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November 17, 2011

Via Hand Delivery

Ohio Attorney General Mike DeWine
30 E. Broad St., 14th Floor
Columbus, OH 43215

Re: Public Records Request

Attorney General DeWine:

Pursuant to the Ohio Public Records Act and on behalf of a client, I request that you and your office provide copies of the following public records:

- all records that document any report, complaint, claim, request for investigation or request for legal action relating to the fact that State Representative Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;
- all records documenting all actions taken by the office or employees of the Ohio Attorney General in response to any report, complaint, claim, request for investigation or request for legal action relating to the fact that State Representative Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;
- all records documenting any communication to or from the office or employees of the Ohio Attorney General in response to any report, complaint, claim, request for investigation or request for legal action relating to the fact that State Representative Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;
- any records documenting any investigation undertaken by the Office of the Attorney General, or its designee, concerning any report, complaint, claim, request for investigation or request for legal action relating to the fact that State Representative Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;
- all records documenting any discussions, assessments, evaluation or decision by the Office of the Attorney General to pursue *vel non* any report, complaint, claim, request for investigation or request for legal action relating to the fact that State Representative Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;

- all records documenting any discussions, assessments, evaluation or decision by the Office of the Attorney General to pursue *vel non a quo warranto* action against Danny R. Bulp for the forfeiture of the office of state representative in light due to the fact that Danny R. Bulp was simultaneously holding and/or continues to simultaneously hold the public offices of state representative and magistrate in a mayor's court;
- any evaluation or analysis by the Office of the Attorney General concerning the provision of Article II, Section 4 of the Ohio Constitution that provides that "[n]o member of the general assembly shall, during the term for which he was elected . . . hold any public office under . . . or this state, or a political subdivision thereof";
- any evaluation or analysis by the Office of the Attorney General concerning the provision of Section 101.26 of the Ohio Revised Code that provides that "[n]o member of either house of the general assembly . . . shall knowingly do any of the following: . . . (C) Accept any . . . office . . . that is authorized or created by the general assembly and that provides other compensation than actual and necessary expenses Any member of the general assembly who accepts any appointment, office, or employment described in division (A), (B), or (C) of this section immediately shall resign from the general assembly, and, if he fails or refuses to do so, his seat in the general assembly shall be deemed vacant."

I would note that on or about October 22, 2009, a Cincinnati-area news station (WKRC-TV) reported that the chairmen of the local Democratic Party in the three counties comprising the 88th state house district (Clermont, Brown and Adams Counties) filed complaints with, *inter alios*, the Ohio Attorney General asserting that Mr. Bulp was in violation of the Ohio Constitution and Ohio law by serving as both a member of the Ohio General Assembly and as a magistrate judge for the village of Ripley.

Thus, with respect to the foregoing requests, the time frame for responsive documents may be limited to the time period from July 1, 2009, to the present, though the request is not limited simply to the complaint of the three party chairmen.

Pursuant to the Public Records Act, I request that responsive records be produced in an electronic medium (specifically, a pdf-file) to the extent such records may reasonably be duplicated in such a medium. The records in electronic medium may be sent to me at the e-mail address in the header of this letter. If such records are not reasonably capable of being produced in such a medium, then I request to receive copies in paper format and am willing to pay the reasonable costs of copying and postage.

Sincerely,


Curt C. Hartman

Receipt confirmed: 

Date: 11-22-11