

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

**OHIO HOUSE REPUBLICAN ALLIANCE
17 S. HIGH STREET
SUITE 310
COLUMBUS, OHIO 43220**

**PHIL PLUMMER
1831 KERSHNER ROAD
DAYTON, OHIO 45414**

**DEREK MERRIN
P.O. BOX 75
MONCLOVA, OHIO 43542**

**RONALD FERGUSON
229 CARA PLACE
WINTERSVILLE, OHIO 43953**

Plaintiffs

-VS-

**JASON STEPHENS
26 COUNTY ROAD 230
KITTS HILL, OHIO 45645**

**J. MATTHEW YUSKEWICH, TREASURER
4679 WINTERSET DRIVE
COLUMBUS, OHIO 43220**

**WINTERSET CPA GROUP, INC
4679 WINTERSET DRIVE
COLUMBUS, OHIO 43220**

**JEFF LARE
7587 CUMBERLAND CIRCLE NW
CANAL WINCHESTER, OHIO 43110**

Defendants.

CASE NO.:

JUDGE:

**VERIFIED COMPLAINT FOR
DECLARATORY JUDGMENT AND
TORTIOUS INTERFERENCE WITH
BUSINESS RELATIONSHIP**

Now comes Plaintiffs Ohio House Republican Alliance (OHRA), Phil Plummer, Derek Merrin, and Ronald Ferguson and for their Complaint against Defendants, Jason Stephens, Treasurer J. Matthew Yuskewich, Winterset CPA Group, Inc., and Jeff LaRe, hereby state and aver as follows:

JURISDICTION, AND VENUE

1. Plaintiff Ohio House Republican Alliance (“OHRA”) is the campaign committee of the Republican Caucus of the Ohio House of Representatives pursuant to Ohio Revised Code §3517.10 (D)(3)(d). OHRA’s has an office located at 17 S. High Street Suite 310, Columbus, Ohio 43220.
2. Plaintiff State Representative Phil Plummer is the duly elected Chair of OHRA, with a mailing address of 1831 Kershner Road, Dayton, Ohio 45414.
3. Plaintiff State Representative Derek Merrin is the duly elected Vice Chair of OHRA, with a mailing address of P.O. Box 75, Monclova, Ohio 43542.
4. Plaintiff State Representative Ronald Ferguson is a member of the Republican Caucus of the House of Representatives with a mailing address of 229 Cara Place, Wintersville, Ohio 43953.
5. Upon information and belief, Defendant, Jason Stephens is Speaker of the House of Representatives with a mailing address of 26 County Road 230, Kitts Hill, Ohio 45645.
6. Upon information and belief, Defendant, J. Matthew Yuskewich, is the Treasurer of OHRA with an office address of 4679 Winterset Drive, Columbus, Ohio 43220.
7. Upon information and belief, Defendant, Winterset CPA Group Inc. a Ohio Limited Partnership with an office address of 4679 Winterset Drive, Columbus, Ohio 43220.

8. Upon information and belief, Jeff Lare is a State Representative with a mailing address of 7587 Cumberland Circle NW, Canal Winchester, Ohio 43110.

9. Jurisdiction and venue are proper in this forum pursuant to Ohio Rules of Civil Procedure Rule 3(C)(3) and 3(C)(5) since Defendants conduct business in Franklin County and the Treasurer of the OHRA fund is located in Franklin County.

STATEMENT OF FACTS

10. Plaintiffs Phil Plummer, Derek Merrin, and Ronald Ferguson are State Representatives and members of the Republican Caucus of the Ohio House of Representatives.

11. OHRA is the legislative campaign fund for the Republican House of Representatives. Speaker Jason Stephens falsely claims to be in control of the OHRA account solely on being elected speaker.

12. Ohio Revised Code §3517.10(D)(3)(d) states:

Each state political party shall have only one legislative campaign fund for each house of the general assembly. Each such fund shall be separate from any other funds or funds of that state party. A legislative campaign fund is authorized to receive contributions and make expenditures for the primary purpose of furthering the election of candidates who are members of that political party to the house of the general assembly with which that legislative campaign fund is associated. Each legislative **campaign fund shall be administered and controlled in a manner designated by the caucus**. As used in this division, , ""caucus"" has the same meaning as in section 3517.01 of the Revised Code and includes, as an ex officio member, the chairperson of the state political party with which the caucus is associated or that chairperson's designee. Emphasis Added.

13. Ohio Revised Code §3517.01 defines Caucus as follows:

(14) ""Caucus"" means all of the members of the house of representatives or all of the members of the senate of the general assembly who are members of the same political party.

14. There are four Legislative Campaign Funds: 1) Ohio House Democratic Caucus; 2) Ohio House Republican Alliance; 3) Ohio Senate Democrats; and 4) Republican Senate Campaign Committee. "Each state political party shall have only one legislative campaign fund for each house of the general assembly." Ohio Revised Code §3517.10(D)(3)(d).

