

BEFORE THE OHIO ELECTIONS COMMISSION

In the Matter of:

**Terry Casey
249 Overbrook Drive
Columbus, OH 43214-3122
(614) 261-6825,**

**Kasich/Taylor for Ohio
211 S. Fifth Street
Columbus, OH 43215,**

**John Kasich
Governor
77 S. High Street, 30th Floor
Columbus, OH 43215
(614) 466-3555,**

**Mary Taylor
Lieutenant Governor
77 S. High Street, 30th Floor
Columbus, OH 43215
(614) 466-3555,**

**Matt Carle
Kasich/Taylor for Ohio
Campaign Director
211 S. Fifth Street
Columbus, OH 43215,**

**Jeff Polesovsky
Kasich/Taylor for Ohio
211 S. Fifth Street
Columbus, OH 43215,**

and

**Dave Luketic
Kasich/Taylor for Ohio
211 S. Fifth Street
Columbus, OH 43215,**

Defendants.

**COMPLAINT
FILED BY CHARLES EARL
10232 Middleton Pike
Bowling Green, Ohio 43402
(419) 801-4040**

SUMMARY

The Complainant, Charles Earl, was the Libertarian Party of Ohio (LPO) candidate for Governor in 2014. Earl filed a sufficient number of signatures in early February of 2014 in order to run, unopposed, in the LPO primary. Had he appeared on that election ballot, a single vote would have insured his place as the LPO candidate for Governor on Ohio's 2014 general election ballot in November.

Earl, however, would not appear on the LPO primary ballot. Nor would he or any other LPO gubernatorial candidate appear on the November 2014 general election ballot in Ohio. On February 21, 2014, Earl was protested by a nominal member of the LPO, a gentleman by the name of Gregory Felsoci. Felsoci, through his lawyers (Zeiger, Tigges & Little), successfully argued that a circulator (Oscar Hatchett) responsible for collecting the bulk of Earl's signatures failed to report on his part-petitions that he was paid by the LPO. Earl and the LPO freely admitted that Hatchett had been paid. They argued, however, that Ohio law only requires that circulators of part-petitions identify their "employers." Hatchett was not employed by Earl, the LPO or anyone else. He was an independent contractor.

In the end, the administrative hearing officer, Bradley Smith, and the Secretary of State, Jon Husted, rejected Earl's defense. He was removed from the ballot on March 7, 2014. Earl that same day proceeded to federal court, where he and the LPO challenged the Secretary's decision. In particular, Earl argued that the Secretary's interpretation of Ohio's "employer statement" rule was not only too novel to be applied to him under the Due Process Clause, it also violated the First Amendment. Felsoci, meanwhile, formally intervened in the federal proceeding to defend Earl's removal.

Felsoci did not disclose at the administrative hearing that Terry Casey, Ohio's chair of the State Personnel Review Board and long-time advisor of Governor Kasich, and the Kasich Campaign for Governor itself were behind his protest. Nor did he, Casey or their shared lawyers disclose this information to the federal court, even though the information was plainly relevant to Earl's constitutional claims. If Felsoci were being financed by a government official, after all, that state actor's conduct might independently violate the First Amendment. Consequently, Earl demanded to know who was paying Felsoci's lawyers.

The federal court agreed with Earl; indeed, the court point-blank asked Felsoci's lawyers on March 17, 2014 who was paying them. Felsoci's lawyers refused to answer the question. Nor did they disclose the identity of their self-styled "confidential client" (Terry Casey) to their named client, Gregory Felsoci.

It took several months and two court orders for Earl to unravel the mystery. After ordering Felsoci to sit for a deposition, where he continued to plead ignorance, the court on August 12, 2014 ordered Felsoci's lawyers to disclose who was paying them. Felsoci's lawyers on August 15, 2014 revealed that Terry Casey was Felsoci's benefactor.

Earl deposed Casey on August 28, 2014. To Earl's surprise, Casey testified that no one else was involved with his plan to locate an LPO member, turn him into a protestor, and have

Earl removed from the ballot. Moreover, Casey claimed that he alone was responsible for paying the Zeiger law firm. He would have to "raise" the money, of course, but he had not thought about who he would ask. The Kasich campaign played no part.

On September 26, 2014, three days before Earl's renewed preliminary injunction hearing in federal court, Felsoci's and Casey's lawyers belatedly produced documents that proved Casey had not acted alone. Indeed, the Kasich Campaign was fully behind Felsoci's protest and Earl's removal. These documents, more than a dozen e-mails between Casey and three high-ranking Kasich Campaign agents (Matt Carle, Kasich's Campaign Manager, Jeff Polesovsky, Kasich's Deputy Campaign Manager, and Dave Luketic) over a four-day period, established that the Kasich Campaign had been deeply involved in Casey's plan as early as February 17, 2014 (four days before the protest was filed).

Because the e-mails were only produced on the eve of trial (even though Earl had been seeking them for several months), Earl did not have the luxury of deposing Carle, Polesovsky and Luketic. Still, the e-mails speak for themselves. Carle, Luketic and Polesovsky were, in fact, responsible for obtaining from the Secretary Earl's part-petitions and studying them for defects. They searched for and located Felsoci. They commissioned Casey to coordinate the effort, pay the lawyers, and 'front' the plan. Felsoci's protest was a coordinated joint venture between the Kasich Campaign and Casey.

Earl's removal from the ballot was important to Kasich. Governor Kasich wanted to harvest Earl's votes. News reports projected that Earl could carry 8% or 10% of the vote. Without Earl on the ballot, Kasich's electoral chances improved markedly. As it turned out, of course, the Democratic candidate imploded and Kasich won handily; but this did not occur until well-after Earl was removed from the ballot.

Earl has uncovered invoices indicating that Casey owes the Zeiger law firm more than \$250,000 for their services. Because the protest of Earl was a coordinated activity between Casey and the Kasich Campaign, Casey's efforts and agreement to pay Felsoci's lawyers' fees constitute an "in kind" contribution to the Kasich Campaign. The Kasich Campaign should have reported the contribution. Moreover, the Kasich Campaign should not have accepted the contribution; it exceeds Casey's contribution limit by at least \$240,000.

