29, 2021 (CAMPO 419);
- Letter from Anthony Campo to Tammy Smith dated June 29, 2021 (CAMPO 420);
- Letter from Dennis Bring to Anthony Campo dated June 29, 2021 (CAMPO 421);
- Email from phastingslead@gmail.com to Anthony Campo dated November 13, 2019 with no content in body of email (CAMPO 422);
- Email from Anthony Campo to Brandy Randolph dated August 20, 2020 (CAMPO 423);
- Email from Anthony Campo to Heather Cloutier dated September 2, 2020 (CAMPO 424);
- Email from Anthony Campo to Brandy Randolph dated May 21, 2017 (CAMPO 426);
- Email from David Graves to James Burge dated July 7, 2021 (CAMPO 427).

Your office has also produced video and photograph files with the following file names:

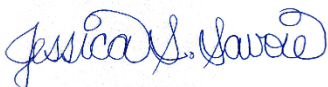
- Camera2_SLCH_SLCH_20210625152609_20210625153105_199093.jpg;
- Camera2_SLCH_SLCH_20210625152609_20210625153105_199093.mp4;
- Camera2_SLCH_SLCH_20210625152454_20210625152626_197166.mp4;
- Camera2_SLCH_SLCH_20210625152454_20210625152626_197166.jpg;
- Camera2_SLCH_SLCH_20210625155120_20210625155559_230055.mp4;
- Camera2_SLCH_SLCH_20210625155120_20210625155559_230055.jpg;
- Camera2_SLCH_SLCH_20210625154617_20210625155120_226353.mp4;
- Camera2_SLCH_SLCH_20210625154617_20210625155120_226353.jpg;
- Camera2_SLCH_SLCH_20210625154118_20210625154617_220380.mp4;

- Camera2_SLCH_SLCH_20210625154118_20210625154617_220380.jpg;
- Camera2_SLCH_SLCH_20210625153608_20210625154118_208415.mp4;
- Camera2_SLCH_SLCH_20210625153105_20210625153608_202966.mp4;
- Camera2_SLCH_SLCH_20210625153608_20210625154118_208415.jpg;
- Camera2_SLCH_SLCH_20210625153105_20210625153608_202966.jpg.

Please advise regarding whether the City of Sheffield Lake's production responding to the July 30, 2021 public-records request is complete.

Thank you for your time and attention.

Sincerely,



Jessica S. Savoie

cc: Ashlie Case Sletvold;
David Graves (via email to dgraves1854@gmail.com);
Mayor Dennis Bring (via email to mayorbring@gmail.com).

Attachment: Public-records request from J. Savoie to City of Sheffield Lake dated July 30, 2021.

From: [Jessica Savoie](#)
To: [Amy Herman](#); [Jim Climer](#)
Cc: [Ashlie Case Sletvold](#); dgraves1854@gmail.com; mayorbring@gmail.com
Subject: Public-records request to City of Sheffield Lake dated July 30, 2021: question regarding whether City's production is complete
Date: Wednesday, September 29, 2021 10:26:00 AM
Attachments: [2021.09.29 J. Savoie to A. Herman and J. Climer regarding whether production is complete.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[2021-07-30 Public-records request to Sheffield Lake.pdf](#)

Amy and Jim,

Please see the attached letter listing the documents and files we have received in response to the public-records request of July 30, 2021.

Does this complete the City of Sheffield Lake's production in response to the July 30 public-records request?

With kind regards,

Jessica

Jessica Savoie
Of Counsel

PEIFFERWOLF
— CARR KANE & CONWAY —

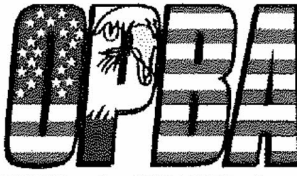
1422 Euclid Avenue, Suite 1610
Cleveland, OH 44115
Main: 216-340-1803 | **Fax:** 216-258-0161

Gender pronouns: she/her/hers

peifferwolf.com



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800-457-4190

June 29, 2021

Mayor Dennis Bring
609 Harris Rd.
Sheffield Lake, Ohio 44054

Via email: mayorbring@gmail.com; and,
dgraves1854@gmail.com

RE: Public records request.

Dear Mayor Bring:

Please consider this my public records request regarding for the following records:

1. Any records pertaining to the Sheffield Lake sexual harassment policy and discrimination policy.
2. A copy of the video recording taken on the camera in the Booking Room on June 25, 2021, from the period of 3:30 pm to 3:50 pm.

I can forward any copy fees and postage for the delivery of the records, if necessary. If not, please provide further instructions as to the location and date the records are available. Feel free to respond directly to gerkenlaw@gmail.com. Thank you for your assistance in this matter.

Sincerely,

George E. Gerken
OPBA Attorney

CLEVELAND OFFICE:

10147 Royalton Road, Suite J
P.O. Box 338003
North Royalton, Ohio 44133
440-237-7900 • FAX: 440-237-6446

COLUMBUS OFFICE:

92 Northwoods Blvd.
Suite B2
Columbus, Ohio 43235
614-888-7901 • FAX: 614-888-7906

EXHIBIT

2-J



CAMPO 000105

CITY OF SHEFFIELD LAKE

609 HARRIS ROAD
SHEFFIELD LAKE, OHIO 44054
Phone: 440-949-7141
Fax: 440-949-5169

Dennis Bring
Mayor

June 29, 2021

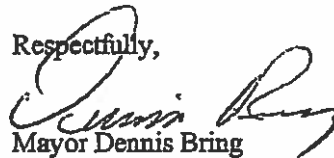
Chief Anthony Campo

RE: Notice of Administrative Leave

Dear Chief Campo:

This correspondence shall serve as notice that you are hereby placed on paid administrative leave pending an investigation into the events which took place on June 25, 2021 within the Sheffield Lake Police Department.

Respectfully,



Mayor Dennis Bring

cc: Law Director, Supervisor, Personnel File

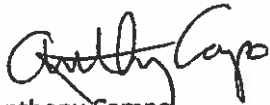
EXHIBIT

2-K

To Tammy Smith
CAMP 000104
Finance Director city of Sheffield Lake

I am submitting this letter as my notification that I am retiring from the City of Sheffield Lake Police Department effective Tuesday 06/29/2021. Please initiate the paperwork and procedure.

Respectfully


Anthony Campo

Copy Mayor Dennis Bring

EXHIBIT
2-L



CITY OF SHEFFIELD LAKE

609 HARRIS ROAD
SHEFFIELD LAKE, OHIO 44054
Phone: 440-949-7141
Fax: 440-949-5169

Dennis Bring
Mayor

June 29, 2021

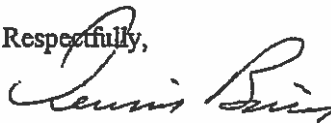
Anthony Campo
4166 Berkely Drive
Sheffield Village, OH 44054

RE: Retirement and Return of City-Issued Equipment

Dear Mr. Campo:

The City of Sheffield Lake is in receipt of your notice of resignation and retirement effective June 29, 2021. Your resignation is hereby accepted. You are hereby directed to immediately return to the Sheffield Lake Police Department all City-issued equipment which is in your possession including duty weapons.

Respectfully,



Mayor Dennis Bring

cc: Law Director, Personnel File

