

CLERK OF COURTS  
MAHONING COUNTY, OHIO

JUN 23 2015

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ANTHONY VIVO, CLERK

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committing the offense or permitted or assented to its use in aid of committing the offense, in violation of R.C. Section 2921.41 (A) (1) being a felony of the 5<sup>th</sup> degree. See Indictment Count 2.

On or about October 6, 2005 to August 29, 2012, at the County of Mahoning and State of Ohio, Michael Sciortino did, being a public official, commit any theft offense as defined in Division (K) of Section 2913.01 of the Ohio Revised Code, to wit: Unauthorized Use of Property – Computer, when the property or service involved was owned by this state, any other state, the United States, a county, a municipal corporation, a township, or any political subdivision, department, or agency of any of them, in violation of R.C. Section 2921.41 (A)(2) being a felony of the 5<sup>th</sup> degree. The defendant used and authorized the use of computer equipment and software owned by Mahoning County for his political campaigns. See Indictment Count 3.

On or about October 6, 2005 to August 29, 2012, at the County of Mahoning and State of Ohio, Michael Sciortino did, being a public official, commit any theft offense as defined in Division (K) of Section 2913.01 of the Ohio Revised Code, to wit: Unauthorized Use of Property – Computer, when the property or service involved was owned by this state, any other state, the United States, a county, a municipal corporation, a township, or any political subdivision, department, or agency of any of them, in violation of R.C. Section 2921.41 (A)(2) being a felony of the 5<sup>th</sup> degree.. The defendant used and authorized the use of computer equipment and software owned by Mahoning County for a private law practice. See Indictment Count 4.

On or about January 2, 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree . See Indictment Count 5.

On or about January 3, 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree . See Indictment Count 6.

On or about January 8, 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer,

computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 7.

On or about January 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 8.

On or about February 18, 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 9.

On or about February 24, 2006, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 10.

Onn or about April 9, 2008, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 11.

On or about October 3, 2008, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer,

computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 12.

On or about November 10, 2008 at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 13.

On or about November 2, 2009, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 14.

On or about March 2010, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 15.

On or about March 4, 2010 to March 10, 2010, at the County of Mahoning and State of Ohio Michael Sciortino did in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree . See Indictment Count 16.

On or about April 20, 2010, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer,

computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 17.

On or about June 9, 2010, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 18.

On or about September 9, 2010, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 19.



On or about October 7, 2010, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 20.

On or about April 18, 2011, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 21.

On or about February 16, 2012, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer,

computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 22.

On or about May 23, 2012, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 23.

On or about June 27, 2012, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree . See Indictment Count 24.

On or about August 13, 2007, at the County of Mahoning and State of Ohio, Michael Sciortino did, in any manner and by any means, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent, in violation of R.C. Section 2913.04(B) & (G)(2) being a felony of the 5<sup>th</sup> degree. See Indictment Count 25.

## **II. Criminal Activity Details.**

The facts supporting the individual charges are simple and straightforward. The discovery provides sufficient information on each count.

## **III. Bill of Particulars Law.**

A Bill of Particulars is not meant to provide a defendant with specifications of evidence or to serve as a substitute for discovery. State v. Sellards (1985), 17 Ohio St.3d 169, 171, citing State v. Wilson (1972), 29 Ohio St.2d 203. Rather, a Bill of Particulars is only meant to particularize a defendant's conduct as to the crime. Id.

When the state permits open-file discovery, a Bill of Particulars is not required. See State v. McDay, 2000-WL-1349804 (Ohio App. 9 Dist.) at \*2, unreported, citing State v. Sarnesky, 1986-WL-2228 (Ohio App. 9 Dist.) at \*1, unreported. In Mahoning County, Loc.R. 9 permits open-file discovery in criminal cases. Additionally, the Indictment and the previous Discovery provide more than sufficient detail to apprise a defendant of the charges. Nevertheless, the State offers the following.

The State also gives notice of its intent to proceed with charge(s) against Defendant(s) as a complicitor to the aforementioned charges, as defined by R.C. 2923.03(A), should the facts at trial warrant such a charge(s)/jury instruction(s). See State v. Herring (2002), 94 Ohio St.3d 246; R.C. 2923.03(F). Additionally, the State gives notice of its intent to proceed against Defendant(s) on the lesser included offense(s) to the aforementioned charge(s) provided the facts at trial warrant such a charge(s)/jury instruction(s).

Notwithstanding the above, the government, recognizing the nature of this matter, elects to provide more specific facts concerning the charges in this matter even though not required to by law:

#### **THE OFFENSES IN GENERAL**

The defendant, either acting by himself or in concert with employees in the Mahoning County Auditor's office of which he was their Employer, herein after referred to as Employee 1, Employee 2, or Employee 3 did, knowingly gain access to, attempt to gain access to, or cause access to be gained to any computer, computer system, computer network, cable service, cable system, or information service without the consent of, or beyond the scope of the express or implied consent of, the owner of the computer, computer system, computer network, cable service, cable system, telecommunications device, telecommunications service, or information service, or other person authorized to give consent. The defendant solicited employees working under his purview to gain access to a computer or computers, a computer system, a computer network or an information services to assist the defendant in running his campaign for election in 2006, and reelection to the office of County Auditor in 2010, or to raise money for the Sciortino

for Auditor Committee so that money could be generated for political purposes to elect and/or reelect Michael Sciortino to the position of Mahoning County Auditor. Employee 1, Employee 2 and Employee 3 created political data on computers, software, a computer system or computer network owned by Mahoning County to assist Michael Sciortino as described above. Data once created was emailed to Michael Sciortino on the Mahoning County Computer network or provided to him on an electronic storage device for him to use. A detailed list of documents and/or data created in such manner has been provided to defense counsel previously. There are more than 300 instances of conduct involving the use of the Mahoning County Computer(s), Mahoning County Software, Mahoning County Computer system and/or network in such a manner. Sciortino was fully aware that employees should not be creating and or performing political election work for him instructing one employee to do the work on the county computer but save it on a flash drive and not to save the work on a county computer. The work was later emailed to Sciortino on Mahoning County's email system. Sciortino by Statute is the head of Mahoning County's information technology department and is fully aware of the laws as it relates to the ability of a county official or employee not to use a county computer, computer system, or network for personal gain such as fundraising for the Sciortino for Auditor Committee or his private law practice.

As it relates to the applicable counts in the indictment, Michael Sciortino, from September of 2005 to March of 2015, was the elected County Auditor of Mahoning County and was thus a public official within the Theft in Office statute which he is charged with violating. Computer, computer system, computer network or information

service as used in the indictment refer to property owned by Mahoning County, a political subdivision of the State of Ohio.

The dates and times of the violations found in Counts 5 through 25 can be found by accessing the particular document which has been electronically provided in discovery; there is therefore, no need to repeat the same herein.

Count One: This count refers to the time period Michael Sciortino was the Mahoning County Auditor. During this time he solicited and/or recruited, during business hours of the Mahoning County Auditor's office, employees to access a computer, the Mahoning County Computer System, the Mahoning County Network or Information system as described herein. In addition to the specific counts and instances levied in Paragraphs 5-25 herein, more than 300 specific events occurred wherein a Mahoning County computer, computer system, or network was accessed by Sciortino or an employee on his behalf for Political purposes, including to:

1. Using Mahoning County computer network to Schedule a fundraiser for Sciortino to attend, or an event to attend for political purposes on software owned by Mahoning County using the Mahoning County computer network.
2. Create and/or pass on, provide, or copy political advertising, in addition to any which may appear in counts 5-25
3. Create address labels and return address labels so that political material may be mailed out to voters.
4. Other political purposes different than what is set forth in Counts 5-25 of the indictment.

