

SUMMIT COUNTY COURT OF COMMON PLEAS
CRIMINAL DIVISION

State of Ohio, Plaintiff, VS. Samuel Randazzo, Defendant. CASE NO. CR-2024-02-0473-A JUDGE Susan Baker Ross RESPONSE TO DEFENDANT'S REQUEST FOR DISCOVERY

Pursuant to the requirements of Ohio Criminal Rule 16, the Special Assistant AAG herein provides defense counsel with copies or photographs, or will permit inspection of the following:

1) Crim.R.16(B)(1)

Written statement of defendant Samuel Randazzo

None known at this time

Oral statement of defendant Samuel Randazzo

None known at this time

Police summary of statements of defendant Samuel Randazzo

Any summaries will be provided

Grand Jury testimony of defendant Samuel Randazzo

None known at this time

2) Crim.R.16(B)(2)

Criminal record of defendant Samuel Randazzo

None known at this time

3) Crim.R.16(B)(5)

Potentially Exculpatory Evidence:

None known at this time

4) Crim.R.16(B)(1)-(7); Crim.R.16(K)

THE FOLLOWING DOCUMENTS HAVE BEEN DELIVERED TO THE DEFENSE AT DEFENSE COUNSEL'S INDEPENDENT PORTAL AT https://docs.matrixexchange.com/. FOR TECHNICAL ASSISTANCE COUNSEL MAY CONTACT THE DISCOVERY SUPPORT LINE AT (800) 282-0515.

Attached files delivered via web portal:

- 1. Audio Recorded Statement - Dan Conway Interview 1 3.4.2024

2. Audio Recorded Statement - Dan Conway Interview 3 3.4.2024
3. Investigative Report - 2024-01-19 Bingaman, Bradley Interview
4. Audio Recorded Statement - Dan Conway Interview 2 3.4.2024
5. Investigative Report - 2023-06-27_ Bailey, Joel Subpoena Served
6. Investigative Report - 2024-02-06 Dawson, Michael Interview
7. Investigative Report - 2024-02-01_ Chack, Dennis Interview
8. Investigative Report - 2024-01-25 Corrigan, Kim Interview
9. Investigative Report - 2023-12-04_ Jonathon McGee Interview
10. Investigative Report - 2023-11-27 Timothy Mott Interview
11. Investigative Report - 2023-10-27 Howard Petricoff Interview
12. Investigative Report - 2023-09-19 Gray, Bryan Interview
13. Investigative Report - 2023-09-18 Cupp, Robert Interview
14. Investigative Report - 2023-08-22 Carfagna, Enrico Interview
15. Investigative Report - 2023-08-10 Greenspan, David Interview
16. Audio Recorded Statement - 2023-08-22 Carfagna, Enrico Interview
17. Audio Recorded Statement - 2023-08-10 Greenspan, Dave Interview
18. Investigative Report - 2024-01-17_ Ethics Commission Meeting, Subpoena, & Response
19. Audio Recorded Statement - Tim Mott Interview 11-27-2023
20. Audio Recorded Statement - Ohio Ethics Commission 1.17.2024
21. Audio Recorded Statement - Mark Coffey Summit Financial 1.17.2024 2
22. Audio Recorded Statement - Mark Coffey Summit Financial 1.17.2024 1
23. Audio Recorded Statement - Mark Coffey Follow Up 1.22.2024
24. Audio Recorded Statement - Kevin Murray Audio Interview
25. Audio Recorded Statement - Josh Rubin Audio Interview 1.5.2024
26. Audio Recorded Statement - Jonathon McGee subpoena service 10.31.2023
27. Audio Recorded Statement - Jonathon McGee audio interview 12.4.2023
28. Audio Recorded Statement - Jason Lisowski Audio Interview 2.5.2024
29. Audio Recorded Statement - Howard Petricoff Interview 10.27.2023
30. Audio Recorded Statement - Gene Pierce Interview 11.1.2023

