

**IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

THE CITY OF COLUMBUS,

Plaintiff,

v.

DAVID LEROY ROSS, JR.,

Defendant.

Case No. 24-CV-6703

JUDGE SHERYL K. MUNSON

MAGISTRATE MARK PETRUCCI

AGREED PERMANENT INJUNCTION

Plaintiff City of Columbus (“the City”) and Defendant David Leroy Ross, Jr. (“Ross”) have agreed to settle this case. In exchange for a dismissal of this lawsuit, with prejudice, parties bearing their own costs, the City and Ross have agreed to voluntarily enter into this **Agreed Permanent Injunction** under the following terms:

(1) Ross is permanently enjoined from disseminating any data purportedly stolen from the City in connection with the City’s recent data breach (“City Data”) that identifies Personal Identifiable Information including, but not limited to, Social Security Numbers, driver’s license numbers, bank account information, credit card numbers, and personal medical information (which may or may not be classified as Protected Health Information (PHI) for purposes of HIPAA) should such information be found;

(2) Ross is permanently enjoined from disseminating any City Data from the City’s MATRIX Prosecutor and MATRIX Crime databases as they may contain protected Criminal Justice Information (“CJI”);

(3) Ross is permitted to disseminate, including by providing copies, City Data to officers of the Columbus Division of Police (“CPD”) designated by the City Attorney’s Office, attorneys representing the City, or their agents irrespective of the provisions in Sections 1 and 2;

(4) Ross is permitted to disseminate City Data that the City Attorney’s Office agrees is subject to disclosure under the Ohio Public Records Act, Ohio Revised Code Section 149.43. Ross shall first obtain a written agreement from the City before disseminating any information under this Section.

Respectfully submitted,

/s/ Paul M. Bernhart

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s/ David Ross (PMB per email auth.)

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PRO SE DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that, on **October 25, 2024**, I electronically filed the foregoing with the Court using the Court's CM/ECF system.

/s/ Paul M. Bernhart
Paul M. Bernhart (0079543)