Count Two: This count refers to the time period Michael Sciortino was the Mahoning County Auditor. During such time he used a Mahoning County Computer or information system for a private law practice consisting of personal injury law, estate and trust law, as well as other general areas of the law. A price list for performing some of these services was created, modified and/or used on a computer owned by Mahoning County and possessed by Michael Sciortino.

Count Three: This count refers to the time period Michael Sciortino was the Mahoning County Auditor. During this time he solicited and/or recruited, during business hours of the Mahoning County Auditor's office, employees to access a computer, the Mahoning County Computer System, the Mahoning County Network, or Information system as described herein. In addition to the specific counts and instances levied in Paragraphs 5-25 herein, more than 300 specific events occurred wherein a Mahoning County computer, computer system, or network was accessed by Sciortino or an employee on his behalf for Political purposes, including to:

1. Using Mahoning County computer network to Schedule a fundraiser for Sciortino to attend, or an event to attend for political purposes on software owned by Mahoning County using the Mahoning County computer network.
2. Create and/or pass on, provide, or copy political advertising, in addition to any which may appear in counts 5-25
3. Create address labels and/or return address labels so that political material may be mailed out to voters.
4. Other political purposes, different than what is set forth in Counts 5-25 of the indictment.

Count Four: This count refers to the time period Michael Sciortino was the Mahoning County Auditor. During such time he used a Mahoning County Computer or information system for a private law practice consisting of personal injury law, estate and trust law, as well as other general areas of the law. A price list for performing some of these services was created, modified and/or used on a computer owned by Mahoning County and possessed by Michael Sciortino.

Count Five: Refers to the following document<sup>1</sup>:

## ***EVENING OF MUSIC***

**WITH**

**MICHAEL V. SCIORTINO  
MAHONING COUNTY AUDITOR**

**ENTERTAINMENT BY  
THE CARMEN MICO ORCHESTRA  
VOCALS BY JAY DEE PAMER & JOHN DAVIS  
SPECIAL PERFORMANCES BY MIKE SCIORTINO**

**FRIDAY FEBRUARY 10, 2006      6:30pm – 10:30pm**

**MR. ANTHONY'S BANQUET CENTER  
7440 South Avenue  
Boardman, Ohio 44512**

**COST:    \$50.00 Per Person**

**BUFFET DINNER      CASH BAR**

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<sup>1</sup> Where appropriate certain names have been blacked out on this pleading but not on the document provided in discovery.



Please RSVP by January 30, 2005 with [REDACTED]  
Please make checks payable to Sciortino for Auditor. No Corporate checks please.

Paid for by Sciortino for Auditor, [REDACTED] 44515

Count Six refers to the following document:

## ***EVENING OF MUSIC***

WITH

**MICHAEL V. SCIORTINO  
MAHONING COUNTY AUDITOR**

**ENTERTAINMENT BY**

**THE CARMEN MICO ORCHESTRA  
VOCALS BY JAY DEE PAMER & JOHN DAVIS  
SPECIAL PERFORMANCES BY MIKE SCIORTINO**

**FRIDAY FEBRUARY 10, 2006**

**6:30pm – 10:30pm**

**MR. ANTHONY'S BANQUET CENTER  
7440 South Avenue  
Boardman, Ohio 44512**

**COST: \$50.00 Per Person**

**BUFFET DINNER CASH BAR**

For ticket information call: Kathleen Cervone: (330) 533 – 5490 or,

Please complete the following if you would like a ticket mailed to you:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Paid for by Sciortino for Auditor, \_\_\_\_\_

Count Seven refers to the following document:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

TO: Sciortino for Auditor Friends and Supporters

FROM: Michael V. Sciortino  
Mahoning County Auditor

DATE: January 8, 2006

RE: February 10, 2006 Fundraiser

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I hope you had a wonderful holiday season. As we embark on an exciting new year, I am happy to report that my County Auditor campaign is now well organized. In order to make sure the campaign is a success, I need your help.

As promised, I want to keep you up to date on my campaign events. One event that I truly want you to be a part of is my Evening of Music Fundraiser which will be held at the following date, time and location:

Evening of Music  
With  
County Auditor Michael V. Sciortino  
Friday, February 10, 2006  
Mr. Anthony's Banquet Center

6:30pm – 10:30pm  
\$50.00 per person    Buffet Dinner    Cash Bar

I can assure you that this will be a wonderful event with great entertainment. The Carmen Mico Orchestra will provide live music with Jay Dee Pamer and John Davis singing. Also, as many of you know, I am a musician and will be performing with Carmen and the band as well.

I have enclosed Evening of Music tickets for you to purchase or sell. Once again, I appreciate your help and please try and come to this event, as we will have a fabulous time.

As always, thank you for your support, and I hope to see you February 10<sup>th</sup>.

Mike Sciortino

Paid for by Sciortino for Auditor, [REDACTED]

Count Eight refers to the following document:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

**January 8, 2006**

Well, it was a great game! Thank you for coming to my Ohio State v. Notre Dame Party on January 2<sup>nd</sup> at St. Nick's. I truly had a great time and I hope you did as well.

My campaign for County Auditor is well under way, and we have a lot more fun planned. One event that I truly want you to be a part of is my Evening of Music Fundraiser which will be held on Friday, February 10<sup>th</sup> at Mr. Anthony's Banquet Center from 6:30pm to 10:30pm. By now you should have received tickets to this event; however, if you have not and wish to have tickets sent to you, please call Kathleen Cervone at 330-533-5490 for more information.

As promised, I will keep you up to date with campaign meetings and other matters dealing with the progress of my campaign. As I have said before, with you in my corner, my campaign can reach new levels, and we can get the job done.

By the way, I must also thank [REDACTED] and the kitchen staff at St. Nicks Byzantine Church for providing great food and service during the game - they sure did go the whole nine yards.

Once again, thanks for your help and I will talk with you soon. Go Buckeyes!!

Sincerely,

Michael V. Sciortino

CC: [REDACTED]

Paid for by Sciortino for Auditor, [REDACTED]

Count Nine refers to the following document:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

TO: Sciortino for Auditor Friends & Supporters

FROM: Mike & Karen Sciortino  
The Sciortino for Auditor Campaign Committee

DATE: February 18, 2006

RE: Evening of Music Fundraiser & Campaign Organizational Meeting

Thank you for coming to my fundraiser on February 10<sup>th</sup> at Mr. Anthony's Banquet Center. Thanks to your support this event was a huge success!! Karen and I had a great time, and we hope you did as well. I wanted this fundraiser to be about the music, and the Carmen Mico band did a wonderful job. It was so nice seeing all of you and I can't tell you how much I appreciate your generous support.

My campaign is well underway, however, we still have a lot of work ahead of us. Many of you have offered your assistance. My committee will be contacting you within the next few weeks to attend an organizational meeting.

Once again, thanks for your help and we hope to see you at the meeting.

Mike& Karen Sciortino

The Sciortino for Auditor Campaign Committee.

Paid for by Sciortino for Auditor, [REDACTED], Youngstown, OH 44515

Count Ten refers to the following document:



Count Eleven refers to the following document:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_  
COUNTY AUDITOR

April 14, 2008

*Dear Friend,*

I am excited to announce that I will be hosting a fundraiser dinner on Wednesday April 30, 2008 at Anthony's on-the-River in Downtown Youngstown. The cost is \$200.00 per person and I have enclosed tickets for your consideration. As you know, Mr. Anthony and his family do a wonderful job, and I am certain you will have a great time.

As an update, I continue to move the County Auditor's Office forward. In the two and a half years I've been Auditor, we've worked together to find alternative ways of governing the County. I have chosen to promote change through cooperation and I refuse to be an officeholder that chooses divisiveness for personal gain – unlike some of my colleagues. Please know – every decision I make is in the best interest of our Mahoning County taxpayers, and to this end I will continue to fight for what I believe is the right thing to do, regardless of the political landscape.