Casey and the Kasich Campaign should each be fined three times the amount Casey's "in kind" contribution exceeds Casey's permissible contribution limit. The Kasich Campaign, moreover, should be fined for failing to report the "in-kind" contribution and for actively concealing it. Further investigation by the Commission is warranted to determine if Casey's and the Kasich Campaign's joint venture violated any other campaign finance laws. Penalties should be determined accordingly.

DOCUMENTED FACTS

1. The complainant, Charles Earl, was the Libertarian Party of Ohio (LPO) candidate for governor. *See Libertarian Party of Ohio v. Husted*, 751 F.3d 403 (6th Cir. 2014) (describing facts behind Felsoci's challenge of Earl); Plaintiffs' Third Amended Complaint, *Libertarian Party of Ohio v. Husted*, No. 13-953 (filed Sept. 11, 2014), Doc. No. 188 (hereinafter "Third Amended Complaint") (attached as Exhibit A).
2. Earl submitted a sufficient number of signatures to appear on the May 2014 primary ballot and was duly certified by Ohio's Secretary of State, Jon Husted. *Id.*
3. Not long after being certified as a qualified candidate, Earl was "protested" by Gregory Felsoci, a nominal member of the LPO, on February 21, 2014. *See* Protest of Earl Filed By Gregory Felsoci with Secretary of State, Feb. 21, 2014 (attached as Exhibit B).
4. Felsoci, who was represented by the law firm of Zeiger, Tigges & Little, argued in his formal protest that one of Earl's signature-collectors, Oscar Hatchett, Jr., had been paid to gather signatures. *Id.*
5. Because Hatchett did not identify his "employer" on each of the petitions he submitted, Felsoci argued, all of the petitions and all of the otherwise legitimate signatures they contained were invalid. *Id.*
6. Without these signatures, Felsoci argued, Earl could not qualify for the 2014 primary ballot in Ohio. *Id.*
7. An administrative hearing was held before a hearing officer, Bradley Smith (former chair of the Federal Elections Commission and a Professor of Law at Capital University), who was specially appointed by Secretary Husted, on March 4, 2014.
8. Earl and the LPO freely admitted that the LPO had paid Hatchett; the LPO had also properly disclosed on its finance campaign forms filed with the Secretary that it had paid Hatchett.
9. Earl and the LPO defended Hatchett's failure to disclose that the LPO had paid him by arguing that Hatchett was an independent contractor he was not required to identify his "employer." *See* Third Amended Complaint (attached as Exhibit A).
10. Earl's and the LPO's interpretation of Ohio law was supported by at least one appellate court holding in Ohio. *See In re Protest of Evans*, 2006 WL 2590613 (Ohio App. 2006).
11. No court in Ohio had ever ruled to that Ohio's employer-statement rule applied to independent contractors. *See* Third Amended Complaint (attached as Exhibit A).

12. The hearing officer, Smith, initially agreed with Earl's interpretation of Ohio's employer-statement requirement. *See* Initial "Report and Recommendations" Written by Smith, March 6, 2014, at 16 (attached as Exhibit C).
13. Smith's initial report, written on March 6, 2014, agreed with Earl's interpretation and explained that Ohio's "employer-statement" rule did not apply to independent contractors, and that Earl should not be disqualified. *See id.* at 17.
14. The hearing officer, Smith, also observed that the Secretary had issued directives stating that the employer-statement rule should not be enforced. *See id.*
15. Applying the employer-statement rule to Earl, even if it included independent contractors, would be unfair, Smith said in his initial report. *See id.*
16. This initial decision by Smith was prepared on March 6, 2014, the night before it was to be submitted for approval to the Secretary of State.
17. The hearing officer announced his conclusion that he was ruling in favor of Earl on the night of March 6, 2014 to officials in the Secretary of State's office in an e-mail that included the comment, "I know this will anger and disappoint a bunch of people" *See* E-mail from Bradley Smith to Jack Christopher, March 6, 2014 (attached as Exhibit E).
18. Smith during the night of March 6, 2014 and early morning of March 7, 2014 changed his mind about the proper application of Ohio's employer-statement rule.
19. After learning that Smith was ruling in favor of Earl, an official, Jack Christopher, in the Secretary of State's office sent Smith an early-morning and lengthy e-mail on March 7, 2014 explaining how Ohio's employer-statement rule should be interpreted. *See* E-mail from Jack Christopher to Bradley Smith, March 7, 2014 (attached as Exhibit F).
20. Christopher's interpretation of Ohio's employer-statement rule directly contradicted Smith's initial ruling. *See id.*
21. According to Christopher, Ohio's employer-statement rule included independent contractors. *See id.*
22. By the time Smith delivered his new, revised report to the Secretary of State on the morning of March 7, 2014, it included Christopher's analysis and conclusion.
23. Smith ruled that Earl violated the employer-statement rule and had to be removed from the ballot. *See* "Report and Recommendations" Written By Smith, March 7, 2014 (attached as Exhibit G).
24. Smith also ruled that it was no longer unfair to apply this interpretation to Earl, even though the Secretary had claimed it would not be enforced. *See id.*

25. The Secretary approved Smith's ruling later that day.
26. Earl immediately on March 7, 2014 went to federal court to challenge the Secretary's decision.
27. Earl's principal challenge in his federal complaint against Earl's removal from the 2014 primary ballot was to the constitutionality of Ohio's employer-statement rule under the First Amendment. *See* Third Amended Complaint (attached as Exhibit A).
28. Earl also sought to discover who was behind Felsoci's protest in hopes of asserting an as-applied First Amendment claim against Felsoci.
29. If Felsoci's benefactors were state actors or the functional equivalent of state actors, Earl argued, theirs and Felsoci's actions would also violate the First Amendment.
30. Earl called Felsoci to testify as the first witness at the hearing in federal court on March 13, 2014. *See* Transcript of Preliminary Injunction Hearing, Testimony of Gregory Felsoci, Doc. No. 86, March 13, 2014 (attached as Exhibit H). Felsoci testified at this hearing that a personal friend, John Musca, a Republican, asked him if he were willing to receive a phone call from someone about protesting Earl. *Id.* at PAGEID # 2200-2201. Felsoci specifically testified in this regard:
 - A. **"He must have had conversation with someone, I have no idea who,** and basically if I was to turn around and sign or to read whatever was presented to me, if I agreed with that if I would, you know, make something -- have a signature on behalf of my thoughts and beliefs of being a Libertarian." *Id.* at 2202 (emphasis added).
 - B. Felsoci further stated that "Mr. Zeiger's law firm" phoned him to inquire if he was interested in protesting Earl. *Id.*
 - C. Felsoci reiterated that he "talked to a member from the law firm. They said if they would have a representative meet up with me would I basically sign some type of paper document with what we're discussing in regards to this." *Id.* at 2208.
 - D. Felsoci never mentioned talking to, meeting, or knowing Terry Casey.
31. Felsoci testified under oath at the federal court hearing that he was not paying his lawyers at the Zeiger law firm and did not know who was. *Id.* at 2203. *See also* *Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014).
32. Felsoci's lawyers failed to disclose to him before the March 13, 2014 hearing that Terry Casey was paying Felsoci's legal bill.
33. Felsoci's lawyers also failed to disclose to him that the Kasich Campaign for Governor was involved in recruiting him to protest Earl's candidacy.

