

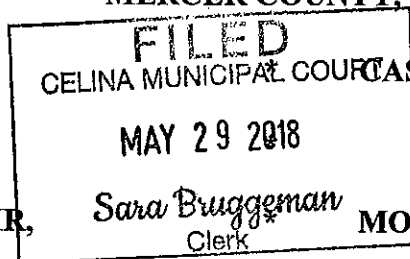
IN THE CELINA MUNICIPAL COURT
MERCER COUNTY, OHIO

STATE OF OHIO,

vs.

JEFFERY RASAWEHR,

DEFENDANT.



CASE NO. 16-CRB-00942
16-CRB-00943

MOTION TO COMPEL DISCOVERY

*


Now comes the State of Ohio, by and through the Prosecuting Attorney Matthew K. Fox and Assistant Prosecuting Attorney Amy B. Ikerd and files this motion to compel discovery.

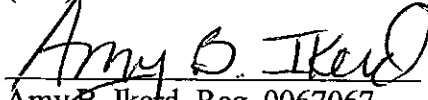
Attached hereto is a correspondence to Attorneys Sawan and Yamin requesting discovery and production of documents in the possession of the defendant that was sent on March 12, 2018. To date, the defendant has provided *none* of the documents requested. The only time the defendant raised a complaint or has given any response regarding the discovery was during the telephone conference held with the court on May 29, 2018.

Failure to produce the documents is discovery abuse and prevents the State of Ohio from adequately preparing for trial.

MERCER COUNTY
PROSECUTING ATTORNEY
19 NORTH WALNUT STREET
CELINA, OHIO 45822
419-586-8677
FAX: 586-8747

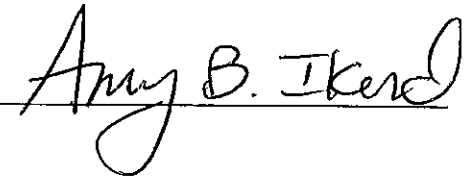
Respectfully submitted,


Matthew K. Fox, Reg. #0056112
Prosecuting Attorney
119 N. Walnut Street
Celina, OH 45822
(419) 586-8677


Amy B. Ikard, Reg. 0067067
Assistant Prosecuting Attorney
119 N. Walnut Street
Celina, OH 45822
(419) 586-8677

CERTIFICATE

This is to certify that a copy of the foregoing was sent to attorneys Joe Yamin, Dennis E. Sawan, Dennis P. Sawan and Chris Sawan via e-mail on this the 27th day of May, 2018.



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PROSECUTING ATTORNEY
119 NORTH WALNUT STREET
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Mercer County Prosecuting Attorney's Office
Matthew K. Fox, Prosecutor

119 North Walnut Street
Celina, Ohio 45822
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Assistant Prosecutors
Andrew J. Hinders
Amy B. Ikerd
Joshua A. Muhlenkamp
Victim Assistance
Rhonda S. Helmer

March 12, 2018

Dennis E. Sawan, Esq.
416 N. Erie St., Suite 200
Toledo, Ohio 43604

Re: Mandatory Reciprocal Discovery
Case No. 16CRB00942 and
Case No. 16CRB00943

Dear Mr. Sawan:

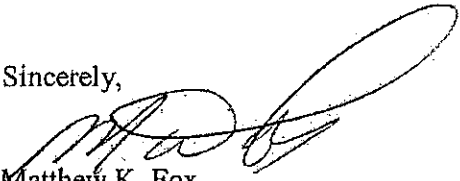
I am confident that you are aware of your duty for reciprocal discovery under Criminal Rule 16, which applies to the prosecution and the defense equally. Because you have previously triggered that rule with your requests for discovery, we hereby demand copies of the following items which are within the possession of, or reasonably available to the Defendant and are relevant to these matters:

- all discovery in Mercer County Common Pleas Court Case No. 12-CIV-078, including, but not limited to:
 - Copy of the videotaped or transcribed depositions of Jeff Rasawehr, Pam Rasawehr, and Rebecca Rasawehr
 - Copies of all of Plaintiff's responses to discovery provided to Rebecca Rasawehr or her counsel
- all discovery in Auglaize County Common Pleas Court Case No. 2012 CV 0310 including but not limited to the deposition of the defendant, affidavits and discovery responses.
- all discovery in Auglaize County Common Pleas Court Case No. and 2014 CV 0208 including but not limited to all depositions, affidavits and discovery responses.
- all of defendants tax returns for the years 2012-2018
- All contracts between the defendant, anyone acting as an agent of the defendant, or any corporation or business owned in whole or in part by the defendant with any company, business or person to post billboard advertisements in Mercer, Auglaize, Allen, Darke, Van Wert, or Shelby County for the last five years.

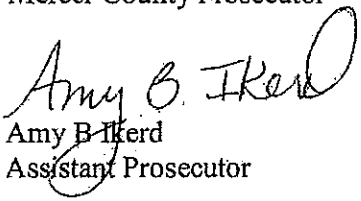
- All contracts between the defendant, anyone acting as an agent of the defendant, or any corporation or business owned in whole or in part by the defendant for the provision of a web site, including but not limited to countycoverup.com
- all records filed by or at the request of the defendant with the Accountancy Board of Ohio
- all records filed by or at the request of the defendant with the Ohio State Board of Education
- any and all contracts with or investigative reports from Upper Valley Investigative Services or any of its owners, employees, or agents provided to the defendant or any person or entity acting as agent for the defendant or any corporation or business owned in whole or in part by the defendant
- all complaints filed by or at the request of the defendant with the Ohio Organized Crime Task Force
- Any and all emails or written communication from the defendant, the defendant's spouse, or anyone acting as agent for either of them to Matt Hilbert, Ohio Attorney General's Office

Should you have any questions regarding this discovery demand, please contact us.

Sincerely,



Matthew K. Fox
Mercer County Prosecutor



Amy B. Ikerd
Assistant Prosecutor

Mandatory Reciprocal Discovery
Case No. 16CRB00942 and
Case No. 16CRB00943