With that said, I need your help! Your financial support strengthens my campaign's ability to promote our message – **Mahoning County Taxpayers deserve a county government that fights for economic development, job creation and progressive new leadership** – not one that attempts to preserve the status quo.

Thank you for all of your past financial support and I hope to see you on Wednesday April 30, 2008 at Anthony's on-the-River.

Best Regards,

Michael Sciortino  
Mahoning County Auditor

Paid for by Sciortino for Auditor, [REDACTED] t, Youngstown, OH 44515

Count Twelve refers to the following document:



*Congratulations to the Austintown  
Democrat Club on 50 Great Years!!  
Keep up the Great Work!*

*Mike* [REDACTED]

*(Fitch '88)*

*Paid for by Sciortino for Auditor, [REDACTED]  
Youngstown OH 44515*

Count Thirteen refers to the following document labeled Ret Labs.doc:

Sciortino for Auditor  
2170 Woodgate Street  
Youngstown, Ohio 44515

Sciortino for Auditor  
2170 Woodgate Street  
Youngstown, Ohio 44515

Sciortino for Auditor  
2170 Woodgate Street  
Youngstown, Ohio 44515

Sciortino for Auditor  
2170 Woodgate Street  
Youngstown, Ohio 44515

Count Fourteen refers to the following document:



*Go Trojans Basketball!*  
*Good Luck in 2010-2011*

*Mike* [REDACTED] *Sciortino*

*Paid for by Sciortino for Auditor* [REDACTED]  
*Youngstown OH 44515*

Count Fifteen refers to the following document:



*Please Attend...*  
*An After Work Mixer with...*

Mike Sciortino  
Mahoning County Auditor  
Tuesday, March 2<sup>nd</sup>  
Donavito's Bar and  
Grille  
5:30 p.m.

Food \* Drinks \* Friends

As you know the Mahoning County Democratic Party will meet on **Thursday, March 11<sup>th</sup>** to endorse local candidates for various political offices. **While I already know you personally, I do not take your support and friendship for granted.** I'm hosting an informal get together on Tuesday, March 2<sup>nd</sup> so we can discuss the endorsement meeting and my campaign for re-election. At that time I intend to demonstrate to you my qualifications to continue serving you as our County Auditor. Also, I'll be providing

you with a summary of my accomplishments in the four plus years I've been in office. I trust you will join me.

---Mike

Pais (sic) for by: Sciortino for Auditor, [REDACTED]

Count Sixteen refers to the following document:



March 10, 2010

Dear Mahoning County Absentee Voter:

My name is Michael V. Sciortino and I have had the privilege to serve you as Mahoning County Auditor for the past three years. As you well know many people today do not exercise their right to vote – a right that countless Americans have fought and died for. I see that you take your commitment to vote seriously since you have voted by Absentee Ballot in the past.

I have enclosed an application form for an Absentee Ballot for the May 2010 primary election. If you wish to vote by absentee ballot again this year, please fill out the enclosed form, stamp it, and return it to the Mahoning County Board of Elections by 12:00 p.m. on May 1, 2010.

If you do not wish to vote absentee this year, please remember to vote on Election Day. In my experience as an attorney, former Director of the Mahoning County Board of Elections, and now County Auditor, I am constantly reminded that one of our greatest responsibilities is choosing

competent, qualified elected leaders. Please take the opportunity to again participate in the electoral process this year.

This year I am seeking re-election to serve as County Auditor and would certainly appreciate your vote – and most importantly, thank you for exercising your right to vote.

Sincerely,

MICHAEL V. SCIORTINO  
Mahoning County Auditor

Paid for by Sciortino for Auditor • [REDACTED]

Count Seventeen refers to the following document:

Being an email on the Mahoning County Computer Network From Michael Sciortino to SciortinoNation,( a name used by Michael Sciortino for reelection purposes an example of which may be found by clicking on this link <https://www.facebook.com/events/166767313335469/> ) Email from Michael Sciortino on the Mahoning County email system to [Sciortinonation@zoominternet.net](mailto:Sciortinonation@zoominternet.net) with attached campaign material, stating who has endorsed Michael Sciortino as follows: “Mike Sciortino has been endorsed by the Mahoning County Democratic Party, the Western Reserve Building & Construction Trades, AFSCME Ohio Council 8, AFL-CIO, the UAW CAP Council, Teamsters Local 377, Youngstown Sheet Metal Workers Local 33 and the North and South County Democratic Clubs. Paid for by Sciortino for Auditor, [REDACTED] Treasurer, [REDACTED] Austintown, Ohio 44515.

Count Eighteen refers to the following document:

An email from [REDACTED] to Michael Sciortino on the Mahoning County Computer system emailing Sciortino the Sciortino for Auditor Golf Scramble flyer and invitation scheduled for July 23, 2010, which follows:

## Sciortino for Auditor Golf Scramble



**Date:** Friday July 23<sup>rd</sup>, 2010  
**Location:** Knoll Run Golf Course  
**Time:** 9:00 am shotgun start (please arrive between 8-8:30 for registration)

Please join and support Mahoning County Auditor Mike Sciortino for a day of golf, food, and fun!!!!!!

- \$75 per player, organize a team for \$300, 18 holes, cart and greens fee included
- Hole sponsorships are available for \$100 per hole
- Compete for skill prizes, skins and other contests!!!
- Lunch at the turn, dinner following the event, and refreshments provided

If there are any questions please contact [REDACTED]

Detach here

Please make check payable to: *Sciortino for Auditor*

No Corporate checks please Amount Enclosed: \_\_\_\_\_

Mail to: [REDACTED]

- Golfer #1: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #2: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #3: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #4: \_\_\_\_\_  
Address: \_\_\_\_\_

Phone #: \_\_\_\_\_

Phone #: \_\_\_\_\_

Phone #: \_\_\_\_\_

Address: \_\_\_\_\_ Phone #: \_\_\_\_\_  
• Hole Sponsorship \_\_\_\_\_ (Company, name, address, phone):  
\_\_\_\_\_

Count Nineteen refers to the following document, called letterhead



Count Twenty refers to the following document, called SN Final Push:



October 7, 2010

Dear Friend:

As Election Day draws near, I am working tirelessly to make sure we run a professional and successful campaign. I have been honored and gratified by the tremendous support that I have received from friends like you. Our opponents have chosen to run harshly negative campaigns, and that makes it necessary to ask again for your continued support.

Your financial contribution in the past has made it possible for us to run a campaign that highlights my credentials and qualifications for county auditor.

Yet, we still will need to have additional recourses to bring home a victory November 2, 2010.

It means so much to my family and myself that you have been a friend we can count on. Now more than ever I need your support. Your financial contribution makes it possible to purchase valuable media time to ensure a tremendous victory on Election Day.

Please use the enclosed envelope today if you are able to help my campaign.

Thank you so much for your continued support.

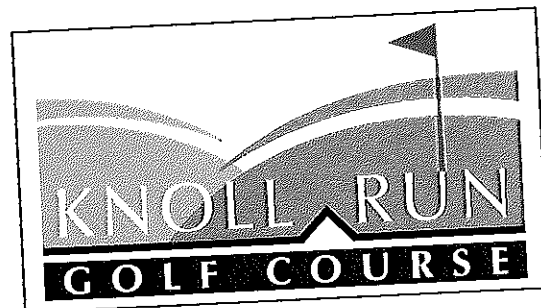
Michael Sciortino

Paid for by Sciortino for Auditor, [REDACTED]

Count Twenty-One refers to the following document created by Employee 3 at the request of Michael Sciortino. The original request to produce this document or a document similar to this occurred during the business hours of the Mahoning County Auditor's office while Employee 3 was being paid as a Mahoning County Employee with the full knowledge of Sciortino :

## **Sciortino for Auditor 2nd Annual Golf Scramble**

**Date:** Friday July 29, 2011  
**Location:** Knoll Run Golf Course  
**Time:** 9:00 am shotgun start  
8-8:30 registration



Please join and support Mahoning County Auditor Mike Sciortino for a day of golf, food, and fun!!!!

