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SENT VIA ELECTRONIC MAIL

May 9, 2024

Stacey Wideman, Esq.
Chief Legal Officer
State Teachers Retirement System of Ohio
275 E. Broad St.
Columbus, OH 43215
widemans@strsoh.org

Re: LITIGATION HOLD / DOCUMENT PRESERVATION NOTICE – JANUARY 2020 to PRESENT

This letter is to give notice to the State Teachers Retirement System of Ohio (“STRS”) that it is not to destroy, conceal or alter in any manner whatsoever any or all evidence, documents, information, paper or electronic data and/or other tangible items or property relevant to its investments, proposed investments or investment strategies since January 2020 and/or relevant to the following persons or entities:

- i. Any QED entity, including QED Management, LLC, QED Systemic Solutions, LLC, and QED Technologies, LLC;
- ii. the Ohio Retired Teachers Association (“ORTA”), including any present or former staff of ORTA or any present or past member of the board of directors of ORTA;
- iii. James Seth Metcalf;
- iv. Jonathan Tremmel;
- v. Callan LLC
- vi. CEM Benchmarking;
- vii. Cliffwater LLC;

- viii. the Ohio Ethics Commission;
- ix. Healthcare of Ontario Pension Plan;
- x. Rob Goobie;
- xi. Goldman Sachs or the Goldman Sachs Group, Inc.;
- xii. Ted Siedle;
- xiii. John Damschroder;
- xiv. the partnership called “OhioAI”;
- xv. Laura Bishop;
- xvi. Mark Hill;
- xvii. the Ohio Federation of Teachers;
- xviii. the Healthcare & Pension Advocates for STRS;
- xix. the Ohio Education Association;
- xx. Fixmypension.org;
- xxi. the Auditor of State;
- xxii. “uhohspgo”;
- xxiii. Tom Curtis;
- xxiv. Robin Rayfield; and
- xxv. the Ohio Department of Education
- xxvi. AON Consulting

STRS is now on notice of potential litigation involving it and/or certain of its directors, officers and/or employees and it has an obligation to preserve the electronic and physical documents and data outlined herein.

This obligation includes, but is not limited to, all data generated and/or stored on any and all computers and cellular telephones owned or used by STRS; all data stored on any and all other electronic storage media of any type, including but not limited to flash drives, backup tapes, online

backup services, or any other storage media or service, all emails, all instant messages, all text messages, all meeting minutes or notes, all calendar invites and attachments, all audio data such as voicemail, tape recordings, and all photographs, videos, writing or other documentary material of any nature found or stored on computers, cellular telephones, or Internet accounts.

This notice also applies specifically, but without limitation, to any and all emails, instant messages, text messages, email accounts, Internet addresses and/or Internet accounts utilized or established by STRS whether or not the data is stored locally on a computer used by a third party on an Internet server such as Gmail.com, Yahoo.com, Hotmail.com, or any other third-party Internet service. STRS's obligation extends to preserving all potential evidence outlined in this letter in its native format, with all metadata preserved.

With regard to electronic data created subsequent to the date of delivery of this letter, relevant evidence is not to be destroyed and STRS is to take whatever steps are appropriate to avoid destruction of evidence. It is anticipated that these items will be discoverable in any ensuing litigation. STRS should consider itself under a continuing obligation to preserve electronically stored information related to investments, proposed investments or investment strategies and/or relevant to the persons or entities listed above that may come into existence after the date of this letter, or that may exist now or in the future but of which STRS has no current knowledge.

In order for STRS to meet its obligation to preserve documents and things, please preserve STRS's documents and also forward a copy of this letter to any and all persons or entities who might have custody or control over the material outlined herein. This includes but is not limited to any personnel, contractor, consultant, or person who has worked on or was involved with STRS's investments, proposed investments or investment strategies since January 2020 and/or all of the persons or entities listed above to the extent STRS has their contact information. STRS's obligations to preserve documents and information also extends to any documents or information within the company's control, including third-party vendors or any other entities that may have documents or information covered by this Litigation Hold regardless of whether they are listed herein. STRS thus has an obligation to determine and inform such third-parties of their preservation obligations.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lance Suede', with a stylized, flowing script.

Lance Suede
Principal Assistant Attorney General
Charitable Law Section
Office of Ohio Attorney General Dave Yost
Lance.Suede@ohioago.gov