31. Audio Recorded Statement - Debbie Ryan Interview 1.24.2023
32. Audio Recorded Statement - 2024-02-06 Dawson, Michael Interview
33. Audio Recorded Statement - 2024-02-01 Chack, Dennis Interview
34. Audio Recorded Statement - 2024-01-29 Petricoff Howard Interview
35. Audio Recorded Statement - 2024-01-25 Housley Kristina Interview
36. Audio Recorded Statement - 2024-01-25 Corrigan Kimberly Interview
37. Audio Recorded Statement - 2024-01-19 Bingaman, Brad Interview
38. Audio Recorded Statement - 2024-01-18 Bojko, Kimberly Interview
39. Audio Recorded Statement - 2024-01-16 Rafeld, Jason Interview
40. Audio Recorded Statement - 2024-01-16 O'Donnell Jr., Terrence Interview
41. Audio Recorded Statement - 2024-01-16 DeAngelo, James Interview
42. Audio Recorded Statement - 2024-01-16 Anderson, Dave Interview
43. Audio Recorded Statement - 2024-01-12 Elisar, Scott Interview
44. Audio Recorded Statement - 2024-01-11 Brakey, Matt Interview Part 2
45. Audio Recorded Statement - 2024-01-11 Brakey, Matt Interview Part 1
46. Audio Recorded Statement - 2024-01-08 Pritchard, Matt Part 2
47. Audio Recorded Statement - 2024-01-08 Pritchard, Matt Part 1
48. Audio Recorded Statement - 2023-12-2023 Christopher, Mahila Interview Part 2
49. Audio Recorded Statement - 2023-12-2023 Christopher, Mahila Interview Part 1
50. Audio Recorded Statement - 2023-12-04 Tully, Pat Interview
51. Audio Recorded Statement - 2023-12-01 Brakey, Matt Interview
52. Audio Recorded Statement - 2023-11-30_Haque, Asim Interview
53. Audio Recorded Statement - 2023-09-18 Cupp, Robert Interview
54. Audio Recorded Statement - 2023-09-06 Hadden, J.B. Interview
55. Audio Recorded Statement - 2023-08-10 Robinson, Jr., Phillip Interview
56. Other Document - Pat Tully Proffer Letter 12.4.2023
57. Other Document - Jonathon McGee Proffer Letter 12.4.2023
58. Other Document - Jason Rafeld Proffer Letter 1.16.2024
59. Other Document - Jason Lisowski Proffer Agreement (Executed)

60. Other Document - Ebony Yeboah-Amankwah Proffer 2.5.2024
61. Other Document - Debbie Ryan Proffer 1.24.2024
62. Investigative Report - 2024-02-07_ Ebony Yeboah-Amankwah ■ Appearance
63. Investigative Report - 2024-01-25_ Housley, Kristina Interview
64. Investigative Report - 2024-01-16_ Anderson, Dave Interview
65. Investigative Report - 2023-06-26 Tyron Pine Subpoena Service
66. Investigative Report - 2024-02-09_ Attempt to Serve; Samuel Randazzo
67. Investigative Report - 2024-02-09_ Attempt to Serve; Charles Jones
68. Investigative Report - 2024-02-09 Attempt to Serve
69. Investigative Report - 2024-01-18_ McNees Wallance & Nurick Subpoena Response
70. Investigative Report - 2024-01-18_ Kevin Murray Subpoena Service
71. Investigative Report - 2024-01-17_ Ethics Commission Meeting, Subpoena, & Response
72. Investigative Report - 2024-01-12_ Debbie Ryan Subpoena Service
73. Investigative Report - 2024-01-11_ Sam Randazzo Subpoena 3 Response
74. Investigative Report - 2024-01-10_ Mark Coffey Subpoena Service
75. Investigative Report - 2024-01-10_ Laurel Dawson Subpoena Service
76. Investigative Report - 2024-01-10_ Fidelity Investments Subpoena Service
77. Investigative Report - 2024-01-10_ Charles Schwab Subpoena Service
78. Investigative Report - 2024-01-09_ James DeAngelo Esq. Subpoena Service
79. Investigative Report - 2024-01-03_ Subpoena Service to McNees Firm
80. Investigative Report - 2024-01-02 Summit Financial Subpoena Service and Response
81. Investigative Report - 2023-12-21_ Sam Randazzo Subpoena 2 Response
82. Investigative Report - 2023-12-15 Randazzo, Samuel Subpoena Service
83. Investigative Report - 2023-12-12 Mahila Christopher Subpoena Service
84. Investigative Report - 2023-12-11 Joshua Rubin Subpoena Service
85. Investigative Report - 2023-12-07 Timothy Mott Subpoena Service for Records
86. Investigative Report - 2023-11-20 Tim Mott Subpoena Service
87. Investigative Report - 2023-11-20 Patrick Tully Subpoena Service

