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Ohio Supreme Court Finds School's Backpack Search Constitutional

In a unanimous opinion, the Ohio Supreme Court recently held that a school's search of an unattended bag, and the two subsequent searches that were triggered by the initial search, were constitutional. The court held that the searches served a compelling governmental interest in protecting the safety of the students. Two lower courts had previously ruled that the subsequent searches were unconstitutional and thus suppressed the evidence found in those searches – including ammunition and a gun.

At issue in this case was whether evidence obtained during a school search could be used against a student in a criminal case. Whetstone High School student James Polk left a book bag on his school bus. The bus driver found the book bag and gave it to the safety and security resource coordinator, Robert Lindsey, whose job it was to check the buses to ensure that no students remained on board. Lindsey was not a police officer. It was the high school's practice to search unattended book bags to identify the owner and to ensure the contents were not dangerous, Lindsey opened the bag and saw some papers and notebooks, along with Polk's name written on

one of the papers (search 1). He had heard rumors that Polk was possibly in a gang, so he took the bag immediately to the principal's office, where together they conducted a more thorough search of the book bag (search 2).

The principal and Lindsey found bullets in the book bag and then contacted a police officer. When the police officer arrived, they found Polk and searched him and a separate book bag he was carrying (search 3). They found a handgun in the book bag during search 3.

On trial for conveyance or possession of a deadly weapon or dangerous ordnance in a school-safety zone, Polk asked the court to suppress the evidence – both the bullets and the handgun – arguing that the searches were unconstitutional under the Fourth Amendment. The Fourth Amendment protects individuals from unreasonable searches and seizures. Both the trial court and the court of appeals granted his motion to suppress the evidence. Both courts held that search 1 was the only lawful search because it was limited in scope and it provided enough information for the school officials to properly identify Polk as the owner of the bag. The other two searches, the courts held, were unconstitutional.

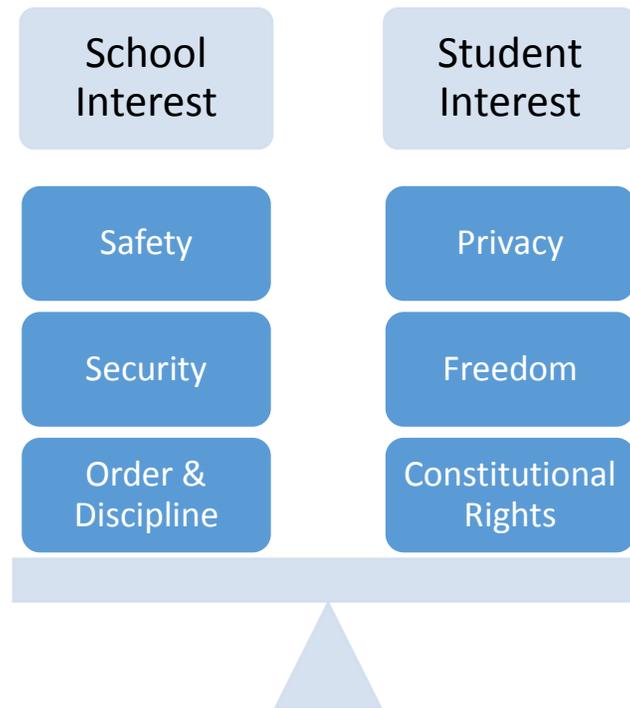
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In general, under the Fourth Amendment, a police officer must have probable cause and a search warrant to conduct a search. However, courts have held that *school* searches may be conducted under a lesser standard of *reasonable suspicion*: justified at inception and reasonable in scope. In this case, the Ohio Supreme Court was tasked with determining whether the search protocol used was reasonable through balancing the government's interest in safety and security against the student's privacy interests.



The court centered on the constitutionality of search 2: whether it was permissible for the principal and Lindsey to conduct a full search of the student's bag, when search 1 provided them with the identity of the owner of the unattended book bag.

