

Case No. _____

**Supreme Court
of the State of Ohio**

STATE OF OHIO *ex rel.* MARY CAPELLA,

Relator,

v.

OHIO ELECTIONS COMMISSION,

and

PHILIP C. RICHTER,

Executive Director/Staff Attorney, Ohio Elections Commission,

and

**OTTO BEATTY III, and NATASHA KAUFMAN,
and D. MICHAEL CRITES aka MICHAEL CRITES, and CHRISTINA M. HAGAN,
and ERNEST C. KNIGHT, and JOHN A. LYALL, and CHARLETA B. TAVARES,**

Members, Ohio Elections Commission,

Respondents.

Original Action in Mandamus

VERIFIED COMPLAINT FOR WRIT OF MANDAMUS

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Counsel for Respondents

**SUPREME COURT
OF THE STATE OF OHIO**

STATE OF OHIO *ex rel.* MARY CAPELLA
c/o Curt Hartman, Legal Counsel
7394 Ridgepoint Drive, Suite 8
Cincinnati, OH 45230

Relator,

v.

OHIO ELECTIONS COMMISSION
77 South High Street
Suite 1850 Riffe Center
Columbus, Ohio 4321

and

PHILIP C. RICHTER,
Executive Director/Staff Attorney
Ohio Elections Commission,
77 South High Street
Suite 1850 Riffe Center
Columbus, Ohio 43215,

and

OTTO BEATTY III
Chairman, Ohio Elections Commission,
77 South High Street
Suite 1850 Riffe Center
Columbus, Ohio 43215,

and

NATASHA KAUFMAN
Member, Ohio Elections Commission,
77 South High Street
Suite 1850 Riffe Center
Columbus, Ohio 43215,

and

Case No. _____

**VERIFIED COMPLAINT
FOR WRIT OF MANDAMUS**

[*continued on next page*]

[Legal counsel for Complainant] has asked me ... to expedite the case, informing me that the Commission, under its statutes, has an obligation to expedite matters. But I indicated to him that, since the Commission became an independent agency, there are statutes that put us in a situation where we may have to expedite matters, but that the Commission made a policy decision early on that we were obligated – specifically obligated – to expedite matters that involve false statements (when the Commission was dealing with false statements and so we always expedited those), but I received a direction from the Commission at that time not to expedite any other matters that came before the Commission. So, I informed him that I do not anticipate expediting that case before the Commission.

- Phillip Richter
Executive Director, Ohio Elections Commission
Commission Meeting, April 7, 2022¹

We certainly don't want it to get out that "oh, they don't expedite"....

- Otto Beatty III
Chairman, Ohio Elections Commission
Commission Meeting, April 7, 2022²

What is the pleasure of the Commission....or does someone feel strong that we just go with tradition and don't worry about it and don't expedite anything?

- Otto Beatty III
Chairman, Ohio Elections Commission
Commission Meeting, April 7, 2022³

¹ Quote taken from video of meeting of OHIO ELECTIONS COMMISSION held on April 7, 2022, and published at <https://www.youtube.com/watch?v=wTDQRxLmBOc>, from 2:09:27 - 2:10:09 of the video.

² Quote taken from video of meeting of OHIO ELECTIONS COMMISSION held on April 7, 2022, and published at <https://www.youtube.com/watch?v=wTDQRxLmBOc>, from 2:12:29 - 2:12:35 of the video.

³ Quote taken from video of meeting of OHIO ELECTIONS COMMISSION held on April 7, 2022, and published at <https://www.youtube.com/watch?v=wTDQRxLmBOc>, from 2:15:44 - 2:15:58 of the video.

Comes now the STATE OF OHIO, by and through Relator MARY CAPELLA., and, in support of its claim for the issuance of a peremptory writ of mandamus or, alternatively, an alternative writ of mandamus, alleges as follows:

1. Despite the clear mandate of state law that requires the OHIO ELECTIONS COMMISSION to conduct expedited hearings on complaints alleging certain violations of Ohio's campaign finance laws filed in close proximity to an election, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have refused and continue to refuse to schedule or conduct such expedited hearings.

2. In fact, as publicly declared by PHILIP RICHTER, the OHIO ELECTIONS COMMISSION has adopted a policy to not conducted expedited hearings on complaints even when state law mandates the holding of such expedited hearings.

3. The heart of campaign finance laws is the timely disclosure of full, complete, and accurate information by candidates and their campaign committees, so that voters possess such information before casting the ballots at an election.

4. Appreciating the critical importance of full, complete, and accurate information by candidates and their campaign committees so as to provide for a fully-informed electorate, the Ohio General Assembly, as the final arbiter of public policy, *State ex rel. VanCleave v. School Emps. Retirement Sys.*, 120 Ohio St.3d 261, 898 N.E.2d 33, 2008-Ohio-5377 ¶27, has determined that allegations of certain violations of campaign finance laws are significant and of critical importance that, when a complaint is filed with the OHIO ELECTIONS COMMISSION alleging violations of specific campaign finance laws in close proximity to an election, the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS have the legal obligation to

conducted expedited hearings on the complaint so that the voters of the State of Ohio are fully informed when casting their ballots at the election.

5. Instead of respecting and complying with the law as enacted by the Ohio General Assembly and proceeding to conduct expedited hearings on complaints alleging certain violations of the campaign finance laws filed in close proximity to an election, the OHIO ELECTIONS COMMISSION, PHILLIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have deliberatively and consciously ignored the law as enacted by the Ohio General Assembly and, in so doing, have violated their oaths of office and have undermined and frustrated the campaign finance laws of the State of Ohio.

6. Stated otherwise, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have placed themselves above the law and a law unto themselves.

7. This mandamus action is brought to compel the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS to comply with the clear mandate under state law to conduct expedited hearings on complaints alleging certain violations of the campaign finance laws filed in close proximity to an election and to not, as characterized by OTTO BEATTY III as chairman of the OHIO ELECTIONS COMMISSION, to “just go with tradition...and don’t expedite anything”.

8. Relator MARY CAPPELLA is a citizen of and a registered voter in the State of Ohio.

9. Respondent OHIO ELECTIONS COMMISSION is a body politic and corporate established by R.C. 3517.152.

10. Respondent PHILIP C. RICHTER is the Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION.

11. Respondent OTTO BEATTY III is one of the seven members of the OHIO ELECTIONS COMMISSION and presently serves as the Chairman of the OHIO ELECTIONS COMMISSION.

12. Respondent NATASHA KAUFMAN is one of the seven members of the OHIO ELECTIONS COMMISSION.

13. Respondent D. MICHAEL CRITES, also known as MICHAEL CRITES, is one of the seven members of the OHIO ELECTIONS COMMISSION.

14. Respondent CHRISTINA M. HAGAN is one of the seven members of the OHIO ELECTIONS COMMISSION.

15. Respondent ERNEST C. KNIGHT is one of the seven members of the OHIO ELECTIONS COMMISSION.

16. Respondent JOHN A. LYALL is one of the seven members of the OHIO ELECTIONS COMMISSION.

17. Respondent CHARLETA B. TAVARES is one of the seven members of the OHIO ELECTIONS COMMISSION.

18. Collectively, the foregoing seven members of the OHIO ELECTIONS COMMISSION are referred herein as the COMMISSION MEMBERS.

Ohio Elections Commission Process and Procedures

19. R.C. 3517.151(A) expressly provides that “complaints with respect to acts or failures to act under the sections listed in division (A) of section 3517.153 of the Revised Code shall be filed with the Ohio elections commission.”

20. In turn, R.C. 3517.153(A) provides for filing a complaint with the OHIO ELECTIONS COMMISSION alleging “a failure to comply with or a violation of any provision in sections 3517.08 to 3517.13, 3517.20 to 3517.22, 3599.03, or 3599.031 of the Revised Code.”

21. R.C. 3517.151(A) “confers exclusive jurisdiction over complaints with respect to acts or failures to act under the specified provisions on the Ohio Elections Commission.” *State ex rel. Ohio Democratic Party v. Blackwell*, 111 Ohio St. 3d 246, 855 N.E.2d 1188, 2006-Ohio-5202 ¶15.

22. Upon the filing of a complaint pursuant to R.C. 3517.153(A), “the commission shall proceed in accordance with sections 3517.154 to 3517.157 of the Revised Code.” R.C. 3517.153(A).

23. An initial review of a complaint filed with the OHIO ELECTIONS COMMISSION is to be made by its staff attorney. Specifically, R.C 3517.154(A) provides that “[t]he full-time attorney for the Ohio elections commission shall review each complaint filed with the commission under section 3517.153 of the Revised Code, shall determine the nature of the complaint, and... shall make a recommendation to the commission for its disposition, in accordance with this section. The attorney shall make the determination and the recommendation, if required, not later than one business day after the complaint is filed.”

24. R.C. 3517.154(A)(2) provide for specific instances when a complaint filed with the OHIO ELECTIONS COMMISSION is to receive a mandatory expedited preliminary hearing.

25. With respect to a mandatory expedited preliminary hearing as provided by R.C. 3517.154(A)(2) and as it specifically concerns this case, R.C. 3517.154(A)(2)(b) provides, in pertinent part, that “[i]f the [staff] attorney determines that the complaint sets forth a failure to comply with or a violation of division (G)... [or] (O) ...of section 3517.13...and that the

complaint is filed during one of the periods of time specified in [R.C. 3517.156(B)(1)], the attorney shall recommend to the commission that the complaint receive an expedited hearing under section 3517.156 of the Revised Code, and the complaint shall receive such a hearing.”

26. The periods of time specified in R.C. 3517.156(B)(1) are “on or after the sixtieth day prior to a primary or special election or on or after the ninetieth day prior to the general election, but not later than the day of the primary, special, or general election to which the complaint relates.”

27. With respect to the expedite hearings mandated by R.C. 3517.154, R.C. 3517.156(A) provides that “[i]f a complaint filed with the Ohio elections commission is to receive an expedited hearing pursuant to section 3517.154 of the Revised Code, a panel of at least three members of the commission shall hold a hearing on the complaint to determine whether there is probable cause to refer the matter to the full commission for a hearing under section 3517.155 of the Revised Code. Not more than one-half of the members of a panel shall be affiliated with the same political party. The chairperson of the commission shall call for the selection of a panel, as needed, and shall select the members of the panel by lot.”

28. In terms of timing for the expedited preliminary hearing, R.C. 3517.156(B)(1) provides that “[i]f a complaint is filed on or after the sixtieth day prior to a primary or special election..., but not later than the day of the primary, special, or general election to which the complaint relates, the hearing shall be held not later than two business days after the determination required to be made under [R.C. 3517.154(A)] is made....”

29. Pursuant to R.C. 3517.156(C), the panel conducting the expedited preliminary hearing has one of three options: (i) make a determination there is no probable cause to believe a violation of the campaign finance laws occurred and dismiss the complaint; (ii) make a

determination there is probable cause to believe a violation of the campaign finance laws occurred and refer the complaint to the full commission for an expedited hearing; or (iii) indicate the evidence is insufficient to make one of the foregoing determinations and request that an investigatory attorney investigate the complaint.

30. If, pursuant to R.C. 3517.156(C)(2), the panel conducting the expedited preliminary hearing determines there is probable cause to believe a violation of the campaign finance law so as to refer the complaint to the full commission for an expedited hearing, the OHIO ELECTIONS COMMISSION “shall hold a hearing on the complaint under [R.C. 3517.155] not later than ten days after the complaint is referred to it by the panel.”

31. In summary, complaints filed with the OHIO ELECTIONS that:

- (i) allege violations of, *inter alia*, R.C. 3517.13(G) or R.C. 3517.13(O); and
- (ii) are filed within 60 days of a primary election,

are mandated by R.C. 3517.154(B)(2)(b) to be afforded expedited hearings pursuant to the process and procedures as follows:

- (i) not later than one business day after the complaint is filed, the staff attorney for the OHIO ELECTIONS COMMISSION shall determine if the complaint alleges a violation of the campaign finance laws for which an expedite hearing is mandated under R.C. 3517.154(A)(2)(a) or R.C. 3517.154(A)(2)(b);
- (ii) if the complaint alleges a violation of specific provisions of the campaign finance laws (including R.C. 3517.13(G) or R.C. 3517.13(O)), then “the [staff] attorney shall recommend” that the complaint “receive an expedited hearing” and “the complaint shall receive such a hearing”;

- (iii) an expedited preliminary hearing before a panel of the Commission must be conducted within two business days of the foregoing;
- (iv) if the panel conducting the expedited preliminary hearing determines probable cause exists of a violation of the campaign finance laws, then the panel “shall refer the complaint to the full commission” for an expedited hearing on the complaint.
- (v) upon referral from the foregoing expedited preliminary hearing panel, the full commission “shall hold a hearing on the complaint” and shall do so “not later than ten days after the complaint is referred to it by the panel.”

Ohio Elections Commission Consciously and Deliberate Ignores Mandates of State Law

32. Notwithstanding the foregoing process and procedure for complaints alleging certain violations of the campaign finance law filed in close proximity to an election, the OHIO ELECTIONS COMMISSION and PHILLIP RICHTER as its Executive Director/Staff Attorney have determined as a matter of policy to not respect or perform their legal obligations with respect to complaints that meet the criteria for expedited processing or hearings.

33. In fact, on April 7, 2022, PHILIP RICHTER made the following public statement at the meeting of the OHIO ELECTIONS COMMISSION held on that day:

[S]ince the Commission became an independent agency, there are statutes that put us in a situation where we may have to expedite matters, but that the Commission made a policy decision early on that we were obligated – specifically obligated – to expedite matters that involve false statements (when the Commission was dealing with false statements and so we always expedited those), but I received a direction from the Commission at that time not to expedite any other matters that came before the Commission.

The foregoing quote was taken from video of meeting of OHIO ELECTIONS COMMISSION held on April 7, 2022, and published at <https://www.youtube.com/watch?v=wTDQRxLmBOc>, from 2:09:27 - 2:10:09 of the video.

34. Thus, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have taken the deliberate and conscious effort to not conform to the mandates of state law in terms of expediting certain complaints filed in close proximity to an election but, instead, have decided placed themselves above the law and a law unto themselves.

35. In refusing to conform to the mandates of state law as its concerns expediting certain complaints filed in close proximity to an election, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have deliberately frustrated and undermined the public policy of ensuring certain campaign finance issues are timely addressed in advance of an election so that the voters are better and more fully informed concerning candidates.

36. In fact, with respect to the two complaints that are the subject of this case, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS acknowledged at the meeting of April 7, 2022, that the first time these two complaints will come before the COMMISSION or a panel thereof will not be until after the forthcoming primary election.

Mary Capella files Complaints for which Expedited Hearings are Mandated by State Law, yet the Commission and Mr. Richter Refused to Proceed With Expedited Consideration

37. On April 7, 2022, MARY CAPELLA filed two complaints with the OHIO ELECTIONS COMMISSION concerning violations of the campaign finance laws by Joe

Blystone and Friends of Joe Blystone, the campaign committee established to support the candidacy of Joe Blystone.

38. Joe Blystone is currently a candidate for governor of the State of Ohio at the forthcoming primary election to be held on May 3, 2022.

39. True and accurate copies of the *OEC Complaints* filed by MARY CAPELLA on April 7, 2022, are attached hereto as *Exhibit A-1* and *Exhibit A-2*, with her address redacted.

40. Generally speaking, *Exhibit A-1* relates to contributions received by Friends of Joe Blystone and is referred herein as the *OEC Contributions Complaint*.

41. Generally speaking, *Exhibit A-2* relates to expenditures by Friends of Joe Blystone and is referred herein as the *OEC Expenditures Complaint*.

The OEC Contributions Complaint

42. The *OEC Contributions Complaint* was assigned Case No. 2022G-012 by the OHIO ELECTIONS COMMISSION.

43. The *OEC Contributions Complaint* was filed with the OHIO ELECTIONS COMMISSION on April 7, 2022, *i.e.*, within 60 days of the primary election to be held on May 3, 2022.

44. The *OEC Contributions Complaint* concerns or relates to information included or not included in the campaign finance report filed by Friends of Blystone in or about January 2022, said report being generally known as the *2021 Annual Report*.

45. Within the *OEC Contributions Complaint*, *i.e.*, *Exhibit A-1*, MARY CAPELLA specifically alleged and set forth a violation of the campaign finance laws, including:

FRIENDS OF JOE BLYSTONE violated R.C. 3517.13(G)(1) & 3517.10(B)(4) when it failed to report the full name and address of each person from whom contributions are received and, instead, reported accumulative amounts of

contributions received at events or locations, including, contributions more than likely in excess of twenty-five dollars.

OEC Contributions Complaint, Violation No. 1.

46. R.C. 3517.13(G)(1) specifically provides that “[n]o person shall knowingly conceal or misrepresent contributions given or received, expenditures made, or any other information required to be reported by a provision in sections 3517.08 to 3517.13 of the Revised Code.”

47. As referenced in paragraphs 12 and 13 of the *OEC Contributions Complaint*, same or similar issue was raised in a previous complaint filed with the OHIO ELECTIONS COMMISSION against Friends of Joe Blystone and Joe Blystone in a case styled *Sarah Chamber v. Joseph K. Blystone*, and assigned Case No. 2021G-022.

48. A true and accurate copy of the *Chambers OEC Complaint* filed in Case No. 2021G-022 is attached hereto as *Exhibit B*. As indicated thereon, the *Chambers OEC Complaint* was filed with the OHIO ELECTIONS COMMISSION on October 28, 2021.

49. On December 16, 2021, the OHIO ELECTIONS COMMISSION conducted a preliminary review of the allegations in the *Chambers OEC Complaint* and, having found sufficient indication of violations of the campaign finance law, to set the matter for a full hearing.

50. A true and accurate copy of the sign minutes of the meeting of the OHIO ELECTIONS COMMISSION held on December 16, 2021, is attached hereto as *Exhibit C*.

51. Thus, at least as of December 16, 2021, *i.e.*, before the filing its the *2021 Annual Report* in January 2022, Friends of Blystone and Joe Blystone knew or should have known that the failure to report the full name and address of each person from whom contributions are received was required and that reporting accumulative amounts of contributions received at events or locations, including, contributions more than likely in excess of twenty-five dollars,

was prohibited under the campaign finance laws. And, thus, when Friends of Joe Blystone filed its *2021 Annual Report*, it knowingly concealed or misrepresented contributions given or received or any other information required to be reported by a provision in R.C. 3517.08 to 3517.13, all in violation of R.C. 3517.13(G)(1).

52. Pursuant to R.C. 3517.154(A)(2)(b), when a complaint filed with the OHIO ELECTIONS COMMISSION “sets forth a failure to comply with or a violation of division (G)...of section 3517.13..., and that the complaint is filed during one of the periods of time specified in division (B)(1) of section”, then the staff attorney, *i.e.*, PHILIP RICHTER, “shall recommend to the commission that the complaint receive an expedited hearing” and, in turn, the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS have the legal duty to provide for “such a hearing” with respect to the complaint.

53. As the *OEC Contributions Complaint* alleges a violation of R.C. 3517.13(G)(1), MARY CAPELLA was entitled to have an expedited hearing on the *OEC Contributions Complaint*.

54. The OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have denied and refused to provide for expedited hearings on the *OEC Contributions Complaint*.

55. On April 8, 2022, PHILIP RICHTER as the Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION transmitted an email to undersigned counsel with his determination on whether he would comply with the mandate of state law to expedite the *OEC Contributions Complaint* as it contained an allegation of the violation of R.C. 3517.13(G)(1)

56. A copy of the transmittal email from PHILIP RICHTER to undersigned counsel is attached hereto as *Exhibit D*.

57. A copy of the determination memorandum prepared by PHILIP RICHTER with respect to the *OEC Contributions Complaint* is attached hereto as *Exhibit E-1*.

58. As indicated in the transmittal email, *i.e.*, *Exhibit D*, PHILIP RICHTER declared the *OEC Contributions Complaint* “will not receive an expedited Probable Cause Panel review”.

59. As further indicated in the transmittal email, *i.e.*, *Exhibit D*, PHILIP RICHTER made the determination not to expedite the *OEC Contributions Complaint* based upon the “longstanding Commission consideration of such requests” (which as indicated above, *see paragraph 33*, was to not expedite any complaint other than those alleging false statements notwithstanding the mandate of state law), as well as such decision being undertaken “with the assent of the Commission” (though, as developed below, *see paragraphs 88-99*, such decision or assent by the COMMISSION MEMBERS was not done in conformity or compliance with the Open Meetings Act).

60. MARY CAPELLA has a clear legal right to have the *OEC Contributions Complaint* processed and afforded an expedited hearing under R.C. 3517.154(A)(2)(b).

61. The OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have a clear legal duty to comply with the mandates of R.C. 3517.154(A)(2)(b) to afford MARY CAPELLA an expedited hearing under R.C. 3517.154(A)(2)(b) with respect to the *OEC Contributions Complaint*.

62. MARY CAPELLA lacks a remedy in the ordinary course of law, especially in light of the close proximity of the forthcoming primary election on May 3, 2022, and the lack of any meaningful and timely review of the denial of an expedited hearing.

63. Additionally, and alternatively, in refusing to afford MARY CAPELLA an expedited hearing under R.C. 3517.154(A)(2)(b) with respect to the *OEC Contributions*

Complaint, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have, as a public body or a public official, engaged in fraud or corruption, abuse of discretion, or a clear disregard of the law.