15. The purpose of these funds is defined by statute, "A legislative campaign fund is authorized to receive contributions and make expenditures for the primary purpose of furthering the election of candidates who are members of that political party to the house of the general assembly with which that legislative campaign fund is associated." Ohio Revised Code §3517.10(D)(3)(d).

16. The control of this campaign fund is by the caucus, "Each legislative campaign fund shall be administered and controlled in a manner designated by the caucus." Ohio Revised Code §3517.10(D)(3)(d).

17. The current controversy is over who is in control of the OHRA fund.

18. On January 3, 2023, Jason Stephens was elected Speaker of the Ohio House of Representatives with the support of 22 Republicans and 32 Democrats in the Ohio House of Representatives. 43 Republicans voted for Rep. Derek Merrin for Speaker of the House.

19. Rep. Derek Merrin had been considered speaker-elect after winning a House Republican Caucus vote November 16, 2022. On January 3, 2023 Derek Merrin continued to have support of the majority of the Republican Caucus.

20. Jason Stephens has self-proclaimed himself the leader of the Ohio House Republican Caucus and claimed to be in control of the OHRA fund.

21. After the vote on January 3, 2023, the Republican Caucus of the House of Representatives "Republican Caucus" called a meeting with all members of the caucus invited to attend on January 24, 2023. *See* Meeting invitation attached hereto as Exhibit A.

22. A majority of the full Republican Caucus was in attendance, and that majority of the caucus unanimously voted to determine who would legally control the Republican Caucus. Rep. Derek Merrin was elected the Chair of the Republican Caucus for the 135th General Assembly and Rep. Phil Plummer was elected the Vice Chair. *See* Resolution hereto as Exhibit B.

23. At that same meeting, in accordance with Ohio Revised Code §3517.10(D)(3)(d), the caucus designated that the legislative campaign fund OHRA associated with the Republican Caucus be controlled by Rep. Phil Plummer as the Chair and Rep. Derek Merrin as the Vice Chair. *See* Exhibit B.

24. The Ohio House Republican Caucus issued a press release with the results of the vote. *See* Press Release, attached hereto as Exhibit C.

25. However, Speaker Stephens publicly refused to accept the results of the majority vote of the Republican Caucus.

26. On January 26, 2023, the Associated Press reported the following:

Stephens supporters note a long-standing tradition that the speaker is the leader of their party caucus, though legal experts told The Associated Press that Ohio law does not expressly require the speaker and caucus leader to be the same individual. As evidence that Stephens is an official representative of the campaign arm, known as the Ohio House Republican Alliance, and has access to its funds, an unofficial political adviser to the speaker provided The Associated Press with an image of an OHRA credit card in Stephens' name. *See* Hendrickson, Samantha, and Julie C. Smyth. "Ohio House Speaker Asserts Leadership, Dismisses Rival Group."

Associated Press, 26 Jan. 2023. <https://apnews.com/article/us-republican-party-ohio>.

27. Defendant J. Matthew Yuskewich of the Winterset CPA Group is the current Treasurer for the OHRA fund.

28. Defendant Yuskewich has refused to follow the direction of the duly elected Chair Rep. Phil Plummer and Vice Chair Rep. Derek Merrin.

29. Speaker Stephens has interfered with the administration of the OHRA fund and is misusing funds to bolster his own position as Speaker instead of “for the primary purpose of furthering the election of candidates who are members of that political party to the house of the general assembly with which that legislative campaign fund is associated.” Ohio Revised Code §3517.10(D)(3)(d).

30. Defendant Yuskewich’s actions supporting Speaker Stephens allow the Speaker to continue his unlawful interference with OHRA’s operations.

31. Following the January 24, 2023 caucus meeting, Chair Phil Plummer, Vice Chair Derek Merrin, and members of the Republican Caucus negotiated in good faith with Speaker Stephens to attempt to resolve the conflict over the control of OHRA without the need for litigation. A tentative arrangement was discussed in which Rep. Phil Plummer would serve as Co-Chair of OHRA along with Rep. Jeff LaRe, but that no funds could be spent, no candidates supported, no vendors hired, and no staff retained, without the approval of both co-chairs.

32. After those discussions, in April 2023, Jason Stephens issued a press release that Rep. Phil Plummer and Rep. Jeff LaRe will both serve as Co-Chairs of the OHRA fund. This press release was prepared by Stephens, and this self-serving press release does not change the vote of the majority of the Republican Caucus.

33. Most critically, Defendants immediately reneged on all prior discussions with Rep. Phil Plummer, and began hiring staff, retaining vendors, engaging in discussions with candidates,

and spending OHRA funds, without the involvement or approval of Rep. Phil Plummer. Accordingly, there has never been any agreement regarding the administration of OHRA other than the vote of the Republican Caucus on January 24, 2023.

