



July 30, 2020

VIA FACSIMILE

Office of the Ohio Secretary of State
22 North Fourth Street, 16th Floor
Columbus, Ohio 43215
Fax: (614) 644-0649

Re: Public Records Act Request

Dear Public Records Officer:

Pursuant to the Ohio Public Records Act (PRA), Ohio Rev. Code § 149.43, American Oversight makes the following request for public records.

Requested Records

American Oversight requests that your office promptly produce the following:

1. All email communications (including email messages, complete email chains, email attachments, calendar invitations, and any attachments thereto) between or among (1) any person holding the office of Secretary of State, or anyone communicating on their behalf (such as a scheduler or assistant), and (2) any of the individuals or any employee or representative of the private entities listed below:
 - i. PTTG Global Chemical, Ltd.
 - ii. PTTGCA America, LLC
 - iii. Daelim Industries of South Korea
 - iv. Bechtel8
 - v. Ineos
 - vi. Mountaineer NGL Storage
 - vii. Lee C. Weingart
 - viii. Scott Owens
 - ix. Erin Synk
 - x. Brandon Sagraves
 - xi. Patrick McCune
 - xii. Dan Williamson

Please provide all responsive records from January 1, 2016, to the date the search is conducted.



2. All email communications (including email messages, complete email chains, email attachments, calendar invitations, and any attachments thereto) between or among (1) any person holding the position of Secretary of State, or anyone communicating on their behalf (such as a scheduler or assistant), and (2) JobsOhio, regarding PTTG Global Chemical, Ltd. and/or PTTGCA America, LLC.

Please provide all responsive records from January 1, 2016, to the date the search is conducted.

Please notify American Oversight of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fees.

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term “record” in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

In addition, American Oversight insists that your office use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. American Oversight is available to work with you to craft appropriate search terms. **However, custodian searches are still required; governmental authorities may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.**

Please search all records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails conducting government business sent or received on the personal account of a governmental authority’s officer or employee constitutes a record.

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion,

including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight your office can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or in PDF or TIF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

We share a common mission to promote transparency in government. American Oversight looks forward to working with your office on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Hart Wood at records@americanoversight.org or 202.873.1743.

Sincerely,

A handwritten signature in blue ink, appearing to read "Austin R. Evers", with a long horizontal flourish extending to the left.

Austin R. Evers
Executive Director
American Oversight