88. Investigative Report - 2023-11-20 Matthew Pritchard Subpoena Service
89. Investigative Report - 2023-11-20 Debbie Ryan Subpoena Service
90. Investigative Report - 2023-10-31 Jonathon McGee Subpoena Service
91. Investigative Report - 2023-09-20 Inspector General Correspondence
92. Investigative Report - 2023-08-16 Householder and Borges Sentencing Transcripts
93. Investigative Report - 2023-08-12 Sam Randazzo Subpoena Service for Records
94. Investigative Report - 2023-08-04 Michael VanBuren Subpoena Service
95. Investigative Report - 2023-07-19 First Energy Records Received
96. Investigative Report - 2023-06-29_ FirstEnergy Corp Subpoena Served
97. Investigative Report - 2023-06-28_ Mikkelsen, Eileen Subpoena Served
98. Investigative Report - 2023-06-27_ Yeboah-Amankwah, Ebony Subpoena Served
99. Investigative Report - 2023-06-27_ Vespoli, Leila Subpoena Served
100. Investigative Report - 2023-05-18 Subpoena Service_ PNC, HNB, 5_3, and JP Morgan Chase
101. Investigative Report - 2023-08-15 Sam Randazzo Subpoena Service
102. Investigative Report - 2023-08-10 Calfee, Halter & Griswold Subpoena & Response
103. Audio Recorded Statement - 2024-03-13 Rambo, Renee Interview - Audio Interview (Case Documents) (1006028)
104. Audio Recorded Statement - 2024-03-22 Willis Maureen Interview - Audio Interview (Case Documents) (1010050)
105. Curriculum Vitae - C. Beckett- CV
106. Expert Report - Courtney Beckett Analysis; AEP Settlement Funds
107. Expert Report - Courtney Beckett Analysis; Industrial Energy Users-Ohio Chase Acct 0785
108. Expert Report - Courtney Beckett Analysis; Industrial Energy Users-Ohio Chase Acct 3571
109. Expert Report - Courtney Beckett Analysis; Industrial Energy Users-Ohio Chase Acct 7715
110. Expert Report - Courtney Beckett Analysis; Industrial Energy Users-Ohio Chase Acct 8267
111. Expert Report - Courtney Beckett Analysis; Bank Records Involved_Randazzo

112. Expert Report - Courtney Beckett Analysis; FE Payments Summary to Randazzo Accts
113. Expert Report - Courtney Beckett Analysis; IEU-Ohio Admin Company LLC- Chase Bank x0798 - 2016-2020
114. Expert Report - Courtney Beckett Analysis; Randazzo Personal- Chase Bank 4786
115. Expert Report - Courtney Beckett Analysis; SFA of Ohio- Chase Bank 9838 - 2016-2020
116. Transcript - Combined Transcript, USA v. Householder et al.
117. Court Filing - Federal Government Exhibit 431G, USA v. Householder et al., 3-16-19 Email Kiani to Griffing re Prep for Tuesday Meeting
118. Court Filing - Federal Government Exhibit 204E, USA v. Householder et al., Larry Householder Calendar
119. Court Filing - PUCO - OCC 1st Set Disc. Req. - 3rd Supp. Stip. - FE 14-1297-EL-SSO - Final 12.2.15c
120. Court Filing - PUCO - OCC Set 17-INT-001-027 and 028-039
121. Email Copy - RE_ Eileen Mikkelson Subpoena
122. Audio Recorded Statement - 2023-09-19 Gray, Bryan Interview

5) *Crim.R.16(I)*

Any and all persons identified in the reports and other documentation provided to defense in discovery shall be deemed potential witnesses for the prosecution. Additionally, the Special Assistant AAG intends to call the following witnesses at trial:

1. SAS Kevin Barbeau
BCI, London
1560 S.R. 56 SW
PO Box 365
London, OH 43140
Criminal Record: None
2. SA Eric Lehnhart
BCI Richfield
4055 Highlander Parkway, Ste. A
Richfield, OH 44286
Criminal Record: None
3. CIA Emily Kreager
BCI, London
1560 S.R. 56 SW
PO Box 365
London, OH 43140

- Criminal Record: None
4. Detective Lieutenant Karla Bloomingdale
Summit County Sheriff's Office
53 University Avenue
Akron, OH 44308
Criminal Record: None
 5. Courtney Beckett
Forensic Accountant
BCI, London
1560 S.R. 56 SW
PO Box 365
London, OH 43140
Criminal Record: None
 6. Matt Brakey
8584 E Washington St #213
Chagrin Falls, OH 44023
Criminal Record: None known at this time
 7. Renee Rambo
Vallourec USA
1053 Ohio Works Drive
Youngstown, OH 44510
Criminal Record: None known at this time
 8. Kimberly Bojko
280 N. High St., Suite 1300
Columbus, OH 43215
Criminal Record: None known at this time
 9. Mark Coffey
4111 Worth Ave #510
Columbus, OH 43219
Criminal Record: None known at this time
 10. Matthew Daniel
825 N 4th St, Unit 403
Columbus, OH 43215
Criminal Record: None known at this time
 11. Tiffany Stover
3500 Embassy Pkwy., Suite 100