34. Speaker Stephens does not have the authority to demote Chair Phil Plummer and Vice Chair Derek Merrin or appoint Jeff LaRe as a Co-Chair. This authority is under the control of the Republican Caucus, and the Republican Caucus specifically elected Rep Phil Plummer as the Chair and Rep. Derek Merrin as the Vice Chair of OHRA.

35. Absurd results would occur if the caucus whether Democratic or Republican are not allowed to determine the leadership of their own caucus.

36. Jason Stephens continues to defy the vote of the Republican Caucus and the Treasurer, J. Matthew Yuskewich and Jeff LaRe have cooperated in that defiance by acting under the direction of Jason Stephens.

37. Treasurer Yuskewich and Winterset CPA Group were notified by letter and email on September 28, 2023, that Jason Stephens does not have authority over the OHRA fund. The Treasurer was asked to respond in writing that he and Winterset would cease to make any expenditures not approved by the duly elected Rep. Phil Plummer and Rep. Derek Merrin by September 29, 2023. *See* letter attached as Exhibit D.

38. Jason Stephens was notified by email on September 27, 2023, that he does not have authority to authorize expenditures from the OHRA fund. *See* E-Mail attached as Exhibit E.

39. The letter requested Jason Stephens to acknowledge that he would not make any expenditures from the OHRA fund.

40. Plaintiffs received a response from Attorney Trevor Stanley that his clients Speaker Stephens and Treasurer Yuskewich would continue to make expenditures in violation of the January 24, 2023 Republican Caucus resolution.

41. Jeff LaRe was notified by letter and email on September 28, 2023, that Jason Stephens does not have authority to designate him as Co-chair of the OHRA fund. To the best of the Plaintiffs knowledge and belief Jeff LaRe has a debit and/or a credit card from the OHRA fund

42. The letter requested Jeff LaRe to acknowledge that he would not make any expenditures from the OHRA fund. Attached as Exhibit F.

43. Jeff LaRe has failed to respond to the request.

FIRST CLAIM FOR RELIEF
DECLARATORY JUDGMENT

44. Plaintiffs incorporates the preceding paragraphs of this Complaint as if fully rewritten herein.

45. Plaintiffs are each a “person whose rights, status, or other legal relations are affected by a . . . statute” who may therefore “have determined any question of construction or validity arising under the statute ...” Ohio Revised Code §2721.03.

46. A real controversy now exists between the parties regarding who is in charge of the OHRA fund.

47. The controversy is justiciable in character because the Defendants are using the OHRA fund without the authority of the caucus when Ohio Revised Code §3517.10(3)(d) clearly states that the fund is to be “administered and controlled in a manner designated by the caucus.”

48. Immediate relief is necessary to preserve the OHRA funds.

49. The Semiannual report filed on July 31, 2023, reports \$284,153.94 in expenditures from the OHRA fund. These expenditures were not authorized by the duly elected representatives of the caucus. *See* Finance Report Cover Sheet attached hereto as Exhibit G.

50. To the best of Plaintiffs' knowledge and belief, the expenditures reflected on the Semiannual Report were authorized by Defendants Jason Stephens and/or Jeff LaRe authorized these expenditures.

51. Plaintiff Rep. Ron Ferguson is a member of the Ohio House Republican caucus who voted to appoint Rep. Phil Plummer and Rep. Derek Merrin to their leadership positions of OHRA. Rep. Ferguson is entitled to receive the leadership voted for by the caucus, and to seek enforcement of the resolution adopted by said caucus.

52. Plaintiffs seek a Declaratory Judgment construing Ohio Revised Code §3517.10(3)(d) to provide that Rep. Phil Plummer and Rep. Derek Merrin, the duly appointed leaders of OHRA, have the sole authority to administer and control OHRA and its finances. Plaintiffs further seek an order that the unauthorized expenditures made by Jason Stephens and/or Jeff LaRe in the sum of \$284,153.94 and any additional expenditures since the July 31, 2023 finance report be personally reimbursed to the OHRA fund.

COUNT TWO
TORTIOUS INTERFERENCE OF BUSINESS RELATIONSHIPS

53. Plaintiffs incorporates the preceding paragraphs of this Complaint as if fully rewritten herein.

54. Plaintiffs, Phil Plummer as Chair and Derek Merrin as Vice Chair are responsible for fundraising ("receiving contributions" under §3517.10(D)(3)(d)), for hiring vendors ("make expenditures" under §3517.10(D)(3)(d)), and to assist with campaigns of the members of the Republican Caucus of the House of Representatives.

55. OHRA has various existing business relationships with candidates, members of the Republican caucus, vendors, creditors, financial institutions, and other third parties. Each of these constitutes a “business relationship.” As the duly elected leaders of OHRA, Rep. Phil Plummer and Rep. Derek Merrin have a business relationship with these aforementioned parties.

56. Defendants each had knowledge of the business relationships involving OHRA, Rep. Phil Plummer, and Rep. Derek Merrin.

