



Via Electronic Mail

September 12, 2023

State Senator Bill DeMora
100 Warren St.
Columbus, OH 43215

Re: Ohio Secretary of State Office Relocation

Dear State Senator DeMora,

I read with interest your recent comments to a local news reporter regarding the long-planned relocation of the Ohio Secretary of State's office. As the chief legal counsel to the office, it's my duty to ensure that all laws, regulations, and ethical standards are followed in the administration of the Secretary's statutory duties. As you know, the news report in question addresses the relocation of the Columbus-based headquarters "for the first time in nearly two decades" but then falsely attempts to assign some sort of political motive to the decision, largely due to speculation offered by you. For the sake of public integrity, I'm obligated to highlight several key facts excluded from the report.

First, I'll note that while you admit in the interview our decision to relocate the office is "not illegal under the definition of the law," you proceed to offer your own personal "smell test." I suspect this test is heavily biased toward your background as a longtime partisan operative who regularly criticizes the Secretary of State, but nevertheless I want to address your apparent concerns, particularly as our office has no record of any engagement with you on this matter. That would suggest either that you had no intention of seeking factual understanding and speaking credibly on the topic or that perhaps you had other – more political – motives.

Let me start by addressing the timeline behind our decision to pursue relocation to a new headquarters facility. This process began shortly after Secretary LaRose took office in 2019, when he asked his senior team to begin exploring relocation opportunities. To say that our current location, the Continental Plaza at 180 E. Broad St., is struggling would be an understatement. This is certainly a hardship facing many downtown properties confronting a pandemic recovery, the rise of remote work, and the reality of rising crime rates in the greater metropolitan area, but we've seen evidence of financial distress at the current property for several years, from facility disrepair to a reduction in support staff. In May of 2023, foreclosure proceedings began on the property, resulting in the appointment of a receiver and the scheduling of a sheriff's auction. These developments are [well documented](#) in Business First.

Since taking office in 2019, Secretary LaRose has had a particular concern about the building's lack of secure parking options, as threats against election personnel are a [real and growing vulnerability](#) nationwide. Some of our employees have received threats on their lives and property due simply to their association with their jobs, and we regularly work with law enforcement to mitigate those realities. Most of our 135 employees must find and pay for their own parking at

nearby garages, lots, and metered spaces. Due to the nature of our work, these loyal team members are sometimes required to arrive early and work late, especially during an election. This often requires staff members to accompany each other when walking to and from their vehicles, as some employees have experienced vandalized vehicles and even aggressive harassment by people approaching them in unsecured garages or on nearby sidewalks outside of traditional daylight working hours.

Secretary LaRose determined this security threat to be an unacceptable risk to our staff, and he asked our senior team in 2021 to revisit the relocation effort, with a focus on efficiency and security. By that time, the post-pandemic economy had created more affordable options in the downtown area. The Secretary asked his team to prioritize locations with an attached parking option to enhance employee safety. In a political context, that effort got underway more than a year before Secretary LaRose filed his candidacy for re-election to the office he currently holds and 18 months before filing campaign paperwork with the Federal Election Commission. Therefore, your assertion that “all of a sudden now they have to move because Frank LaRose has to be close to his [U.S. Senate] campaign” is demonstrably false.

In partnership with the Department of Administrative Services, our exploration of several properties in and around the Columbus area continued through 2021 and into 2022. Our staff first visited the property at 200 Civic Center Drive (our new location) in June of 2022. As the news report indicates, we did explore other options that either proved to be cost prohibitive or lacked adequate parking options for our employees. Simply put, the Civic Center Drive location offered an overall reduction in our lease, as well as an attached parking garage that can safely accommodate our full-time, in-office staff. This proved to be a challenging combination to achieve, but we anticipate that the more streamlined and modern facility offered at the new location also will help with employee recruitment and retention. We made the decision to finalize this property in consultation with our entire bipartisan staff, including our bargaining unit employees, some of whom began working with this office under then-Secretary of State Sherrod Brown back in the early 1980s.

On two separate occasions this year, we appeared before the General Assembly’s Controlling Board to explain the relocation effort and secure funding for the move. We first received unanimous, bipartisan approval to expend funds related to the move in January of 2023, again nearly six months before Secretary LaRose filed paperwork with the FEC. The address listed on that paperwork is for the Columbus office of Baker Hostetler, the law firm that represents Secretary LaRose’s federal campaign. His campaign has no formal office. It should be noted here that if the Secretary wanted to find an office with proximity to a law firm providing political representation to his campaign interests, we wouldn’t need to leave our current location. Our current location houses the Dickinson Wright law firm, which represents the Secretary’s state campaign committee. No concern has ever been expressed about our proximity to that law firm because this entire narrative is silly, misinformed and clearly designed to score political points, which is why no serious journalist thinks this is a story.

Finally, no tax dollars will be spent to finance the relocation. The overall cost of the new lease is lower than that of our current arrangement, and the one-time costs associated with the move will be covered with revenue received by our office through business filing fees. As you know, business filings have reached a record number in Ohio during the Secretary’s administration thanks in part to the successful development incentives and economic policies adopted by the Republican-led General Assembly.

While you sought no information from our office before administering your “smell test” and making these spurious assertions, I trust the context provided in this letter is helpful to improving your understanding of our decision. When asked for comment by the reporter, you leveled unfounded ethical allegations and offered, “I don’t know how else to explain it.” Perhaps getting the facts before offering an opinion is a good place to start, but as they say, why let the facts get in the way of a good story. Please contact me if I can be of further assistance.

Yours,

Paul Disantis



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