The OEC Expenditures Complaint

64. The *OEC Expenditures Complaint* was assigned Case No. 2022G-013 by the OHIO ELECTIONS COMMISSION.

65. The *OEC Expenditures Complaint* was filed with the OHIO ELECTIONS COMMISSION on April 7, 2022, *i.e.*, within 60 days of the primary election to be held on May 3, 2022.

66. The *OEC Expenditures Complaint* concerns or relates to, *inter alia*, the outright failure of Friends of Blystone to file complete information with its *2021 Annual Report* relating to its expenditures, including failing to file any receipts in support of all of the expenditures.

67. Thus, within the *OEC Expenditures Complaint*, *i.e.*, *Exhibit A-2*, MARY CAPELLA specifically alleged and set forth a violation of the campaign finance laws, including:

Violation No. 1 / Failure to File Receipts in Support of Expenditures Totaling \$235,044.93: FRIENDS OF JOE BLYSTONE violated R.C. 3517.13(G)(1) & 3517.10(D)(4) when it failed to file any receipts and/or other documentation supporting the expenditures totaling \$235,044.93 for its 2021 Annual Report, let alone filing such receipts and/or other documentation on or before January 31, 2022.

68. R.C. 3517.13(G)(1) specifically provides that “[n]o person shall knowingly conceal or misrepresent contributions given or received, expenditures made, or any other information required to be reported by a provision in sections 3517.08 to 3517.13 of the Revised Code.”

69. As indicated in an email from the Office of the Secretary of State to undersigned counsel, a copy of which is attached hereto as *Exhibit F*, Friends of Joe Blystone filed receipts in

support of expenditures reported in its *2021 Semi-Annual Report* thus, clearly demonstrating knowledge of the obligation to file receipts of expenditures.

70. Thus, at least as before the filing its the *2021 Annual Report* in January 2022, Friends of Blystone and Joe Blystone knew or should have known that of the obligation to provide information in the form of receipts supporting expenditures such that, when Friends of Joe Blystone filed its *2021 Annual Report*, it knowingly concealed or misrepresented expenditures or any other information required to be reported by a provision in R.C. 3517.08 to 3517.13, all in violation of R.C. 3517.13(G)(1).

71. Additionally the *OEC Expenditures Complaint* concerns or relates to, *inter alia*, the apparent conversion of campaign funds of Friends of Blystone for the personal use by Joe Blystone as indicated in the *2021 Annual Report* of Friends of Joe Blystone.

72. Thus, within the *OEC Expenditures Complaint*, *i.e.*, *Exhibit A-2*, MARY CAPELLA specifically alleged and set forth a violation of the campaign finance laws, including:

Violation No. 3 / Illegal Use/Convrsion of Campaign Funds for Personal Use: FRIENDS OF JOE BLYSTONE and JOE BLYSTONE violated R.C. 3517.13(O) in that the campaign committee utilized or provided campaign funds so as to benefit JOE BLYSTONE personally and not for legitimate, verifiable, and necessary to the campaign itself.

73. R.C. 3517.13(O) specifically provides that “[n]o beneficiary of a campaign fund or other person shall convert for personal use, and no person shall knowingly give to a beneficiary of a campaign fund or any other person, for the beneficiary’s or any other person’s personal use, anything of value from the beneficiary’s campaign fund,” with the exception for legitimate, ordinary, verifiable, and necessary reimbursement of campaign-related expenditures.

74. As developed in the *OEC Expenditures Complaint*, *i.e.*, *Exhibit A-2*, it readily appears that Joe Blystone converted campaign funds for his personal use through repeated bulk purchases of fuel (as opposed to reimbursement on a per milage basis) and through the

expenditures at clothing-type stores which would not be in the nature of legitimate, ordinary, verifiable, and necessary expenses.

75. Pursuant to R.C. 3517.154(A)(2)(b), when a complaint filed with the OHIO ELECTIONS COMMISSION “sets forth a failure to comply with or a violation of division (G)...of section 3517.13..., and that the complaint is filed during one of the periods of time specified in division (B)(1) of section”, then the staff attorney, *i.e.*, PHILIP RICHTER, “shall recommend to the commission that the complaint receive an expedited hearing” and, in turn, the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS have the legal duty to provide for “such a hearing” with respect to the complaint.

76. As the *OEC Expenditures Complaint* alleges a violation of R.C. 3517.13(G)(1), MARY CAPELLA was entitled to have an expedited hearing on the *OEC Expenditures Complaint*.

77. As the *OEC Expenditures Complaint* alleges a violation of R.C. 3517.13(O), MARY CAPELLA was entitled to have an expedited hearing on the *OEC Expenditures Complaint*.

78. The OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have denied and refused to provide for expedited hearings on the *OEC Expenditures Complaint*.

79. On April 8, 2022, PHILIP RICHTER as the Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION transmitted an email to undersigned counsel with his determination on whether he would comply with the mandate of state law to expedite the *OEC Expenditures Complaint* as it contained an allegation of the violation of R.C. 3517.13(G)(1) and a separate violation of R.C. 3517.13(O).

80. A copy of the transmittal email from PHILIP RICHTER to undersigned counsel is attached hereto as *Exhibit D*.

81. A copy of the determination memorandum prepared by PHILIP RICHTER with respect to the *OEC Expenditures Complaint* is attached hereto as *Exhibit E-2*.

82. As indicated in the transmittal email, *i.e.*, *Exhibit D*, PHILIP RICHTER declared the *OEC Expenditures Complaint* “will not receive an expedited Probable Cause Panel review”.

83. As further indicated in the transmittal email, *i.e.*, *Exhibit D*, PHILIP RICHTER made the determination not to expedite the *OEC Expenditures Complaint* based upon the “longstanding Commission consideration of such requests” (which as indicated above, *see paragraph 33*, was to not expedite any complaint other than those alleging false statements notwithstanding the mandate of state law), as well as such decision being undertaken “with the assent of the Commission” (though, as developed below, *see paragraphs 88-99*, such decision or assent by the COMMISSION MEMBERS was not done in conformity or compliance with the Open Meetings Act).

84. MARY CAPELLA has a clear legal right to have the *OEC Expenditures Complaint* processed and afforded an expedited hearing under R.C. 3517.154(A)(2)(b).

85. The OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have a clear legal duty to comply with the mandates of R.C. 3517.154(A)(2)(b) to afford MARY CAPELLA an expedited hearing under R.C. 3517.154(A)(2)(b) with respect to the *OEC Expenditures Complaint*.

86. MARY CAPELLA lacks a remedy in the ordinary course of law, especially in light of the close proximity of the forthcoming primary election on May 3, 2022, and the lack of any meaningful and timely review of the denial of an expedite hearing

87. Additionally, and alternatively, in refusing to afford MARY CAPELLA an expedited hearing under R.C. 3517.154(A)(2)(b) with respect to the *OEC Expenditures Complaint*, the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS have, as a public body or a public official, engaged in fraud or corruption, abuse of discretion, or a clear disregard of the law.

The Ohio Elections Commission in conclusion with the Executive Director privately made the decision to not expedite complaints notwithstanding the mandate of state law and, in particular, the complaints filed by Mary Capella

88. At the meeting of the OHIO ELECTIONS COMMISSION held on April 7, 2022, PHILIP RICHTER informed that COMMISSION MEMBERS that he had just received complaints, *i.e.*, the *OEC Contributions Complaint* and the *OEC Expenditures Complaint*, for which undersigned counsel for Relator had informed PHILIP RICHTER of the requirement to expedite it under state law but that, based upon and in light the prior policy direction of the OHIO ELECTIONS COMMISSION (in derogation of state law), *see paragraph 33, above*, Mr. RICHTER did not anticipate expediting the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*.

89. At the meeting of the OHIO ELECTIONS COMMISSION held on April 7, 2022, PHILIP RICHTER indicated that he would, after the meeting, circulate all the materials relating to the *OEC Contributions Complaint* and the *OEC Expenditures Complaint*, as well as the related statutes, to the COMMISSION MEMBERS and that he would then “ask for input” from the COMMISSION MEMBERS (outside of the confines of any meeting of the OHIO ELECTIONS COMMISSION). These comments are available from the video of the meeting held on April 7, 2022, and published on the YouTube channel of the OHIO ELECTIONS COMMISSION at <https://www.youtube.com/watch?v=wTDQRxLmBOc>, at 2:12:53 -2:13:07.

Mr. RICHTER further indicated that he would “circulate [to the COMMISSION MEMBERS] everything this afternoon”, as indicated on the foregoing video at 2:16:14 - 2:16:16.

90. Thus, as indicated by the statements of PHILIP RICHTER as the Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION made during the meeting of the COMMISSION on April 7, 2022, he would be providing information to the COMMISSION MEMBERS concerning and relating to the *OEC Contributions Complaint* and the *OEC Expenditures Complaint*, including the *Complaints* themselves, and seeking a decision or direction from the COMMISSION MEMBERS as to whether to expedite the preliminary hearing on either complaint pursuant to R.C. 3517.154(A)(2)(b).

91. Based on information and belief, PHILIP RICHTER as the Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION did distribute various materials to the COMMISSION MEMBERS concerning and relating to the *OEC Contributions Complaint* and the *OEC Expenditures Complaint*, including the *Complaints* themselves, in order to obtain a decision or direction from the COMMISSION MEMBERS as to whether to expedite the preliminary hearing on either complaint pursuant to R.C. 3517.154(A)(2)(b).

92. As indicated the transmittal email from PHILIP RICHTER to undersigned counsel, *i.e.*, *Exhibit D*, the decision to deny MARY CAPELLA an expedited hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint* was made “with the assent of the Commission”.

93. As indicated in both determination memoranda prepared by PHILIP RICHTER with respect to the *OEC Contributions Complaint* and the *OEC Expenditures Complaint*, *i.e.*, *Exhibits E-1 & E-2*, the decision to deny MARY CAPELLA an expedited hearing on either the

OEC Contributions Complaint or the *OEC Expenditures Complaint* was made “with the concurrence of the Commission”.

94. At no time after April 7, 2022, did the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS conduct an open meeting of the COMMISSION whereat they considered or made a decision with respect to a policy to operate in contravention of R.C. 3517.154(A)(2)(b), including “assenting” or “concurring” to not expedite any hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*.

95. At no time after April 7, 2022, did the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS conduct an open meeting of the COMMISSION whereat they considered or made a decision with respect to the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*, including “assenting” or “concurring” to not expedite any hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*.

96. In consulting with and obtaining the “assent” or “concurrence” of the COMMISSION MEMBERS as to not conduct an expedited hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*, PHILIP RICHTER as Executive Director/Staff Attorney of the OHIO ELECTIONS COMMISSION and the COMMISSION MEMBERS engaged in fraud or corruption, abuse of discretion, or a clear disregard of the law, as R.C. 3517.154 does not provide or authorize the COMMISSION MEMBERS to weigh in or assess on whether any complaint should be expedited to a preliminary hearing panel. In so doing, the COMMISSION MEMBERS exceeded their statutory authority.

97. The members of the OHIO ELECTIONS COMMISSION have no role, duty, input, or decision-making authority concerning whether any complaint should be expedited pursuant to R.C. 3517.154(A)(2)(b) yet, with respect to the *OEC Contributions Complaint* and the *OEC*

Expenditures Complaint, the COMMISSION MEMBERS illegally and impermissibly intervened into the mandatory referral for an expedite preliminary hearing and, as a result, engaged in fraud or corruption, abuse of discretion, or a clear disregard of the law as a public body or public officials.

98. In “assenting” or “concurring” to not afford MARY CAPELLA an expedited hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*, the COMMISSION MEMBERS engaged in fraud or corruption, abuse of discretion, or a clear disregard of the law, as the conduct of making the decision to provide “assent” or “concurrent” outside of the confines of an open meeting of the OHIO ELECTIONS COMMISSION violated or threatened to violate the Open Meetings Act.

99. Thus, in addition to the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS violating a clearly established duty, the decision to not afford MARY CAPELLA an expedited hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint* constitutes fraud or corruption, abuse of discretion, or a clear disregard of the law by a public body or public official not otherwise subject to appellate review and, accordingly, mandamus should issue.

Issuance of a Writ of Mandamus is Warranted

100. Relator MARY CAPELLA has a clear legal right to the issuance of the writ of mandamus to obtain an order directing the OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS to schedule and conduct an expedite preliminary hearing on the *OEC Contributions Complaint* and/or the *OEC Expenditures Complaint* as set forth above.

101. Respondents OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS are under a clear legal duty to comply with the legal mandates in R.C. 3517.154 *et seq.* whenever a complaint is filed with COMMISSION in close proximity to an election and alleging violations of the campaign finance laws set forth in R.C. 3517.154(A)(2)(b) and Respondents have the further legal duty to conduct the appropriate expedited hearings within the time frame set forth in R.C. 3517.154 *et seq.s*

102. Respondents OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and the COMMISSION MEMBERS are under a clear legal duty to comply with the legal mandates in R.C. 3517.154 *et seq.* and not to adopt, formally or informally, any policy, practice or custom in contravention or violation of the law itself, including the law concerning expedited hearings under R.C. 3517.154(A)(2)(b), so as to deny MARY CAPELLA and others who might filed complaints subject to mandatory expedited hearings under R.C. 3517.154(A)(2) are denied such hearings.

103. Relator MARY CAPELLA lacks a remedy in the ordinary course of law, especially in light of the close proximity of the forthcoming primary election on May 3, 2022, and the lack of any meaningful and timely review of the denial of an expedite hearing.

104. Furthermore, and alternatively, the actions of Respondents OHIO ELECTIONS COMMISSION, PHILIP RICHTER as its Executive Director/Staff Attorney, and/or the COMMISSION MEMBERS in denying MARY CAPELLA an expedited hearing on either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint* is the result of fraud or corruption, abuse of discretion, or a clear disregard of the law by Respondents in their capacity as a public body or public officials for which no timely appeal lies.

105. Additionally, this case presents and raises a debatable constitutional question or a matter of great public or general interest, including the constitutional authority of an unelected administrative body to adopt policies contrary to or in violation of both the letter and spirit of statutory enactments, as well as the viability of any policy, practice, or custom of the OHIO ELECTIONS COMMISSION to issue essentially a *carte blanche* prohibition on conducting any expedited hearings on any complaints alleging violations of the campaign finance laws, as opposed to adhering to the requirements for both mandatory and discretionary expedited hearings as set forth in R.C. 3517.154.

WHEREFORE, the STATE OF OHIO, by and through Relator MARY CAPELLA, and, in support of its claim, hereby applies and request this Court to order the issuance of a peremptory writ of mandamus or, alternatively, an alternative writ of mandamus, compelling the Respondents to comply forthwith with their legal duties as set forth above or as established by the evidence, including, without limitation, promptly referring either the *OEC Contributions Complaint* or the *OEC Expenditures Complaint*, or both, to an expedited preliminary hearing pursuant to R.C. 3517.154 *et seq.*, as well as to expedite any other ensuring process or hearings consistent with R.C. 3517.154 *et seq.*

Respectfully submitted,

/s/ Curt C. Hartman

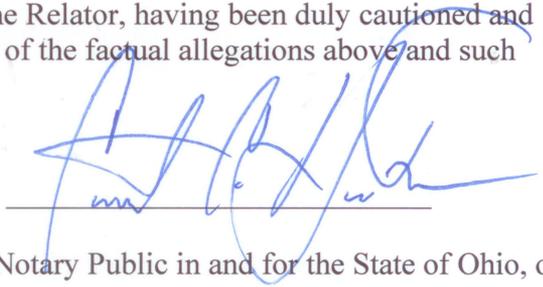
Curt C. Hartman
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgepoint Drive, Suite 8
Cincinnati, Ohio 45230
(513) 379-2923
hartmanlawfirm@fuse.net

Attorney for Relator

VERIFICATION

State of Ohio, County of Clermont) ss:

Comes now, Curt C. Hartman, counsel for the Relator, having been duly cautioned and sworn, and declares that he has personal knowledge of the factual allegations above and such allegations are true and accurate.



Sworn to and subscribed before me, a Notary Public in and for the State of Ohio, on this the 11th day of April 2022.



SETH KIRCHNER
Notary Public
State of Ohio
My Comm. Expires
December 22, 2026

day reflected in the last previously filed statement, to the close of business on the last day of December of the previous year.” This report is generally known as an “Annual Report”.

4. As indicated on the website of the Ohio Secretary of State, FRIENDS OF JOE BLYSTONE filed its *2021 Annual Report* (presumably in January 2022). Within the *2021 Annual Report*, FRIENDS OF JOE BLYSTONE failed to file a full, true, and itemized statement setting forth in detail the contributions and expenditures, together with the receipts supporting the latter.

Violation No. 1 / Failure to Report Contributors of \$95,849.00 in Contributions: FRIENDS OF JOE BLYSTONE violated R.C. 3517.13(G)(1) & 3517.10(B)(4) when it failed to report the full name and address of each person from whom contributions are received and, instead, reported accumulative amounts of contributions received at events or locations, including, contributions more than likely in excess of twenty-five dollars.

Violation No. 2 / Failure to Report Contributors of \$95,849.00 in Contributions: FRIENDS OF JOE BLYSTONE violated R.C. 3517.10(B)(4) when it failed to keep and maintain an account for all contributions received, including contributions less of twenty-five dollars at any events or locations.

5. Attached hereto as *Exhibit A* is the *Cover Page Report* for FRIENDS OF JOE BLYSTONE as obtained from the website of the Secretary of State.

6. As indicated in the *Cover Page Report*, FRIENDS OF JOE BLYSTONE reported a total of \$314,447.52 in contributions in the *2021 Annual Report*.

7. Pursuant to **Ohio Rev. Code 3517.10(B)(4)(b)(i)**, the statement of contributions in every campaign finance report must include “[t]he full name and address of each person ... from whom contributions are received”.

8. Pursuant to **Ohio Rev. Code 3517.10(B)(4)(e)**, the statement of contributions in every campaign finance report must include “[a] separately itemized account of all contributions...regardless of the amount, except a receipt of a contribution from a person in the sum of twenty-five dollars or less at one social or fund-raising activity.... A campaign

committee...shall keep records of contributions from each person in the amount of twenty-five dollars or less at one social or fund-raising activity....”

9. Pursuant to **Ohio Admin. Code 111:2-4-13(a)**, “account of contributions shall be kept, by any reasonable accounting procedure, of all contributions received by or on behalf of the entity, regardless of the amount of the contribution received or the circumstances of where the contribution was received. The account shall include the name and street address of the contributor, the date the contribution was received, the form in which the contribution was received, and the amount of the contribution.”

10. Attached hereto as *Exhibit B* are some of the contributions received by FRIENDS OF JOE BLYSTONE as contained in the *2021 Annual Report* totaling \$95,849.00 wherein the identify of the contributor is not indicated but, instead, are locations or event descriptions. This amount represents 28% of all the contributions received by FRIENDS OF JOE BLYSTONE during the pertinent period.

11. Assuming each of the contributions reported on *Exhibit B* were cumulative of individual contributions of \$25, this would equate to total of 3,834 individual donors.

12. As set forth in *Count Two* in the *Complaint* filed with the Ohio Elections Commission in Case No. 2021G-022, styled *Sarah Chambers v. Joseph K. Blystone*, which is incorporated here by reference, FRIENDS OF JOE BLYSTONE reported in its *2021 Semi-Annual Report* contributions of \$88,142 in a similar fashion as that in *Exhibit B*, which, if each and everyone consisted of \$25 contributions, would equate to total of 3,834 individual donors.

13. As set forth in *Counts Six, Seven and Eleven* in the *Complaint* filed with the Ohio Elections Commission in Case No. 2021G-022, styled *Sarah Chambers v. Joseph K. Blystone*, which is incorporated here by reference, personnel associated with FRIENDS OF JOE

BLYSTONE have attested under oath wherein FRIENDS OF JOE BLYSTONE would regularly conduct events and accept cash donations in excess of \$25 but not itemized such contributions in campaign finance reports and it readily appears that such reporting is continuing with some or all of the contributions indicated on *Exhibit B*.

WHEREFORE, Complainant requests that the Ohio Elections Commission:

- (i) Consistent with the process and procedure mandated by Ohio Rev. Code 3517.154(B)(2)(b) & Code 3517.156, set the matter for an expedited hearing before a panel of the Commission to determine whether probable cause exists to refer the matter to the full commission for hearing under Ohio Rev. Code 3517.155;
- (ii) Upon a finding of probable cause to believe that the failure to comply with or the violation of a law alleged in the complaint has occurred, to conduct an expedited hearing before the full Commission consistent with Ohio Rev. Code 3517.156(C)(2).

and at the conclusion of the hearing before the full Commission:

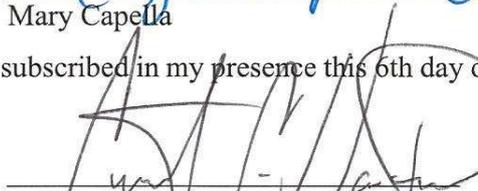
- (i) find the violations by and JOE BLYSTONE, FRIENDS OF JOE BLYSTONE, and its treasurer, M. JANE BLYSTONE, of the violations of the campaign finance laws set forth above, or as otherwise established by the evidence;
- (ii) impose the appropriate fines under Ohio Rev. Code 3517.993;
- (iii) refer the matter to the Franklin County Prosecuting Attorney; and
- (iv) grant any other relief to which Complainant may be entitled, in law or in equity.

STATE OF OHIO, COUNTY OF BUTLER) ss:

Complainant MARY CAPELLA, having been duly cautioned and sworn, states that the facts in the foregoing Complaint are based upon personal knowledge supported by the exhibits and attached hereto and are true and accurate.


Mary Capella

Sworn to before a Notary Public and subscribed in my presence this 6th day of April 2022.