In its finding, the court determined that it was appropriate for Whetstone High School to conduct complete searches of unattended book bags to ensure that they do not contain dangerous contents. Anything less than a complete search would not be enough to ensure safety and security for students. Key to this determination was that Whetstone High School required searches of unattended book bags to not only identify the owners but also to verify that the contents of the book bag are not dangerous. This was their protocol, albeit unwritten. Further, the search protocol was appropriate, reasonable, and reflective of the school's obligation to keep students safe in a time when schools face a myriad of security concerns (e.g., school shootings, bomb threats, terrorist attacks). As a result, search 1 was inadequate in the court's mind as it did not advance the school's interest in ensuring safety and security of its students. Search 2 was required to fulfill this interest.

Additionally, the court found that the student's expectation of privacy in his unattended book bag was "greatly diminished." A person's reasonable expectation of privacy diminishes when an item is lost or unattended, to the extent that the contents may be examined by the person who has found the item. Furthermore, a lost item in a closed container such as a book bag would carry an even lesser expectation of privacy, especially in a school setting, which must ensure the safety and security of all students.

Therefore, in balancing the school's strong interest in protecting its students against Polk's low expectation of privacy in the unattended book bag, the court determined that search 2 was reasonable and appropriate because the school needed to not only identify the owner of the book bag *but also* ensure the contents of the book bag were not dangerous. The court did not comment on search 3 but instead left the resulting judgment on that search to the lower court to make, consistent with this new decision.

What This Decision Means to Your District

In this case the court attempted to find a balance between the need for schools to ensure the safety and security of their students against the expectation of students to have some privacy, even inside the school doors. Key factors in this case were the school's unwritten protocol for searching unattended bags, and the security officer's practice of following the protocol and searching every unattended bag. Written procedures and protocols are always preferred, but the lack of these procedures can be looked past in certain circumstances. It is important for districts to remember that this case did not involve school discipline but centered on whether evidence found in the searches at school could be used to sustain criminal charges against the student. School discipline is much easier to uphold due to the lower search-and-seizure standards on schools. However, administrators need to be aware of how their work can affect criminal cases brought against a student for acts that take place on school grounds.

State v. Polk, Slip Opinion No. 2017-Ohio-2735.

Employer Sued for Workers' Comp Claim a Year After Employee Quits Job

The Supreme Court of Ohio recently issued an opinion in a workers' compensation case in which an employer was sued for disability payments after the employee had quit and moved on to another job.

The employee, Norman James Jr., worked for Walmart at the time he was injured. The injury fractured a surgical screw in his neck from a prior surgery, and he was allowed some compensation for certain conditions related to that injury. He returned to work in September 2005 after being fully released by his doctor, and then he quit his job in April 2007. He briefly worked at Petco and then began working for Casper Service Automotive. After a few months, in November 2007, he was fired from Casper for excessive absenteeism.

More than a year later, in January 2009, James filed a motion for temporary total disability (TTD) payments against Walmart – retroactive to the day after he was fired from Casper. Walmart contested the claim on the grounds that the medical evidence did not support an award and that James had voluntarily abandoned his job when he was fired for cause from Casper.

An injured worker who voluntarily abandons employment but reenters the workforce will be eligible to receive temporary total disability compensation from the original employer if, due to the original industrial injury, the claimant becomes temporarily and totally disabled while working at the new job.

If an injured worker does not return to his or her former position of employment as a result of the worker's own actions rather than the industrial injury, the worker is considered to have voluntarily abandoned his or her employment and is no longer eligible for TTD compensation. However, an injured worker who voluntarily abandons employment but reenters the workforce will be eligible to receive TTD compensation from the original employer if, due to the original industrial injury, the claimant becomes temporarily and totally disabled while working at the new job. Thus, James had the burden of proving that his termination from Casper for excessive absences was due to his industrial injury at Walmart.