Akron, OH 44333

- Criminal Record: None known at this time
12. Timothy Mott
7654 Slate Ridge Blvd
Reynoldsburg, OH 43068
Criminal Record: None known at this time
13. Scott Elisar
PUCO
180 E. Broad St.
Columbus, OH 43215
Criminal Record: None known at this time
14. Dan Conway
PUCO
180 E. Broad St.
Columbus, OH 43215
Criminal Record: None known at this time
15. M. Beth Trombold
1111 Schrock Road, Suite 100
Columbus, OH 43229
Criminal Record: None known at this time
16. Lawrence K. Friedeman
PUCO
180 E. Broad Street
Columbus, OH 43215
Criminal Record: None known at this time
17. Jennifer French
PUCO
180 E. Broad Street
Columbus, OH 43215
Criminal Record: None known at this time
18. Howard Petricoff
170 Webster Park Ave.
Columbus, OH 43214
Criminal Record: None known at this time
19. Asim Haque
PO Box 1525
Southeastern, PA 19399-1525
Criminal Record: None known at this time

20. Jason Lisowski
341 White Pond Dr.
Akron, OH 44320
Criminal Record: None known at this time
21. Kimberly Corrigan
341 White Pond Dr
Akron, OH 44320
Criminal Record: None known at this time
22. Kristina Housley
341 White Pond Dr.
Akron, OH 44320
Criminal Record: None known at this time
23. Brian X. Tierney
341 White Pond Dr
Akron, OH 44320
Criminal Record: None known at this time
24. Ebony Yeboah-Amankwah
2716 Carriage Hill Lane
Cuyahoga Falls, OH 44223
Criminal Record: None known at this time
25. Dennis Chack
2071 Rock Creek
Akron, OH 44333
Criminal Record: None known at this time
26. Robert Reffner
247 Hollywood Ave.
Akron, OH 44313
Criminal Record: None known at this time
27. Leila L. Vespoli
1929 Four Seasons Dr.
Akron, OH 44333
Criminal Record: None known at this time
28. Brad Bingaman
Pennsylvania Public Utilities Commission
400 North Street 3 East Keystone Building
Harrisburg, PA 17120-0001
Criminal Record: None known at this time

29. Mark Clark
3421 Ridgewood Rd #125
Akron, OH 44333
Criminal Record: None known at this time
30. Tyrone Pine
2630 Henthorn Rd.
Upper Arlngtn, OH 43221
Criminal Record: None known at this time
31. Maureen Willis
Ohio Consumer's Counsel
65 E. State St., Ste. 700
Columbus, OH 43215
Criminal Record: None known at this time
32. Dave Anderson
PO Box 170399
San Francisco, CA 94117
Criminal Record: None known at this time
33. George Jonson
Montgomery Jonson LLP
600 Vine Street, Suite 2650

Cincinnati, OH 45202
Criminal Record: None known at this time
34. Paul Nick
Executive Director
Ohio Ethics Commission
30 W. Spring St.
Columbus, OH 43215
Criminal Record: None known at this time
35. Tony Bledsoe
Joint Legislative Ethics Committee
100 E. Broad St.
Columbus, OH 43215
Criminal Record: None known at this time
36. James DeAngelo
McNees, Wallace & Nurick
100 Pine St.
Harrisburg, PA 17101

- Criminal Record: None known at this time
37. Debbie Ryan
2280 Wall Street
Centerburg, OH 43011
Criminal Record: None known at this time
38. Kevin Murray
5856 New Bridge Dr.
Dublin, OH 43017
Criminal Record: None known at this time
39. Michael Dawson
356 Stanbery Ave.
Columbus, OH 43209
Criminal Record: None known at this time
40. Laurel Dawson
356 Stanbury Ave.
Columbus, OH 43209
Criminal Record: None known at this time
41. Josh Rubin
8625 Dunblane Ct.
Dublin, OH 43017
Criminal Record: None known at this time
42. Kristen Wegryn
Veritext Legal Solutions
41 South High Street, Suite 1670
Columbus, OH 43215
Criminal Record: None known at this time
43. Patrick Tully
670 Chatsworth Ct.
Powell, OH 43065
Criminal Record: None known at this time
44. Terrence O'Donnell
Dickinson Wright, PLLC
180 E. Broad St., Ste. 3400
Columbus, OH 43215
Criminal Record: None known at this time
45. James Hadden