CURT C. HARTMAN, Attorney at Law
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration
date. Section 147.03 O.R.C.

Committee Name	Report Type	Year	Total Contributions	Total Other Income	Total Expenditures	Amount		Debt Owed By Committee	Inkind Received	Inkind Made	Loans Owed By Committee	Loans Owed To Committee	Independent Expenditures Made
						Forward	Hand						
FRIENDS OF JOE BLYSTONE	DESIGNATION OF TREASURER	2021	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
FRIENDS OF JOE BLYSTONE	ANNUAL (JANUARY)	2021	\$314,447.52	\$0.00	\$235,044.93	\$134,909.44	\$214,312.03	\$0.00	\$18,354.69	\$0.00	\$0.00	\$0.00	\$0.00
FRIENDS OF JOE BLYSTONE	SEMIANNUAL (JULY)	2021	\$270,536.00	\$0.00	\$135,626.56	\$0.00	\$134,909.44	\$0.00	\$27,250.00	\$0.00	\$0.00	\$0.00	\$0.00

Exhibit A

Contributor Non Individual	City	State	Zip	File Date	Amount	Event Date
ADAMS COUNTY	WEST UNION	OH		10/27/2021	\$355.00	10/27/2021
ASHLAND	ASHLAND	OH		8/16/2021	\$526.00	8/16/2021
ASHLAND FAIR	ASHLAND	OH		10/23/2021	\$785.00	10/23/2021
ASHTABULA COUNTY	ORWELL	OH		7/11/2021	\$2,017.00	
AUGLAZE COUNTY	WAPAKONETA	OH		7/19/2021	\$634.00	
BELLVILLE BREAKFAST	BELLVILLE	OH		8/16/2021	\$450.00	8/16/2021
BLYSTON FARM FALL FEST	CANAL WINCH	OH		10/30/2021	\$1,140.00	10/30/2021
BLYSTONE TOWNHALL	CANAL WINCH	OH		8/2/2021	\$122.00	8/2/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		10/27/2021	\$250.00	10/27/2021
BLYSTONE FARM RETAIL	CANAL WINCHESTER	OH		11/14/2021	\$274.00	
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/25/2021	\$200.00	8/25/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/26/2021	\$155.00	8/26/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		11/7/2021	\$484.00	11/7/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		11/26/2021	\$739.00	11/26/2021
BLYSTONE FARM RETAIL	CANAL WINCHESTER	OH		11/26/2021	\$739.00	
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/29/2021	\$165.00	8/29/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/30/2021	\$568.00	8/30/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/18/2021	\$580.00	8/18/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		9/3/2021	\$993.00	9/3/2021
BLYSTONE FARM RETAIL	CANAL WINCH	OH		8/11/2021	\$100.00	
BLYSTONE FARM RETAIL	CANAL WINCHESTER	OH		7/2/2021	\$190.00	1/0/1900
BLYSTONE FARM RETAIL	CANAL WINCHESTER	OH		7/8/2021	\$84.00	
BLYSTONE FARMS RETAIL	CANAL WINCHESTER	OH		7/25/2021	\$260.00	
BLYSTONE FARMS RETAIL	CANAL WINCHESTER	OH			\$125.00	
BOWLING GREEN	BOWLING GREEN	OH		11/20/2021	\$1,340.00	
BROWN CO FAIR	GEORGETOWN	OH		9/18/2021	\$754.00	
BULLET RANCH	PATASKALA	OH		11/7/2021	\$579.00	11/7/2021
BURWICK				10/20/2021	\$269.00	10/20/2021
CENTURY FARMS	CARROLTON	OH		9/12/2021	\$1,497.00	
CLARK COUNTY	SPRINGFIELD	OH		8/29/2021	\$1,050.00	8/29/2021
CLARK COUNTY	SPRINGFIELD	OH		8/7/2021	\$987.00	8/6/2021
CLINTON COUNTY	BLANCHESTER	OH		10/18/2021	\$240.00	10/18/2021
CLYDE FARM	SENECA	OH		11/30/2021	\$538.00	11/30/2021

Exhibit B

CLYDE FARM - SENECA CO	CLYDE	OH		11/30/2021	\$538.00		12/9/2021
COLUMBIANA COUNTY	LISBON	OH		12/9/2021	\$25.00		12/9/2021
COLUMBUS TOWING	COLUMBUS	OH		12/12/2021	\$385.00		12/12/2021
COSHOCON CO FREEDOM RALLY	COSHOCTON	OH		10/17/2021	\$443.00		10/17/2021
COSHOCON CO FREEDOM RALLY	COSHOCTON	OH		10/17/2021	\$345.00		10/17/2021
COSHOCTON GUN CLUB	COSHOCTON	OH		11/3/2021	\$80.00		11/3/2021
DICKINSON CATTLE FARM	BARNESVILLE	OH		9/4/2021	\$828.00		9/4/2021
EAGLES STARK COUNTY	MAGNOLIA	OH		10/16/2021	\$849.00		10/16/2021
ELKS UPPERSANDUSKY	UPPER SANDUSKY	OH		11/14/2021	\$97.00		
ERIE CO	MILAN	OH		11/10/2021	\$343.00		11/10/2021
FAST EDDIES STARK COUNTY				8/30/2021	\$905.00		8/30/2021
FOREST LANES	HANOVERTON	OH		11/13/2021	\$491.00		11/13/2021
FOREST LANES	HANOVERTON	OH		11/13/2021	\$491.00		
FOX WINERY	GALION	OH		9/10/2021	\$731.00		
FRANKLIN CO	COLUMBUS	OH		9/3/2021	\$165.00		9/3/2021
FRANKLIN CO				8/10/2021	\$592.00		8/10/2021
FRANKLIN COUNTY	CANAL WINCHESTER	OH		8/2/2021	\$122.00		
FRANKLIN COUNTY	WORTHINGTON	OH		8/3/2021	\$50.00		
FRANKLIN COUNTY	CANAL WINCHESTER	OH		7/15/2021	\$166.00		
FRANKLIN COUNTY	CANAL WINCHESTER	OH		7/20/2021	\$330.00		
FRANKLIN COUNTY	CANAL WINCHESTER	OH		7/24/2002	\$1,093.00		
FROEHLICH'S CLASSIC CORNOR	STUEBENVILLE	OH		10/21/2021	\$841.00		10/21/2021
GEAUGA COUNTY	MIDDLEFIELD	OH		10/23/2021	\$1,278.00		10/23/2021
GEAUGA COUNTY	PARKMAN	OH		7/22/2021	\$1,709.00		
GHOST TOWN	HANCOCK	OH		8/19/2021	\$733.00		8/19/2021
GOP MALVERN	CARROLL	OH		11/11/2021	\$425.00		11/11/2021
GRANVILLE	GRANVILLE	OH		9/16/2021	\$85.00		
HAMILTON COUNTY	CINCINNATI	OH		9/29/2021	\$277.00		9/29/2021
HAMILTON COUNTY	CINCINNATI	OH		8/25/2021	\$882.00		8/25/2021
HARDIN COUNTY	KENTON	OH		7/3/2021	\$3,230.00		
HENRY CO	NOPOLEON	OH		8/28/2021	\$571.00		8/28/2021
HORSE PROGRESS DAYS	MILLERSBURG	OH		7/2/2021	\$950.00		
JACKSON FARMS	JACKSON	OH		9/26/2021	\$250.00		9/26/2021
J-MO MEATS					\$150.00		9/4/2021

PORTAGE COUNTY	KENT	OH		10/7/2021	\$738.00	10/7/2021
PUMPKIN SHOW	CIRCLEVILLE	OH		10/23/2021	\$1,420.00	10/23/2021
PUMPKIN SHOW	CIRCLEVILLE	OH		10/21/2021	\$1,370.00	10/21/2021
PUMPKIN SHOW	CIRCLEVILLE	OH		10/22/2021	\$1,761.00	10/22/2021
RHYTHM & BREWS	WAPAKONETA	OH		12/1/2021	\$260.00	
RICHLAND COUNTY	RICHWOOD	OH		10/30/2021	\$130.00	10/31/2021
RICHWOOD FAIR				9/5/2021	\$470.00	9/5/2021
RIVERBOAT	CINCINNATI	OH		7/4/2021	\$1,088.00	7/4/2021
ROSS COUNTY	CHILLICOTHE	OH		7/26/2021	\$655.00	7/26/2021
SCHRIEDER FARMS	PLAIN CITY	OH		9/11/2021	\$1,779.00	
SENECA CO FAIRGROUNDS	TIFFIN	OH		11/18/2021	\$259.00	
SENECA COUNTY	BASCOM	OH		8/20/2021	\$415.00	8/20/2021
SENECA COUNTY	TIFFIN	OH		7/9/2021	\$3,836.00	
SHOOTER	BARNESVILLE	OH		9/4/2021	\$385.00	9/4/2021
SPRINGFIELD RODEO	SPRINGFIELD	OH		12/17/2021	\$480.00	12/17/2021
SUMMIT COUNTY	BATH	OH		10/12/2021	\$555.00	10/12/2021
SUMMIT COUNTY	TIFFIN	OH		11/18/2021	\$259.00	11/18/2021
TIKI GUENS COUNTY	CAMBRIDGE	OH		11/5/2021	\$1,160.00	11/5/2021
TIM CONCELL		OH		8/14/2021	\$149.00	8/14/2021
TOBACCO SHOP	DELAWARE	OH		11/4/2021	\$25.00	11/4/2021
TOWN HALL	GROVE CITY	OH		8/22/2021	\$518.00	8/22/2021
TRUMBULL COUNTY	CORTLAND	OH		7/14/2021	\$515.00	
TURNBULL COUNTY BREAKFAST	NEWTON FALLS	OH		10/16/2021	\$139.00	10/16/2021
TUSCARAWAS COUNTY	DOVER	OH			\$1,963.00	
TUSCARAWAS FAIR	TUSCARAWAS	OH		9/20/2021	\$460.00	9/20/2021
VAN WERT	VAN WERT	OH		8/12/2021	\$567.00	8/12/2021
VAN WERT COUNTY	OHIO CITY	OH		7/18/2021	\$542.00	
WARREN COUNTY	OREGONIA	OH		7/10/2021	\$832.00	
WAYNE COUNTY	ORVILLE	OH		7/15/2021	\$3,398.00	
WINNER FARMS	DEGRAF	OH		9/9/2021	\$1,205.00	
WOOD COUNTY	BOWLING GREEN	OH		11/20/2021	\$1,340.00	11/20/2021
WORTHINGTON COUNTRY CLUB	WORTHINGTON	OH		8/3/2021	\$50.00	8/3/2021
WYANDOT ELKS	UPPER SANDUSKY	OH		11/14/2021	\$97.00	11/14/2021
ZANESVILLE	ZANESVILLE	OH		9/15/2021	\$835.00	

day reflected in the last previously filed statement, to the close of business on the last day of December of the previous year.” This report is generally known as an “Annual Report”.

4. As indicated on the website of the Ohio Secretary of State, FRIENDS OF JOE BLYSTONE filed its *2021 Annual Report* (presumably in January 2022). Within the *2021 Annual Report*, FRIENDS OF JOE BLYSTONE failed to file a full, true, and itemized statement setting forth in detail the contributions and expenditures, together with the receipts supporting the latter.

Violation No. 1 / Failure to File Receipts in Support of Expenditures Totaling \$235,044.93: FRIENDS OF JOE BLYSTONE violated R.C. 3517.13(G)(1) & 3517.10(D)(4) when it failed to file any receipts and/or other documentation supporting the expenditures totaling \$235,044.93 for its 2021 Annual Report, let alone filing such receipts and/or other documentation on or before January 31, 2022.

5. Attached hereto as *Exhibit A* is the *Cover Page Report* for FRIENDS OF JOE BLYSTONE as obtained from the website of the Secretary of State.

6. As indicated in the *Cover Page Report*, FRIENDS OF JOE BLYSTONE reported a total of \$235,044.93 in expenditures in the *2021 Annual Report*.

7. Pursuant to **Ohio Rev. Code 3517.10(D)(4)**, “[e]very expenditure in excess of twenty-five dollars shall be vouched for by a receipted bill, stating the purpose of the expenditure, that shall be filed with the statement of expenditures.”

8. Pursuant to **Ohio Admin. Code 111:2-5-03**, “[a]ny entity that files a statement by electronic means of transmission ... shall also file a copy of the canceled checks or paid receipts required by section 3517.10 of the Revised Code.”

9. Pursuant to **Ohio Admin. Code 111:2-5-03(A) & (B)**, the copy of the canceled checks or paid receipts required by section 3517.10 of the Revised Code shall be filed or postmarked “not later than the date the statement is required” which, in the case of the *2021 Annual Report*, was January 31, 2022.

10. Pursuant to **Ohio Rev. Code 3517.13(G)(1)**, “[n]o person shall knowingly conceal ... any [] information required to be reported by a provision in sections 3517.08 to 3517.13 of the Revised Code.”

11. Attached hereto as *Exhibit B* is a copy of an email from the Ohio Secretary of State to Complainant’s legal counsel confirming that FRIENDS OF JOE BLYSTONE failed to file any (let alone, timely) receipts and/or supporting documentation of expenditures with respect to the *2021 Annual Report*, though it has filed some receipts and/or supporting documentation in support of the *2021 Semi-Annual Report* (filed in July 2021).

Violation No. 2 / Failure to State Purpose or Object of Expenditures: FRIENDS OF JOE BLYSTONE violated R.C. 3517.13(G)(1) & 3517.10(A) when it knowingly concealed information required to be reported by R.C. 3517.10(B)(5)(c) and, in so doing, failed to file a “full, true, and itemized” campaign finance report.

12. Pursuant to **Ohio Rev. Code 3517.10(B)(5)(c)**, the statement of expenditures in every campaign finance report must include “[t]he object or purpose for which the expenditure was made”.

13. Pursuant to **Ohio Rev. Code 3517.13(G)(1)**, “[n]o person shall knowingly conceal ... any [] information required to be reported by a provision in sections 3517.08 to 3517.13 of the Revised Code.”

14. Attached hereto as *Exhibit C* are expenditures by FRIENDS OF JOE BLYSTONE as contained in the *2021 Annual Report* wherein no purpose was stated for the expenditures totaling \$103,792.20.

Violation No. 3 / Illegal Use/Conversion of Campaign Funds for Personal Use: FRIENDS OF JOE BLYSTONE and JOE BLYSTONE violated R.C. 3517.13(O) in that the campaign committee utilized or provided campaign funds so as to benefit JOE BLYSTONE personally and not for legitimate, verifiable, and necessary to the campaign itself.

15. Pursuant to Ohio Rev. Code 3517.13(O), “[n]o beneficiary of a campaign fund or other person shall convert for personal use, and no person shall knowingly give to a beneficiary of a campaign fund or any other person, for the beneficiary’s or any other person’s personal use, anything of value from the beneficiary’s campaign fund.” Excepted from the foregoing prohibition is the reimbursement of a beneficiary of a campaign fund for certain purposes provides that such expenses are “legitimate and verifiable” and, in certain instances, “necessary”.

16. Ohio Rev. Code 3517.13(R)(1) provides that “[R.C. 3517.13(O)] does not prohibit a campaign committee from making direct advance or post payment from contributions to vendors for goods and services for which reimbursement is permitted under [R.C. 3517.13(O)].”

17. Ohio Rev. Code 3517.13(R)(2) provides that “[i]f any expense that may be reimbursed under [R.C. 3517.13(O)] is part of other expenses that may not be paid or reimbursed, the separation of the two types of expenses for the purpose of allocating for payment or reimbursement those expenses that may be paid or reimbursed may be by any reasonable accounting method, considering all of the surrounding circumstances.”

18. Ohio Rev. Code 3517.13(R)(3) provides that “[f]or purposes of [R.C. 3517.13(O)], mileage allowance at a rate not greater than that allowed by the internal revenue service at the time the travel occurs may be paid instead of reimbursement for actual travel expenses allowable.

19. Attached hereto as *Exhibit D* are expenditures by FRIENDS OF JOE BLYSTONE as contained in the *2021 Annual Report* wherein the purpose was indicated as being for fuel or, in those instances when no purpose of the expenditure was stated in the *2021 Annual Report*, the vendor involved appears to have been fuel-related. As indicated therein, FRIENDS OF JOE

BLYSTONE simply made bulk purchases of fuel (sometime multiple purchases on the same day at the same location) instead of

20. Additionally, as indicated on the expenditures for which no purpose was listed, *i.e.*, *Exhibit C*, the failure to provide any statement of purpose may have been used as a subterfuge to purchase items for the personal use and enjoyment of JOE BLYSTONE and which were not legitimate, verifiable, and necessary to the work of FRIENDS OF JOE BLYSTONE. Such expenditures include, but are not necessarily limited to

- a. multiple purchases from Amazon in the total amount of \$649.78;
- b. various purchases at Blystone Farm/Blystone Restaurant, the family business of JOE BLYSTONE;
- c. multiple purchases at Rod's Western Palace (which advertises itself – <https://www.rods.com/about-us> – as “your source for everything Western, from Western apparel and tack to unique Western gifts and home décor”) in the total amount of \$340.50;
- d. a purchase at Silver Spur Western Store (which advertises itself – http://www.silverspurwesternstore.com/index.php?route=information/information&information_id=4 – as “the leader in Ohio for a complete line of western wear offering”).

21. All of the foregoing lack any indication of the purpose for the purchase, together with the nature of the vendors being that such items are or may reasonably be likely to not be for legitimate, verifiable, and necessary campaign expenses but, instead, for personal use, consumption, or ultimate conversion.

WHEREFORE, Complainant requests that the Ohio Elections Commission:

- (i) Consistent with the process and procedure mandated by Ohio Rev. Code 3517.154(B)(2)(b) & Code 3517.156, set the matter for an expedited hearing before a panel of the Commission to determine whether probable cause exists to refer the matter to the full commission for hearing under Ohio Rev. Code 3517.155;
- (ii) Upon a finding of probable cause to believe that the failure to comply with or the violation of a law alleged in the complaint has occurred, to conduct an expedited hearing before the full Commission consistent with Ohio Rev. Code 3517.156(C)(2).

and at the conclusion of the hearing before the full Commission:

- (i) find the violations by FRIENDS OF JOE BLYSTONE, its treasurer, M. JANE BLYSTONE, and JOE BLYSTONE of the violations of the campaign finance laws set forth above, or as otherwise established by the evidence;
- (ii) impose the appropriate fines under Ohio Rev. Code 3517.993;
- (iii) refer the matter to the Franklin County Prosecuting Attorney; and
- (iv) grant any other relief to which Complainant may be entitled, in law or in equity.

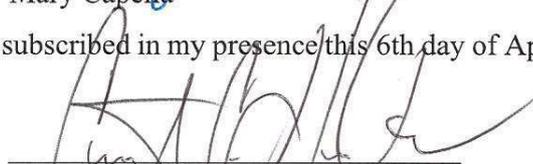
STATE OF OHIO, COUNTY OF BUTLER) ss:

Complainant MARY CAPELLA, having been duly cautioned and sworn, states that the facts in the foregoing Complaint are based upon personal knowledge supported by the exhibits and attached hereto and are true and accurate.



Mary Capella

Sworn to before a Notary Public and subscribed in my presence this 6th day of April 2022.



CURT C. HARTMAN, Attorney at Law
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration
date. Section 147.03 O.R.C.

Committee Name	Report Type	Year	Total Contributions	Total Other Income	Total Expenditures	Amount Forward	Balance On Hand	Debt Owed By Committee	Inkind Received	Inkind Made	Loans Owed By Committee	Loans Owed To Committee	Independent Expenditures Made
FRIENDS OF JOE BLYSTONE	DESIGNATION OF TREASURER	2021	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
FRIENDS OF JOE BLYSTONE	ANNUAL (JANUARY)	2021	\$314,447.52	\$0.00	\$235,044.93	\$134,909.44	\$214,312.03	\$0.00	\$18,354.69	\$0.00	\$0.00	\$0.00	\$0.00
FRIENDS OF JOE BLYSTONE	SEMIANNUAL (JULY)	2021	\$270,536.00	\$0.00	\$135,626.56	\$0.00	\$134,909.44	\$0.00	\$27,250.00	\$0.00	\$0.00	\$0.00	\$0.00

Exhibit A

Ohio Secretary of State Public Records Request

From : Hetrick, Leah <lhetrick@OhioSOS.Gov>
Subject : Ohio Secretary of State Public Records Request
To : hartmanlawfirm@fuse.net

Tue, Mar 01, 2022 12:41 PM
📎 16 attachments

Mr. Hartman,

This email is to respond to your request for public records, which was received by this office on February 15, 2022. Specifically, you have requested:

“all receipts and/or supporting document of expenditures filed by Friends of Joe Blystone campaign committee with respect the following campaign finance reports: (i) the 2021 Semi-Annual Report (filed in or about July 2021); and (ii) the 2021 Annual Report (filed in January 2022).”

Regarding your request for “the 2021 Annual Report (filed in January 2022),” I have inquired within our office and determined that there are no records responsive to this request.

As for your request for “the 2021 Semi-Annual Report (filed in or about July 2021),” attached are the records I believe to be responsive to this request. I have redacted the personal, non-record information in accordance with R.C. § 149.43 and 149.45 respectively.

Sincerely,



Leah Hetrick | Assistant Chief Legal Counsel

Office of the Ohio Secretary of State

o: 614.728.9505

OhioSoS.gov

Confidentiality Notice: This message is intended for use only by the individual or entity to whom or which it is addressed and may contain information that is privileged, confidential and/or otherwise exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone. Thank you.