- \$75 per player, organize a team for \$300, 18 holes, cart and greens fee included
- Hole sponsorships are available for \$100 per hole
- Compete for top team money, skill prizes, skins and other contests!!!
- Lunch at the turn, dinner following the event, and refreshments provided

If there are any questions please contact [REDACTED]

Detach here

Please make check payable to: *Sciortino for Auditor* No Corporate checks please

Mail to: [REDACTED] Austintown, OH, 4451 Amount Enclosed: \_\_\_\_\_

- Golfer #1: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #2: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #3: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Address: \_\_\_\_\_
- Golfer #4: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Address: \_\_\_\_\_
- Hole Sponsorship \_\_\_\_\_ (Company, name, address, phone)  
\_\_\_\_\_

Paid for by Sciortino for Auditor [REDACTED]

Count Twenty-Two refers to the following document called Mikes (sic) Golf Outing Prizes 2011, containing the gift and the amount, the name of the done (some of which were Mahoning County Auditor Employees whose names have been withheld on this document for privacy reasons but exist on the actual document):

Gift

Amount

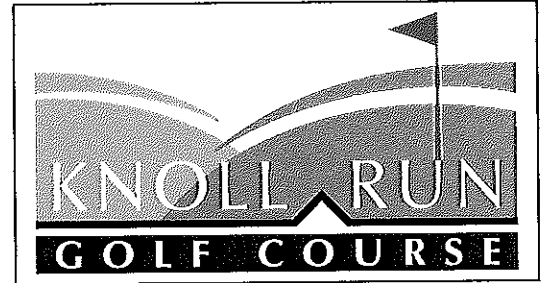
1	Golf Glove	---	
2	Golf Glove	---	
3	Club Brush	---	
4	Club Brush	---	
5	Set of Soft Spikes	---	
6	Handel's Ice Cream	1 Pint	
7	Handel's Ice Cream	1 Pint	
8	Handel's Ice Cream	1 Pint	
9	Handel's Ice Cream	1 Pint	
10	Handel's Ice Cream	1 Pint	
11	Inner Circle Canfield Gift Card		\$10.00
12	Inner Circle Canfield Gift Card		\$10.00
13	Inner Circle Canfield Gift Card		\$10.00
14	Inner Circle Canfield Gift Card		\$10.00
15	Inner Circle Canfield Gift Card		\$10.00
16	Austintown/Canfield Auto Spa		\$10.00
17	Austintown/Canfield Auto Spa		\$10.00
18	Austintown/Canfield Auto Spa		\$10.00
19	Austintown/Canfield Auto Spa		\$10.00
20	Austintown/Canfield Auto Spa		\$10.00
21	Starbucks Gift Card		\$15.00
22	Vintage Estate Gift Card		\$20.00
23	Dona Vito's Gift Card		\$25.00
24	Applebee's Gift Card		\$25.00
25	Applebee's Gift Card		\$25.00
26	Quaker Steak & Lube Gift Card		\$25.00
27	Quaker Steak & Lube Gift Card		\$25.00
28	Youngstown Crab Company		\$25.00
29	Y-town Sports Grille Gift Card		\$25.00
30	Y-town Sports Grille Gift Card		\$25.00
31	Café Cimmento's Gift Card		\$25.00
32	Trax Gift Certificate		\$25.00
33	Trax Gift Certificate		\$25.00
34	Upstairs		\$25.00
35	Upstairs		\$25.00
36	Upstairs		\$25.00
37	Upstairs		\$25.00
38	Michael Alberini's Gift Card		\$30.00
39	Travel Bag	---	
40	Tie, Hanky & Cuff Link Set	---	
41	Kensington Golf Course	18 Holes	
42	Kensington Golf Course	18 Holes	
43	Kensington Golf Course	18 Holes	
44	Kensington Golf Course	18 Holes	
45	Kensington Golf Course	18 Holes	
46	Kensington Golf Course	18 Holes	



Count Twenty-Three refers to the following document

# Sciortino for Auditor 3rd Annual Golf Scramble

**Date:** Friday July 27, 2012  
**Location:** Knoll Run Golf Course  
**Time:** 9:00 am shotgun start  
8-8:30 registration



Please join and support Mahoning County Auditor Mike Sciortino for a day of golf, food, and fun!!!!

- \$75 per player, organize a team for \$300, 18 holes, cart and greens fee included
- Hole sponsorships are available for \$100 per hole
- Compete for top team money, skill prizes, skins and other contests!!!
- Lunch at the turn, dinner following the event, and refreshments provided

If there are any questions please contact [REDACTED]

Detach here

Please make check payable to: *Sciortino for Auditor* No Corporate checks please

Mail to: [REDACTED]

Amount Enclosed:

- Golfer #1: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Golfer #2: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Golfer #3: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_

• Golfer #4: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_

• Hole Sponsorship \_\_\_\_\_ (Company, name, address, phone)  
\_\_\_\_\_

Paid for by Sciortino for Auditor, [REDACTED]

Count Twenty-Four refers to the following document:



June 27, 2012

Dear

I hope this letter finds you in good health as we enjoy this wonderful summer. One thing is for certain, this great weather makes for even better golf.

On July 27, 2012 I will be hosting my 3<sup>rd</sup> Annual *Sciortino for Auditor Golf Outing* at Knoll Run Golf Course. A flier is included for your review. Once again, I need your help with sponsorships to make our outing one of this summer's best.

I have designated four levels of golf sponsorships for you to consider purchasing:

LEVEL	AMOUNT	SPONSORSHIP RECOGNITION
TEAM	\$300.00	4 member golf team

BIRDIE	\$500.00	Golf team and breakfast sponsor
SILVER	\$750.00	Birdie Level plus lunch sponsor
PLATINUM	\$1000.00	Silver Level plus Dinner Sponsor

Last year, we had 34 teams play golf and everyone in attendance enjoyed a great event. I can assure you that we run a very professional outing and one that you would be proud to associate your name with.

You have always supported my campaign and I once again want to sincerely thank you for all the help. Your support and friendship truly means a lot to me and my family.

Mike Sciortino

Paid for by Sciortino for Auditor, [REDACTED]

Count Twenty-Five refers to the following document:



*Have a great season - Go Cards!  
Good Luck in 2007-08*

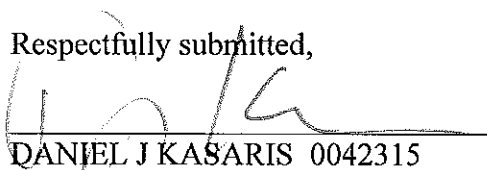
**Mike [REDACTED] Sciortino**

*Paid for by Sciortino for Auditor, [REDACTED]*

**IV. Conclusion.**

WHEREFORE, the State of Ohio prays for an Order of this Court finding that a Bill of Particulars has been rendered herein pursuant to law. The State reserves the right to supplement or amend this Bill of Particulars as justice may require.

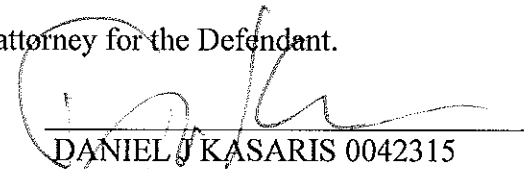
Respectfully submitted,

  
DANIEL J KASARIS 0042315  
Assistant Ohio Attorney General  
Deputy / Assistant Mahoning County  
Prosecutor  
20 West Federal Plaza Third Floor  
Youngstown, Ohio 44503  
Telephone: (330) 884-7540

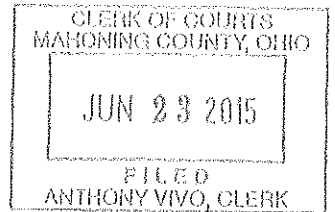
Counsel for Plaintiff, State of Ohio

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of June 2015 a copy of the foregoing *Bill of Particulars* was emailed to John Juhasz, attorney for the Defendant.

