

BEFORE THE OHIO ELECTIONS COMMISSION

SARAH CHAMBERS
6593 MEADOW GLEN DRIVE S
WESTERVILLE, OH 43082

COMPLAINANT,

VS.

JOSEPH K. BLYSTONE
8677 OREGON ROAD
CANAL WINCHESTER, OH 43110

CASE NO. 2021G-022

AND,

M. JANE BLYSTONE, TREASURER
8677 OREGON ROAD
CANAL WINCHESTER, OH 43110

AND,

FRIENDS OF JOE BLYSTONE
8677 OREGON ROAD
CANAL WINCHESTER, OH 43110

RESPONDENTS,

**COMPLAINANT'S FIRST REQUEST
FOR PRODUCTION OF
DOCUMENTS**

Pursuant to Rule 34 of the Ohio Rules of Civil Procedure, Complainant requests that the Respondents, Joseph K. Blystone, M. Jane Blystone, and Friends of Joe Blystone produce for inspection and copying the documents described below. The documents should be produced at the offices of the Pullins Law Firm LLC ,110 East Gambier Street, Suite 3, Mount Vernon, OH 43050 on or before 4pm on February 3, 2022.

DEFINITIONS

As used herein, the following terms shall mean:

1. "Respondents" refers to the Respondents in this action, its subsidiaries and affiliates, its present and former employees, agents, officers, and directors, and all other persons who have acted or purported to act on its behalf or under its control.

2. "Document" shall mean each and every document, including electronically stored information, however produced or reproduced, in the possession, custody or control of the Respondents, regardless of the origin or location, whether an original, identical, copy, draft, or non-identical copy, whether an official or unofficial document, including, but not limited to: minutes, notes, comments, worksheets, summaries, records or other reports concerning meetings, conferences, visits, surveys, inspections, statements, interviews or telephone conversations; inter-office and intra-office memoranda; books, manuals, pamphlets, bulletins, circulars, instructions, work papers, transcripts, reports, memoranda, summaries, studies, analyses, evaluations, worksheets, invoices, contracts, journals, logs, files; statistical records, diaries, calendars, travel and telephone logs, and appointment books; correspondence and telegrams, envelopes and other wrappers and packaging; graphs, charts and maps; transcripts of verbal testimony or statements; checks, check stubs and money orders, travel vouchers, receipts, returns; reports of experts; affidavits; balance sheets, profit and loss statements, books of account, statements of account, and other financial data; financial data, analyses, statistical and other forecasts, projections or budgets; teletypes, telefax; printouts or other stored information from computers or other information retrieval systems; photographic matter or sound reproduction, however produced or reproduced, including, but not limited to, photographs, microfiche, microfilm, videotapes, recordings, motion pictures, tapes, cassettes, and discs; and any other written, printed, recorded or graphic matter.

The term "document" shall also be construed so as to include in each document request a request for every document that revises, amends, changes, modifies, supersedes, replaces or otherwise alters any document identified by Respondents.

INSTRUCTIONS

1. The same document or documents may be responsive to more than one request. The presence of such duplication is not to be considered as narrowing or limiting each individual request. Where a document is requested by more than one numbered paragraph of this request, only one copy of the document need be produced, unless the copies are different because of markings, deletions, notations or marginal notes.

2. If there is an objection to the production of any document or part thereof, as to each such document state:

- (a) its name or title or describe it in detail;
- (b) its author(s);
- (c) the person to whom it was sent;
- (d) its date;
- (e) the subject matter of the writing;
- (f) its present location;
- (g) the basis for your objection.

3. If any document responsive to any request is no longer in your possession or control, or no longer in existence, then for each such document state whether it:

- (a)has been destroyed;
- (b)is missing or lost; or
- (c)has been sent to another person or entity.

Also, please explain the circumstances surrounding the disposition of the document and state the date it was disposed of.

4. This request is continuing in nature. Respondents shall produce for inspection and copying all documents requested herein which are currently unavailable to Respondents, but which come into existence or become available to it at any time prior to or during the trial of this action.

DOCUMENTS TO BE PRODUCED

1. A copy of the names and addresses and amounts contributed for every donor that made cash contributions of \$25.00 or less to Friends of Joe Blystone from February 11, 2021 until June 30, 2021.
2. A copy of every deposit made to the bank account of Friends of Joe Blystone from February 11, 2021 until June 30, 2021.
3. A copy of every check written or any other expenditure from the bank account of Friends of Joe Blystone from February 11, 2021 until June 30, 2021.
4. A copy of every statement or communication from the bank for the bank account of Friends of Joe Blystone for the periods from February 11, 2021 until June 30, 2021.
5. A copy of all records from the Friends of Joe Blystone Anedot account from February 11, 2021 until June 30, 2021.
6. A copy of all records from the Friends of Joe Blystone Bonfire account from February 11, 2021 until June 30, 2021.

Respectfully Submitted,



Scott Allan Pullins (0076809)
Attorney & Counselor at Law
Pullins Law Firm LLC
110 East Gambier Street, Suite 3
Mount Vernon, OH 43050
740.392.3505
740.392.5150 Facsimile

scott@pullinslaw.com
www.pullinslaw.com

Counsel for the Complainant

CERTIFICATE OF SERVICE

A copy of this filing was served upon the Counsel for the Respondents via electronic mail, read receipt requested.