57. Defendants Jason Stephens and Jeff LaRe each intentionally interfered with the foregoing business relationships, causing the breach of the relationship as they existed with the duly elected leaders of OHRA, Rep. Phil Plummer and Rep. Derek Merrin.

58. As a direct and proximate cause of Jason Stephens and Jeff LaRe’s tortious interference, Chair Phil Plummer and Vice Chair Derek Merrin have been unable to administer and control OHRA to further the election of candidates and members of the Republican Caucus of the House of Representatives and have suffered damages in excess of the jurisdictional threshold of this Court.

WHEREFORE, Plaintiffs respectfully request the following relief:

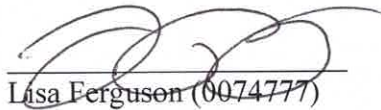
A. As to the First Claim for Relief, a declaratory judgment that: (1) The OHRA fund is to be “administered and controlled in a manner designated by the caucus” pursuant to Ohio Revised Code §3517.10(3)(d); (2) The OHRA fund is to be administered and controlled by the duly elected members Chair Phil Plummer and Vice-Chair Derek Merrin; (3) An Order that Jason Stephens and/or Jeff LaRe personally reimburse OHRA for unauthorized expenditures.

B. As to the Second Claim for Relief: An award from Jason Stephens and Jeff LaRe to OHRA, Rep. Phil Plummer, Rep. Derek Merrin, Rep. Ronald Ferguson, all House Republican Caucus members, and all other candidates tortiously harmed by the unauthorized use of OHRA

funds for damages in excess of \$100,000.00 plus attorneys' fees, and costs, arising from unauthorized expenditures made from the OHRA accounts.

C. Such other relief as this Honorable Court deems equitable, proper, and just under the evidence.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lisa Ferguson', is written over a horizontal line.

Lisa Ferguson (0074777)
110 Main Street
Wintersville, Ohio 43953
Telephone: (740) 264-0661
Facsimile: (740) 264-6855
Email: lferguson@dlferguson.com

VERIFICATION

Phil Plummer, being first duly sworn, says that he has read the Verified Complaint above, has personal knowledge of the facts sworn to therein, and the same are true and correct to the best of his knowledge, information, and belief.



Phil Plummer

STATE OF OHIO

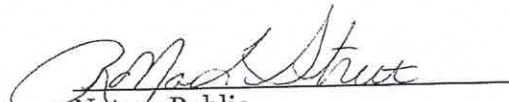
SS:

COUNTY Montgomery



BEFORE ME, a Notary Public in and for said county and state, personally appeared the above-named Phil Plummer, who acknowledged that he did sign the foregoing instrument, that the same is his free act and deed, and that the statements contained therein are true as he verily believes.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal at Montgomery County, Ohio, this 6th day of October, 2023.


Notary Public

VERIFICATION

Derek Merrin, being first duly sworn, that he has read the Verified Complaint above, has personal knowledge of the facts sworn to therein, and the same are true and correct to the best of his knowledge, information, and belief.

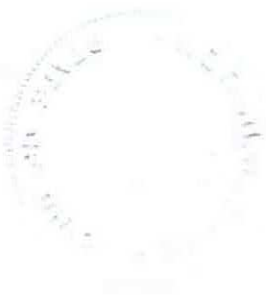

Derek Merrin

STATE OF OHIO

SS:
COUNTY LUCAS

BEFORE ME, a Notary Public in and for said county and state, personally appeared the above-named Derek Merrin, who acknowledged that he did sign the foregoing instrument, that the same is his free act and deed, and that the statements contained therein are true as he verily believes.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal at Lucas County, Ohio, this 3rd day of October, 2023.



Ann F. Cubbedge
Notary Public, State of Ohio

My Commission
expires 5-1-2024

 10/3/23
Notary Public

VERIFICATION

Ronald Ferguson, being first duly sworn, that he has read the Verified Complaint above, has personal knowledge of the facts sworn to therein, and the same are true and correct to the best of his knowledge, information, and belief.



Ronald Ferguson

STATE OF OHIO

SS:

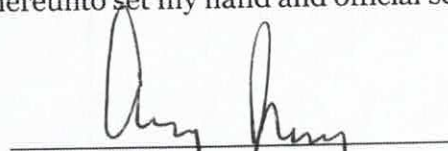
COUNTY Jefferson

BEFORE ME, a Notary Public in and for said county and state, personally appeared the above-named Ronald Ferguson, who acknowledged that he did sign the foregoing instrument, that the same is his free act and deed, and that the statements contained therein are true as he verily believes.

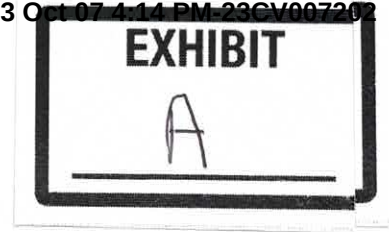
IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal at Jefferson County, Ohio, this 6nd day of October, 2023.