  
DANIEL J KASARIS 0042315  
Assistant Ohio Attorney General  
Deputy / Assistant Mahoning County  
Prosecutor

**IN THE COURT OF COMMON PLEAS  
CRIMINAL DIVISION  
MAHONING COUNTY, OHIO**



STATE OF OHIO	)	CASE NO. 15 CR 542
	)	
PLAINTIFF	)	JUDGE SHIRLEY CHRISTIAN
	)	
vs.	)	RESPONSE TO REQUEST FOR
	)	DISCOVERY DEMAND
	)	NOTICE AND RECEIPT
MICHAEL SCIORTINO	)	
	)	
DEFENDANT	)	

I hereby Request and Demand all Discovery entitled to me pursuant to Criminal Rule 16 and Local Rule 9.

*[Signature]*  
ATTORNEY FOR DEFENDANT

On the above date, upon written request, I received from Assistant Ohio Attorney General, Daniel Kasaris, in regards to the above captioned case, the following Information Packet for discovery purposes, which were electronically transferred to an external hard drive I had supplied to Mr. Kasaris, to wit:


1. Copy of Indictment
2. The Mahoning County Computer use policy
3. A Paul Gains Appointment letter
4. Mahoning County Computer Inventory
5. Mahoning County personnel manual
6. Michael Sciortino's Ohleg report
7. Invoice from Del showing that Mahoning County purchased and owned what has been called EV 16 by The Ohio BCI, turned over by Michael Sciortino at his residence in September of 2014. The invoice was acquired by BCI Computer Forensic Analyst Michael Dodson.
8. The Contents of EV 16<sup>1</sup> including the following folders and/or files:

A file called 6x4 5 (2).pdf being a political ad pertaining to the East High Hall of Fame

A file called 9A579629.doc being a list of person created in word to mail political material.

<sup>1</sup> EV 16 is a computer provided to BCI and or other law enforcement agents by Michael Sciortino at his home on September 22, 2014. Sciortino refused to sign a consent to search form, despite the fact that he knowingly handed law enforcement the computer to search it. Sciortino through his attorney had earlier requested to keep such computer throughout the evening and overnight. Law enforcement did not ultimately agree to that request and Sciortino drove to his house and retrieved the computer for law enforcement agents who were waiting for him.

11. Erika Moore—BCI & 1, 20 West Federal Plaza Youngstown, Ohio
12. The Government retains the right to supplement list as the matter progresses.
9. Remaining discovery will be provided when it is available, the government possesses no grand jury transcripts in this matter.
10. The government recognizes its continuing duty to disclose evidence and will supplement discovery as needed and required.

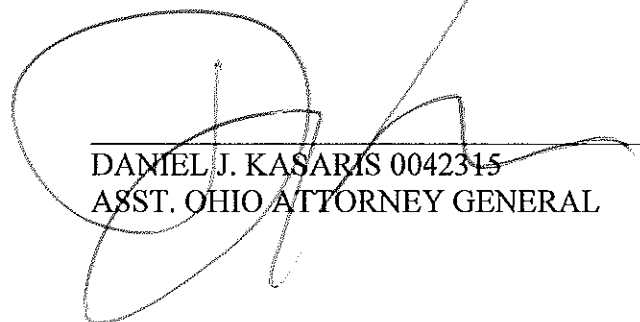


DANIEL J. KASARIS 0042315  
ASST. Ohio Attorney General  
Deputy / Assistant Mahoning County  
Prosecutor  
20 West Federal Plaza 3<sup>rd</sup> floor  
Youngstown, Ohio 44503  
Tel. (330) 884-7540

COUNSEL FOR PLAINTIFF

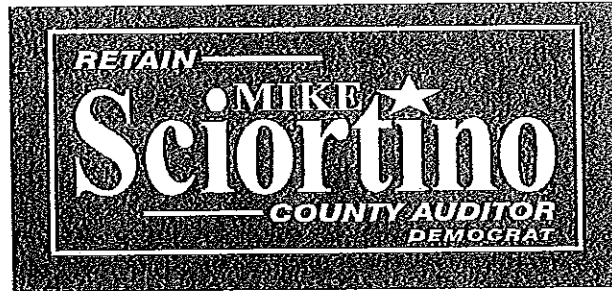
CERTIFICATE OF SERVICE

This 23<sup>rd</sup> day of June, 2015 the State certifies that a copy of the foregoing was hand delivered to Attorney John Juhasz or his representative.



DANIEL J. KASARIS 0042315  
ASST. OHIO ATTORNEY GENERAL

A file called Abs( Absentee voter) letter being a letter dated March 10, 2010 from Michael Sciortino, Candidate for the Office of Mahoning County Auditor, to Mahoning County Absentee Voters as seen below:



March 10, 2010

Dear Mahoning County Absentee Voter:

My name is Michael V. Sciortino and I have had the privilege to serve you as Mahoning County Auditor for the past three years. As you well know many people today do not exercise their right to vote – a right that countless Americans have fought and died for. I see that you take your commitment to vote seriously since you have voted by Absentee Ballot in the past.

I have enclosed an application form for an Absentee Ballot for the May 2010 primary election. If you wish to vote by absentee ballot again this year, please fill out the enclosed form, stamp it, and return it to the Mahoning County Board of Elections by 12:00 p.m. on May 1, 2010.

If you do not wish to vote absentee this year, please remember to vote on Election Day. In my experience as an attorney, former Director of the Mahoning County Board of Elections, and now County Auditor, I am constantly reminded that one of our greatest responsibilities is choosing competent, qualified elected leaders. Please take the opportunity to again participate in the electoral process this year.

This year I am seeking re-election to serve as County Auditor and would certainly appreciate your vote – and most importantly, thank you for exercising your right to vote.

Sincerely,

MICHAEL V. SCIORTINO  
Mahoning County Auditor

Paid for by Sciortino for Auditor • [REDACTED]

A letter called Accom power point.docx , listing Major Accomplishments for Michael Sciortino since he became the Mahoning County Auditor

A file called addresses listing the addresses of 10 entities for political purposes

A File called Address1 Nov08

A File called Address2 Nov08

A File called Address3 Nov08

A File called Address5 Nov08

~~A File called Address6 Nov08~~

A File called Address9 Nov08

A file called AFL/CIO in which the defendant answered 10 questions so that he could obtain the endorsement of the AFL/CIO in 2010 –the file is dated last accessed 8/16/12

A file called AFL/CIO in which the defendant answered 10 questions so that he could obtain the endorsement of the AFL/CIO in 2010, the file is dated last accessed March 15, 2010

A file called April 30 invite, being a letter dated April 14, 2008 from Michael Sciortino announcing a political fundraiser on April 30, 2008 for Sciortino for Auditor

A file called Aus( Austintown) Democratic Club, being a political add to Retain Mike Sciortino County Auditor

A PDF called Aus Democratic Club, being a political add to Retain Mike Sciortino County Auditor

A file called Aus Democratic Club (14662793) being a political ad to Retain Mike Sciortino County Auditor



A file called Aus Democratic Club (14669344) being a political ad to Retain Mike Sciortino County Auditor

A file called Aus Hall of Fame being a political ad to Retain Mike Sciortino County Auditor

A file called baseball sign, being Mike Sciortino--- County Auditor letterhead.

A file called bdm (Boardman) speech, being a political speech to seek election or re-election.

A file called [REDACTED], being a political advertisement to Retain Mike Sciortino, County Auditor.

A file called Brunner-Cordray-Dann invite4, being an invitation for a fundraiser for Jennifer Brunner, Richard Cordray, and Mark Dann with a disclaimer stating paid for by Sciortino for Auditor .