The Industrial Commission ruled against James, finding that the medical evidence did not support his claim. The next month, James again filed a request for TTD. This time, the hearing officer ruled that the matter had already been adjudicated, that James had voluntarily abandoned his job at Casper, and that he was not employed by either Casper or Walmart when his alleged disability recurred.

James then filed a mandamus action in the court of appeals, challenging the Industrial Commission's ruling. The magistrate affirmed the Industrial Commission's ruling, and the employee filed objections. The court of appeals agreed that James had voluntarily abandoned his employment at Walmart, but it sent the case back to the Industrial Commission to hear further evidence as to whether the employee was fired from Casper or laid off.

After an unsuccessful attempt at mediation, the case then came to the Ohio Supreme Court by way of appeals. The Supreme Court found that James had voluntarily quit his job at Walmart because his departure was not due to his industrial injury but rather so that he could pursue other employment. The court found that James had presented no evidence that his industrial injury caused the excessive absences for which he was fired: "[A] key tenet in temporary-total-disability cases is that 'the industrial injury *must remove the claimant from his or her job*. This requirement obviously cannot be satisfied if the claimant had no job *at the time of the alleged disability*.'"

What This Decision Means to Your District

Districts should be aware that they may have liability for TTD claims even after an injured worker has moved on to other employment. An employer would certainly be liable if the industrial injury is the cause of the departure – whether from the current or a subsequent employer – even if an employee is terminated for excessive absences. If the absences are caused by the industrial injury, the employee may be entitled to TTD. However, if the separation is not caused by the industrial injury, the employee is not losing wages due to the injury, and so no TTD can be awarded. TTD would also be denied, as in this case, where a new period of disability begins without the employee having a job at the time.

– *State ex rel. James v. Wal-Mart Stores, Inc.*, Slip Opinion No. 2017-Ohio-1426.

Arbitrator May Override Employer Decision on Workplace Discipline Absent Limiting Contract Language

Reversing the decision of two lower courts, the Ohio Supreme Court recently ruled that absent negotiated language in a collective bargaining agreement (CBA) limiting an arbitrator's authority to modify a disciplinary action for just cause, an arbitrator has authority both to review the disciplinary action *and* to fashion a remedy that is outside the scope of the CBA.

A City of Findlay police officer was first disciplined in 2012 for conduct unbecoming. This discipline was grieved, taken to arbitration, and then modified by the arbitrator to be in line with the city's use of a discipline matrix.

Later that same year, the same officer was found to have violated the department's sexual harassment policy, and termination of the officer's employment contract was recommended. The termination was grieved and taken to arbitration. The arbitrator determined that the city did not present evidence to support termination, and therefore he set aside the termination. Instead, the arbitrator determined that the disciplinary matrix could not be used, stated that a "lengthy disciplinary suspension [was] warranted," and imposed a five-month suspension. The city appealed this decision to the county common pleas court. Both the common pleas court and the appeals court agreed with the city and found that the arbitration award did not draw its essence from the CBA and was arbitrary, capricious, and unlawful (i.e., the arbitrator overstepped his authority and power). However, the Ohio Patrolmen's Benevolent Association, on behalf of the officer, appealed these decisions to the Ohio Supreme Court.

The Supreme Court was left to determine whether the just cause discipline provision in the CBA authorized an arbitrator to change the disciplinary action recommended by the employer (in this case, the police chief using a disciplinary matrix). Key to this case was the fact that the disciplinary matrix used by the department to discipline the officer was not part of or mentioned in the CBA. Further, the CBA did not mention the department's disciplinary

procedures, and it did not restrict an arbitrator's authority to review the appropriateness of the type of discipline imposed upon finding just cause for discipline. Absent this limiting language in the CBA, the arbitrator was free to fashion a remedy that he believed was appropriate.

Only Chief Justice Maureen O'Connor dissented from the court's majority opinion, noting that the case should not have been accepted by the Supreme Court in the first place and that the majority's decision could have unintended consequences as it seems to throw out the consideration of past practice(s). She noted that the department used the matrix as a past practice as the basis for disciplinary action, and the inability to rely on this or throw it out of consideration is dangerous. O'Connor concluded that under the majority opinion, even if a past practice is established related to disciplinary outcomes, an arbitrator could modify the discipline if the practice is shown as not specifically bargained for and incorporated into the CBA. This, in her opinion, is an undesirable result.