ASHLEY L. DAUGHERTY
NOTARY PUBLIC - OHIO
JEFFERSON COUNTY
MY COMMISSION EXPIRES 6/2024



Notary Public



To: All House Republican Members

From: Representatives Derek Merrin and Bill Dean

Subject: House Republican Caucus Meeting on January 24, 2023

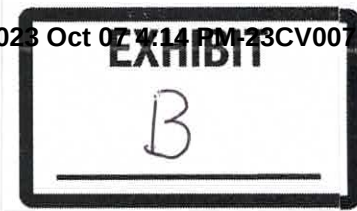
Date: Saturday, January 21, 2023

As leader of the Ohio House Republican Caucus, duly elected on November 16, 2022, and as Dean of the Ohio House Republican Caucus, we are jointly calling a Republican Caucus meeting on Tuesday, January 24 at 11:15am. The meeting will take place at Due Amici (67 E. Gay St., Columbus, OH 43215) in the first floor meeting room. The agenda for the meeting is below.

AGENDA

- Caucus Leadership
- Leadership of OHRA pursuant to statute
- House Rules

*Only Members can attend the meeting, no staff permitted



The Republican Caucus of the Ohio House of Representatives, meeting on Tuesday January 24, 2023, pursuant to the call of its duly elected leader, Rep. Derek Merrin, does hereby adopt the following resolution:

Be it resolved:

1. That Rep. Derek Merrin, by virtue of his election by the Caucus as its candidate for Speaker in November 2022, is the duly elected leader of the Republican Caucus for the 135th General Assembly.
2. That the call of this meeting was properly made by the Caucus leader, and therefore is a legally held meeting; and
3. That Rep. Derek Merrin be elected Chair, and Rep. Phil Plummer be elected Vice Chair, of the Republican Caucus.
4. That in accordance with ORC section 3517.10(D)(3)(d), the legislative campaign fund associated with the Republican Caucus in the Ohio House, which is currently named the Ohio House Republican Alliance ("OHRA"), be administered and controlled by three trustees elected by the Caucus.
5. That the three trustees of OHRA for 2023 and 2024 be Rep. Plummer, Chair; Rep. Merrin, Vice Chair; and a member to be elected by the Caucus no later than March 1, 2023.

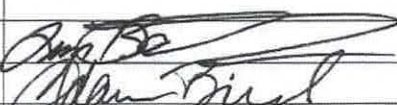
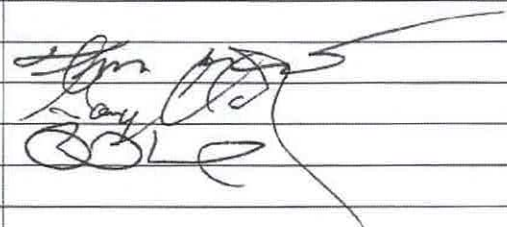
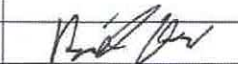
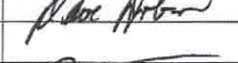
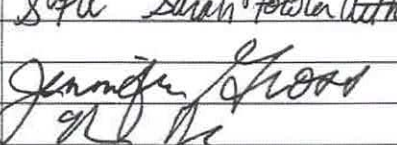
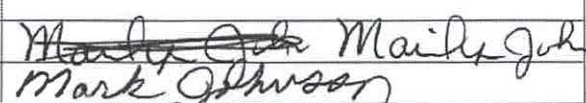
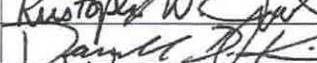
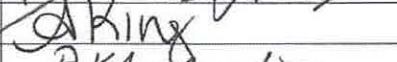
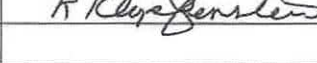
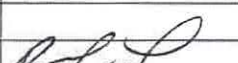
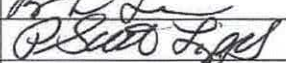
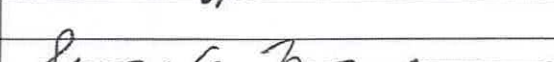
Majority Caucus, January 24, 2023