34. Felsoci expressed little knowledge about the content of his protest.
35. The federal court, after hearing Felsoci's testimony, wrote in its Opinion and Order: "To state the obvious, Felsoci's testimony, as well as other evidence in the record, supports an inference that operatives or supporters of the Ohio Republican Party orchestrated the protest that Felsoci signed." *See* Opinion and Order, March 19, 2014, Doc. No. 80 at PAGEID # 2148-49 (attached as Exhibit I). Felsoci was so glib that the federal court described him as a "guileless dupe." *Id.* at 2148.
36. Earl attempted to call Felsoci back to the stand on March 17, 2014, the third day of the federal court's hearing. *See Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014).
37. Felsoci failed to appear. *Id.*
38. Earl on or before March 29, 2014 attempted to depose Felsoci to ask him questions that he did not appear to answer during the preliminary injunction hearing, but Felsoci's lawyers refused to allow him to sit for his deposition. *Id.*
39. The federal district court ultimately ruled that Earl had not established that he was entitled to emergency relief, *see* Exhibit I, a holding that was affirmed by the Sixth Circuit ruled in *Libertarian Party of Ohio v. Husted*, 751 F.3d 403 (6th Cir. 2014).
40. After losing his First Amendment claim and missing the 2014 primary, Earl sought to amend his federal challenge to seek a place on the general election ballot as the LPO candidate for governor in November 2014; this amendment was eventually allowed by the court. *See* Third Amended Complaint (attached as Exhibit A).
41. Earl argued in his amended complaint that Felsoci had acted for Republican Party operatives, who were effectively state actors, in having Earl removed from the primary ballot. *Id.*
42. The Court agreed that this was a legitimate theory, authorized the amended complaint, and allowed the case to go forward.
43. During the course of discovery, which was vigorously contested by Felsoci and the Secretary, Earl learned that Defendant-Terry Casey, Ohio's Chair of the State Personnel Board of Review, and Defendant-Kasich/Taylor for Ohio Campaign (John Kasich's official campaign for governor) (hereinafter "Kasich Campaign"), had sponsored Felsoci's protest.
44. Both Felsoci and Secretary Husted refused to cooperate in or allow the discovery needed to uncover Casey's and the Kasich Campaign's involvement.
45. Felsoci had not only ignored Earl's demand that he appear to testify at the federal court's preliminary injunction /hearing on March 17, 2014, his lawyers had refused to answer the federal

court's query (citing confidentiality concerns) on March 17, 2104 as to who was behind Felsoci's protest. *See Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014).

46. On March 14, 2014, the federal court on its own motion ordered that Matt Borges, the chair of the Ohio Republican Party, testify in federal court on March 17, 2014.

47. Borges denied any knowledge of who was behind Felsoci's protest.

48. Earl on June 13, 2014, again attempted to depose Felsoci, but he again refused to sit for his deposition. *See Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014).

49. Earl also attempted at approximately this same time to arrange the depositions of several officials in the Secretary's office. *See Libertarian Party of Ohio v. Husted*, 33 F.Supp. 3d 914 (S.D. Ohio 2014).

50. Both Felsoci and the Secretary refused to allow any kind of discovery, including depositions. *Id.*; *Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014).

51. Earl was forced to seek and obtain three separate court orders forcing Felsoci and Secretary Husted's agents to sit for depositions and produce documents. *See Libertarian Party of Ohio v. Husted*, 33 F.Supp. 3d 914 (S.D. Ohio 2014); *Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014); *Libertarian Party of Ohio v. Husted*, 2014 WL 3792727 (S.D. Ohio, July 31, 2014); *Libertarian Party of Ohio v. Husted*, 2014 WL 3928293 (S.D. Ohio, Aug. 12, 2014).

52. Earl's three court orders included one that directed Husted to present the hearing officer (Smith), Christopher, and others for their depositions. *See Libertarian Party of Ohio v. Husted*, 33 F.Supp. 3d 914 (S.D. Ohio 2014) The next directed Felsoci to sit for his deposition. *See Libertarian Party of Ohio v. Husted*, 302 F.R.D. 472 (S.D. Ohio 2014). The last directed Felsoci's lawyers to present at least one document identifying who was paying them to represent Felsoci. *See Libertarian Party of Ohio v. Husted*, 2014 WL 3792727 (S.D. Ohio, July 31, 2014), and *Libertarian Party of Ohio v. Husted*, 2014 WL 3928293 (S.D. Ohio, Aug. 12, 2014).

53. At his deposition, conducted on August 12, 2014 (just hours before the court ordered his lawyers to produce a document identifying who was paying them), Felsoci testified that he was not paying his lawyers. *See* Transcript of Deposition of Gregory Felsoci, Aug. 12, 2014, at PAGEID # 3525-26 (attached as Exhibit J). He also claimed that he did not know who was paying his attorneys and whether they were even being paid. *Id.* at 3527-28. He appeared to contradict the latter part of this statement, however, by also testifying that he had orally "agree[d] to have [his] lawyers represent [him] while they were being paid by someone else to represent [him]." *Id.* at 3534. Felsoci's also testified:

A. That he does not know Terry Casey. *Id.* at 3510.

- B. That he was first directly contacted by a lawyer (rather than Casey), *id.* at 3519, that this lawyer was not Tigges or Zeiger, and that this lawyer might "possibly" have been Dan Mead. *Id.* at 3522.
- C. That Mead "possibly" could have delivered Earl' formal protest to him (Felsoci) in person at his home for his signature. *Id.* at 3523.
54. Felsoci admitted that he was not responsible for paying his lawyers. *Id.*
55. On August 15, 2014, Felsoci's lawyers, pursuant to the court's order of August 12, 2014, produced an e-mail showing that Terry Casey was paying Felsoci's lawyers. *See* E-mail from John Zeiger to Terry Casey, May 16, 2014 (attached as Exhibit K).
56. A subsequently produced invoice showed that the amount owed by Casey to Felsoci's lawyers exceeded \$250,000 as of the date of that invoice, May 16, 2014. *See* Letter from John Zeiger to Terry Casey, May 16, 2014 (attached as Exhibit L).
57. Casey was deposed on August 28, 2014, where he testified that he alone was responsible for paying Felsoci's lawyers. *See* Transcript of Deposition of Terry Casey, Aug. 28, 2014, Doc. No. 241-1 at PAGE ID # 6233 (attached as Exhibit M). Casey's deposition also included the following testimony:
- A. Casey stated that he retained the Zeiger firm around February 14, 2014 to handle the protest filed by Felsoci. *Id.* at 6230-31.
- B. Casey claimed that he would seek contributions from "interested" persons at some yet-to-be-determined time to pay Felsoci's lawyers, *id.* at 6237-38, but had no one immediately in mind. *Id.* at 6237.
- C. Casey testified that he had not received money from anyone to assist his payment of the Zeiger law firm. *Id.* at 6240.
- D. Casey testified that he did not know if anyone would ever provide him with funds to pay the Zeiger law firm. *Id.*
- E. Casey admitted that he discussed hiring the Zeiger law firm to prosecute the protest of Earl with others but could not "remember each name." *Id.* at 6240-41.
- F. Casey testified that he had not discussed keeping his identity confidential with his lawyers. *Id.* at 6255-56.
- G. Casey claimed that he telephoned Felsoci after "[o]ne or two people ... gave me a name." *Id.* at 6256.
- H. Casey testified that he did not know John Musca, Felsoci's friend who convinced him to protest Earl. *Id.* at 6317. He may have spoken to Musca on the telephone "once

or twice," "[b]ut, to my knowledge I've never met the guy." *Id.* at 6317-18. He further testified that he could not remember how he got Musca's name and phone number to make those one or two calls. *Id.* at 6318.

I. Casey testified that he did not know if it would be lawful for "anyone in the Kasich Campaign to give [him] money to pay [his] lawyers." *Id.* at 6327.

58. In an effort to prevent the disclosure of Casey's identity, John Zeiger, Casey's and Felsoci's lawyer, delivered to the court in July of 2014 a declaration stating that Casey wished his identity to be kept confidential. *See* Doc. No. 159-1, at PAGEID # 3205-06 (attached as Exhibit N) ("I understood from initial conversations with the Confidential Client [Casey] that the Confidential Client intended that the identity of the Confidential Client, and our representation of the Confidential Client, be maintained as confidential and privileged.").

59. Zeiger's declaration also made clear that Casey, and Casey alone, was paying Felsoci's lawyers. *Id.* at 3206 ("The Confidential Client agreed to pay the fees and expenses associated with representation of Mr. Felsoci ... Mr. Felsoci was advised when he retained the Firm that the Confidential Client is paying all fees associated with Mr. Felsoci's representation and that the Firm will not bill him for its services.").

60. Casey denied at his deposition that the Kasich Campaign was involved in any way with his plan to recruit someone, ultimately Felsoci, to protest Earl. The Kasich Campaign, Casey testified, was not involved in any way -- **it did not even know about Casey's efforts**. *See* Doc. No. 241-1 at 6367-6369 (attached as Exhibit M) (emphasis added). Earl's lawyer repeatedly questioned Casey at his deposition about the involvement of others -- in particular, members of the Kasich Campaign -- in the protest of Earl. Casey claimed that he was solely responsible for recruiting Felsoci and arranging the protest, an assertion that is contradicted by e-mails between Casey and the Kasich Campaign. *See* Exhibit O, discussed *infra*. Casey was specifically asked, for example, whether he had been in contact with the Kasich Campaign:

Q. Since January 1st, 2014, have you communicated with anybody in the John Kasich for Governor campaign?

A. I've seen people around at social events, I've sometimes sent out general e-mails about political issues, or in doing TV shows, might have asked for background information.

Id. at 6223. At another point, Casey was asked:

Q. Was there anybody else that was helping you, assisting you in finding a Libertarian protestor?

A. I reached out to a bunch of political people, like I mentioned, Lucas County, Cuyahoga County, Summit County, there might have been some other counties, looking for Libertarians who might be potential folks.

Id. at 6366. Casey did not mention that Matt Carle, Dave Luketic and Jeff Polesovsky knew about his efforts and were in fact assisting his efforts to find a Libertarian protestor. If this were not enough, Casey was specifically asked if anyone **even knew** that he was planning a protest against Charlie Earl. The questions drew repeated objections from Casey's (and Felsoci's) lawyer:

Q. Did the leadership in the Ohio Republican Party know you were doing this?

A. I'm not sure what they knew or didn't know.

Q. Did Matt Borges know you were doing this?

A. I don't know.

Q. Who else might have known you were doing this?

Mr. Tigges: Objection. Calls for speculation.

A. I mean I know --

Q. To your knowledge, of course. To your knowledge.

A. Right. Right. Right. What ---

Mr. Tigges: Wait a minute. Stop. What's the question?

Mr. Brown: Can you read back the question?

Mr. Tigges: You said might and then you said to his knowledge, and the two are fundamentally inconsistent.

Mr. Brown: Why don't you read back the question. Go ahead, Carolyn.

(Record read.)

Mr. Brown: I was trying to respond to Steve's objection on speculation. I only want Mr. Casey to answer to what he knows.

Mr. Tigges: So what's the question? Are you asking him who he knows?

Mr. Brown: Carolyn, can you read the question?

Mr. Tigges: Fine. Go ahead. I don't care.

(Record read.)

Mr. Tigges: The question's objectionable. Same objection. Calls for speculation.

- A. **I'm not sure who else would have known** because I was spreading the network out in terms of both kind of sharing my surprise over the whole Oscar Hatchett, Democratic Party stuff, because I thought it was pretty amazing that the Democratic Party would be that involved in trying to literally manipulate, prop up, run, almost, the Libertarian Party. So I mean I shared with a lot of people how shocked and surprised I was.