Exhibit B

Form Code	Payee/Non Individual	Address	City	State	Zip	Amount	Expend Date	Purpose
31B	AMAZON					\$22.53	9/7/2021	
31B	AMAZON					\$81.08	9/17/2021	
31B	AMAZON					\$81.64	9/17/2021	
31B	AMAZON					\$122.46	9/17/2021	
31B	AMAZON					\$21.49	9/29/2021	
31B	AMAZON					\$15.65	10/12/2021	
31B	AMAZON					\$60.79	10/19/2021	
31B	AMAZON					\$130.18	11/12/2021	
31B	AMAZON					\$96.64	11/15/2021	
31B	AMAZON					\$17.32	8/13/2021	
31B	AUTHORIZE.NET		SAN FRANCISCO	CA		\$29.84	9/7/2021	
31B	AUTHORIZE.NET					\$25.00	10/4/2021	
31B	AUTHORIZE.NET					\$25.80	11/4/2021	
31B	AUTHORIZE.NET					\$25.00	12/6/2021	
31B	BB RIVERBOATS				KY	\$3,346.00	7/2/2021	
31B	BEACH FRONT RESORT				OH	\$500.00	7/8/2021	
31B	BLUE LINE INKS	3750 TRADERSVILLE BRIGHTON RD	LONDON	OH	43140	\$1,480.95	9/22/2021	
31B	BLUE LINE INKS	3750 TRADERSVILLE BRIGHTON RD	LONDON	OH	43140	\$1,588.95	9/22/2021	
31B	BLYSTONE FARM	8677 OREGON RD	CANAL WINCHESTER	OH	43110	\$15.00	9/21/2021	
31B	BLYSTONE REST		CANAL WINCHESTER	OH	43110	\$343.06	12/22/2021	
31B	BOCENTENNIAL		COLUMBUS	OH		\$10.00	12/6/2021	
31B	BP OIL		ASHLAND	OH		\$100.00	10/25/2021	
31B	CASSONE LAW OFFICES	5086 N HIGH ST	COLUMBUS	OH	43214	\$480.00	10/20/2021	
31B	CCV EVENTS		COLUMBUS	OH		\$500.00	9/29/2021	
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$29.91	7/2/2021	
31B	CGS SIGNS					\$438.48	10/19/2021	
31B	CGS SIGNS					\$353.60	12/3/2021	
31B	CGS SIGNS					\$771.09	12/21/2021	
31B	COSTCO		PLAIN CITY	OH		\$48.10	10/20/2021	
31B	EMBED.LLY, INC					\$9.00	12/3/2021	
31B	EMBED.LLY, INC		BOSTON	MA		\$9.00	9/3/2021	
31B	EMBED.LLY, INC					\$9.00	10/4/2021	
31B	EMBED.LLY, INC					\$9.00	11/3/2021	
31B	EMBED.LLY, INC		BOSTON	MA		\$9.00	7/6/2021	
31B	EMBED.LLY, INC		BOSTON	MA		\$9.00	8/3/2021	
31B	FACEBOOK		MENLO PARK	CA		\$900.00	7/9/2021	

Exhibit C

31B	FACEBOOK		MENLO PARK	CA		\$900.00	7/13/2021
31B	FACEBOOK		MENLO PARK	CA		\$900.00	7/19/2021
31B	FACEBOOK		MENLO PARK	CA		\$900.00	7/20/2021
31B	FACEBOOK		MENLO PARK	CA		\$900.00	7/26/2021
31B	FLYING J		SUNBURY	OH		\$81.08	12/15/2021
31B	GO DADDY					\$154.54	12/27/2021
31B	GODADDY					\$154.54	11/15/2021
31B	GOTPRINT					\$67.65	12/2/2021
31B	GOTPRINT					\$101.07	12/3/2021
31B	GOTPRINT.COM		BURBANK	CA	91505	\$44,495.00	10/26/2021
31B	HAMPTON INN			OH		\$180.07	7/12/2021
31B	HUNTINGTON BANK		COLUMBUS	OH	43216	\$111.31	9/30/2021
31B	JUST INK TEES		HEBRON	OH	43025	\$4,644.53	10/8/2021
31B	JUST INK TEES		JAMESTOWN RD	OH	45335	\$2,791.45	7/6/2021
31B	JUST INK TEES		JAMESTOWN RD	OH	45335	\$560.44	7/12/2021
31B	JUST INK TEES		JAMESTOWN RD	OH	45335	\$3,357.07	7/23/2021
31B	LOVES		OBETZ	OH		\$300.00	10/14/2021
31B	LOVES		ETNA	OH		\$425.00	10/21/2021
31B	LOVES		BURBANK	OH		\$300.00	10/28/2021
31B	LOVES TRAVEL		OBETZ	OH		\$43.58	7/19/2021
31B	MAIL CHIMP					\$16.00	10/10/2021
31B	MAIL CHIMP					\$86.48	10/28/2021
31B	MAIL CHIMP		COM	GA		\$16.11	8/2/2021
31B	MAILCHIMP					\$100.88	11/1/2021
31B	MAILCHIMP					\$91.27	11/8/2021
31B	MAILCHIMP					\$192.15	12/1/2021
31B	MAILCHIMP C/O THE ROCKET SCIENCE GROUP, LLC		ATLANTA	GA	30308	\$16.00	8/30/2021
31B	MARATHON		STONECREEK	OH		\$80.00	8/27/2021
31B	MARATHON		LITHOPOLIS	OH		\$54.60	7/6/2021
31B	MARATHON		PORT CLINTON	OH		\$80.00	7/8/2021
31B	MERCHANT BNKCD					\$3.50	9/3/2021
31B	MERCHANT BNKCD					\$3.50	10/4/2021
31B	NATIONALBUILDER		LOS ANGELES	CA	90081	\$239.00	7/13/2021
31B	NATIONALBUILDER		LOS ANGELES	CA		\$287.00	8/12/2021
31B	NATIONBUILDER		LOS ANGELES	CA		\$335.00	10/12/2021
31B	NATIONBUILDER		LOS ANGELES	CA		\$335.00	11/12/2021
31B	NATIONBUILDER					\$335.00	12/13/2021
31B	OSU CAMPUSPARC ACADEM		COLUMBUS	OH		\$14.50	11/16/2021

Form Code	PayeeNon Individual	Address	City	State	Zip	Amount	Year	Expend Date	Purpose
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$75.00	2021	7/2/2021	FUEL
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$75.00	2021	7/2/2021	FUEL
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$75.00	2021	7/2/2021	FUEL
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$75.00	2021	7/2/2021	FUEL
31B	CERTIFIED OIL		LOCKBOURNE	OH		\$29.91	2021	7/2/2021	
31B	MARATHON		LITHOPOLIS	OH		\$54.60	2021	7/6/2021	
31B	MARATHON		PORT CLINTON	OH		\$80.00	2021	7/8/2021	
31B	SPEEDWAY		BELLEFONTAINE	OH		\$84.20	2021	7/12/2021	
31B	PILOT	2320 FAIRCREST ST	CANTON	OH	44706	\$75.00	2021	7/16/2021	FUEL
31B	LOVES	6023 ALUM CREEK	OBETZ	OH	43137	\$375.00	2021	7/17/2021	FUEL
31B	LOVES	6023 ALUM CREEK	OBETZ	OH	43137	\$350.00	2021	7/17/2021	FUEL
31B	LOVES TRAVEL		OBETZ	OH		\$43.58	2021	7/19/2021	
31B	LOVE'S	9901 SCHUSTER WAY	ETNA	OH	43018	\$200.00	2021	7/21/2021	FUEL
31B	BP	5188 GROVEPORT PK	COLUMBUS	OH	43207	\$100.00	2021	7/25/2021	FUEL
31B	CERTIFIED OIL	5991 S HIGH ST	COLUMBUS	OH	43207	\$375.00	2021	7/26/2021	FUEL
31B	PILOT	2320 FAIRCREST ST	CANTON	OH	44706	\$250.00	2021	8/4/2021	FUEL
31B	LOVES	9901 SCHUSTER WAY	ETNA	OH	43018	\$194.01	2021	8/6/2021	FUEL
31B	LOVE'S	9901 SCHUSTER WAY	ETNA	OH	43018	\$200.00	2021	8/6/2021	FUEL
31B	LOVE'S	6023 ALUM CREEK DR	OBETZ	OH	43137	\$386.02	2021	8/11/2021	FUEL
31B	PILOT	7680 EAST ST RT 36	SUNBURY	OH	43074	\$300.00	2021	8/13/2021	FUEL
31B	PILOT	1365 SR 42 NE	LONDON	OH	43140	\$375.63	2021	8/17/2021	FUEL
31B	LOVE'S	6023 ALUM CREEK DR	OBETZ	OH	43137	\$378.97	2021	8/24/2021	FUEL
31B	EAGLE AUTO TRUCK PLAZA	217 16TH ST SW	NEW PHILADELPHIA	OH	44663	\$300.00	2021	8/27/2021	FUEL
31B	MARATHON		STONECREEK	OH		\$80.00	2021	8/27/2021	
31B	LOVE'S	6023 ALUM CREEK DR	OBETZ	OH	43137	\$300.00	2021	9/1/2021	FUEL
31B	PILOT	2786 SALT SPRINGS RD	GIRARD	OH	44420	\$300.00	2021	9/3/2021	FUEL
31B	FLYING J	7735 E SR 37	BERKSHIRE	OH	43074	\$334.12	2021	9/7/2021	FUEL
31B	PILOT	488 ST RT 61	MARENGO	OH	43334	\$350.00	2021	9/10/2021	FUEL
31B	LOVE'S	976 SR 97	BELLVILLE	OH	44813	\$375.00	2021	9/14/2021	FUEL
31B	LOVE'S	6023 ALUM CREEK DR	OBETZ	OH	43137	\$400.00	2021	9/22/2021	FUEL
31B	FLYING J	175 NORTHWOODS BLVD	VANDALIA	OH	45377	\$400.00	2021	9/24/2021	FUEL
31B	LOVES	25727 DUROC ST	CIRCLEVILLE	OH	43113	\$270.37	2021	9/28/2021	FUEL AND OIL

Exhibit D

Form Code	PayeeNon Individual	Address	City	State	Zip	Amount	Year	Expend Date	Purpose
31B	SPEEDWAY	213 NORTH URBANA ST	SOUTH VIENNA	OH	45369	\$200.00	2021	9/30/2021	FUEL
31B	PAR MAR 11	100 5TH ST	BEVERLY	OH	45715	\$300.00	2021	10/3/2021	FUEL
31B	DUCHESS 1253	57 DAYTON RD	NEWARK	OH		\$88.97	2021	10/5/2021	FUEL
31B	PILOT		MARENGO	OH		\$72.36	2021	10/6/2021	
31B	PILOT		MARENGO	OH		\$30.34	2021	10/8/2021	
31B	PILOT		MARENGO	OH		\$225.00	2021	10/8/2021	
31B	SUNOCO		VERMILLION	OH		\$74.00	2021	10/12/2021	
31B	SUNOCO		VERMILLION	OH		\$74.00	2021	10/12/2021	
31B	SUNOCO		VERMILLION	OH		\$200.00	2021	10/12/2021	
31B	LOVES		OBETZ	OH		\$300.00	2021	10/14/2021	
31B	LOVES		ETNA	OH		\$425.00	2021	10/21/2021	
31B	LOVES	976 ST RT 97	BELLVILLE	OH	44813	\$300.00	2021	10/24/2021	FUEL
31B	BP OIL		ASHLAND	OH		\$100.00	2021	10/25/2021	
31B	SPEEDWAY		CHILLICOTHE	OH		\$72.10	2021	10/27/2021	
31B	LOVES		BURBANK	OH		\$300.00	2021	10/28/2021	
31B	MARATHON	10257 LANCASTER SE	HEBRON	OH	43025	\$75.00	2021	11/3/2021	FUEL
31B	LOVES	9901 SCHUSTER WAY	ETNA	OH	43018	\$400.00	2021	11/10/2021	FUEL
31B	BELLSTORES	450A CANAL ST SE	BOLIVAR	OH	44612	\$80.00	2021	11/13/2021	FUEL
31B	LOVES	9901 SCHUSTER WAY	ETNA	OH	43018	\$300.00	2021	11/13/2021	FUEL
31B	PILOT	7680 E ST RT 36	SUNBURY	OH	43074	\$320.00	2021	11/18/2021	FUEL
31B	LOVES	13190 DESHLER RD	N BALTIMORE	OH	45872	\$465.59	2021	11/21/2021	FUEL
31B	PILOT	7680 E ST RT 36	SUNBURY	OH	43074	\$400.00	2021	11/24/2021	FUEL
31B	PILOT	7680 E ST RT 36	SUNBURY	OH	43074	\$200.00	2021	11/30/2021	FUEL
31B	PILOT		SUNBURY	OH		\$165.53	2021	11/30/2021	
31B	PILOT	1111 E MAIN ST	CHILLICOTHE	OH	45601	\$200.00	2021	12/2/2021	FUEL
31B	PILOT	6830 FRANKLIN-LEBANON RD	FRANKLIN	OH	45005	\$250.00	2021	12/5/2021	FUEL
31B	TRUCKOMAT	I-70 EXIT 126	HEBRON	OH	43025	\$273.52	2021	12/9/2021	FUEL
31B	FLYING J		SUNBURY	OH		\$81.08	2021	12/15/2021	
31B	PILOT		LONDON	OH		\$275.00	2021	12/17/2021	

\$13,508.90

BEFORE THE OHIO ELECTIONS COMMISSION

SARAH CHAMBERS
6593 MEADOW GLEN DRIVE S
WESTERVILLE, OH 43082

CASE NO. 2021G-022

EXHIBIT: A

COMPLAINANT,

VS.

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

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,

CASE NO. _____

RECEIVED

OCT 28 2021

**OHIO ELECTIONS
COMMISSION**

VERIFIED COMPLAINT

Now comes the Complainant, and after being duly cautioned and sworn, deposes and states the following:

- I am Sarah Chambers and I have personal knowledge of the facts contained herein.
- Joseph K. Blystone is an announced Republican Candidate for Governor of Ohio for the May 2022 primary election.
- Friends of Joe Blystone is the officially designated state campaign committee for Joseph K. Blystone.
- M. Jane Blystone is the spouse of Joseph K. Blystone and is the treasurer for Friends of Joe Blystone.

Exhibit B

BACKGROUND

Candidate for Governor Joe Blystone's campaign has engaged in an unprecedented level of illegal activity. More than a dozen Blystone for Governor donors, volunteers, and staff members who witnessed these illegal acts have come forward.

The Blystone for Governor campaign collected tens of thousands of dollars in illegal donations, failed to document thousands of dollars in donations, violated numerous campaign finance laws and did so deliberately. As you will see, staff members were given specific instructions to NOT document donor information. Staff members have provided sworn affidavits, video documentation, bank statements, and various other pieces of evidence that show Joe Blystone's campaign has violated multiple laws. These actions raise serious questions as to who is funding Joe Blystone's campaign and undermine our elections process.

Election integrity is paramount to the fabric of our society. We ask the Ohio Elections Commission to investigate these claims and take appropriate action.

COUNT ONE – DOUGLAS FRANK UNLAWFUL CONTRIBUTION

- Complainant restates the allegations contained in paragraphs 1 through 4.
- On May 8, 2021, Douglas Frank attended an event and while there made a \$100 cash contribution directly to Joseph K. Blystone for Friends of Joe Blystone.
- That contribution was captured on video and can be viewed by watching the disc attached here as **Complainant's Exhibit #1**.
- Notwithstanding this evidence, a review of the campaign finance records located at the Ohio Secretary of State indicates NO contributions from Douglas Frank to Friends of Joe Blystone.
- A list of itemized and unitemized contributions for May 8, 2021, is attached here as **Complainant's Exhibit #2**.

- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT TWO – EXCESSIVE CASH CONTRIBUTIONS

- Complainant restates the allegations contained in paragraphs 1 through 10.
- On July 30, 2021, Respondents filed a campaign finance report with the Ohio Secretary of State where they disclosed contributions of \$258,836.00 of which \$88,142.00 or thirty-four percent (34%) were allegedly cash contributions in amounts of \$25 or less.
 - Even assuming that each of these alleged persons made a contribution of between \$1 and \$25, these totals would mean that cash contributions were received from a range of people as low as 3,526 or as high as 88,142.
 - Complainant is unable to find any other candidate with such a high level of cash contributions received.
 - Complainant alleges that these cash contributions are being reported in this manner in order to disguise their true size and scope.
 - Complainant further alleges that these cash contributions are being reported in this manner in order to facilitate a theft of these campaign funds by the Respondents.
 - The activities alleged here appear to be a violation of Ohio Revised Code Section 2921.41(2) Theft in Office.

COUNT THREE – SARAH CHAMBERS ALLEGATIONS

- Complainant restates the allegations contained in paragraphs 1 through 17.
- Sarah Chambers served approximately four months as the co-campaign manager for Friends of Joe Blystone.
 - Sarah Chambers made a statement, sworn under oath, which can be found attached here

as **Complainant's Exhibits #3 and #4.**

- In her statement, Ms. Chambers alleged that she made total contributions in goods and contributions in the amount of \$13,871.97 to Friends of Joe Blystone.
- Ms. Chambers provided her personal financial records to document those contributions and those records are attached here as **Complainant's Exhibits #5 through #14.**
- Notwithstanding this evidence, Friends of Joe Blystone reported to the Ohio Secretary of State total contributions in the amount of \$515.00 from Sarah Chambers. Please see

Complainant's attached Exhibit #15.

- Ms. Chambers further alleges that she then received a partial refund of these contributions but there is no such information found at the Ohio Secretary of State.
- Finally, Ms. Chambers alleges that she personally observed numerous other potential violations of Ohio campaign finance laws committed by Friends of Joe Blystone including being personally instructed to not write down any donor info.
- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT FOUR – STEPHANIE FOUCHER ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 26.
- Stephanie Foucher served approximately three months as a volunteer regional leader for Friends of Joe Blystone.
- Ms. Foucher made a lengthy statement, sworn under oath, which can be found attached here as **Complainant's Exhibits #16 and #17.**
- During an event on May 1, 2021, Ms. Foucher alleges that she and her boyfriend Shane

Parrino worked at a Friends of Joe Blystone event where they witnessed numerous contributions over the amount of \$25 in cash that were not reported to the Ohio Secretary of State. These included donations from Mark Probst and Joyce McFaul.

- An actual list of itemized and un-itemized donations reported to the Ohio Secretary of State can be found here as **Complainant's Exhibit #18**.

- During two events on May 2, 2021, Ms. Foucher alleges that she and her boyfriend Shane Parrino worked at Blystone campaign events where they witnessed numerous contributions over the amount of \$25 in cash that were not reported to the Ohio Secretary of State. These included donations from Mary and Robert Jones and Devin McFaul.

- An actual list of itemized and un-itemized donations reported to the Ohio Secretary of State can be found here as **Complainant's Exhibit #19**.

- Ms. Foucher alleges that she made total contributions to the Friends of Joe Blystone in excess of \$2,000 via cash and contributions through the website.

- Nonetheless, the Blystone campaign only reported a total of \$615 in contributions which reflects Ms. Foucher's contributions via the website. Please see attached **Complainant's Exhibit #20**.

- Finally, Ms. Foucher alleges that she personally observed numerous other potential violations of Ohio campaign finance laws committed by Friends of Joe Blystone including being personally instructed to not write down any donor info.

- Ms. Foucher's boyfriend, Shane Parrino, also executed a statement in support of Ms. Foucher's allegations. It can be found attached here as **Complainant's Exhibit #21**.

- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT FIVE – DIANNE B. GARRETT ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 38.

- Dianne B. Garrett was a volunteer for the Friends of Joe Blystone campaign, and she has made a statement, sworn under oath, which can be found attached here as **Complainant's Exhibits #22 and #23**.
- On June 11, 2021, Ms. Garrett alleges that she made total donations of \$40 at an event for Friends of Joe Blystone.
- Notwithstanding that evidence, the Friends of Joe Blystone did not report any donations from Ms. Garrett for that day. See list attached here as **Complainant's Exhibit #24**.
- Finally, Ms. Garrett alleges that that she personally observed numerous other potential violations of Ohio campaign finance laws committed by Friends of Joe Blystone including being personally instructed to not write down any donor info.
- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT SIX – JEFF SEIBERT ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 44.
- Jeff Seibert previously worked as a regional director for the Friends of Joe Blystone campaign and he has a made a statement, sworn under oath, which can be found attached here as **Complainant's Exhibits #25 and #26**.
- Mr. Seibert alleges that he attended at least six events put on by Friends of Joe Blystone where cash donations in excess of \$25 were accepted but not itemized in reports filed by the campaign.
- Finally, Mr. Seibert alleges that he personally observed numerous other potential violations of Ohio campaign finance laws committed by Friends of Joe Blystone including being personally instructed to not write down any donor info.
- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT SEVEN – TRACEY SPARKS ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 49.
- Tracey Sparks previously served as a volunteer for the Friends of Joe Blystone campaign

and she has made a statement, sworn under oath, that can be found attached here as

Complainant's Exhibits #27 and #28.

- Ms. Sparks alleges that she attended two events for the Friends of Joe Blystone campaign where cash contributions in excess of \$25 were being accepted without donor information being taken.
- Ms. Sparks also alleges that she personally observed numerous other potential

violations of Ohio campaign finance laws committed by Friends of Joe Blystone including being personally instructed to not write down any donor info.