What This Decision Means to Your District

School districts should be aware that this holding by the Supreme Court could impact arbitrations and the review of the same by courts in Ohio. The court concluded, "Any limitation on an arbitrator's authority to modify a disciplinary action pursuant to a CBA provision requiring that discipline be imposed only for just cause must be specifically bargained for by the parties and incorporated into the CBA." Districts should review their CBAs for appropriate language, and if needed speak with an Ennis Britton attorney to determine whether proposals should be made during upcoming or future negotiations related to this case.

Ohio Patrolmen's Benevolent Assn. v. Findlay, Slip Opinion No. 20147-Ohio-2804.

Tips to Ease Teacher Turnover

Each year schools experience teacher turnover. Here are a few reminders to help ease this process for administrators.

Notice of Resignation

Resigning teachers must submit their resignation by July 10. After this date, a board of education may, but is not obligated, to release teachers from their contract. A teacher may rescind notice of resignation if it has not been formally accepted by the board or designee. After the board accepts a resignation, the teacher may not withdraw the resignation.

Licensure of New Hires

New teachers' licenses must be effective as of their first day on the job, regardless of whether class is in session. A board of education is not authorized by law to pay a teacher unless the teacher holds an effective state-issued license for all grade levels and subjects taught. Treasurers and superintendents should check each newly hired teacher's license for verification of the effective date of licensure. Contact an Ennis Britton attorney if your district has any issues with teacher licenses in pending status.

Nonrenewal

Refer to the May 2017 issue of Ennis Britton's [School Law Review](#) for the nonrenewal procedure.

Budget Bill Amendment: Class of 2018 Graduation Requirements

The Senate Education Committee has drafted an amendment for the budget bill for additional graduation pathways for the class of 2018. Senate Education Committee chair Peggy Lehner explained that the class of 2018 has not had enough time to adjust to the new graduation requirements and would face the possibility of about one-third of students not graduating next year.

The amendment adds several options to the graduation pathways for the class of 2018. These students would still have to take all the classes required for graduation as well as the end-of-course exams, but they may graduate without obtaining the required number of exam points if they complete two of the following options:

- Senior year attendance rate of 93 percent
- Grade point average of 2.5 for senior-year classes
- Completion of a senior capstone project
- Community service or work experience of 120 hours
- Completion of a College Credit Plus course
- Completion of an International Baccalaureate or Advanced Placement course
- Score of 4 on a related IB exam or 3 on a related AP exam

Career-tech students would have the following additional options:

- Score of Proficient or better on career-tech program end-of-course exams or test modules
- Obtain industry credentials
- Workplace participation of 250 hours

After the class of 2018, future graduating classes are expected to have enough time to fulfill at least one of the graduation pathways among the new requirements; however, the Ohio Department of Education workgroup will continue to consider long-term changes to graduation requirements. For more information on the new graduation requirements, see the [December 2016](#) issue of Ennis Britton's *School Law Review* newsletter.

Legislation in the Works

Ohio's 132nd General Assembly has introduced hundreds of bills since it convened in January. The bills listed below are those relevant to schools that are currently under consideration by the legislature.

House Bills

HB 53, Union Dues: Removes the requirement under Public Employees Collective Bargaining Law that public employees join or pay dues to any employee organization, prohibits public employers from requiring public employees to join or pay dues to an employee organization, prohibits an employee organization from being required to represent public employees who are not members of the employee organization.

HB 87, Community Schools: Recovered funds from mismanaged charter schools would be returned to the school districts rather than to the general fund.

HB 102, School Funding: Overhauls the school funding system.

HB 118, Property Tax: Prohibits the dismissal of a property tax complaint for failure to correctly identify the property owner.