Id. at 6367-69 (emphasis added).

61. Subsequently discovered documents that were introduced into evidence at the preliminary injunction hearing on September 29-30, 2014 establish that Kasich Campaign agents, including Kasich's campaign manager, Matt Carle, as well as Jeff Polesovsky and Dave Luketic, were deeply involved in Casey's plan to recruit Felsoci to protest Earl. *See* Doc. No. 240-1 (attached as Exhibit O). These documents included the following exchanges between Terry Casey, Dan Mead (Felsoci's and Casey's lawyer), John Zeiger (Felsoci's and Casey's lawyer), Jeff Polesovsky (Kasich Campaign official), Dave Luketic (Kasich Campaign official), and Matt Carle (Kasich Campaign manager), as well as others:

A. Casey sent an e-mail on February 17, 2014 to Richard Lumpke, with blind copies to Mead and Polesovsky, stating that he (Casey) was "doing an (sic) **high priority research project for the Governor's folks**" Doc. No. 240-1 at PAGEID # 6162 (emphasis added).

B. On February 17, 2014, Casey sent an e-mail to Mead, Zeiger, Polevosky, Carle, and Luketic, an e-mail stating: "Great finding by our 'legal eagle', Dan!! BUT, this \$700 was paid out to our 'hero' Oscar Hatchett on Nov. 21, 2013, way before these signatures were obtained in early 2014. Clearly it shows proof for Oscar being a hired signature guy. ... Our folks are working on more information about Ohioans for Liberty, **plus the added items we discussed this afternoon.**" *Id.* at 6158 (emphasis added).

C. Luketic sent an e-mail on February 19, 2014 to Casey stating: "Agree Terry. There is no way they are going to hit that number IF we could get rid of those circulators. Still awaiting the final part-petition copies from the SoS office." *Id.* at 6181. Casey responded to Luketic that same day, with copies to Mead, Zeiger and Polevosky, and a blind copy to Carle: "Thanks, Dave! Just talked with Dan [Mead]. Keep working on those numbers and details from the SoS office for which circulators got what numbers of good ones from each of the counties. **Dan needs more specifics on Oscar conviction, the charges, penalty, timing, etc.** ... Let me know what else I can do, push, help on for this afternoon and evening." *Id.* (emphasis in original).

D. On February 19, 2014, Luketic e-mailed Casey, Mead, Zeiger, Polesovsky, and Carle, stating: "**Team.** Our numbers may have been a little of (sic) (in a good way). ... We are still awaiting from the SOS the copies of petitions validated by the BOE's." *Id.* at 6178 (emphasis added).

E. Casey wrote to the "Team," including Mead, Zeiger, Polesovsky, Luketic and Carle, on February 19, 2014 that "a client from Cuyahoga County who is a Libertarian Party member and who is concerned about these types of issues" had been located. *Id.* at 6191. He explained that "[t]hey are still working on a 'back-up' from Lima/Allen County. Plus, maybe if needed, a true non-affiliated voter, too. **Matt Carle has been up in Akron today for the funeral of Lt. Gov. Mary Taylor's mother. Will have more on the other questions. Matt has been on the phone lining up those other needs for this process.**" *Id.* (emphasis added).

F. On February 20, 2014, Luketic sent to the "Team," including Casey, Mead, Zeiger, and Polevosky, a "Validity Report" on the signatures collected by Earl. *Id.* at 6192 & 6198.

G. Casey wrote on February 21, 2014 to this "Team," including Zeiger, Mead, Luketic and Polevosky, as well as Mike Kiggin and Joe Masich, that the filing against the LPO's candidate for Attorney General, Steve Linnabary, "seemed kind of close to the filings by attorney Zeiger in the Governor's Charlie Earl protest." *Id.* at 6205.

62. Not only did Kasich's agents, Polesovsky and Luketic, know about Casey's plan, the Kasich Campaign's manager, Matt Carle, was deeply involved and personally responsible for locating and recruiting persons to protest Earl, including Gregory Felsoci. *See, e.g.*, ¶¶ 61. B., C., D., E.

63. Casey authenticated the e-mails at the federal hearing on September 29, 2014. *See* Transcript of Preliminary Injunction Hearing, Sept. 29-30, 2014 (attached as Exhibit D). Even though Felsoci's and Casey's lawyers were allotted one and one-half days to present their case, they did not call anyone from the Kasich Campaign to dispute the authenticity of the e-mails or to deny the Kasich Campaign's involvement in Casey's plan. Because his lawyer's effort to suppress these e-mails was unsuccessful, Casey was forced to explain them:

A. Casey testified that he retained the Zeiger firm on February 14. *Id.* at 6491.

B. Casey admitted that he knew Jeff Polesovsky and Dave Luketic worked for the Kasich campaign, and that Matt Carle was Kasich's Campaign Manager. *Id.* at 6493, 6496-97.

C. Although he denied that he was acting on "behalf" of the Kasisch Campaign, *id.* at 6493-94, Casey admitted that Dave Luketic was "helpful" in finding an LPO member to protest Earl. *Id.* at 6504.

D. Casey agreed that Felsoci was "probably" the person mentioned in his February 19, 2014 e-mail to Luketic, Polesovsky and Carle describing the Kasich Campaign's efforts to find an LPO member to protest Earl. *Id.* at 6517.

E. Casey continued to assert that he was not concerned about secrecy; “We never really discussed it.” *Id.* at 6526.

F. Casey admitted that he is a Kasich supporter, played a significant role (playing the part of Ted Strickland in mock debates) with the Kasich Campaign during the 2010 election, and was appointed by Governor Kasich to the State Personnel Review Board. *Id.* at 6529.

G. Casey admitted that he “called upon them [Carle, Polesovsky and Luketic] to help on some of the mechanics of like getting copies of petitions, things that they already had. So they were helpful in that way when I asked for information.” *Id.* at 6530.

H. When confronted with his deposition testimony and asked, “since January 1, 2014, have you communicated with anyone in the John Kasich for governor campaign as of today?,” this time Casey answered “yes.” *Id.* at 6541.

I. Casey admitted that he talked to Carle, Polesovsky and Luketic. *Id.* at 6541.

J. Casey admitted that there was “back and forth” between himself and the Kasich Campaign about the protest. *Id.* at 6545.