<u>Ohio House of Representatives District 12</u>	X	<u>Brian Stewart</u>
<u>Ohio House of Representatives District 17</u>		<u>Thomas Patton</u>
<u>Ohio House of Representatives District 29</u>		<u>Cindy Abrams</u>
<u>Ohio House of Representatives District 30</u>		<u>Bill Seitz</u>
<u>Ohio House of Representatives District 31</u>		<u>Bill Roemer</u>
<u>Ohio House of Representatives District 32</u>		<u>Bob Young</u>
<u>Ohio House of Representatives District 35</u>	X	<u>Steve Demetriou</u>
<u>Ohio House of Representatives District 36</u>	X	<u>Andrea White</u>
<u>Ohio House of Representatives District 37</u>	X	<u>Tom Young</u>
<u>Ohio House of Representatives District 39</u>	X	<u>Phil Plummer</u>
<u>Ohio House of Representatives District 40</u>	X	<u>Rodney Creech</u>
<u>Ohio House of Representatives District 41</u>	X	<u>Josh Williams</u>
<u>Ohio House of Representatives District 42</u>	X	<u>Derek Merrin</u>
<u>Ohio House of Representatives District 45</u>	X	<u>Jennifer Gross</u>
<u>Ohio House of Representatives District 46</u>	X	<u>Thomas Hall</u>
<u>Ohio House of Representatives District 47</u>		<u>Sara Carruthers</u>
<u>Ohio House of Representatives District 48</u>		<u>Scott Oelslager</u>
<u>Ohio House of Representatives District 49</u>	X	<u>Jim Thomas</u>
<u>Ohio House of Representatives District 50</u>	X	<u>Reggie Stoltzfus</u>
<u>Ohio House of Representatives District 51</u>		<u>Brett Hudson Hillyer</u>
<u>Ohio House of Representatives District 52</u>		<u>Gayle L. Manning</u>
<u>Ohio House of Representatives District 54</u>	X	<u>Dick Stein</u>
<u>Ohio House of Representatives District 55</u>	X	<u>Scott Lipps</u>
<u>Ohio House of Representatives District 56</u>		<u>Adam Mathews</u>
<u>Ohio House of Representatives District 57</u>		<u>Jamie Callender</u>
<u>Ohio House of Representatives District 58</u>		<u>Alessandro Cutrona</u>
<u>Ohio House of Representatives District 60</u>	X	<u>Kris Jordan</u>
<u>Ohio House of Representatives District 61</u>	X	<u>Beth Lear</u>
<u>Ohio House of Representatives District 62</u>		<u>Jean Schmidt</u>
<u>Ohio House of Representatives District 63</u>	X	<u>Adam Bird</u>
<u>Ohio House of Representatives District 64</u>	X	<u>Nick Santucci</u>
<u>Ohio House of Representatives District 65</u>		<u>Mike Loychik</u>
<u>Ohio House of Representatives District 66</u>		<u>Sharon Ray</u>
<u>Ohio House of Representatives District 67</u>	X	<u>Melanie Miller</u>
<u>Ohio House of Representatives District 68</u>	X	<u>Thaddeus Claggett</u>
<u>Ohio House of Representatives District 69</u>		<u>Kevin Miller</u>
<u>Ohio House of Representatives District 70</u>		<u>Brian Lampton</u>
<u>Ohio House of Representatives District 71</u>	X	<u>Bill Dean</u>

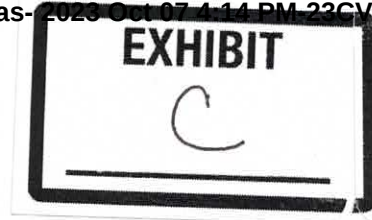
- Merrin called meeting to order.
- Merrin called on Stewart to describe amendments to rules.
- Discussion ensued, questions asked.
- Josh Williams introduced amendments.
- Merrin declared official quorum present at 35 members present.

X David Robos

135th General Assembly Majority Party Members

Representative	Signature
Abrams	
Baldrige	
Barhorst	
Bird	
Callender	
Carruthers	
Claggett	
Click	
Creech	
Cross	
Cutrona	
Dean	
Demetriou	
Dobos	
Edwards	
Ferguson	
Fowler Arthur	
Ghanbari	
Gross	
Hall	
Hillyer	
Holmes	
Hoops	
John	
Johnson	
Jones	
Jordan	
Kick	
King	
Klopfenstein	
Lampton	
LaRe	
Lear	
Lipps	
Loychik	
Manchester	

Manning	
Matthews	
McClain	<i>Paul Mcl</i>
Merrin	<i>Derek Merrin</i>
K. Miller	
M. Miller	<i>M. Miller</i>
Oelslager	
Patton	
Pavliga	
Peterson	
Plummer	<i>Paul Plummer</i>
Powell	<i>Powell</i>
Ray	<i>Ray</i>
Richardson	
Robb Blasdel	
Roemer	
Santucci	<i>Robb Blasdel</i>
Schmidt	
Seitz	
Stein	<i>Dick Stein</i>
Stephens	
Stewart	<i>Stewart</i>
Stoltzfus	<i>Reggie Stoltzfus</i>
Swearingen	
Thomas	<i>J. Thomas</i>
White	<i>White</i>
Wiggam	<i>Scott Wiggam</i>
Williams	<i>Williams</i>
Willis	<i>Willis</i>
B. Young	<i>B. Young</i>
T. Young	<i>T. Young</i>



FOR IMMEDIATE RELEASE

Date: January 24, 2023

Merrin, Plummer Elected to Lead Ohio House Republican Caucus and Campaign Committee

COLUMBUS, OH— Members of the Republican majority in the Ohio House of Representatives elected Representative Derek Merrin (R- Monclova) as Chair and Representative Phil Plummer (R- Dayton) as Vice-Chair of the Ohio House Republican Caucus today. Additionally, Representative Plummer was elected Chair and Representative Merrin Vice-Chair of the Ohio House Republican Alliance (OHRA) campaign committee.

