

[Until this opinion appears in the Ohio Official Reports advance sheets, it may be cited as *State ex rel. Lawrence v. Dept. of Rehab. & Corr., Operation Support Ctr.*, Slip Opinion No. 2026-Ohio-3471.]

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SLIP OPINION NO. 2026-OHIO-3471

**THE STATE EX REL. LAWRENCE v. DEPARTMENT OF REHABILITATION AND
CORRECTION, OPERATION SUPPORT CENTER.**

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*Public-records requests—R.C. 149.43—Public office’s producing a public record
in response to a limited writ without disputing that the record was in its
possession at the time the record was requested established that the public
office failed to comply with its obligation under Public Records Act—
Relator awarded \$1,000 in statutory damages.*

(No. 2024-1169—Submitted June 9, 2026—Decided September 8, 2026.)

IN MANDAMUS.

The per curiam opinion below was joined by KENNEDY, C.J., and DEWINE,
BRUNNER, DETERS, HAWKINS, and SHANAHAN, JJ. FISCHER, J., dissented.

Per Curiam.

{¶ 1} Relator, Corrionne Lawrence, sought a writ of mandamus ordering respondent, the Ohio Department of Rehabilitation and Correction, Operation Support Center (“ODRC”), to provide records under Ohio’s Public Records Act, R.C. 149.43, and awards of statutory damages and court costs.¹ In an earlier opinion, we granted a limited writ of mandamus ordering ODRC to either provide Lawrence with a copy of his master file or certify to this court that ODRC does not possess it. 2026-Ohio-509, ¶ 45. We deferred our determination on statutory damages for the master file until after ODRC complied with the limited writ. *Id.* at ¶ 43, 45. We denied the writ with respect to Lawrence’s other public-records requests at issue in this case and did not award statutory damages with respect to those requests. *Id.* at ¶ 45.

{¶ 2} ODRC has produced the master file to Lawrence in response to this court’s limited writ. ODRC’s certification of compliance does not dispute that the record was in its possession at the time that Lawrence requested it. Accordingly, ODRC’s production of the record in response to the limited writ establishes that it failed to comply with its obligation to produce it in response to Lawrence’s public-records request. *See State ex rel. Barr v. Wesson*, 2024-Ohio-596, ¶ 5.

{¶ 3} Statutory damages are available if a requester transmits a written public-records request by hand delivery, electronic submission, or certified mail in a manner that fairly describes the public record to the public office and the court determines that the public office failed to comply with an obligation in accordance with R.C. 149.43(B). R.C. 149.43(C)(2). Lawrence is eligible for statutory

1. Lawrence is an inmate at Toledo Correctional Institution, and under the version of the Public Records Act as amended by 2024 Sub.H.B. No. 265 (effective Apr. 9, 2025), inmates are prohibited from recovering statutory damages under the Public Records Act. R.C. 149.43(C)(3). But as we noted in an earlier opinion, this case is governed by the version of the statute enacted in 2023 Am.Sub.H.B. No. 33 (effective Oct. 3, 2023), which contained no such prohibition. *See* 2026-Ohio-509, ¶ 43, fn. 2.

damages because he transmitted his request for his master file by electronic kite, which qualifies as an electronic submission under R.C. 149.43(C)(2). *See State ex rel. Griffin v. Sehlmeier*, 2021-Ohio-1419, ¶ 21. Statutory damages accrue at the rate of \$100 for each business day that the public office failed to meet one of R.C. 149.43(B)'s obligations, beginning on the day the requester files a mandamus action, up to \$1,000. R.C. 149.43(C)(2). Because more than ten business days have passed between Lawrence's filing of this action and ODRC's compliance with the limited writ, Lawrence is entitled to recover \$1,000 in statutory damages.

{¶ 4} For the foregoing reasons, we award Lawrence \$1,000 in statutory damages.

So ordered.

Corrionne Lawrence, pro se.

D. Andrew Wilson, Attorney General, and Marcy A. Vonderwell and B. Alexander Kennedy, Assistant Attorneys General, for respondent.