K. Casey admitted that he “reach[ed] out to” Polesovsky and Luketic to locate someone to protest Earl. *Id.* at 6557.

L. Casey claimed that he spoke to Felsoci about filing the protest. *Id.* at 6558.

M. When asked, “Mr. Casey, this was all you doing this, right? You were the one to do this. Governor Kasich’s re-election campaign had nothing to do with it?,” he responded: “They didn’t tell me to do it. I’m kind of a self-starter, initiating it myself. They obviously helped me get some documents along with other people did.” *Id.* at 6589.

N. When questioned about his e-mail stating he was doing a research project for the “Governor’s folks,” Casey testified: “I just kind of hyped it up a little bit to get his attention.” *Id.* at 6589.

O. When asked whether Polesovsky, Carle and Luketic “were just helping you?,” Casey testified, “Yes.” *Id.* at 6590.

64. Earl, through counsel, on April 6, 2015, inquired of the Secretary, through counsel, via e-mail, whether the Secretary had initiated or knew of any campaign finance investigation being conducted under the facts described above.

65. The Secretary did not respond to Earl’s inquiry.

66. On October 17, 2014 the federal court ruled that Felsoci and his attorneys had purposely delayed and obstructed Earl’s efforts to uncover the identities of the parties who were paying Felsoci’s attorneys and otherwise behind his activity. *See* Opinion and Order, Oct. 17, 2014,

Doc. No. 260 (attached as Exhibit P). Quoting an exchange that occurred at the deposition of Bradley Smith between Felsoci's and Casey's lawyer and the lawyer for Earl, the court quoted stated: "[t]here is a lot wrong with this exchange, but the Court finds particularly troubling the statement by Felsoci's counsel that he would continue to waste the time of Plaintiffs' counsel. **Felsoci's attorneys made good on that threat, and this is but one of the many examples of similar harassing and obstructive conduct that occurred throughout discovery.**" Doc. No. 260 at PAGEID # 7104 (emphasis added).

67. Felsoci, Casey, and the Kasich Campaign purposely attempted to keep secret Casey's and the Kasich Campaign's joint involvement with Felsoci's protest of Earl. *Id.* Casey and the Kasich Campaign purposely concealed from Plaintiffs and the public Casey's "in kind" contribution to the Kasich Campaign.

68. Felsoci, Casey, and the Kasich Campaign succeeded in keeping Casey's involvement in the plan to recruit Felsoci and pay his lawyers a secret until August 15, 2014, when Casey's and Felsoci's lawyers finally delivered to Earl an invoice identifying Casey.

69. Felsoci, Casey, and the Kasich Campaign succeeded in keeping the Kasich Campaign's involvement in the plan to recruit Felsoci and pay his lawyers a secret until September 26, 2014, when Casey's and Felsoci's shared lawyers finally produced documents identifying several Kasich Campaign staff members' deep involvement in Felsoci's recruitment and the plan to protest Earl.

70. Casey testified at the preliminary injunction hearing held on September 29-30, 2014 that he was not attempting to keep his identity a secret, *see* Transcript of Preliminary Injunction Hearing, Sept. 29-30, 2014, at 6256 (attached as Exhibit D); this assertion, however, was contradicted by his previous claim, made through counsel during discovery, that it was imperative to keep his identity a secret. *See Libertarian Party of Ohio v. Husted*, 2014 WL 3792727 (S.D. Ohio, July 31, 2014), and *Libertarian Party of Ohio v. Husted*, 2014 WL 3928293 (S.D. Ohio, Aug. 12, 2014).

71. Although the Secretary has been aware of all of the facts described above since October 17, 2014, the Secretary has chosen not to investigate Casey's and the Kasich Campaign's activities under Ohio's campaign finance laws.

72. The testimony and documents described in the foregoing summary, all of which are part of the public record and have been known to the Secretary of State since October 17, 2014, along with campaign finance papers and documents otherwise on file with the Secretary of State, support the following factual findings:

A. Gregory Felsoci, a member of the LPO, was sought out by Casey, members of the Kasich Campaign, and the Zeiger law firm to protest Earl.

B. Felsoci was not located by Casey, but was (according to Casey's e-mails, *see* Exhibit O) located by the Kasich Campaign, most likely by Matt Carle, Kasich's Campaign Manager, through John Musca, Felsoci's friend.

C. Felsoci testified that he has never met Casey and does not know him.

D. Felsoci remembers that someone from the Zeiger law firm initially contacted him and that this person was possibly Dan Mead

E. Felsoci also remembers that someone from the Zeiger law firm, possibly Dan Mead, delivered the protest to him for his signature.

F. Terry Casey helped orchestrate the plan and agreed to be the secret client who paid the Zeiger law firm to represent Felsoci, prosecute his protest of Earl, and defend Felsoci's protest in federal court, but he was not responsible for locating Felsoci; that task was performed by the Kasich Campaign.

G. The Kasich Campaign knew that the Zeiger law firm was involved in Casey's plan to protest Earl before Felsoci was located and recruited.

H. The Kasich Campaign knew that the Zeiger law firm would be paid by someone to represent whomever was eventually recruited.

I. The Kasich Campaign agreed that Casey would pay the Zeiger law firm to represent someone, ultimately Felsoci, to protest Earl.

J. The Kasich Campaign and Casey entered into a joint venture to recruit someone, ultimately Felsoci, and have this person protest Earl. This is established by the fact that Felsoci was located by someone other than Casey; according to Casey someone in the Kasich Campaign, likely Matt Carle, located Felsoci.

K. The Kasich Campaign, Casey and the Zeiger law firm, agreed that someone, ultimately Felsoci, would be recruited to protest Earl and that the Zeiger law firm would handle the protest. This is established by the fact that all three stakeholders in the discussions played a significant role in the plan to protest Earl: the Kasich Campaign carefully studied Earl's signatures and actually located Felsoci; Casey coordinated efforts and agreed to pay the Zeiger law firm; and the Zeiger law firm took charge and made contact with Felsoci after he had been located by the Kasich Campaign.

L. The Kasich Campaign and Casey entered into a joint venture to study Earl's signature-collection efforts, recruit someone to protest Earl, and retain the Zeiger law firm to prosecute that protest.