A file called Buckeye thank you being a letter dated January 8, 2006 with Retain Mike Sciortino County Auditor letterhead written at the top, notifying people of a fundraiser to be held at Mr. Anthony's Banquet center for Sciortino for Auditor.

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A file called C29739 Sciortino Card (1) being a palm card to hand out when campaigning to seek the recipient's vote

A file called C29739 (1) (14665744) Sciortino Card (1), being a palm card to hand out when campaigning to seek the recipient's vote

A file called Campaign Labels, being a word document with names and addresses of people on it so that a letter can be easily sent as part of a mail merge.

A. file called Canf(canfield) Sports , being a political ad to retain Mike Sciortino County Auditor

A file called col cnty internet policy.

A file called Commptfiled2-11, being an excel spreadsheet of Mahoning County Precinct committee persons and others

A file called Commptfiled2-18, being an excel spreadsheet of Mahoning County Precinct committee election candidates

A file called Congrats, being a letter from Michael Sciortino to those who won an election on or about November 8, 2007.

A file called Congratulations 2005 Inductees, being a Thank You to certain persons for "dedication to the democratic party"

A file called contributors2, being 73 pages long appearing to be a template for letters to over 100 people for political purposes.

A file called Endorsements, listing all Mike Sciortino's endorsements and later emailed by Mike Sciortino using he Mahoning County email network to Sciortinonation, his political campaign Facebook page and group name. ( An example of what



appears on the Sciortinonation page follows:

**Michael V. Sciortino**

**October 13, 2010**

"Thank you to all of the great Sciortinonation supporters who have helped me in the past. Just two weeks left in the campaign and a perfect time for a NFL Football Party Sunday October 24 at Barry Dingles...Plenty of Barry Dingle's great food and fun!!! \$20.00 per person and cash bar. Tailgate and corn hole at noon.)"

A file called est57026, being a bill City Printing Emailed to Mike Sciortino for printing political material, emailed to Michael Sciortino on the Mahoning County Email system on or about February 12, 2009.

A file called est57027 , being a bill City Printing Emailed to Mike Sciortino for printing political material, emailed to Michael Sciortino on the Mahoning County Email system on or about February 12, 2009.

A file called est57028 , being a bill City Printing Emailed to Mike Sciortino for printing political material, emailed to Michael Sciortino on the Mahoning County Email system on or about February 12, 2009.

A file called "Evening of Music ticket", being a ticket to attend a political fundraiser for Sciortino for Auditor on February 10, 2006

A file called "Evening of Music", being an invitation to attend a political fundraiser for Sciortino for Auditor on February 10, 2006.

A file called Evening of Music FR letter being a letter dated January 8, 2006 to be sent to people inviting them to attend a political fundraise for Mike Sciortino on February 10, 2006 providing the following information:

**Evening of Music**

**With**

County Auditor Michael V. Sciortino  
Friday, February 10, 2006  
Mr. Anthony's Banquet Center  
6:30pm – 10:30pm  
\$50.00 per person    Buffet Dinner    Cash Bar

A file called fam.pic, such picture was used for political advertising for Mike Sciortino.

A file called February 9, 2007 fundraiser thank you labels.

A file called Feb 9 fundraiser.doc.

A file called February 10 thank you, being a letter on Retain Mike Sciortino County Auditor thanking supporters for coming to his February 10, 2006 fund raiser, paid for by Sciortino for Auditor and signed The Sciortino for Auditor Campaign Committee.

A file called Fling Press Rel.doc., being a press release dated February 9, 2010 whereby Michael Sciortino announces he is filing petitions to seek reelection.

A file called Flier.doc being the Sciortino for Auditor 2<sup>nd</sup> Annual Golf Scramble golf outing fundraiser to be held on July 29, 2011.

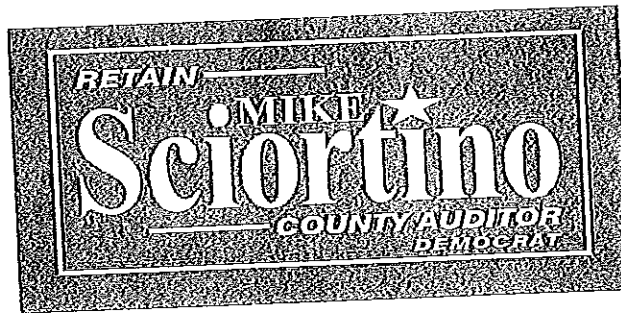
A file called Golf Labels master list (1)(1), being a master list for people to invite to a political event, being a fundraiser for Sciortino for Auditor.

A file called Golf letter 2010 with the following letterhead:



Being a letter dated June 27, 2012 notifying people of the third annual Sciortino for Auditor Golf Outing.

A file called Golf letter 2012 with the following letterhead:



Being a letter dated June 27, 2012 notifying people of the Third Annual Sciortino for Auditor Golf Outing.

A file called Hello all, being a letter or note to people of campaign endorsements and yard sign information.

A file called hole sponsors, listing 38 hole sponsors for the Sciortino for Auditor Golf outing.

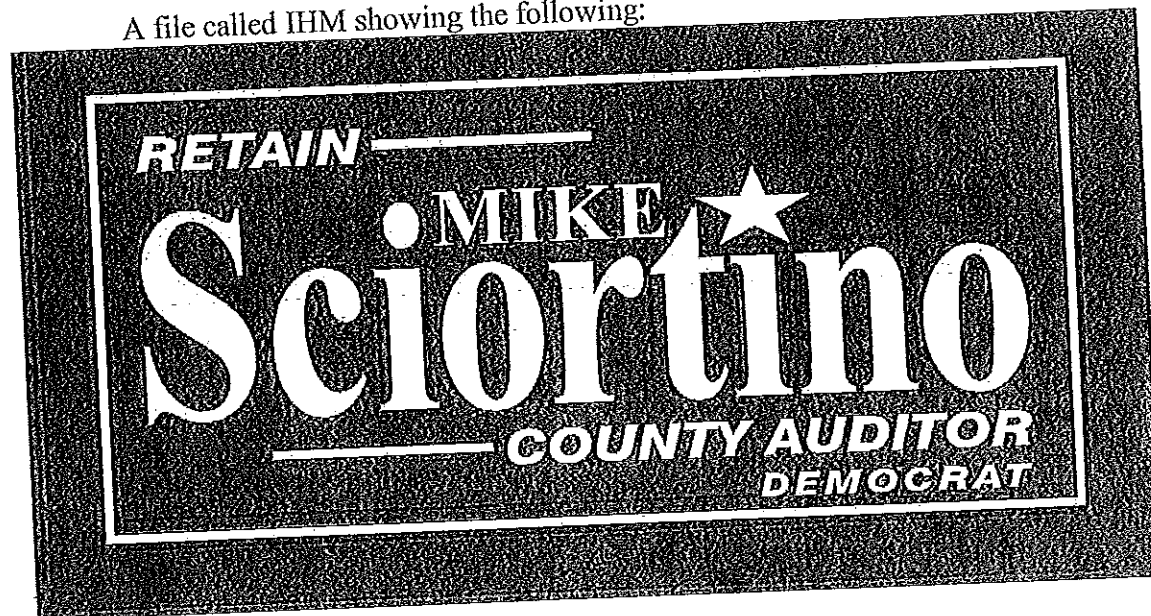
A file called holi lab 1, created on Mahoning County Computer by Mike Sciortino' s a County Auditor Employee.

A file called holi lab 2, created on Mahoning County Computer by Mike Sciortino' s a County Auditor Employee.

A file called holi lab 3, created on Mahoning County Computer by Mike Sciortino' s a County Auditor Employee.

A file called holi lab 4, created on Mahoning County Computer by Mike Sciortino' s a County Auditor Employee.