HB 137, Child Abuse Reporting: Makes municipal and county peace officers mandatory reporters of child abuse or neglect.

HB 160, Discrimination: Enacts the Ohio Fairness Act to prohibit discrimination on the basis of sexual orientation or gender identity or expression, adds mediation to methods for use by Ohio Civil Rights Commission, and upholds existing religious exemptions.

HB 201, Concealed Weapons: Allows a concealed-carry licensee to carry any weapon not prohibited by law, repeals the requirement that licensees notify officers if they are carrying a firearm and expunges prior convictions of violating this requirement, and allows anyone age 21 or older who is not prohibited of possessing or receiving a firearm to carry a concealed firearm without a license.

HB 233, Concealed Weapons: Decriminalizes concealed handgun licensees' carrying a concealed handgun in a prohibited place if the individual leaves upon request, and penalizes as disorderly conduct failing to do so or returning with a firearm.

Senate Bills

SB 34, Academic Year: Requires public and chartered nonpublic schools to open for instruction after Labor Day.

SB 82, School Absences: Requires public schools to call parents within one hour if child is absent without legitimate excuse.

SB 84, Racial Profiling: Prohibits law enforcement officers from engaging in biased policing or status-based profiling, requires annual officer training, and provides a civil cause of action for an individual who is a victim of biased policing or status-based profiling.

SB 85, School Choice: Eliminates Educational Choice and Pilot Project Scholarship Programs and creates the Opportunity Scholarship Program, which could be used by any student whose family earnings are at or below 400 percent of federal poverty level.

SB 104, School Seclusion: Prohibits the use of seclusion in public schools.

SB 111, School Zones: Requires signs with flashing lights to indicate when the speed limit is restricted.

SB 123, Property Taxes: Limits the right to initiate property tax complaints to the property owner and the county recorder.

SB 133, Student Behavior and EMIS: Includes in EMIS information regarding those to whom a student's violent behavior was directed, and requires ODE to give a one-time report on that information Ohio's General Assembly.

Awaiting the Governor's Signature

SB 3, Sales Tax Holiday: Creates a one-time, three-day tax exemption in August for purchase of certain school supplies. This bill has passed both the House and the Senate and is expected to be sent to Gov. Kasich for signature soon.

Upcoming Deadlines

As your school district prepares for the next couple of months, please keep in mind the following upcoming deadlines. For questions about these requirements, please contact an Ennis Britton attorney.

- **June 1:** Deadline for notice of nonrenewal of contracts for administrators other than superintendents and treasurers – teachers, classified staff, other administrators – (RC 3319.02); Deadline for written notice of intent not to reemploy teachers and nonteaching employees (RC 3319.11(D), 4141.29(l)(1)(f))

- **June 30:** End of 2016–2017 school year (RC 3313.62); End of third ADM reporting period (RC 3317.03(A))
- **July 1:** Beginning of 2017–2018 school year (RC 3313.62); Board may begin to adopt appropriation measure, which may be temporary (RC 5705.38); Deadline for salary notices for teachers and nonteachers (RC 3319.12, 3319.082); Treasurer must certify available revenue in funds to county auditor (RC 5705.36)
- **July 10:** Deadline for teachers to terminate contract without consent of the board of education (RC 3319.15); Deadline for voter registration for August election (RC 3503.01, 3503.19)
- **July 15:** Deadline to adopt school library district tax budget on behalf of a library district (RC 5705.28(B)(1))
- **July 25:** Deadline to submit certification for November conversion levy to tax commissioner (RC 5705.219(B))
- **July 31:** Deadline to submit certification for November income tax levy to Ohio Department of Taxation (RC 5748.02(A))

Upcoming Presentations

2016–2017 ADMINISTRATOR’S ACADEMY SEMINAR SERIES

Tackling Issues in Student Discipline – Archive available
September 29, 2016

School Employee Leave and Benefits Update – Archive available
January 26, 2017

Special Education Legal Update – Archive available
April 20, 2017

2016–2017 Education Law Year in Review
July 13, 2017
Live video webinar

Ennis Britton has listened to the valuable feedback from our clients! This year, the Administrator’s Academy seminars are offered in a different format from previous years. In September and April, the presentations were live seminars with a live audio webinar option. In July, as in January, the presentation will be offered via a live video webinar professionally produced by the Ohio State Bar Association. As always, we offer an archive for all presentations.