M. The Kasich Campaign and Casey engaged in coordinated efforts in order to recruit Felsoci and have Felsoci protest Earl. This is established by the "substantial discussions and/or negotiations" between Kasich Campaign personnel, including the Campaign Manager, and Casey. The identification and location of Felsoci by the Kasich Campaign further establishes that the Kasich Campaign played a significant role in organizing Felsoci's protest of Earl.

N. The Kasich Campaign has not reported any payments to the law firm of Zeiger, Tigges & Little.

O. The Kasich Campaign has not reported any payments to Terry Casey.

P. Casey's activities and payments and/or agreement to pay the law firm of Zeiger, Tigges & Little to represent Felsoci in his protest of Charlie Earl constitute and "in kind" contribution to the Kasich Campaign.

Q. The Kasich Campaign has not reported an "in kind" contribution from Terry Casey or the law firm of Zeiger, Tigges & Little.

R. Casey's "in kind" contribution to the Kasich Campaign totaled over \$250,000 on May 16, 2014, the date of the last uncovered invoice, and is likely much larger today.

S. Casey, the Kasich Campaign, and their attorneys, went to great lengths to conceal their coordinated plan to recruit someone, ultimately Felsoci, to protest Earl and that the lawyers responsible for prosecuting the protest were being paid by Casey.

T. Casey, the Kasich Campaign, and their attorneys, successfully kept the Kasich Campaign's involvement in the coordinated plan a secret until September 26, 2014 notwithstanding Earl's repeated efforts to discover who had arranged and supported Felsoci's protest.

ANALYSIS

73. A candidate's use of campaign funds to challenge an opponent's qualification for the ballot is not improper under Ohio's campaign finance laws. *See* Ohio Election Commission Advisory Opinion 2003 ELC-01 (Sept. 18, 2003) (interpreting Ohio campaign finance law and stating that "a candidate may use campaign funds to pay for costs incurred (court costs, attorney fees, transcripts, etc.) in the prosecution of an election protest against a candidate, or candidates, that may be potential opponents of the candidate making the expenditure.").

74. Had the Kasich Campaign agreed to itself pay the attorneys representing Gregory Felsoci and prosecuting his protest, it would not have likely violated Ohio's campaign finance restrictions.

75. The Kasich Campaign would have still been required to report any payments it made to Felsoci's attorneys. *See* Federal Election Commission Advisory Opinion 1980-57 (interpreting federal campaign finance law and stating that "a candidate's attempt to force an election opponent off the ballot so that the electorate does not have an opportunity to vote for that opponent is as much an effort to influence an election as is a campaign advertisement derogating that opponent."). *See also* Federal Election Advisory Opinion 1983-37 (funds are campaign contributions if used "to initiate legal action to remove an identified candidate from the ballot"); *see also* FEC MUR 5509, Gen. Cnsl. Rep. 4-6 (Feb. 24, 2005) (expenditures in connection with

challenges to Nader/Camejo nomination papers are “qualified campaign expenses” on behalf of the Kerry/Edwards 2004 campaign committee).

76. Terry Casey testified under oath that he and he alone agreed to pay Felsoci's attorneys, a fact corroborated by Zeiger's e-mail and invoice.

77. Casey claimed that he planned on raising money to pay the lawyers' fees, which by May of 2014 totaled more than \$250,000, from "interested persons."

78. At the time of Casey's deposition on August 28, 2014, Casey claimed he had no particular "interested person" in mind.

79. Casey denied at his deposition that the Kasich Campaign knew of his plan to recruit Felsoci and pay Felsoci's lawyers' fees.

80. Casey's claim was proved false by documents eventually produced (under subpoena to Casey and discovery request to Felsoci) by Casey's and Felsoci's shared lawyers.

81. These documents, which were authenticated by Casey in federal court, establish that the Kasich Campaign, through several of its agents (including the Kasich Campaign manager, Matt Carle), knew of Casey's plan to recruit Felsoci to protest Earl.

82. The documents further reveal that these same members of the Kasich Campaign knew that Dan Mead, a lawyer with Zeiger, Tigges & Little and one of Felsoci's and Casey's named lawyers in the federal court proceedings, and John Zeiger himself, were deeply involved in the plan.

83. Mead and Zeiger were copied by name and identified by name in many if not all of the relevant e-mails/documents establishing the Kasich Campaign's involvement.

84. Agents of the Kasich Campaign, as well as Casey, knew that the lawyers who were assisting in the protest of Earl were going to be paid by someone other than the Kasich Campaign.

85. Casey has testified that he alone agreed to pay the law firm, and the invoices not only corroborate this fact, they also prove that the firm expected and expects to be paid by Casey and no-one else.

86. The Kasich Campaign knew that Zeiger and Mead, attorneys with the law firm representing Casey and Felsoci, were not working, and would not work, for free.

87. Even if the law firm (Zeiger, Tigges & Little) were to have agreed to donate its efforts to the Kasich Campaign -- which is obviously not the case here, *see* Exhibits K & L -- those efforts would still have been an "in kind" contribution to the Kasich Campaign. *See* Federal Election Commission Advisory Opinion 2006-22 (interpreting federal campaign finance law and stating

that the value of legal services a law firm provides on behalf of a campaign committee in a court case addressing the ballot eligibility of another candidate is an "in kind" contribution).

88. Those lawyers, like Mead and Zeiger, who continued to draw salaries from the firm while working on the Felsoci protest cannot be considered volunteers who are donating services under campaign finance laws. *Id.*

89. Even if they were otherwise donating their time, Felsoci's attorneys' use of firm resources, including office space, support staff, computers, equipment, supplies and related materials constitutes a campaign contribution that is subject to the reporting requirements, limitations and prohibitions found in Ohio's campaign finance law. *Id.*

90. The Kasich Campaign's activities in recruiting Felsoci and having him protest Earl were "coordinated" with Casey within the meaning of Ohio's campaign finance laws. See O.R.C. § 3517.01(B)(16) ("In-kind contribution' means anything of value other than money that is used to influence the results of an election or is transferred to or used in support of or in opposition to a candidate, campaign committee, legislative campaign fund, political party, political action committee, or political contributing entity and that is made with the consent of, in coordination, cooperation, or consultation with, or at the request or suggestion of the benefited candidate, committee, fund, party, or entity."). Casey's activities were "made with the consent of, in coordination, cooperation, or consultation with, or at the request or suggestion of [John Kasich and/or Mary Taylor], [or] the campaign committee or agent of the ... candidate[s] ..." *Disciplinary Counsel v. Spicer*, 106 Ohio St.3d 247, 834 N.E.2d 332, 338 (2005). Kasich, Taylor and/or their campaign agents, including their Campaign Manager (Carle), "engage[d] in **substantial discussion** or negotiation with [Casey] regarding the contents, timing, type, or frequency of" Casey's actions and plan, and/or "**ha[d] the ability to direct or control [Casey's] expenditure in a meaningful way**, such that the [Kasich Campaign] and [Casey] engage[d] in a joint venture." *Id.* at 338-39 (emphasis added).