Murray, Murphy, Moul & Basil
1114 Dublin Rd.
Columbus, OH 43215

Criminal Record: None known at this time

46. Franklin County Auditor Representative
Franklin County Government Center
373 S. High St., 21st Floor
Columbus, OH 43215
Criminal Record: None known at this time
47. Public Utilities Commission of Ohio Representative
PUCO
180 E. Broad St.
Columbus, OH 43215
Criminal Record: None
48. Paul De Marco
119 E. Court Street Suite 530
Cincinnati, OH 45202
Criminal Record: None
49. Jason Rafeld
6658 Olentangy River Road
Delaware, OH 43015
Criminal Record: None known at this time
50. Jonathon McGee
100 E Broad St Suite 2300
Columbus, OH 43215
Criminal Record: None known at this time
51. Carolyn Brakey
8584 E Washington St #321
Chagrin Falls, OH 44023
Criminal Record: None known at this time
52. Dave Greenspan
27700 Hilliard Blvd
Cleveland, OH 44115
Criminal Record: None
53. Enrico Carfagna
34 S 3rd St.
Columbus, OH 43215
Criminal Record: None known at this time

54. Robert Cupp
30 E. Broad St.
Columbus, OH 43215
Criminal Record: None
55. Matthew Pritchard
250 West Street, Suite 550
Columbus, OH 43215
Criminal Record: None known at this time
56. Bryan Gray
720 South High Street
Columbus, OH 43206
Criminal Record: None known at this time
57. Juan Cespedes
150 E. Mound St., Suite 308
Columbus, OH 43215
Criminal Record:
Criminal Record: Transcript - USA v. CESPEDES, Change of Plea Hearing
Delivered to Defense Attorney via web portal
58. Jeffrey Longstreth
601 S. High Street
Columbus, OH 43215
Criminal Record:
Criminal Record: Transcript - USA v. LONGSTRETH, Change of Plea
Hearing
Delivered to Defense Attorney via web portal
59. Chase Bank Records Custodian
RCO Centralized Mail
Mail Code LA4-7300
700 Kansas Lane
Monroe, LA 71203-4774
Criminal Record: None known at this time
60. Representative Duke Energy Corp.
525 S Tryon St.
Charlotte, NC 28202
Criminal Record: None known at this time
61. Ohio Broadcast Educational Media Commission Representative
2470 North Star Rd., Columbus, Ohio 43221

Criminal Record: None known at this time

The State of Ohio, through the Office of the Ohio County Prosecuting Attorney, pursuant to Criminal Rule 12(E) gives notice of its intent to use the discovery provided herein as evidence at a hearing or trial in this matter.

The criminal justice information provided which was obtained through the Law Enforcement Automated Data System (LEADS) and/or the Ohio Law Enforcement Gateway (OHLEG) is "Counsel Only" and protected by federal and state law including, but not limited to, 28 CFR Part 20, 2913.04(B) and 2913.04(D) of the Ohio Revised Code, and Chapter 4501:2-10 of the Ohio Administrative Code. Dissemination of information obtained through LEADS and/or OHLEG, other than the defendant's own CHRI/CJI to the defendant, is considered a misuse of information and will be prosecuted accordingly. Also, such dissemination beyond defense counsel or defense counsel's agents or employees may constitute a violation of Ohio Criminal Rule 16(C) and subject counsel to disciplinary action.

Respectfully submitted,



BY: Matthew Meyer #0075253
Special Assistant AAG
30 East Broad Street, 25th Floor
Columbus, OH 43215
(216) 787-3095

SERVICE

A copy of the foregoing Response to Defendant's Request for Discovery pursuant to Criminal Rule 16 has been served electronically on April 1, 2024 upon: Richard H. Blake, Attorney for Samuel Randazzo, at: <https://docs.matrixexchange.com/>

(Select the option below to indicate service by U.S. mail)

_____ If selected, a copy of the foregoing Response to Defendant's Request for Discovery pursuant to Criminal Rule 16 has been mailed this _____ day of _____, to:

Richard H. Blake,

Attorney for Samuel Randazzo, at:

McDonald Hopkins
600 Superior Ave. E
Suite 2100
Cleveland, OH 44114



BY: Matthew Meyer #0075253
Special Assistant AAG