A file called IHM showing the following:



A file named Invite, inviting people to an Evening of Music fundraiser for Sciortino for Auditor held on February 9, 2007.

A file named Ital Fest., being 2010 campaign literature for Mike Sciortino.

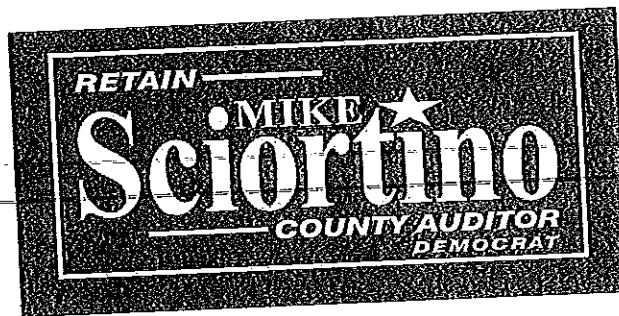
A file named Ken Simon being a political advertisement to Retain Mike Sciortino county auditor.

A file named labels pol 7.

A file named master list containing 10 pages of names for person to solicit fundraising to.

A file named master list (1) (1) containing 10 pages of names for person to solicit fundraising to.

A file named letterhead containing the following:



A file named Libby, being a political advertisement to retain Mike Sciortino County Auditor.

A file named logo, being a letter dated June 27, 2012 notifying people of the third annual Sciortino for Auditor Golf Outing.

A file called LWVGY, being a questionnaire for political candidate office to answer.

A file called Master List, being the master list of names to send the 2012 golf outing invitations too.

A file called Mike songs, being a list of songs he sang at his February fundraiser which was called an Evening of Music.

A file called Mike Sciortino for Auditor Scramble.

A file called Mike's Auditor Speech, wherein Mike Sciortino asks a group of people to vote for him for county auditor citing among other things his integrity, leadership, and qualifications.

A file called Mike's golf outing prizes, —47 of them listing the people who donated the prizes.

A file called MVS (Michael Victor Sciortino) Candidate Release 02-15-06, on the following letterhead:

RETAIN \_\_\_\_\_

Mike

SCIORTINO

\_\_\_\_ COUNTY AUDITOR

announcing that Michael Sciortino is filing his Nominating Petitions Wednesday February 15, 2006 at 3:00 pm.

A file called "MVS message", being a letter to voters.

A file called "MVS Update 03-14-06", being a Candidate Update to All Mahoning County Democratic Party Precinct Officials.

A file called "MVS Update 4/10/06", being a Candidate Update to Sciortino for Auditor Friends and Supporters.

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A file called "MVS%AUW%20 Supp", being an endorsement questionnaire from the UAW Cap Council.

A file called "MVS%AUW%20 Supp2", being an endorsement questionnaire from the UAW Cap Council.

A file called "MVS April 2008 (1)", being an invitation to a Fundraiser for Sciortino for Auditor at Anthony's on the River on April 30, 2008.

A file called MVS Update, being a memo to Sciortino Nation Supporters dated April 30, 2007 updating supporters the 2006 Mahoning County Auditor Political Campaign and fundraiser.

A file called MVS evening of music, containing nothing but the Retain Mike Sciortino County Auditor letterhead.

A file called MVS evening of music 2007, being a letter dated January 11, 2007 announcing "my 2<sup>nd</sup> annual "Evening of Music" on February 9, 2007 that being a fundraiser for Sciortino for Auditor.

A file called OCCHA, being a political advertisement to the Spanish Community of Mahoning County written in Spanish.

A file called Oct 24, 2009 being a letter dated April 14, 2008 on the following letterhead:

RE - ELECT \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

Announcing that "I will be hosting a fundraiser cocktail party on Saturday October 24, 2009 at Antone's Banquet Center..." "The cost is \$20,00 a person and I have enclosed tickets for your consideration." Being a fundraiser for Sciortino for Auditor

A file called osu(sic) 07, being a list of people who won money at a Sciortino for Auditor political event.

A file called OSU 2009 being an invitation to Mike Sciortino's 4<sup>th</sup> Annual OSU v. Michigan Football Party fundraiser.

A file called OSU v. Michigan food invite 07 being a letter written to Dear Friends on the following letter head:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

inviting people to a Sciortino for Auditor fundraiser.

A file called OSU v. Michigan food invite 08, being a letter written to Dear Friends on the following letter head:

RETAIN \_\_\_\_\_  
Mike  
**SCIORTINO**  
\_\_\_\_\_ COUNTY AUDITOR

inviting people to a Sciortino for Auditor fundraiser.

A file called OSU v. Michigan food invite 07, being a letter written to Dear Friends on the following letter head:

RETAIN \_\_\_\_\_

Mike

SCIORTINO

\_\_\_\_\_ COUNTY AUDITOR

inviting people to a Sciortino for Auditor fundraiser.

A file called OSU v. Michigan food invite, being a letter written to Dear Friends inviting people to a Sciortino for Auditor fundraiser, dated November 2, 2006.

A file called pcom, being a letter dated September 25, 2005 from Michael Sciortino thanking the Mahoning County Democratic Party Central Committee for appointing him county auditor, written/crated on a computer owned by Mahoning County.

At least 130 postings on a computer owned by Mahoning County and on Software licensed to Mahoning County of political events for Michael Sciortino to attend, including fundraisers during the 2006 and 2010 election year, and other years, posted by a Mahoning County Employee who worked for the Mahoning County Auditor' office and/or posted by Sciortino or someone else action under his direction.

A file called "Proposed fr April 30, 2008", being 61 pages in length containing names of people to invite to a Sciortino for Auditor Fundraiser.

An email from Michael V. Sciortino to Carol McFall dated March 22, 2010 regarding obtaining the UAW endorsement using the Mahoning County Email system.

An email string dated April 23, 2010 between Michael Sciortino regarding the placement of political signs, using the Mahoning County Email system.

An email string dated July 30, 2009 pertaining to transferring the domain Sciortinonation.com using the Mahoning County Email system.

An email string dated March 26, 2010 using the Mahoning County Email system regarding attending a Sciortino for Auditor Fund raiser.



A file called Ret. Labs stating: Sciortino for Auditor  
2170 Woodgate Street  
Youngstown, Ohio 44515

A file called "RETAIN", and containing campaign letterhead as follows:

RETAIN \_\_\_\_\_  
Mike  
SCIORTINO  
\_\_\_\_\_ COUNTY AUDITOR

A file called SCDC, being Michael V. Sciortino's answers to questions directed to him by the South County Democrats Club for the May 4, 2010 Primary Election.

A file called "Scior FR 1st" listing 30 pages of names of persons.

A file called "Sciortino Beshara Party", being an after work cocktail party/\$100.00 a person fundraiser for Sciortino for Auditor

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A file called Sciortino for Auditor Golf Flyer

A file called Sciortino for Auditor Golf Flyer.pdf

A file called Sciortino for Auditor being return address labels for Sciortino for Auditor

A file called Sciortino Golf Flyer.

A file called Sciortino Golf Flyer.

A file called "Sciortino's list".

A file called Sciortino Nation Aus(Austintown) Mix, being a fundraiser March 4<sup>th</sup> at the Manor Bar and Grill for Sciortino for Auditor.

A file called "Sciortino Nation AWP", being an invitation to a fundraiser for Sciortino for Auditor

A file called "Sciortino Nation end letter", being a letter drafted March 2, 2010 seeking the endorsement of the Mahoning County Democratic Party for the May 2010 primary

A file called "Sciortino nation eve Music March 2010" announcing the 4<sup>th</sup> annual Evening of music fundraiser for Sciortino for Auditor.

A file called "Sciortino nation meeting", announcing a meeting of the Mike Sciortino Campaign Committee on March 3, 2010.