- The activities alleged here appear to be a violation of Ohio Revised Code Section 3517.10(A)(4) and potentially other violations.

COUNT EIGHT – JACOB NOVOTNY ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 54.
- Jacob Novotny attended three Friends of Joe Blystone campaign events and he has

executed a statement, which is attached here as **Complainant's Exhibit #29.**

- On May 10, 2021 Mr. Novotny alleges that he attended a campaign event where he witnessed Joe Blystone place a bucket at the front of the event and ask that cash donations be placed in it.

• Mr. Novotny further alleges that no effort was made to attempt to take down any donor information for these cash donations.

- A copy of the itemized and un-itemized donors from May 10, 2021 that were reported to the Ohio Secretary of State can be found attached here as **Complainant's Exhibit #30.**
- The activities alleged here appear to be a violation of Ohio Revised Code Section

3517.10(A)(4) and potentially other violations.

COUNT NINE – POP UP KIT CONTRACT

- Complainant restates the allegations found in paragraphs 1 through 60.
- Throughout the course of this campaign, Friends of Joe Blystone has required volunteers to enter into a contract with them in order to utilize pop up kits. Please see **Complainant's attached Exhibit #31**.
- These pop up kits contain 50 signs, 20 shirts, 20 flags, and 20 stickers and the cost is \$1,070.00.
- After the event is concluded, volunteers must either pay \$1,070 to the campaign either from the proceeds of the sale of these items, return any unsold items for credit, and/or pay any differences themselves. Donors Susan Eddy, and Stacey Jarrett were two who took part in this pop up kit contract. Many others signed and took part as well, including pop up kits/contracts that were disbursed by Joe Blystone himself.
- The very design of this process calls for the deliberate concealment of the actual donors to the campaign and clearly appears to violate Ohio's campaign finance laws.

COUNT TEN – Volunteer #1 ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 65.
- Volunteer #1 volunteered on the Blystone campaign for approximately four months and has submitted a statement attached here as **Complainant's Exhibit #32**.
- Volunteer #1 alleges that she attended over a dozen events where she personally witnessed members of the Blystone campaign, including Joe Blystone, accepting cash contributions in excess of \$25 without obtaining any donor information.
- Volunteer #1 further alleges that she was informed multiple times that it was not necessary to obtain donor info for anyone that gave \$25 or less in cash.
- Nonetheless, Volunteer #1 alleges that she personally witnessed many people give \$50, \$100, or more in cash without any documentation being taken from them.
- In fact, Volunteer #1 alleges that she personally donated \$140.00 in cash but

the donation was not reported to the Ohio Secretary of State.

- Volunteer #1 also alleges that she bought shirts via the Blystone Bonfire online store, has produced her bank statements to prove the transactions, and the amounts were not correctly reported to the Ohio Secretary of State. Please see **Complainant's attached Exhibits #33, #34, and #35.**
- The activities alleged here appear to be a violation of Ohio Revised Code Section

3517.10(A)(4) and potentially other violations.

COUNT ELEVEN – AMANDA HELMICK ALLEGATIONS

- Complainant restates the allegations found in paragraphs 1 through 73.
- Amanda Helmick was a volunteer for the Friends of Joe Blystone campaign and her

statement can be found attached here as Complainant's Exhibit #36.

- Ms. Helmick alleges that she attended a campaign event on May 15, 2021 where she was specifically told NOT to document information from donors.
- The activities alleged here appear to be a violation of Ohio Revised Code Section

3517.10(A)(4) and potentially other violations.

June 6th Event at Blystone Farm

Multiple inconsistencies appear on Joe Blystone's campaign finance report regarding his June 6th fundraiser held at Blystone Farm. Video evidence shows Joe accepting a donation of \$200 cash from an unknown man. This contribution is not documented. No male appears on his campaign finance report as donating \$100 or \$200 to the Blystone campaign on this date.

In addition, Blystone's finance reports \$500 in kind donation from an organization named "Pickaway County Leaders." No such entity exists.

WHEREFORE, Complainant requests that the panel find probable cause for a violation and proceed to a full hearing on this matter. Furthermore, Complainant requests that if a violation is found at a full hearing that the Ohio Elections Commission recommend prosecution by the Franklin County Prosecuting Attorney. Finally, Complainant requests that if a violation is found

of the allegations in Count Two, that Respondents be forever disqualified to serve as public officials.

Further Affiant saith naught.



Affiant

Sworn to before me and subscribed in my presence this Oct 28 day of October, 2021.



Notary Public



JAMES F. GINLEY
Notary Public, State of Ohio
My Commission Expires
December 4, 2024

Committee	Cover Page	Contributions	Expenditures
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Search Results For Candidate Committee Contribution Details

[Back](#)



Contributor Name	Contributor Non Individual	Contributing PAC Reg No	Address	City	State	Zip	Report Type	Year	Contribution Date	Amount	Event Date	Employer/Occupation
ARMSTRONG LOGAN	CONTRIBUTIONS RECEIVED 25 OR LESS	-	-	-	-	-	SEMIANNUAL (JULY)	2021	05/08/2021	\$4,907.00	-	FRIENDS OF JOE BLYSTONE
CARTER BILL	-	-	9101 PARK DRIVE	SHREVE	OH	44676	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	STATE TROOPER
CROININ KARRI	-	-	2617 DODGEVILLE ROAD	ROME	OH	44085	SEMIANNUAL (JULY)	2021	05/08/2021	\$250.00	-	JACO
CROTHERS BROOKE	-	-	3280 BUENA VISTA CIRCLE	ZANESVILLE	OH	43701	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	OCCUPATIONAL THERAPIST
DELANCEY SHAD	-	-	1086 NADINE DRIVE	HEATH	OH	43056	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	FRIENDS OF JOE BLYSTONE
FEGLEV JEFF	-	-	7155 FRAZEYSBURG RD	NASHPORT	OH	43830	SEMIANNUAL (JULY)	2021	05/08/2021	\$40.00	-	FARMER, & FIREFIGHTER
FLOYD JENNIFER	-	-	6422 WALNUT FORK DR	WESTERVILLE	OH	43081	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	BANKER
HACKLER MELINDA	-	-	56 MORTON STREET	JACKSON	OH	45640	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	CLERK
LAMB KATELYN	-	-	13325 PINE ROAD NORTHEAST	THORNVILLE	OH	43076	SEMIANNUAL (JULY)	2021	05/08/2021	\$50.00	-	FRIENDS OF JOE BLYSTONE
LATHAM AINMEE	-	-	1023 WINTHROP LANE	ASHLAND	OH	44805	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	FRIENDS OF JOE BLYSTONE
	-	-	3049 GRILL RD	NEW FRANKLIN	OH	44216	SEMIANNUAL (JULY)	2021	05/08/2021	\$20.00	-	FRIENDS OF JOE BLYSTONE

NORRIS SANDRA	-	3991 HUMPHREY ROAD	RICHFIELD	OH	44286	SEMIANNUAL (JULY)	2021	05/08/2021	\$50.00	-	RETIRED	OF JOE BLYSTONE
RANCK JAY	-	10268 SHELLEY ROAD	THORNVILLE	OH	43076	SEMIANNUAL (JULY)	2021	05/08/2021	\$200.00	-	SELF	FRIENDS OF JOE BLYSTONE
SERGENT ANTHONY	-	400 N MAIN ST	WEST MILTON	OH	45383	SEMIANNUAL (JULY)	2021	05/08/2021	\$10.00	-	RETIRED	FRIENDS OF JOE BLYSTONE
WELLS DEANNA	-	3543 ANCHOR LANE NE	MINERAL CITY	OH	44656	SEMIANNUAL (JULY)	2021	05/08/2021	\$10.00	-	INSURANCE AGENT	FRIENDS OF JOE BLYSTONE

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1 - 15

Note

Please note that queries based on specific candidates/committees, date ranges and entity types are updated regularly on the File Transfer Page (FTP) ([?p=CFDISCLOSURE:73](https://www.OhioSoS.gov/CFDISCLOSURE:73)). Persons seeking large amounts of campaign finance data should check the FTP ([?p=CFDISCLOSURE:73](https://www.OhioSoS.gov/CFDISCLOSURE:73)) first (see above blue tab). Users attempting to query very large amounts of data (greater than 10,000 records) from the Simple or Advanced Search will be required to narrow the search criteria in order to reduce the number of records returned.

Disclaimer

THE SEARCHABLE CAMPAIGN FINANCE DATA ONLY CONTAINS DATA FROM THE YEAR 2015 TO PRESENT AND CONTAINS BOTH AUDITED AND UNAUDITED DATA. AS REPORTS ARE AUDITED OR COMMITTEES UPDATE INFORMATION, THE DATA WILL CHANGE. FOR DATA PRIOR TO 2015, PLEASE UTILIZE THE FILES FROM THE FILE TRANSFER PAGE (FTP).

Secretary LaRose & the Office (<https://www.OhioSoS.gov/secretary-office/>) | Elections & Voting (<https://www.OhioSoS.gov/elections/>) | Campaign Finance (<https://www.OhioSoS.gov/Campaign-Finance/>) | Legislation & Ballot Issues (<https://www.OhioSoS.gov/legislation-and-ballot-issues/>) | Businesses (<https://www.OhioSoS.gov/businesses/>) | Records (<https://www.OhioSoS.gov/records/>) | Media Center (<https://www.OhioSoS.gov/media-center/>) | Publications (<https://www.OhioSoS.gov/publications/>)

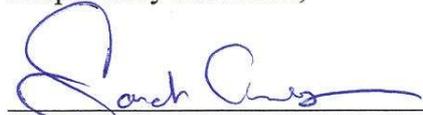
AFFIDAVIT

State of Ohio }

County of Delaware }

My name is Sarah Chambers. I swear and/or affirm, under penalty of perjury, that the attached statement was made upon my personal knowledge and it is true to the best of my belief and understanding.

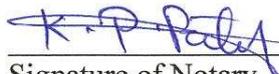
Respectfully submitted,


Signature

10-21-21
Date

Sworn to and subscribed in my presence this 21 day of Oct, 20 21 by

Sarah Chambers [Name of Signer].


Signature of Notary

Kinnari Patel
Printed name of Notary

(Seal)




KINNARI P PATEL
Notary Public, State of Ohio
My Commission Expires 09/17/2024
10/21/2021



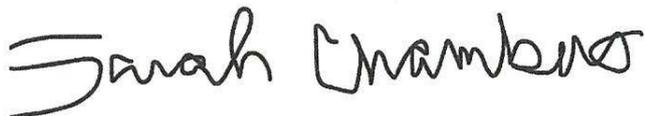
My name is Sarah Chambers and I worked on the Blystone campaign for 4 months. I attended dozens of events where I witnessed Joe Blystone, his wife Jane, and volunteers accepting campaign contributions in excess of \$25 without requesting or accepting the donors information. Myself and others questioned this practice and offered to document and track contributions, signs sold, and t-shirts sold, but we were told that it wasn't necessary at the time. I witnessed hundreds of give \$50, \$100 and more without any documentation being taken from volunteers. At most events, we would have a donation bucket for any cash donations to be put in. At the end of the event, we would empty the cash, without knowing who gave what, and give the cash to Joe or Jane.

I personally donated several thousand dollars to Joe Blystone and the donation was not reported on his campaign finance report. I was able to receive a partial refund, but that wasn't disclosed either.

I have attached my own personal records of my donations to the campaign including several items that I purchased myself as donations. These are noted on my credit card statement on 6/5/21 as Shoot Point blank(a gun for auction), Rod's Western Place(2 hats for auction) and several amazon purchases used for auction.

This shady activity is one of many reasons I left the Blystone campaign. I have reason to believe that Blystone received more money than he has reported on his filing. I strongly suggest the Ohio Secretary of State launch an investigation into this activity immediately.

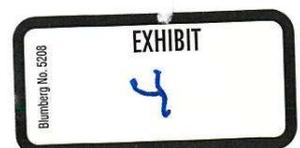
Sarah Chambers



10/19/2021

Sent from [Mail](#) for Windows

9 attachments



10/21/2021 8:58 AM

APR-11

OT DE

A*JOE BLYSTONE 225-250-1301 OH

Services

\$100.00

A*JOE BLYSTONE



REDEEMED THIS PERIOD

CASHBACK BONUS

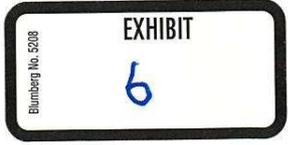
5% Cashback Bonus

APR-JUN

Gas Stations, Wholesalers,
Streaming Services

Earn up to \$75 in 5% cash
back on all purchases

For details, see Inform



TRANS. DATE

PURCHASES

MERCHANT CATEGORY

03/24

A *JOE BLYSTONE 225-250-1301 OH
A *JOE BLYSTONE

Services

\$500.00

Transactions continued

TRANS.

DATE

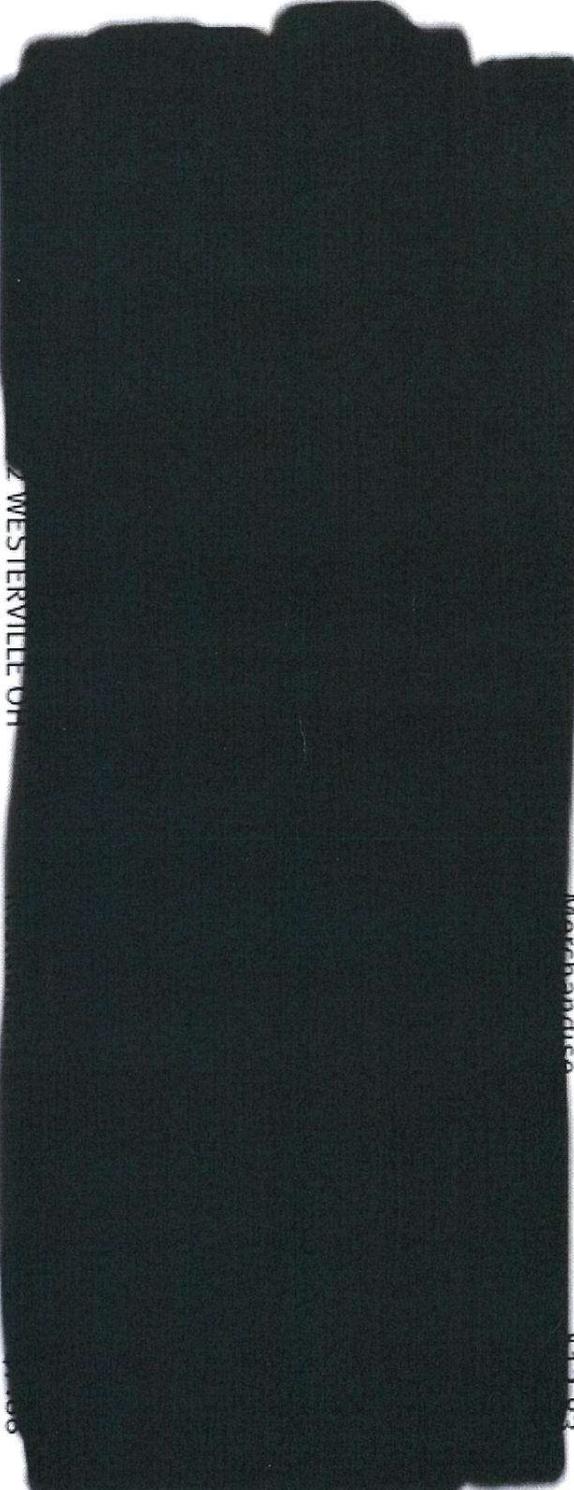
PURCHASES

MERCHANT CATEGORY

AMOUNT

Merchandise

\$13.83



WESTERVILLE OH

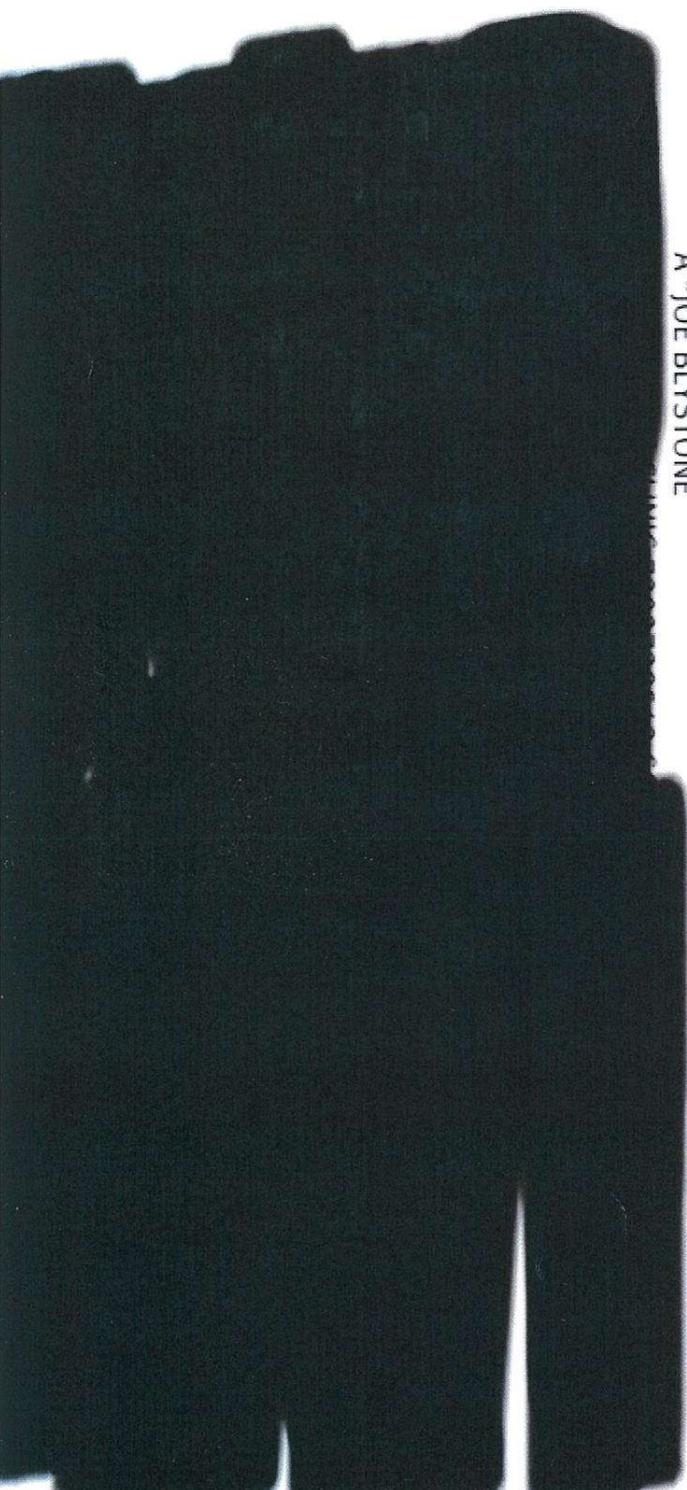
04/14

A*JOE BLYSTONE 225-250-1301 OH

Services

\$100.00

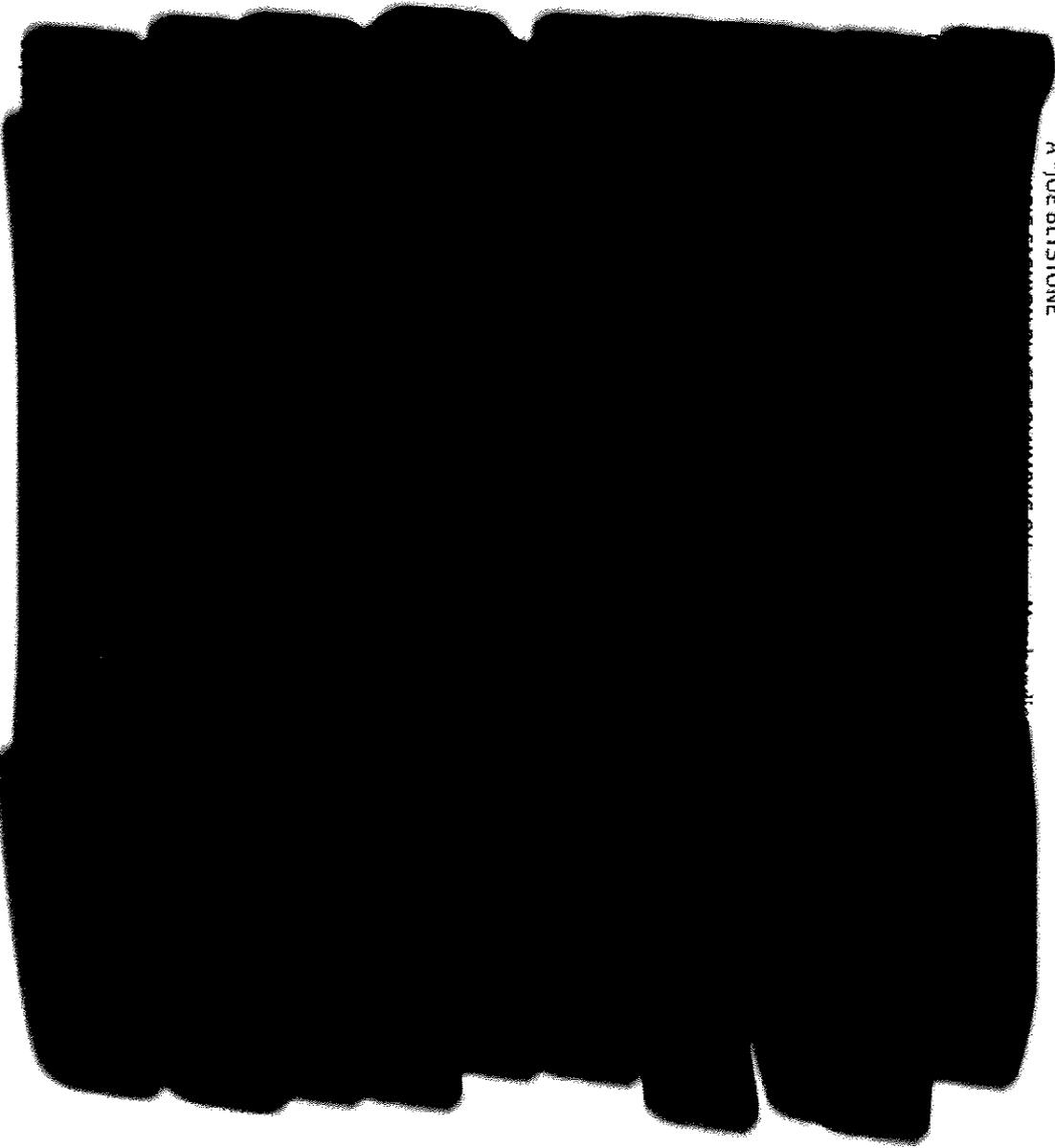
A*JOE BLYSTONE



Blumberg No. 5209
EXHIBIT
9



FL
05/18 A *JOE BLYSTONE 225-250-1301 OH Services \$5,000.00
A *JOE BLYSTONE



[View invoice](#)