Participants must be registered to attend each event. All four webinars will be archived for those who wish to access the event at a later time. You can register on our [website](#) or contact Hannah via [email](#) or phone at 614-705-1333.

OTHER UPCOMING PRESENTATIONS

June 1: Cincinnati Paralegal Association

– Pamela Leist

June 16: Ohio Council of School Board Attorneys – School Attorney Workshop

– Ryan LaFlamme, with Adam Blevins and Damon Hacker

June 23: Ohio School Boards Association Sports Law Workshop

– Bill Deters and Pamela Leist

June 23: Public-Sector Labor Law Seminar

– John Britton

June 27: Ohio School Resource Officers Association

– Bill Deters

July 27: BASA New Superintendent Transition Program

– John Britton

August 8: Ohio School Resource Officers Association

– Hollie Reedy and Giselle Spencer

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Want to stay up-to-date about important topics in school law?
Check out Ennis Britton's [Education Law Blog](#).

Webinar Archives

Did you miss a past webinar or would you like to view a webinar again? If so, we are happy to provide that resource to you. To obtain a link to an archived presentation, contact Hannah via [email](#) or phone at 614-705-1333. Archived topics include the following:

- New Truancy and Discipline Laws
- Supreme Court Special Education Decisions
- Employee Licensure
- Transgender and Gender-Nonconforming Students
- Contract Nonrenewal
- Ohio Sunshine Laws
- Managing Workplace Injuries and Leaves of Absence
- Special Education: Challenging Students, Challenging Parents
- Fostering Effective Working Relationships with Boosters
- Requirements for Medicaid Claims
- Effective IEP Teams
- Cyberlaw
- FMLA, ADA, and Other Types of Leave
- Levies and Bonds
- OTES & OPES Trends and Hot Topics
- Tax Incentives
- Prior Written Notice
- Advanced Topics in School Finance
- Student Residency, Custody, and Homeless Students
- Student Discipline
- Media and Public Relations
- Gearing Up for Negotiations

Ennis Britton Practice Teams

At Ennis Britton, we have assembled a team of attorneys whose collective expertise enables us to handle the wide variety of issues that currently challenge school districts and local municipalities. From sensitive labor negotiations to complex real estate transactions, our attorneys can provide sound legal guidance that will keep your organization in a secure position.

When you have questions in general areas of education law, our team of attorneys help you make competent decisions quickly and efficiently. These areas include:

Labor & Employment Law

Student Education & Discipline

Board Policy & Representation

There are times when you have a question in a more specialized area of education or public law. In order to help you obtain legal support quickly in one of these areas of law, we have created topic-specific practice teams. These teams comprise attorneys who already have experience in and currently practice in these specialized areas.

Construction/Real Estate

Construction Contracts • Easements •
Land Purchases & Sales • Liens •
Mediations • Litigation

Team Members:

Ryan LaFlamme
Bronston McCord
Gary Stedronsky

Workers' Compensation

Administrative Hearings •
Court Appeals • Collaboration with TPAs •
General Advice

Team Members:

Ryan LaFlamme
Pam Leist
Giselle Spencer
Erin Wessendorf-Wortman

Special Education

Due Process Claims • IEPs • Change of
Placement • FAPE • IDEA • Section 504 •
any other topic related to Special Education

Team Members:

John Britton
Bill Deters
Michael Fischer
Pam Leist
Jeremy Neff
Hollie Reedy
Giselle Spencer
Erin Wessendorf-Wortman
Megan Bair Zidian

School Finance

Taxes • School Levies •
Bonds • Board of Revision

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