"I am thankful to my colleagues for entrusting me to lead the House Republican Caucus for the 135th General Assembly," Merrin stated. "I am also excited to work with Representative Plummer to help ensure that we elect conservative leaders to the Ohio House in 2024 who are committed to advancing legislation to help hardworking Ohioans."

"It is an honor that my peers have elected me to run the Ohio House Republican Alliance for the 2024 campaign cycle. We have a lot of work to do to further the Republican majority and it won't be easy, but I will work tirelessly to help recruit and elect strong Republican state representatives to advance conservative principles in Columbus," Plummer said.

In the coming days and weeks, OHRA leadership will be working to put together staff and a team that will direct the efforts for successful 2024 Ohio House Republican campaigns.

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Lisa K. Ferguson

Attorney At Law

110 Main Street • Wintersville, Ohio 43953 • (740) 264-0661 • Fax (740) 264-6855

September 27, 2023

Treasurer: Winterset CPA Group, J. Matthew Yuskewich, CPA, and Susan Jones

EXHIBIT

D

I represent State Representatives Phil Plummer and Derek Merrin. The purpose of this letter is to put you on notice that Winterset CPA Group as Treasurer has issued payments from the Ohio House Republican Alliance (OHRA) account under the direction of Jason Stephens, despite the fact that he does not have legal authority to direct you to issue expenditures. If there are any other individuals authorized to make expenditures from any of these accounts, I need those names provided to me immediately, so they can also be provided notice. I also need the names and information of anyone who possesses any debit cards or credit cards that you are aware of for any OHRA account.

After the vote for Speaker of the House, on January 3, 2023, the Republican Caucus of the House of Representatives called a meeting with ALL members of the caucus invited to attend on January 24, 2023. A majority of the full Republican caucus was in attendance, and that majority of the caucus unanimously voted to determine who would legally control the Ohio House Republican Alliance (OHRA) accounts. Specifically, Rep. Phil Plummer was named as the Chair and Rep. Derek Merrin named as the Vice-Chair of OHRA. I have attached the minutes from the meeting for your reference.

I have included the Ohio Revised Code 3517.10(3)(d) that states the following:

(d) Each state political party shall have only one legislative campaign fund for each house of the general assembly. Each such fund shall be separate from any other funds or accounts of that state party. A legislative campaign fund is authorized to receive contributions and make expenditures for the primary purpose of furthering the election of candidates who are members of that political party to the house of the general assembly with which that legislative campaign fund is associated. Each legislative **campaign fund shall be administered and controlled in a manner designated by the caucus.** As used in this division, "caucus" has the same meaning as in section 3517.01 of the Revised Code and includes, as an ex officio member, the chairperson of the state political party with which the caucus is associated or that chairperson's designee.

ORC 3517.01 definition of Caucus:

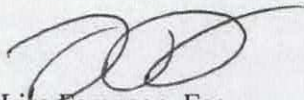
(14) "Caucus" means all of the members of the house of representatives or all of the members of the senate of the general assembly who are members of the same political party.

Clearly, the campaign fund is to be "administered and controlled in a manner designated by the caucus." The caucus designated how its campaign fund would be administered at its January 24, 2023 meeting, and as a result, Jason Stephens has no legal authority over the Ohio House of Republican Alliance (OHRA) account. While I understand your confusion, if you write any check for expenditures after receiving this notice, on the direction of Jason Stephens, or anyone else except for the duly elected leaders OHRA Chair Rep. Phil Plummer and the OHRA Vice-Chair Rep. Derek Merrin from the OHRA account, I will report it to the Accountancy Board of Ohio and bring legal action against the Accounting Firm and any individual personally who pays for an expenditure not approved by Rep. Phil Plummer or Rep. Derek Merrin. As the treasurer of that fund, you are to follow the direction of OHRA Chair Rep. Phil Plummer, and OHRA Vice-Chair Derek Merrin. If you are unwilling to follow the vote of the caucus, please advise and the duly-elected leaders of OHRA will make alternative arrangements for the services of a Treasurer.

Please confirm to me, in writing, that you agree to follow the direction of the Ohio House Republican Caucus and to cease making any expenditures that have not been approved by OHRA Chair Rep. Phil Plummer or OHRA Vice Chair Derek Merrin, by 12:00pm on Friday September 29, 2023. If I have not received such confirmation by that time, we will conclude that you intend to continue making expenditures in violation of Ohio law and will take action accordingly.

I also need an email today providing me with the names of all individuals that have authority to sign on any of the accounts and the names and information of anyone who possesses any debit cards or credit cards that you are aware of for the OHRA account.