Shipment details

FREE Prime Delivery

Delivered

Delivery Estimate

Thursday, June 3, 2021 by 9pm



2

**VSVO Ohio Flag 3x5 Ft
-300D Nylon Premium
Outdoor Embroidered
OH Flag...**

\$25.99

Qty: 2

Sold By: VSVO Flags



**Double Sided Dont
Tread on Me Gadsden**

\$21.99

EXHIBIT

10

Blumberg No. 5208

[View invoice](#)



Shipment details

Two-Day Shipping

Delivered

Delivery Estimate

Thursday, June 3, 2021 by 8pm



Personalized Custom

\$58.99

**Whiskey Glass (Set Of
4), Engraved Etched...**

Qty: 1

Sold By: DADDY FACTORY

[Contact Seller](#)

EXHIBIT



Blumberg No. 5208

TRANS. AMOUNT
DATE

DATE	DESCRIPTION	AMOUNT
06/05	ROD'S WESTERN PALACE 614-268-8200 OH Merchandise	\$96.64
06/05	AMZN MKTP US* 2X2XC1LCO Merchandise	\$50.49
	AMZN.COM/BILLWA EDJLRGQEK1V	
06/05	SHOOT POINT BLANK 513-7660830 OH Merchandise	\$517.87

Blumberg No. 5203
EXHIBIT
12

DATE

06/14 A*JOE BLYSTONE 225-250-1301 OH Services

\$6,000.00



Blumberg No. 6288 EXHIBIT 13



ONLINE
Discover.com or
download our app

PHONE
1-800-367-2683
TDD 1-800-367-7449

PAYMENTS
Discover
PO Box 6103
Carol Stream
IL 60197-6103

DISCOVER® MORE® CARD ENDING IN 6659
STATEMENT DATE: 04/25/2021 - 05/24/2021

OPEN

Transactions continued

TRANS

MERCHANT CATEGORY



DATE	DESCRIPTION	MERCHANT CATEGORY	AMOUNT
05/13	A *JOE BLYSTONE 225-250-1301 OH	Services	\$700.00
	A *JOE BLYSTONE		

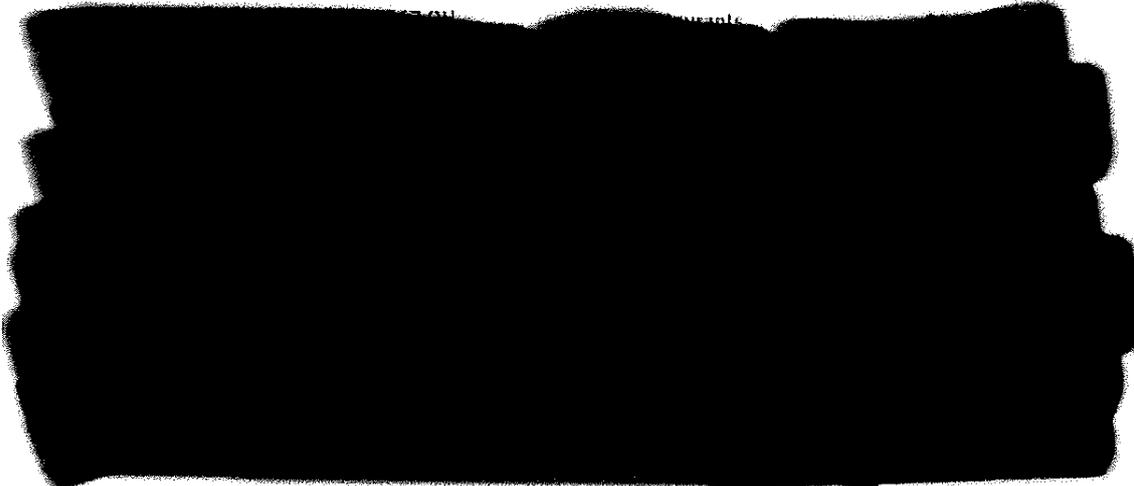


EXHIBIT
14
Binding No. 528

Committee Cover Page Contributions Expenditures

Search Results For Candidate Committee Contribution Details

[Back](#)

Contributor Name	Contributor Non Individual	Contributing PAC Reg No	Address	City	State	Zip	Report Type	Year	Contribution Date	Amount	Event Date	Employer/Occupation
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CHAMBERS SARAH	-	-	6593 MEADOW GLEN DR S	WESTERVILLE	OH	43082	SEMIANNUAL (JULY)	2021	03/25/2021	\$500.00	-	HOMEMAKER
CHAMBERS SARAH	-	-	6593 MEADOW GLEN DRIVE SOUTH	WESTERVILLE	OH	43082	SEMIANNUAL (JULY)	2021	04/29/2021	\$5.00	-	FRIENDS OF JOE BLYSTONE
CHAMBERS SARAH	-	-	6593 MEADOW GLEN DRIVE SOUTH	WESTERVILLE	OH	43082	SEMIANNUAL (JULY)	2021	04/29/2021	\$10.00	-	FRIENDS OF JOE BLYSTONE

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1 - 3

Note

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Disclaimer

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AFFIDAVIT

State of Ohio }

County of Beaumont }

My name is Stephanie Foucher. I swear and/or affirm, under penalty of perjury, that the attached statement was made upon my personal knowledge and it is true to the best of my belief and understanding.

Respectfully submitted,

Stephanie Foucher
Signature

10/25/2021
Date

Sworn to and subscribed in my presence this 25 day of October, 2021 by

Stephanie Foucher [Name of Signer].

Belinda DeMuth
Signature of Notary

Belinda DeMuth
Printed name of Notary

(Seal)



BELINDA J. DEMUTH
Notary Public, State of Ohio
My Commission Expires
January 22, 2022

EXHIBIT
16
Blumberg No. 5235

October 19, 2021

My name is Stephanie Foucher. The purpose of this statement is to address a variety of financial concerns I personally witnessed within the Joe Blystone Governor for Ohio campaign. I volunteered with Joe Blystone's campaign shortly after he declared as a formal candidate for Governor of Ohio 2022. I volunteered from March of 2021 until May of 2021. I submitted a formal letter of resignation to his campaign in May of 2021 due to many red flags I witnessed in regards to the handling of money, he and his campaign's unprofessionalism and many other actions I felt to be unethical.

At the beginning of Blystone's campaign I accepted the role of Regional Leader for Lake, Geauga and Ashtabula counties. As a resident of NE Ohio I am well acquainted with all three counties.

Three events were scheduled in NE Ohio on the weekend of May 1, 2021 thru May 2, 2021.

May 1, 2021 the first event in NE Ohio was held at The Plank Road Tavern in Montville, Ohio. My fiancé of ten years, Shane Parrino, came with me to help at the event. Joe and Jane Blystone arrived late to the event because they had three events prior to making it to The Plank Road event. Regardless, once Joe arrived I had already set up an area with a patriotic tablecloth, a large black binder to keep track of donations and sign sales, another binder to write down volunteer information and three patriotic tins. The tins were to be used for cash donations, Blystone's campaign literature and the other tin for 100 pocketbook constitution's I purchased at my own cost. I gave them away for free because I felt every American should own one.

The event at Plank Road had a rather large turnout. The entire inside of the bar was packed and also the back patio where Joe gave his speech. The back patio is where I had set up everything pertaining to Joe Blystone for the event. Over the course of the event I personally witnessed several dozen donations over \$25, \$50, \$100 even as high as \$300. I know these donations were never recorded because when I offered to document everything and shared I brought a binder to keep track of sign sales and donations I was told not to by the Blystone's. I was only permitted to write down any potential volunteer information in my other small binder I brought with me.

Two people I know personally who were in attendance made donations and neither were documented. Mark Probst

purchased two yard campaign signs on May 1st at The Plank Road event. Yard signs run \$5 a piece. He gave \$300 to us for the two signs and said to keep the remaining \$290 for a cash donation to the Blystone campaign. His donation was not documented. Joyce McFaul donated \$20 in cash and purchased two yard signs at the Plank Road event. Her contributions of \$30 were not documented. Countless others made cash donations and purchased campaign signs all of which were not documented. I would believe it safe to say the amount of money to come in at the event would be near \$2,000 as Shane and I were the primary handlers of the cash during the entire event.

At the end of the event there was no counting of the cash donations which were received for confirmation. Jane Blystone, treasurer of the Blystone campaign, quickly came up to the table, opening the tin with all of the cash in it. She grabbed all of the money and shoved the money into a smaller purse she had within her personal handbag. I did not see her count the money at



all. Joe and Jane Blystone stayed after the event enjoying some drinks while speaking with guests and us for a few hours. They then left and went to their hotel in Mentor.

On May 2, 2021 Blystone had two events. The first event was a private event held at Vitality Church in Mentor, Ohio. After the Sunday service there was a gathering down in the recreational area of the church. I only had a cup of coffee and left because the Garfield Park event started at 12pm and we needed to set up.

Shane and I drove the five minute drive to Garfield Park and began setting everything up underneath the pavilion. Many attendees were already there. Again, this was a large turnout. It was a windy day and some came out to help us unload signs, the American flag, and literature. It took Joe Blystone an additional thirty minutes to make it five minutes down the road. When he finally arrived he apologized for being late. Many attendees had already started purchasing signs before Joe's arrival. All cash was stored within the tins. Once the event started everything went smoothly. At the end of the event the picnic table was swarmed with those in attendance looking to purchase signs along with those who made cash donations. Again I was asked to not record or document anything in regards to sign sales or cash donations. I was however permitted to take down volunteer information. Mary Jones and her husband Robert were in attendance and signed up to volunteer. They purchased a total of eight signs and contributed a \$60 cash donation. Devin McFaul was in attendance at Garfield Park. He made a \$300 cash donation and purchased two yard signs. Shane and I witnessed again dozens of cash donations exceeding \$25, \$50, \$100 and even \$300, in addition to the sign sales at the Garfield Park event. None of which were documented. At the end of the event Jane Blystone, treasurer of the Blystone campaign, did the same as she did the evening before. She grabbed all of the money out of the tin and shoved it into her little purse then placed it within her handbag. There was no counting or totaling of funds from this event either. No regard to the amount of cash donations that came in or the total amount of signs sold. We witnessed a considerable amount of cash given to the Blystone campaign during the Garfield Park event. A visually estimated total of approximately \$1500. Shane and I felt very uncomfortable about this again.

On May 8, 2021 Shane Parrino, our daughter and myself made the trip to Blystone's farm. The purpose of this trip was to obtain literature and to purchase stickers for constituents in my region. The campaign refused to send these items to me. Joe and Jane Blystone were in a rush because Joe was due to be at an event where he was to announce his running mate for Lt. Governor, Joanna Swallen. Jane Blystone pulled a cardboard box out of the back of their pickup truck with the stickers in it. I purchased 300 stickers total on this day. They run \$1 a piece. I personally handed Jane \$150 cash I had on hand at the time. It was not documented. I then went to the Blystone campaign website and made an additional donation of \$150 to cover the cost of the remaining balance for the stickers.

On May 13, 2021 I was able to gather some of the volunteers that came in for Lake County for a team meeting and breakfast. I brought yard signs and some literature to this event. One volunteer in attendance was Danina O'Leary. Danina donated \$70 that is not documented on the campaign finance report. She sent her funds to me via PayPal in return for Blystone campaign signs. No documentation was required by the Blystone campaign in regards to sign sales.

I would also receive messages from individuals requesting campaign yard signs via Facebook messenger. One woman specifically was Kayla Lette Willert. She personally drove to my home

and purchased a larger 2x4 sign and two other campaign signs. \$30 total. She did not have enough cash on hand so I told her it was okay to PayPal me the remaining amount which was \$6.

The first donation I made to the Blystone campaign was on April 2, 2021. I had inquired on how to obtain signs up here in NE Ohio. I was told I needed to pay upfront cost in order to get signs. It was explained to me signs were \$5 a piece. I went ahead and made a \$300 donation in order to get some signs up here. From there I was told I could keep the money from each sign I sold or I could donate the money back to the campaign so I could get more signs. Entirely up to me. My initial \$300 donation provided me with 60 signs. The campaign then suggested to try to make as many donations as possible through the campaign website but it was not necessary. The first time Shane and I were able to hear Joe speak was on April 18, 2021 at the Pontifex in Fremont, Ohio. The campaign had reached out to me prior and asked if I would pick up 600 signs from the printer in Mentor, Ohio and drive them to the Fremont event. Naturally I said yes. This gave us the opportunity to hear Joe speak and to meet him in person. We delivered the signs to the event. Bringing some into the facility for sign sales. This is when we witnessed the chaos and disorganization of the campaign setup. There was no organization at all at this event. Boxes of t-shirts, stickers, cash laying around on the window sills. Unlike anything we had seen before. We still continued to make a cash donation of \$400 and bought two t-shirts which were \$20 a piece. These contributions were not documented.

After witnessing how disorganized and chaotic the Fremont event had been, Shane and I discussed we could not have anything of the sort happen at the events I had planned. Which is what led to my organization and planning for our events in NE Ohio. I donated in-excess more than \$2000 and only \$675 was accounted for on the Secretary of State's finance report. The \$675 donation amounts are donations which were made through Joe Blystone's campaign website. None of my cash donations were documented.

Sincerely,
Stephanie Foucher

A handwritten signature in black ink, appearing to read 'Stephanie Foucher', with a long, sweeping underline.

Committee

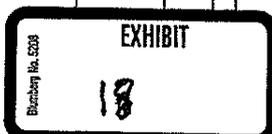
Cover Page

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Contributor Name	Contributor Non Individual	Contributing PAC Reg No	Address	City	State	Zip	Report Type	Year	Contribution Date	Amount	Event Date	Employer/Occupation	Committee
CONTRIBUTIONS RECEIVED													
25 OR LESS													
EDDY MICHELLE	-	-	10343 KETCH ROAD	PLAIN CITY	OH	43064	SEMIANNUAL (JULY)	2021	05/01/2021	\$3,612.00	-	-	FRIENDS OF JOE BLYSTONE
FLESHER ANGIE	-	-	4696 GRAND STRAND DR	GROVE CITY	OH	43123	SEMIANNUAL (JULY)	2021	05/01/2021	\$25.00	-	SAB/HOMESCHOOL MOM	FRIENDS OF JOE BLYSTONE
GINTER TONY	-	-	222 WEST MAIN STREET	SHELBY	OH	44875	SEMIANNUAL (JULY)	2021	05/01/2021	\$25.00	-	NURSE	FRIENDS OF JOE BLYSTONE
HANN WILLIAM	-	-	1763 ARCADIA AVENUE	OBETZ	OH	43207	SEMIANNUAL (JULY)	2021	05/01/2021	\$30.00	-	RETIRED	FRIENDS OF JOE BLYSTONE
MARCUS DAISY	-	-	2672 TWO RIDGE AVENUE	LANCASTER	OH	43130	SEMIANNUAL (JULY)	2021	05/01/2021	\$10.00	-	LPN	FRIENDS OF JOE BLYSTONE
MARTIN STEPHANIE	-	-	1711 OHIO 60	ASHLAND	OH	44805	SEMIANNUAL (JULY)	2021	05/01/2021	\$20.00	-	BILLING	FRIENDS OF JOE BLYSTONE
MATTHEW JEFF	-	-	207 E PORTER ST	MALVERN	OH	44644	SEMIANNUAL (JULY)	2021	05/01/2021	\$20.00	-	-	FRIENDS OF JOE BLYSTONE
SHAHAN BONNIE	-	-	9730 KILE ROAD	CHARDON	OH	44024	SEMIANNUAL (JULY)	2021	05/01/2021	\$10.00	-	-	FRIENDS OF JOE BLYSTONE
ZYCHOWSKI HOLIE	-	-	4550 COLINAS DR	MEDINA	OH	44256	SEMIANNUAL (JULY)	2021	05/01/2021	\$50.00	-	PARALEGAL	FRIENDS OF JOE BLYSTONE

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CONTRIBUTIONS RECEIVED 25 OR LESS

SEMIANNUAL (JULY)

2021 05/02/2021

\$2,242.00

-

FRIENDS OF JOE BLYSTONE

AVERS NATALIE

3961 ABIGAIL DR.

LORAIN

OH

44053 SEMIANNUAL (JULY)

2021 05/02/2021

\$51.00

-

FRIENDS OF JOE BLYSTONE

BAER SHELBY

7561 BULLSEYE DRIVE

CANAL WINCHESTER

OH

43110 SEMIANNUAL (JULY)

2021 05/02/2021

\$5.00

-

FRIENDS OF JOE BLYSTONE

CROSBY TAMMY

54060 HIGH RIDGE RD

BELLAIRE

OH

43906 SEMIANNUAL (JULY)

2021 05/02/2021

\$25.00

-

FRIENDS OF JOE BLYSTONE

DREXEL LESLIE

3692 DARBY KNOLLS BLVD

HILLIARD

OH

43026 SEMIANNUAL (JULY)

2021 05/02/2021

\$25.00

-

FRIENDS OF JOE BLYSTONE

DREXEL LESLIE

3692 DARBY KNOLLS BLVD

HILLIARD

OH

43026 SEMIANNUAL (JULY)

2021 05/02/2021

\$75.00

-

FRIENDS OF JOE BLYSTONE

FINSTERBUSCH KIMBERLY

1079 MCCOY DR

PATAKALA

OH

43062 SEMIANNUAL (JULY)

2021 05/02/2021

\$25.00

-

FRIENDS OF JOE BLYSTONE

GINGERICH CHRISTINE

311 14TH STREET NW

CANTON

OH

44703 SEMIANNUAL (JULY)

2021 05/02/2021

\$5.00

-

FRIENDS OF JOE BLYSTONE

JACKSON JAMES

3021 SOUTH COUNTY LINE ROAD

JOHNSTOWN

OH

43031 SEMIANNUAL (JULY)

2021 05/02/2021

\$25.00

-

FRIENDS OF JOE BLYSTONE

JOHNSON KATHY L

11263 CHARDON RD

CHARDON

OH

44024 SEMIANNUAL (JULY)

2021 05/02/2021

\$50.00

-

FRIENDS OF JOE BLYSTONE

LANE JOSHUA

7498 UPPER TWIN ROAD

SOUTH SALEM

OH

45681 SEMIANNUAL (JULY)

2021 05/02/2021

\$26.00

-

FRIENDS OF JOE BLYSTONE

LEMMASTER KAREN	-	5511 SWEET GALE COURT	CANAL WINCHESTER	OH	43110	SEMIANNUAL (JULY)	2021	05/02/2021	\$25.00	-	OWNER	OF JOE BLYSTONE
LUPU PHILLIP	-	199 FLORENCE AVENUE	LOGAN	OH	43138	SEMIANNUAL (JULY)	2021	05/02/2021	\$43.00	-	-	FRIENDS OF JOE BLYSTONE
MCCALLISTER MAC	-	1960 CHEYENNE DR	CIRCLEVILLE	OH	43113	SEMIANNUAL (JULY)	2021	05/02/2021	\$50.00	-	-	FRIENDS OF JOE BLYSTONE
MCDONALD MIKE	-	3986 WILSTON DRIVE	GROVEPORT	OH	43125	SEMIANNUAL (JULY)	2021	05/02/2021	\$22.00	-	-	FRIENDS OF JOE BLYSTONE

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Contributor Name	Contributor Non Individual	Contributing PAC Reg No	Address	City	State	Zip	Report Type	Year	Contribution Date	Amount	Event Date	Employer/Occupation	Committee
FOUCHER STEPHANIE	-	-	8 WABAN ROAD	TIMBERLAKE	OH	44095	SEMIANNUAL (JULY)	2021	04/02/2021	\$300.00	-	CLEVELAND CLINIC	FRIENDS OF JOE BLYSTONE
FOUCHER STEPHANIE	-	-	8 WABAN ROAD	TIMBERLAKE	OH	44095	SEMIANNUAL (JULY)	2021	05/12/2021	\$150.00	-	-	FRIENDS OF JOE BLYSTONE
FOUCHER STEPHANIE	-	-	8 WABAN ROAD	TIMBERLAKE	OH	44095	SEMIANNUAL (JULY)	2021	04/24/2021	\$125.00	-	-	FRIENDS OF JOE BLYSTONE
FOUCHER STEPHANIE	-	-	8 WABAN ROAD	TIMBERLAKE	OH	44095	SEMIANNUAL (JULY)	2021	04/24/2021	\$40.00	-	-	FRIENDS OF JOE BLYSTONE

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Note

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October 21, 2021

My name is Shane Parrino. I volunteered to help my finance, Stephanie Foucher, at Joe Blystone's events on May 1, 2021 at The Plank Road in Montville, Ohio and on May 2, 2021 at Garfield Park in Mentor, Ohio.