91. Kasich and Taylor are responsible under Ohio's campaign finance laws for the actions of their agents, including the "substantial discussions" Carle, Polesovsky and Luketic had with Casey in planning the recruitment of Felsoci and his protest of Earl, and the ability Carle, Polesovsky and Luketic had to "direct or control" Casey's actions. See *Disciplinary Counsel v. Spicer*, 106 Ohio St.3d 247, 834 N.E.2d 332, 338 (2005).

92. Because Casey's efforts and payments to Felsoci's lawyers (Zeiger, Tigges & Little) were coordinated with Kasich, Taylor and the Kasich Campaign, they constitute an "in kind" contribution to the Kasich Campaign that not only must be reported, but which also violate Casey's individual contribution limit.

93. Because of their "substantial discussions" with Casey, their "ability to direct or control" Casey's actions, and their coordination with Casey, the Kasich Campaign's agents accepted an "in kind" contribution from Casey on behalf of the Kasich Campaign. See ORC § 3517.01(B)(16).

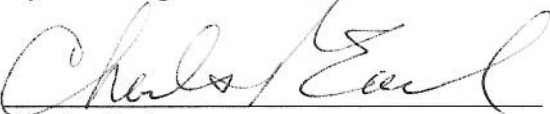
94. Ohio's campaign finance laws require that Casey's individual "in kind" contribution be reported by the Kasich Campaign. *See* O.R.C. §§ 3517.10(A) & (B); O.R.C. § 3517.13(A); O.R.C. § 3517.992(A)(1) (penalty of up to \$100 per day).
95. Records available on the Secretary of State's web page reflect no disclosure of the Casey contribution (described above) by the Kasich Campaign.
96. The Kasich Campaign's misrepresentation and/or concealment of the contribution, through its agents, Carle, Polesovsky, and Luketic, is illegal under O.R.C. § 3517.13(G) and carries a potential fine of \$10,000 and the possible forfeiture of office by Kasich and/or Taylor. *See* O.R.C. § 3517.992(C).
97. The Kasich Campaign and Casey should be fined \$10,000 for misrepresenting and concealing Casey's "in kind" contribution under O.R.C. § 3517.13(G) and O.R.C. § 3517.10(B)(4)(c) & (d); moreover, if Governor Kasich and Lt. Governor Taylor knew they should be removed from office. *See* O.R.C. § 3517.992(C).
97. Casey's exceeding the permissible campaign contribution limit for individuals is illegal under Ohio law. *See* O.R.C. § 3517.102(B)(1).
98. The individual limit of \$12,155.52 in Ohio, *see* Secretary of State, Ohio Campaign Contribution Limits: Effective 25 FEB 2013 through 24 FEB 2015, <http://www.sos.state.oh.us/sos/upload/candidates/2013limitchart.pdf>, applied to Casey's "in kind" contribution made during the 2014 election cycle.
99. Casey and the Kasich Campaign are subject to penalties equal to three times the amount of that the contribution that exceeded the amount allowed by law. *See* O.R.C. § 3517.992(I) & (J).
100. The amount of Casey's excess contribution is approximately \$240,000 measured by the invoice sent to him by the Zeiger law firm on May 16, 2014. *See* Exhibit L.
101. Casey and the Kasich Campaign should be fined three times the amount of Casey's excess contribution, which as of May 16, 2014 was over \$240,000.
102. A candidate's soliciting excessive campaign contributions is a first degree misdemeanor. *See* §§ 3517.092 and 3517.992(M)(1).
103. If John Kasich and Mary Taylor had knowledge of Casey's and the Kasich Campaign's plan, they committed a misdemeanor and should be punished accordingly.
104. If Kasich and/or Taylor agreed to and participated in Casey's and the Kasich Campaign's plan, they also agreed with the solicitation of a campaign contribution from Casey in excess of the amount allowed by law.
105. Assuming their knowledge, Kasich and Taylor would be guilty of criminal solicitation.

106. Earl respectfully requests that the Commission investigate these allegations and fully investigate the Casey-Kasich Campaign joint venture to determine whether violations of Ohio law have taken place and to penalize the appropriate parties.

ENGLAND RESERVATION

The undersigned is a plaintiff in a federal action, *Libertarian Party of Ohio v. Husted*, No. 13-953, that remains pending in federal court. The undersigned submits to the Ohio Election Commission for resolution only factual and legal issues raised by the named Defendants' actions under Ohio's campaign finance laws. The undersigned reserves to the proceeding that remains pending in federal court all factual and legal issues that already have been raised in that proceeding, including but not limited to whether Felsoci's, Casey's and/or the Kasich Campaign's activities in removing Earl from the Ohio ballot violated the First Amendment to the United States Constitution, whether Ohio is required to afford new and minor parties political primaries under the United States Constitution and/or the Ohio Constitution, whether Ohio's employer statement rule violates the First Amendment, whether application of Ohio's employer statement rule to Earl violated the First and Fourteenth Amendments, and whether Bradley Smith's participation as the hearing officer violated the Fourteenth Amendment. *See England v. Louisiana State Board of Medical Examiners*, 375 U.S. 411 (1964).

I swear under penalty of perjury that the aforementioned allegations are true to the best of my knowledge and belief; SIGNED AND SWORN BEFORE A NOTARY PUBLIC.



Charles Earl
10232 Middleton Pike
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(419) 801-4040

STATE OF OHIO

COUNTY OF WOOD

Subscribed, sworn to and acknowledged before me by Charles Earl this 13 day of April, 2015.



Notary Public



KIMBERLY R. WARD
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires June 16, 2016

My commission expires 6/16/16.

Respectfully submitted,



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