Very truly yours,



Lisa Ferguson, Esq.
110 Main Street
Wintersville, OH 43953
Telephone: (740) 264-0661
Email: lferguson@dlferguson.com



Lisa K. Ferguson

Attorney At Law

110 Main Street • Wintersville, Ohio 43953 • (740) 264-0661 • Fax (740) 264-6855

September 27, 2023

Jason Stephens,

EXHIBIT

E

I represent State Representatives Phil Plummer and Derek Merrin. The purpose of this letter is to put you on notice that you do not have legal authority to authorize expenditures from the Ohio House Republican Alliance (OHRA) account.

After the vote for Speaker of the House, on January 3, 2023, the Republican Caucus of the House of Representatives called a meeting with ALL members of the caucus invited to attend on January 24, 2023. A majority of the full Republican caucus was in attendance, and that majority of the caucus unanimously voted to determine who would legally control the Ohio House Republican Alliance (OHRA) accounts. Specifically, Rep. Phil Plummer was named as the Chair and Rep. Derek Merrin named as the Vice-Chair of OHRA. I have attached the minutes from the meeting for your reference.

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ORC 3517.01 definition of Caucus:

(14) "Caucus" means all of the members of the house of representatives or all of the members of the senate of the general assembly who are members of the same political party.

Clearly, the campaign fund is to be "administered and controlled in a manner designated by the caucus." The caucus designated how its campaign fund would be administered at its January 24, 2023, meeting. If you continue to make unauthorized expenditures from the OHRA account, I will bring legal action against you.

Please confirm to me, in writing, that you agree to follow the direction of the Ohio House

Republican Caucus and to cease making any expenditures from the OHRA account by 12:00 pm on Friday September 29, 2023. If I have not received such confirmation by that time, we will conclude that you intend to continue making expenditures in violation of Ohio law and will take action accordingly.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Lisa Ferguson', with a long, sweeping horizontal line extending to the right.

Lisa Ferguson, Esq.
110 Main Street
Wintersville, OH 43953
Telephone: (740) 264-0661
Email: lferguson@dlferguson.com



Lisa K. Ferguson

Attorney At Law

110 Main Street • Wintersville, Ohio 43953 • (740) 264-0661 • Fax (740) 264-6855

September 27, 2023

Jeff LaRe,

EXHIBIT

F

I represent State Representatives Phil Plummer and Derek Merrin. The purpose of this letter is to put you on notice that you do not have legal authority to authorize expenditures from the Ohio House Republican Alliance (OHRA) account.

After the vote for Speaker of the House, on January 3, 2023, the Republican Caucus of the House of Representatives called a meeting with ALL members of the caucus invited to attend on January 24, 2023. A majority of the full Republican caucus was in attendance, and that majority of the caucus unanimously voted to determine who would legally control the Ohio House Republican Alliance (OHRA) accounts. Specifically, Rep. Phil Plummer was named as the Chair and Rep. Derek Merrin named as the Vice-Chair of OHRA. I have attached the minutes from the meeting for your reference.

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ORC 3517.01 definition of Caucus:

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Clearly, the campaign fund is to be "administered and controlled in a manner designated by the caucus." The caucus designated how its campaign fund would be administered at its January 24, 2023, meeting. Jason Stephens does not have the authority to appoint you as Co-chair of the OHRA account. If you continue to make unauthorized expenditures from the OHRA account, I

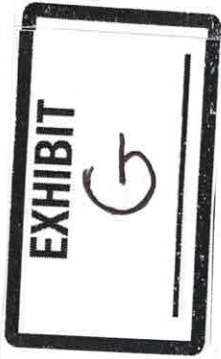
will bring legal action against you.

Please confirm to me, in writing, that you agree to follow the direction of the Ohio House Republican Caucus and to cease making any expenditures from the OHRA account by 12:00 pm on Friday September 29, 2023. If I have not received such confirmation by that time, we will conclude that you intend to continue making expenditures in violation of Ohio law and will take action accordingly.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Lisa Ferguson', written in a cursive style.

Lisa Ferguson, Esq.
110 Main Street
Wintersville, OH 43953
Telephone: (740) 264-0661
Email: lferguson@dlferguson.com



Committee Name	Report Type	Report Year	Line(1) Amount Forward	Report Filed Date
OHIO HOUSE REPUBLICAN	SEMIANNUAL (JULY)	2023	\$153,694.30	7/31/2023

Line(2) Total Contribution	Line(3) Total Other Income	Line(5) Total Expenditures	Line(6) Balance On Hand
\$1,203,938.00	\$8,008.83	\$284,153.94	\$1,081,487.19

Inkind Contribution Made	Inkind Contribution Received	Outstanding Debts Owed By
\$0.00	\$20,969.17	\$0.00

Outstanding Loans Owed By	Outstanding Loans Owed To	Independent Expenditures Made	Total Ohio Receipts
\$0.00	\$0.00	\$0.00	\$0.00