Stephanie came prepared with two different binders to document sign sales, money donations and to collect potential volunteer information for the Blystone Campaign. I witnessed Stephanie being instructed by the Blystone's that no record of ledger for donations or sign sales were necessary when Stephanie inquired about it. She was however permitted to collect volunteer information.

I personally witnessed and handled thousands of cash donations over the course of both events. Many donations were well over \$25.00. On May 1st at the Plank Road event I witnessed one man, a friend of Stephanie's family, Mark Probst, purchase two signs for five dollars a piece which the total came to \$10. He handed me \$300 cash for the signs and when I offered him his change he said to keep the remaining \$290 cash as a donation towards the Blystone campaign. This was not documented.

I accepted money and made change from individuals that attended both of these events. Neither cash donations or sign sales were documented at either event.

At the end of both events Jane Blystone grabbed all of the cash out the tins we provided for the event. She placed the cash within her own personal bag from her purse. There was no counting of cash witnessed or ledger made.

Sincerely,



Shane Parrino



AFFIDAVIT

State of Ohio }

County of Clinton }

My name is DIANNE B. GARRETT. I swear and/or affirm, under penalty of perjury, that the attached statement was made upon my personal knowledge and it is true to the best of my belief and understanding.

Respectfully submitted,

Dianne B. Garrett
Signature

10/21/21
Date

Sworn to and subscribed in my presence this 21 day of October, 2021 by

Dianne Garrett
~~Jessica M. Wells~~ [Name of Signer].

Jessica M. Wells
Signature of Notary

Jessica M. Wells
Printed name of Notary



JESSICA M WELLS
Notary Public
State of Ohio
My Comm. Expires
February 18, 2026

Blumberg No. 5205
EXHIBIT
22

(CP 19.2021)

April 11, 2021 - Wilmington, Ohio Fairgrounds
Purchased 1 sign = \$5
Purchased 1 fee = \$20

May 4, 2021 - Nick's Restaurant - Xenia
\$200 check (\$100 down / \$100 signs)

June 6 - Blystone Farm event
\$75 ticket I paid for will
show up on Kelly Tolliver,
as he made the reservation.
I paid Kelly (cash).

June 11, 2021 - ^{Nichols} ~~State~~ Farm - Blanchester
Purchased 1 fee = \$20
Purchased 20 buttons = \$20

July 3, 2021 - Blanchester Festival
sold signs that were printed
by the campaign.

at every event money exchanged hands for donations + merchandise (shirts, signs, buttons, stickers + banners).

Some were checks; most were cash.

I never saw them take any info to record donors. Unless they

sometimes helped. All monies were

given to Jane Blystone + placed in an envelope or bag + then her purse.

When we sold signs, we were never instructed to get donor info. It was not until we were into the campaign that they started referring to money collected as "donations" instead of "sold".

Osanna B. Hallett

P.O. Box 807

Wilmington, OH 45177

614-568-6159

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8023 (04/2020) EXHIBIT 24

CONTRIBUTIONS RECEIVED 25 OR LESS

BEARD PATRICIA	-	-	4245 ANGELS WALK	BATAVIA	OH	45103-7104	SEMIANNUAL (JULY)	2021	06/11/2021	\$1,575.00	-	-	FRIENDS OF JOE BLYSTONE
BLYSTONE JEFFREY	-	-	5241 W LAKE RD APT 1	ERIE	PA	16505	SEMIANNUAL (JULY)	2021	06/11/2021	\$5.00	-	RETIRED	FRIENDS OF JOE BLYSTONE
BUSSINA KEVIN	-	-	3855 MORGAN RD	FAYETTEVILLE	OH	45118	SEMIANNUAL (JULY)	2021	06/11/2021	\$60.00	-	FORD	FRIENDS OF JOE BLYSTONE
CULLER AMANDA	-	-	15 MIAMI AVE	FREDERICKTOWN	OH	43019-8036	SEMIANNUAL (JULY)	2021	06/11/2021	\$15.00	-	43019-8036	FRIENDS OF JOE BLYSTONE
HESELBART ANDREW	-	-	5039 SOUTHWEST BLVD	GROVE CITY	OH	43123	SEMIANNUAL (JULY)	2021	06/11/2021	\$50.00	-	-	FRIENDS OF JOE BLYSTONE
JAMES YVETTE	-	-	5483 SANDALWOOD BOULEVARD	COLUMBUS	OH	43229	SEMIANNUAL (JULY)	2021	06/11/2021	\$50.00	-	COUNSELOR	FRIENDS OF JOE BLYSTONE
LATHAM DOTTE	-	-	PO BOX 304	WINCHESTER	OH	45697	SEMIANNUAL (JULY)	2021	06/11/2021	\$100.00	-	SELF EMPLOYED	FRIENDS OF JOE BLYSTONE
LATHAM DOTTE	-	-	PO BOX 304	WINCHESTER	OH	45697	SEMIANNUAL (JULY)	2021	06/11/2021	\$500.00	-	SELF EMPLOYED	FRIENDS OF JOE BLYSTONE
WILLEY SCOTT	-	-	2077 GLADY RD	FAYETTEVILLE	OH	45118	SEMIANNUAL (JULY)	2021	06/11/2021	\$63.00	-	FARMER	FRIENDS OF JOE BLYSTONE

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AFFIDAVIT

State of Ohio } County of Clermont; My name is JEFF SEIBERT
I swear and/or affirm, under penalty of perjury, that the attached statement was made upon my
personal knowledge and it is true to the best of my belief and understanding.

Respectfully submitted,

Jeff Seibert

Signature

10-21-21

Date

Sworn to and subscribed in my presence this 21st day of October 2021 by
Jeff Seibert [Name of Signer].

Shellie Kay Seip

Signature of Notary

Shellie Kay Seip

Printed name of Notary

(Seal)



SHELLIE KAY SEIP
Notary Public, State of Ohio
My Commission Expires
August 7, 2022

EXHIBIT
25
Blumberg No. 5209

I, Jeff Seibert, worked on Joe Blystone's campaign as a regional director. I attended at least 6 events where I witnessed donations being made for signs, t-shirts, etc. where no information was collected or documented by Joe Blystone and/or his volunteers. Many of the donations received were in excess of \$25. We were always told that if they were small donations there was no need for documentation. That changed later in the campaign. At no time were volunteers instructed to document by Joe Blystone.

I also witnessed an auction July 4th on BB Riverboats where multiple items were auctioned off in excess of \$500. Those donations do not appear on Joe's campaign finance report. In addition, I purchased a \$100 ticket for that event on his web site and that was apparently not reported. They have me down for only \$50, which were an additional two separate donations for shirts and merchandise.

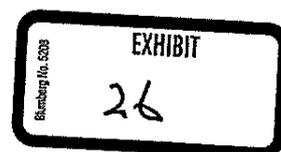
I strongly encourage the Secretary of State, and/or the Ohio Elections commission to investigate Joe Blystone's campaign finance activities and take the proper action.

Signed,



Jeff Seibert
10-18-2021

267 Wood St.
Batavia OH 45703
513-218-0743



AFFIDAVIT

State of Ohio }
County of Clemont }

My name is Tracey Sparks. I swear and/or affirm, under penalty of perjury, that the attached statement was made upon my personal knowledge and it is true to the best of my belief and understanding.

Respectfully submitted,

Tracey Sparks
Signature

10/21/2021
Date

Sworn to and subscribed in my presence this 21st day of October, 2021 by

Tracey Sparks [Name of Signer].

Eleanor Wahoff
Signature of Notary

Eleanor Wahoff
Printed name of Notary

(Seal)



ELEANOR WAHOFF
Notary Public
State of Ohio
My Comm. Expires
April 7, 2026

EXHIBIT
27
Blumberg No. 5206

To: Whom it May Concern
From: Tracey Sparks
Date: October 18, 2021
Re: Blystone Events and Finances

I am writing to inform whomever may be concerned about two events that I attended for the Joe Blystone campaign while I was a volunteer.

The first event was held at Eastgate Holiday Inn on April 27, 2021. This was during a monthly Friends of Liberty United meeting. During this event, the campaign set up a table and had their signs available for sale for \$5 each. They were also taking donations during this event. I personally witnessed Deborah Lee take donations and not record them, but she would have people go to the Blystone website after donations were taken to sign up on the website. I have no idea how this money was recorded.

The second event was run exactly the same way; with a table with signs for \$5 each and donations and a piece of paper that had people go to the website to sign up after the donations were made. I have no idea how this money was recorded. This event was held in Anderson Township in the beginning of May.

Should you need my assistance in any further way, please don't hesitate to reach me.
Thank you sincerely for your time.

Tracey Sparks



513-658-1589



EXHIBIT
29
October 16, 2021

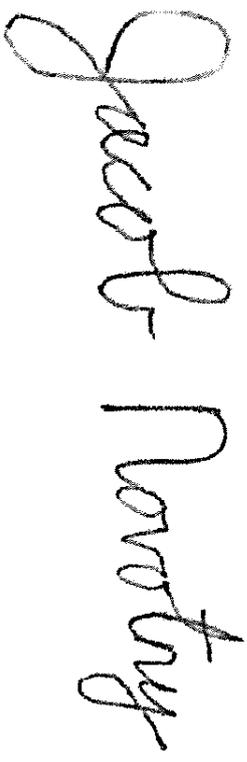
I, Jacob Novotny, attended Joe Blystone's campaign meet and greet at Blendon Woods Metro Park on May 10th, 2021. I personally witnessed the Blystone campaign at the request of Joe Blystone place a bucket at the front of the pavilion after Joe was done speaking and request cash donations. I saw multiple people drop cash in the bucket without the Blystone campaign taking down any information about these donors.

On Friday, August 6th I attended another event at a farm in Knox County. The Blystone campaign was there again taking donations and selling merchandise, and I did not notice anyone filling out a form of donor identification. I am positive there were cash purchases made there.

On August 15th I went to another event in Bellville hosted at the American Legion pavillion which had over 500 attendees. There were cash donations and purchases made there as well, and I did not notice anyone filling out a form of donor identification.

I hereby certify that, to the best of my knowledge, the information above I provided is true and accurate.

With respect,



Jacob Novotny
10/27/2021

Pop Up Kit Contract

This contract serves to identify a transaction between _____, hereafter referred to as "Borrower," and _____, hereafter referred to as "Lender," and to outline the requirements for reimbursement between the two parties.

On _____, the Lender loaned the Borrower _____ pop up kits for the purpose of using to hold a fundraiser event. Each kit holds: 50 signs; 20 shirts; 20 flags; 20 stickers. These items total \$1,070.00.

Terms (Check all that apply):

- The Borrower agrees to leave his or her credit card number with the Lender as collateral until either full payment for each kit is made, or a combination of funds and goods are returned.
- The Borrower will repay the entire debt in one lump sum, or by a combination of funds and goods on or before _____. If Borrower does repay the entire amount by _____, the following will happen: the Lender will charge the Borrowers credit card the full amount of _____ for _____ kits.

Violations

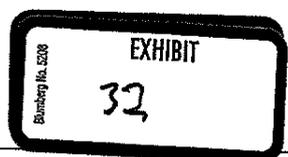
Both parties agree to abide by the specifications outlined in this contract.

If either party violates the terms of this contract, the following consequences will apply: ?????

Borrowers credit card #: _____

Exp Date: _____ CVC/CVV #: _____





My name is Shawna Sundberg and I worked on the Blystone campaign from March 2021 - July 2021. I attended over a dozen events where I witnessed campaign volunteers, including Joe, accepting campaign contributions in excess of \$25 without requesting or accepting the donors information. I did question this and was told we didn't need to collect any information from people if amount was under \$25. I also witnessed many people give \$50, \$100 and more in cash without any documentation being taken from volunteers.

I personally donated \$140 in cash (for campaign gear) to Joe Blystone and the donation was not reported on his campaign finance report. I also bought shirts off of Joe Blystones' Bonfire online store and that was not recorded on the finance report either. I have attached photos of my bank statements proving this.

I strongly suggest the Ohio Secretary of State launch an investigation into this activity immediately.

Shawna Sundberg
10/27/2021

Shawna Sundberg
10/27/2021

PINNACLE BANK
PO BOX 147
FORT LUPTON CO 80621-0147

016 00007 01
ACCOUNT:
DOCUMENTS:

XXXXXX2227
3

PAGE: 6
04/20/2021

TELEPHONE:111-111-1111

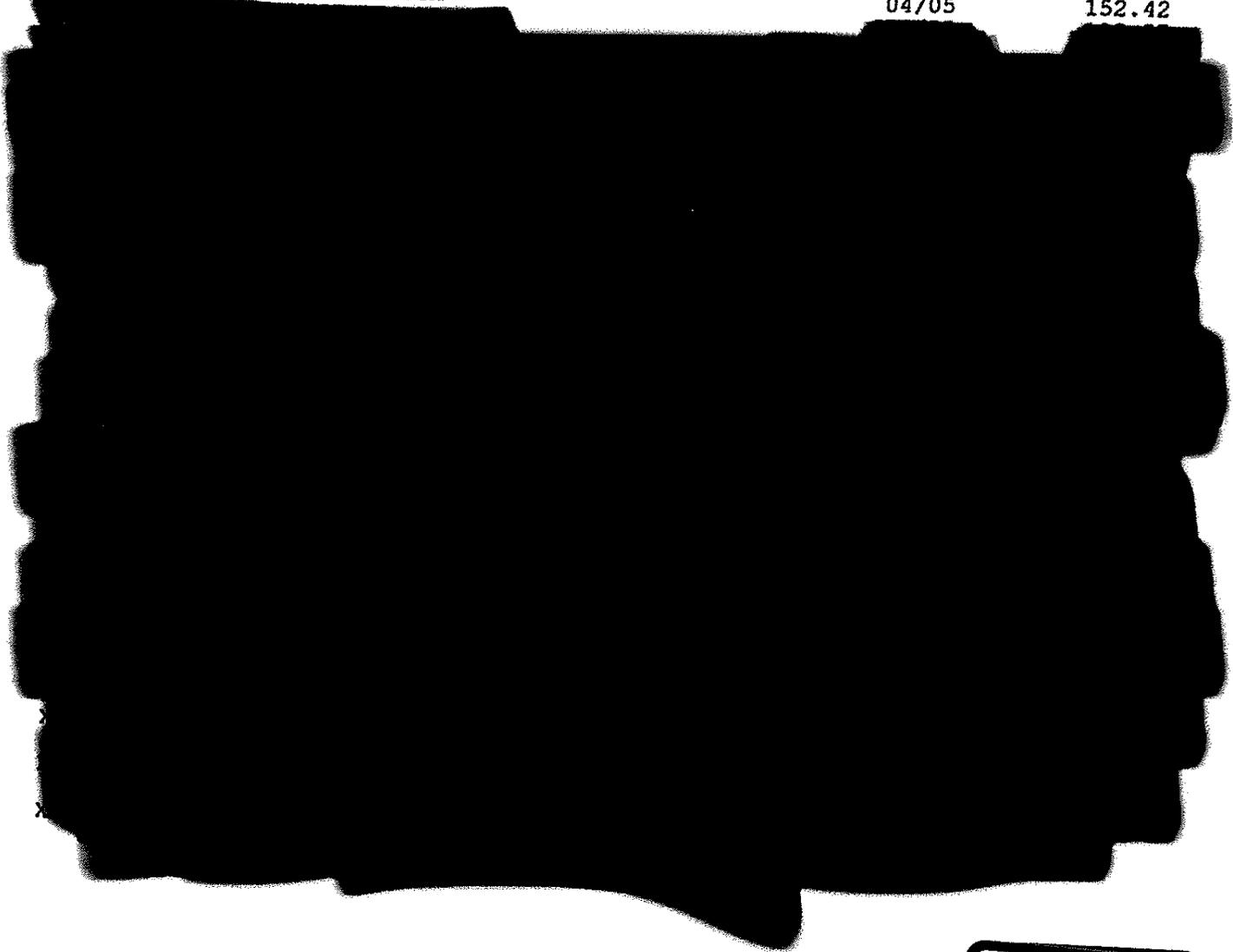
RYAN C SUNDBERG
SHAWNA J SUNDBERG

=====

PINNCHECK FREE ACCOUNT XXXXXX2227

=====

DESCRIPTION	----- OTHER DEBITS -----	DATE	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
PAYPAL INST XFER BONFIRE COM		04/05	152.42



Bainberg No. 5208
EXHIBIT
33

PINNCHECK FREE ACCOUNT XXXXXX2227

DESCRIPTION OF TRANSACTION AMOUNT

[REDACTED]

PAYPAL INST XFER BONFIRE COM 04/05 33.15
PAYPAL INST XFER BONFIRE COM 04/05 35.29

[REDACTED]

EXHIBIT
34
Blanchard Inc. 6208

You don't have any sales yet. After you get your first one, they will appear here.

My orders

[Start new](#)

RECENT ORDERS

Blystone Bling #3
Apr 2, 2021

**Delivered Apr 12,
2021**

1 item

[Track](#)

Blystone Bling #7
Apr 2, 2021

**Delivered Apr 13,
2021**

5 items

[Track](#)

Blystone Bling #6
Apr 2, 2021

**Delivered Apr 15,
2021**

1 item



10/25/2021

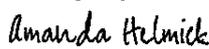
To whom it may concern:

I Amanda Helmick volunteered on Joe Blystone's campaign for Governor. I attended multiple events where I witnessed Joe Blystone's volunteers collect cash donations, many of which exceeded \$25 and even \$100, without documenting the donor. One event I attended in Strongsville on May 15th I was the volunteer designated to collect donations. The event was the GOP Summit and Joe Blystone had a table set up. I brought my laptop and offered to document donors names, addresses, and any other info that may be needed but was specifically told not to. I was also instructed not to count the total of cash donations by Joe Blystone's campaign staffer Deborah Lee.

Most of the of the donations that day were in excess of \$25. None of the names of donors were recorded because I was instructed not to. I was told however that I was permitted to write down the names of individuals who would like to volunteer.

At the end of the event, I witnessed Deborah Lee take the cash donations and place them in a green money bag, then placing them in her purse before leaving. This activity and many other major character flaws on behalf of Joanna(ex-running mate) and Joe himself, raised many red flags for me and contributed to me leaving the campaign. There was an underlying element of shadiness and untrustworthiness to the campaign that I could never place my finger on. I have come to learn that this is due to the fact that how the money was handled had a lot to this gut feeling I had. I strongly encourage the Ohio Elections Commission and the Ohio Secretary of State to investigate these many incidents.

Amanda Helmick
3021 Rowland Ave NE
Canton OH 44714

DocuSigned by:

739CCE4AADD04D6...



Committee	Cover Page	Contributions	Expenditures
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Search Results For Candidate Committee Contribution Details

[Back](#)

Contributor Name ↑ Contributor Non Individual Contributing PAC Reg No Address City State Zip Report Type Year Contribution Date Amount Event Date Employer/Occupation



CONTRIBUTIONS RECEIVED 25 OR LESS

BOSSON BECKI			2565 AIKIN CIRCLE NORTH	LEWIS CENTER	OH	43035	SEMIANNUAL (JULY)	2021	05/10/2021	\$1,565.00	-		FRIENDS OF JOE BLYSTONE
BURTON ANDREW			1946 MILLSBORO ROAD	MANSFIELD	OH	44906	SEMIANNUAL (JULY)	2021	05/10/2021	\$500.00	-		FRIENDS OF JOE BLYSTONE
CATON JAMIE			857 HEATHER CT	VANDALIA	OH	45377	SEMIANNUAL (JULY)	2021	05/10/2021	\$10.00	-		FRIENDS OF JOE BLYSTONE
CHAPLINE BOB			1321 GENESEE AVENUE	MAYFIELD HEIGHTS	OH	44124	SEMIANNUAL (JULY)	2021	05/10/2021	\$20.00	-		FRIENDS OF JOE BLYSTONE
COTTRELL NANETTE			1145 CHEYENNE AVE	SPRINGFIELD	OH	45503	SEMIANNUAL (JULY)	2021	05/10/2021	\$100.00	-		FRIENDS OF JOE BLYSTONE
DONLEY LORA			4534 MILLBROOK ROAD	WOOSTER	OH	44691	SEMIANNUAL (JULY)	2021	05/10/2021	\$20.00	-		FRIENDS OF JOE BLYSTONE
NOVOTNY JACOB			3311 COUNTY ROAD 180	FREDERICKTOWN	OH	43019	SEMIANNUAL (JULY)	2021	05/10/2021	\$35.00	-		FRIENDS OF JOE BLYSTONE
PENNELL KATHY			12898 PORTAGE ST	DOYLESTOWN	OH	44230	SEMIANNUAL (JULY)	2021	05/10/2021	\$10.00	-		FRIENDS OF JOE BLYSTONE
PENNELL KATHY			12898 PORTAGE ST	DOYLESTOWN	OH	44230	SEMIANNUAL (JULY)	2021	05/10/2021	\$10.00	-		FRIENDS OF JOE BLYSTONE
PENNELL KATHY			12898 PORTAGE ST	DOYLESTOWN	OH	44230	SEMIANNUAL (JULY)	2021	05/10/2021	\$10.00	-		FRIENDS OF JOE BLYSTONE

**MINUTES
OF
THE OHIO ELECTIONS COMMISSION**
Meeting of December 16, 2021

The Ohio Elections Commission came to order at 9:00 A.M. on Thursday, December 16, 2021, in Room 1948 on the nineteenth floor of the Riffe Center, located at 77 South High St., Columbus, Ohio and all members of the Commission were present.