An email dated October 1, 2010 from Carol McFall to Michael Sciortino regarding Sciortino nation and a posting on Sciortino nation's Facebook page.

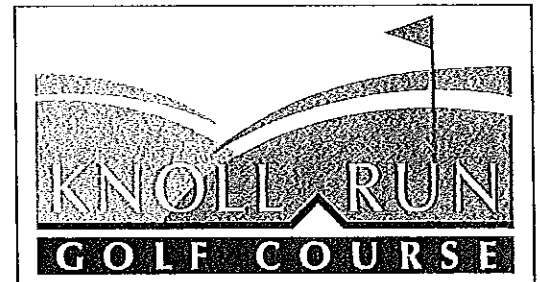
A file called "Sciortino 2012" being a political advertisement for Michael Sciortino

A file called Sciortino Golf Flyer (1) being an invitation for the 3<sup>rd</sup> annual fundraiser as seen below

## **Sciortino for Auditor**

### **3rd Annual Golf Scramble**

**Date: Friday July 27, 2012**  
**Location: Knoll Run Golf Course**  
**Time: 9:00 am shotgun start**  
**8-8:30 registration**



Please join and support Mahoning County Auditor Mike Sciortino for a day of golf, food, and fun!!!!

- \$75 per player, organize a team for \$300, 18 holes, cart and greens fee included
- Hole sponsorships are available for \$100 per hole
- Compete for top team money, skill prizes, skins and other contests!!!
- Lunch at the turn, dinner following the event, and refreshments provided

If there are any questions please contact Anthony Magnetta @ 330-207-9918

Detach here

Please make check payable to: *Sciortino for Auditor* No Corporate checks please

Mail to: Karen Sciortino, 2170 Woodgate St, Austintown, OH, 44515

Amount Enclosed:

- Golfer #1: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Golfer #2: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Golfer #3: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Golfer #4: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone #: \_\_\_\_\_
- Hole Sponsorship \_\_\_\_\_ (Company, name, address, phone)

Paid for by Sciortino for Auditor, [REDACTED]

A file named "Sciortino Nation End Letter", being a letter dated March 2, 2010 requesting the endorsement of the Mahoning County Democratic Party

A file named Sciortinoad ( correct spelling )being a political document

A file named Seb basketball , being a political advertisement to Retain Mike Sciortino County Auditor

A file called SN Final Push, being a letter dated October 7,2010 seeking donations for Sciortino for Auditor

A file called State Street Invoice dated February 4, 2008

An email from Sciortinonation to Michael V. Sciortino on the Mahoning County email system.

A file called "Talk Pnts" , created under Retain Mike Sciortino County Auditor letter head.

A file called "Team list" being a pdf listing teams for the Sciortino golf outing .

9. A folder containing the private law practice work of Attorney Michael Sciortino, including a fee schedule for providing legal services including

- A. Power of Attorney for Client 1
- B. Power of Attorney for Client 2
- C. Last Will and Testament for Client 2
- D. Last Will and Testament for Client 2.
- E. Last Will and Testament for Client 3
- F. Last Will and Testament for Client 4
- G. Personal Injury Client 5
- H. Power of Attorney Client 6
- I. Property Law Client 7
- J. Last Will and Testament for Client 8. (2001)
- K. A file called Michael V
- L. A file called Michael v. [14667867]
- M. A file called Murphy
- N. A file called [REDACTED] Deed created 9/27/06
- O. A file called [REDACTED] LWT created 9/30/06
- P. A file called Personal Injury Case Checklist
- Q. A file called [REDACTED] LWT created 12/7/07
- R. A Power of Attorney Mike file
- S. A file called SXXXXXX created 11/6/07...
- T. A file called [REDACTED] hcpoa created 5/21/12
- V. A file called [REDACTED] Will created 5/21/12
- W. A file called [REDACTED] a POA created 5/21/12
- X. A file called Sgcondos
- Y. A file called S [REDACTED] e created 8/28/07
- Z. A file called [REDACTED] o created 8/13/08

10. A folder called "Narrowed Down Documents", stating the documents specifically included in the indictment as narrowed down by the Government for indictment purposes.

11. A folder called "attachment t ev14hdi<sup>2</sup>", being a documents created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer not owned by Mahoning County

12. A folder called "attachment t ev14hdi", being emails created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer not owned by Mahoning County

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<sup>2</sup> These attachment ... folders are folders created by BCI and labeled for evidence purposes. The contents of the folders are/were the contents of a specific computer. EV 14 and EV 15 were not computers owned by Mahoning County. EV 16 was/is a computer owned by Mahoning County.

13. A folder called "attachment t ev15hdi" ,being a documents created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer not owned by Mahoning County

14. A folder called "attachment t ev15hdi" ,being emails created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer not owned by Mahoning County

15. A folder called "attachment t ev16hdi" ,being a documents created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer owned by Mahoning County

16. A folder called "attachment t ev16hd" , being emails created on or viewed on a computer provided to the State of Ohio by Michael Sciortino being a computer owned by Mahoning County

17. An email dated February 10, 2009 from Michael Sciortino using the Mahoning County email system quoting the recipient his fees for singing , and /or DJ service

I acknowledge that I am on notice that the State intends to use each of the items contained within the above mentioned Information Packet at the trial in this case.

*John Thomas*  
ATTORNEY FOR DEFENDANT  
*Does not comply with R. 12(E)(2)*

#### **STATE'S RECIPROCAL DISCOVERY REQUEST**

Having provided Defendant with Discovery pursuant to Criminal Rule 16, and Local Rule 9, and having provided Notice of the Intention to Use Evidence pursuant to Criminal Rule 12(E), I hereby request all Discovery entitled to the State of Ohio pursuant to Criminal Rule 16 and Local Rule 9(D) be delivered within seven (7) days of the filing of this document.

#### **NOTICE OF INTENT TO USE EVIDENCE**

Furthermore, the State hereby gives notice to the Defendant, pursuant to Criminal Rule 12(E) that it intends to use each of the items contained within the above mentioned Information Packet at the trial in this case, and in addition any and all evidence of the defendant creating private law practice material on the Mahoning County Computer he possessed. The misuse of computer was not De Minimis, but a continued reflection of corruption.

## OTHER RULE 16 DISCOVERY

1. The government does not possess any written or recorded statement made by the defendant.
2. No witness has a criminal record, at this time which is discoverable, other than John Reardon and Lisa Antonini , their records have been provided on the external hard drive.
3. All papers, documents provided electronically
4. The results of computer forensic testing has been provided to defense counsel on an external hard drive
5. The government has turned over all documents, papers and evidence it currently possesses in this matter. The government has asked Defense Counsel to be more specific with this particular request.
6. The government possesses no reports from the Ohio Highway Patrol in this matter. All reports it possesses will be emailed to defense counsel immediately upon availability if not provided electronically on the aforementioned external hard drive
7. Witness statements have been provided electronically as stated herein

### ~~8. WITNESS LIST~~

1. George Tablack
2. Anthony Magnetta—120 Market St, Youngstown, Ohio 44503, witness statement provided
3. Ingrid Cassidy—120 Market St. Youngstown, Ohio 44503, witness statement provided
4. Jake Williams—120 Market St. Youngstown, Ohio 44503, witness statement provided
5. Alisa Akuszewski—120 Market St. Youngstown, Ohio 44054, witness statement provided
6. Michael Dodson, Ohio BCI and I -20 West Federal Plaza Youngstown, Ohio
7. James Ciotti Ohio BCI and I -20 West Federal Plaza Youngstown, Ohio
8. Ed Carlini Ohio BCI and I -20 West Federal Plaza Youngstown, Ohio
9. Rep Dell Computers -P.O. BOX 643561 Pittsburgh, Pa 15264
10. Lisa Antonini c/o John Schultz Attorney at law 4822 Market St. Suite 220 Boardman, Ohio 44512, witness statement provided