MEMBERS PRESENT

D. Michael Crites, Chair
Otto Beatty, Vice Chair
Dennis B. Brommer
Catherine A. Cunningham
Natasha Kaufman
Scott Norman
Charleta B. Tavares

STAFF PRESENT

Philip C. Richter, Staff Attorney
Christopher Hughes, Administrative Assistant

Chair Crites called the meeting to order. After a roll call vote, all members of the Commission were present. Mr. Norman then moved approval of the minutes of the meeting of December 2, 2021. Mr. Brommer seconded the motion. The motion passed 6 – 0. Mr. Norman then moved approval of the minutes of the meeting of December 7, 2021. Ms. Tavares seconded the motion. The motion passed 5 – 0.

PRELIMINARY REVIEW

Cross v. Nunnari (Case No. 2021G-019). Mr. Richter introduced the case to the Commission. He described the allegations contained in the complaint and explained that the Commission had received a response from the counsel to the respondent. Mr. Richter described the response that was received and indicated that he had circulated all of the materials to the members for their consideration. Mr. Richter explained the basis for his recommendation to find no violation and to dismiss the complaint. Mr. Norman moved to accept Mr. Richter's recommendation to find no violation and dismiss. Ms. Cunningham seconded the motion. The motion passed 7 – 0.

Hord v. End Corruption PAC, et al. (Case No. 2021G-021). Mr. Richter introduced the case to the Commission. He stated that only one of the respondents were confirmed as being properly served but stated that his recommendation was to find a violation as alleged in the complaint and impose a fine of \$25/day with reconsideration option. Commission members questioned Mr. Richter as to the status of service and its impact on a finding in the case. At the conclusion of the conversation, Ms. Cunningham moved to continue the matter for service. Ms. Tavares seconded the motion. The motion passed 7 – 0.

Chambers v. Blystone, et al. (Case No. 2021G-022). Mr. Richter introduced the case to the Commission. He described the allegations contained in the complaint and explained to the Commission that a response from counsel for the respondent had been received along with an affidavit from the treasurer for the respondent campaign committee. He stated his recommendation to set the matter for hearing and informed the Commission that counsel for both parties were present. Scott Pullins, counsel for the complainant was introduced and addressed the Commission. Joshua Brown, counsel for the respondent was present and made a lengthy statement to the Commission. At the conclusion of the statements to the Commission, Mr. Richter was asked whether the presentations had changed his recommendation. Mr. Richter indicated that they had not. Mr. Norman then moved to accept Mr. Richter's recommendation to set the matter for hearing. Mr. Beatty seconded the motion. The motion passed 7 – 0.

Culp, et al. v. Brent, et al. (Case No. 2021D-025). Mr. Richter introduced the case to the Commission. He described the allegations contained in the complaint that the respondent failed

to include a proper disclaimer on certain campaign materials. He informed the Commission that a response had been received that explained that the candidate was confused as he had filed the waiver allowed by statute and that as a write-in candidate was confused by the statutory provisions that spoke to 'candidates that appear on a ballot', as his name did not appear on a ballot. Mr. Richter stated his recommendation that the Commission find a violation as alleged in the complaint but to find that good cause is present not to impose a fine or refer the matter for further prosecution. Mr. Norman then moved to accept Mr. Richter's recommendation to find a violation but for good cause not impose a fine or refer the matter for further prosecution. Ms. Kaufman seconded the motion. The motion passed 7 – 0.

Gillespie v. Citizens to Elect Wayne Bryan, et al. (Case No. 2021D-026). Mr. Richter introduced the case to the Commission. He described the allegations contained in the complaint that the respondents failed to include a proper disclaimer on certain campaign signs. Mr. Richter outlined the responses that the Commission had received. A response was received from each of the candidates as well as from Kathleen Walsh. Ms. Walsh informed the Commission that she had paid for the signs that were at issue in the complaint and not the candidates. The candidate's statements also confirmed this statement. Mr. Richter recommended that the Commission find no violation. Nancy Gillespie was present, sworn and briefly addressed the Commission as to the basis for her filing the complaint. The Commission expressed their appreciation for her efforts. Mr. Norman then moved to accept Mr. Richter's recommendation to find no violation. Ms. Kaufman seconded the motion. The motion passed 7 – 0.

GROUP CONSIDERATIONS

Mark J. Tekulve, et al. (Case No. 2021R-349). Mr. Richter introduced the case to the Commission and stated that his recommendation was to find a violation but for good cause not to impose a fine or refer the matter for further prosecution. Mark Tekulve, was present, sworn and made a statement to the Commission. Mr. Norman moved to accept Mr. Richter's recommendation to find a violation but for good cause not to impose a fine or refer the matter for further prosecution. Mr. Brommer seconded the motion. The motion passed 7 – 0.

Louis N. Carouse, Jr., et al. (Case No. 2021R-338). Mr. Richter introduced the case to the Commission and stated that his recommendation was to find a violation and impose a fine of \$300. Raymond Weiss, Jr., treasurer for the committee was present, sworn and made a statement to the Commission. Commission members asked questions of Mr. Weiss and Mr. Richter concerning the status of the filings and whether this referral was similar to the immediate prior matter addressed by the Commission. At the conclusion of the question and answer period, Mr. Norman moved to find a violation but for good cause not to impose a fine or refer the matter for further prosecution. Ms. Cunningham seconded the motion. The motion passed 7 – 0.

Friends of Marion DD, et al. (Case No. 2021R-371). Mr. Richter introduced the case to the Commission and stated that his recommendation was to find a violation and impose a fine of \$100. Jean Obenauer, treasurer for the committee was present, sworn and made a statement to the Commission. Commission members asked questions of Ms. Obenauer and Mr. Richter. At the conclusion of the question and answer period, Mr. Norman moved to find a violation and impose a fine of \$50. Mr. Beatty seconded the motion. The motion passed 7 – 0.

Tara Dyer, et al. (Case No. 2021R-372). Mr. Richter introduced the case to the Commission and stated that his recommendation was to find a violation and impose a fine of \$25\day with reconsideration option. Mr. Richter explained that the respondent, Tara Dyer, was present if the Commission wanted to hear from her. Ms. Dyer was sworn and made a statement to the Commission. Commission members asked questions of Ms. Dyer. At the conclusion of the question and answer period, Mr. Norman moved to find a violation but for good cause not to impose a fine or refer the matter for further prosecution. Ms. Cunningham seconded the motion. The motion passed 7 – 0.

Mr. Richter advised the Commission that the following cases had filed the required reports with the appropriate filing office and an affidavit of response with the Commission, were in compliance and recommended that the Commission find a violation but for good cause shown not impose a fine or refer a matter for further prosecution. Ms. Tavares moved to find one or more violation(s) of Ohio campaign finance law(s) in the following cases but for good cause shown not impose a fine or refer a matter for further prosecution: 2021R-348, 2021R-352, 2021R-354, 2021R-357, 2021R-358, 2021R-363, 2021R-364, 2021R-367 and 2021R-369. Mr. Brommer seconded. The motion passed 7 – 0.

Zachary Wallick, et al. (Case Nos. 2021R-346 & 2021R-347). Mr. Richter introduced the cases to the Commission and stated that his recommendation was to consolidate the two cases, find a violation but for good cause shown not impose a fine or refer a matter for further prosecution. Mr. Richter explained the circumstances of the case and the explanation provided by the respondent. At the conclusion of the explanation, Mr. Norman moved to find a violation but for good cause not to impose a fine or refer the matter for further prosecution. Ms. Kaufman seconded the motion. The motion passed 7 – 0.

Mr. Richter recommended that the Commission find a violation in Case Nos. 2021R-340, 2021R-351, 2021R-353, 2021R-359, 2021R-360, 2021R-362, 2021R-368, 2021R-376, 2021R-377 and 2021R-378 and impose a fine of \$50. Ms. Kaufman moved to accept Mr. Richter's recommendation. Mr. Beatty seconded the motion. The motion passed 7 – 0.

Mr. Richter recommended that the Commission find a violation in Case Nos. 2021R-334, 2021R-366 and 2021R-375 and impose a fine of \$100. Mr. Norman moved to accept Mr. Richter's recommendation. Ms. Cunningham seconded the motion. The motion passed 7 – 0.

Marlene J. Ridenour, et al. (Case No. 2021R-342). Mr. Richter introduced the case to the Commission and stated that his recommendation was to reconsider all outstanding matters, vacate the previous impositions of the per diem fines, consolidate the outstanding cases with Case No. 2021R-342, find a violation and impose a fine of \$200. Mr. Richter explained that the respondent had submitted a request for reconsideration with the Commission along with a check for \$250, as one of the prior matters had directed. He discussed the information included in the reconsideration request and explained the basis for his recommendation. He explained that the fine he was recommending was in addition to the amount already received. Commission members asked questions of Mr. Richter. Mr. Brommer moved to accept Mr. Richter's recommendation and to impose a fine of \$200 as indicated. Mr. Norman seconded the motion. The motion passed 7 – 0.

Kyle E. Henline, et al. (Case No. 2021R-361). Mr. Richter introduced the case to the Commission and stated that his recommendation was to consolidate this case with Case No. 2020R-339, find a violation and impose a fine of \$200. Mr. Richter explained the basis for his recommendation. Mr. Norman moved to accept Mr. Richter's recommendation and to impose a fine of \$200 as indicated. Ms. Kaufman seconded the motion. The motion passed 7 – 0.

Lee Barbee, et al. (Case No. 2021R-336). Mr. Richter introduced the case to the Commission and stated that his recommendation was to consolidate this case with Case No. 2021R-086, find a violation and impose a fine of \$25 per day commencing on the date the reports were due and continuing until such time as the reports are filed. Mr. Richter further recommended that the Commission may reconsider the matter if the reports are filed with the appropriate filing office and properly notarized affidavit are received by the Commission within 30 days of notification of the disposition. Mr. Norman moved to accept Mr. Richter's recommendation. Mr. Brommer seconded the motion. The motion passed 7 – 0.

Demaine Kitchen, et al. (Case No. 2021R-335). Mr. Richter introduced the case to the Commission and stated that his recommendation was to find a violation and impose a fine of \$25 per day commencing on the date the reports were due and continuing until such time as the reports are filed. Mr. Richter further recommended that the Commission may reconsider the matter if the reports are filed with the appropriate filing office and properly notarized affidavit are received by the Commission within 30 days of notification of the disposition. Mr. Norman moved to accept Mr. Richter's recommendation. Ms. Tavares seconded the motion. The motion passed 7 – 0.

Chair Crites continued Case Nos. 2021R-330, 2021R-331, 2021R-332, 2021R-333, 2021R-337, 2021R-339, 2021R-341, 2021R-343, 2021R-343, 2021R-344, 2021R-345, 2021R-350, 2021R-355, 2021R-356, 2021R-365, 2021R-370, 2021R-373, 2021R-374, 2021R-379 and 2021R-380.

HEARING

Hicks v. Freeman, et al. (Case No. 2020G-019). Chair Crites recused himself from consideration of the matter and exited the meeting room. Mr. Richter reviewed the circumstances of the case to this point and provided an overview of the Decision and Finding that he had written and circulated to the Commission members involved in this case for their consideration. He indicated that certain changes had been made from the original draft, some of which were the result of a review for typographical errors and other minor items that Mr. Hughes had performed. Mr. Richter informed the Commission that a Motion to Dismiss had been received from Donald Brey, counsel for the respondent that indicated that a termination report for the respondent committee had been submitted to the office of the Secretary of State. Commission members offered comment on the Decision and Finding and the Motion. All members and Mr. Richter indicated that they believed that the hearing had been concluded at the Commission's meeting of November 18, 2021, deliberations had been held and concluded on December 7, 2021 and that there was no reason to address any additional matters as the case had been concluded and submitted for final determination. Commission members offered additional comment, after which Mr. Norman moved to adopt the Decision and Finding as written and circulated. Mr. Brommer seconded the motion. After a roll call vote, the motion passed 6 – 0 (Chair Crites recused).

Chair Crites rejoined the meeting at this time.

ADVISORY OPINIONS

Donald McTigue, legal counsel who submitted the advisory opinion request which the Commission was considering as Advisory Opinion 2021ELC-06, was present and briefly addressed the Commission. Mr. Richter expressed concern regarding how the Commission would take the opinions under consideration. Commission members first addressed Mr. Richter's concerns and then discussed Advisory Opinion 2021ELC-06 with Mr. McTigue. Questions were asked of Mr. Richter who offered an explanation for the basis of the opinion. Mr. McTigue indicated there may be follow up questions and stated that he and Mr. Richter had discussed the opinion and that he had offered some additional comments. At the conclusion of this consideration, the Commission members indicated that they would address the other pending opinions.

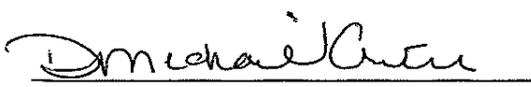
Mr. Richter then introduced Advisory Opinions 2021ELC-03, 2021ELC-04 and 2021ELC-05 to Commission members. He briefly offered an explanation as to how the issues were presented to the Commission and the approach that he had taken in writing the opinions. Mr. Richter responded to questions from Commission members and the members offered comment on the respective opinions.

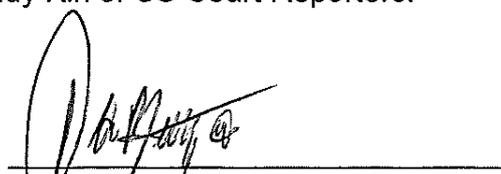
At the conclusion of the discussion period, Ms. Tavares moved to approve Ohio Elections Commission Advisory Opinions 2021ELC-03, 2021ELC-04, 2021ELC-05 and 2021ELC-06. Ms. Kaufman seconded the motion to approve the opinions. The motion passed 7 – 0.

Ms. Tavares moved to adjourn the meeting. Ms. Kaufman seconded the motion. The motion passed 7 – 0.

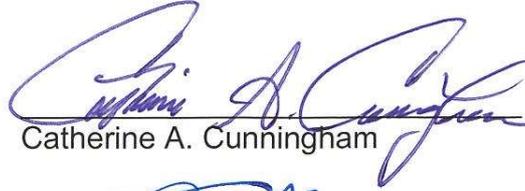
The court reporter for today's meeting was Sandy Kin of US Court Reporters.

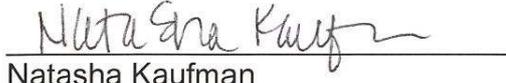
APPROVED:


D. Michael Crites, Chair


Otto Beatty III, Vice Chair


Dennis B. Brommer


Catherine A. Cunningham


Natasha Kaufman


Scott Norman


Charleta B. Tavares

RE: Blystone Complaints

From : Philip Richter <Philip.Richter@elc.state.oh.us> Fri, Apr 08, 2022 04:05 PM
Subject : RE: Blystone Complaints 📎 2 attachments
To : hartmanlawfirm@fuse.net
Cc : Joshua Brown <josh@joshbrownesq.com>, Chris Hughes
<Chris.Hughes@elc.state.oh.us>

Mr. Hartman:

Attached are the Case Determinations that I have prepared for the 2 Blystone cases for which you have requested expedited consideration.

After reviewing the complaints, and in concert with longstanding Commission consideration of such requests, I have recommended that the cases not be expedited and so, with the assent of the Commission, the cases will not receive an expedited Probable Cause Panel review. The cases will be addressed at a Preliminary Review of the Commission currently scheduled for May 19, 2022. Preliminary Review notices will be sent to parties and counsel on Monday.

Along with sending this reply to your e-mail, I am including a 'cc' to Joshua Brown who is counsel for the respondents in this case to assure that he is informed of the Commission's decision and the status of the case.

Philip C. Richter, Esq.
Executive Director\Staff Attorney
Ohio Elections Commission

From: hartmanlawfirm@fuse.net <hartmanlawfirm@fuse.net>
Sent: Friday, April 8, 2022 3:37 PM
To: Richter, Philip <Philip.Richter@elc.state.oh.us>
Subject: Blystone Complaints

Case Nos. 2022G-012 & 202G-013

Phil -

Following up on our conversation of yesterday on the above-referenced complaints to see if you are going to schedule the expedited probable cause hearing?

Thanks,
Curt

CAUTION: This is an external email and may not be safe. If the email looks suspicious,

Exhibit D

please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

 **Determination2022G-012.pdf**
122 KB

 **Determination2022G-013.pdf**
122 KB

Ohio Elections Commission Case Determination

After request by the Complainant seeking expedited consideration of the matter in Case No. 2022G-012, and upon review of the complaint containing the request for expedited determination, Staff Attorney for the Ohio Elections Commission has determined that the complaint does not set forth a basis for automatic expedited hearing as set forth in R.C. §3517.154(A)(1). Therefore, pursuant to O.A.C. §3517-1-02(A)(3), which rule expands on the provisions of R.C. §3517.154(A) and holds that Staff Attorney “(f)or all other complaints filed with the commission, ... shall make a timely recommendation to the commission as to the disposition of the complaint”, Staff Attorney hereby recommends that the Commission deny the request for an expedited hearing on the case.

This recommendation is consistent with the Commission’s longstanding direction to its Staff Attorney that only complaints that conform with the ‘automatic expedited hearing’ provision contained in R.C. §3517.154(A)(1) shall receive expedited consideration. Further, as the essential basis for this complaint is due to alleged omissions by the respondents as contained in their submissions pursuant to R.C. §3517.10, and stem from failure to comply with Ohio’s campaign finance filing statutes, which are subject to the provisions R.C. §3517.154(A)(2)(c), complainant has not established a proper basis for expedited consideration.

Staff Attorney believes that this matter is more suitable for consideration before the entire Commission for a complete review of the issues in this case and it will be set for preliminary review before the full Commission in the normal course of business on Thursday, May 19, 2022. Therefore, this case shall not receive an automatic expedited hearing before a Probable Cause panel of the Commission.

For all of the reasons stated, and with the concurrence of the Commission, Staff Attorney to the Ohio Elections Commission determines that the complaint shall not receive expedited review.

Dated: April 8, 2022

Philip C. Richter

Philip C. Richter, Esq.
Staff Attorney

Exhibit E-1

Ohio Elections Commission Case Determination

After request by the Complainant seeking expedited consideration of the matter in Case No. 2022G-013, and upon review of the complaint containing the request for expedited determination, Staff Attorney for the Ohio Elections Commission has determined that the complaint does not set forth a basis for automatic expedited hearing as set forth in R.C. §3517.154(A)(1). Therefore, pursuant to O.A.C. §3517-1-02(A)(3), which rule expands on the provisions of R.C. §3517.154(A) and holds that Staff Attorney “(f)or all other complaints filed with the commission, ... shall make a timely recommendation to the commission as to the disposition of the complaint”, Staff Attorney hereby recommends that the Commission deny the request for an expedited hearing on the case.

This recommendation is consistent with the Commission’s longstanding direction to its Staff Attorney that only complaints that conform with the ‘automatic expedited hearing’ provision contained in R.C. §3517.154(A)(1) shall receive expedited consideration. Further, as the essential basis for this complaint is due to alleged omissions by the respondents as contained in their submissions pursuant to R.C. §3517.10, and stem from failure to comply with Ohio’s campaign finance filing statutes, which are subject to the provisions R.C. §3517.154(A)(2)(c), complainant has not established a proper basis for expedited consideration.

Staff Attorney believes that this matter is more suitable for consideration before the entire Commission for a complete review of the issues in this case and it will be set for preliminary review before the full Commission in the normal course of business on Thursday, May 19, 2022. Therefore, this case shall not receive an automatic expedited hearing before a Probable Cause panel of the Commission.

For all of the reasons stated, and with the concurrence of the Commission, Staff Attorney to the Ohio Elections Commission determines that the complaint shall not receive expedited review.

Dated: April 8, 2022

Philip C. Richter

Philip C. Richter, Esq.
Staff Attorney

Ohio Secretary of State Public Records Request

From : Hetrick, Leah <lhetrick@OhioSOS.Gov>
Subject : Ohio Secretary of State Public Records Request
To : hartmanlawfirm@fuse.net

Tue, Mar 01, 2022 12:41 PM

 16 attachments

Mr. Hartman,

This email is to respond to your request for public records, which was received by this office on February 15, 2022. Specifically, you have requested:

“all receipts and/or supporting document of expenditures filed by Friends of Joe Blystone campaign committee with respect the following campaign finance reports: (i) the 2021 Semi-Annual Report (filed in or about July 2021); and (ii) the 2021 Annual Report (filed in January 2022).”

Regarding your request for “the 2021 Annual Report (filed in January 2022),” I have inquired within our office and determined that there are no records responsive to this request.

As for your request for “the 2021 Semi-Annual Report (filed in or about July 2021),” attached are the records I believe to be responsive to this request. I have redacted the personal, non-record information in accordance with R.C. § 149.43 and 149.45 respectively.

Sincerely,



Leah Hetrick | Assistant Chief Legal Counsel

Office of the Ohio Secretary of State

O: 614.728.9505

OhioSoS.gov

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