

COURT OF CLAIMS OF OHIO

McEachron v. Brecksville

2026-Ohio-1323 · No. 2026-00056PQ · Decided March 10, 2026

SUMMARY

This report and recommendation addresses a public-records dispute between Orville McEachron and the City of Brecksville concerning records related to a traffic case transferred from Brecksville Mayor’s Court to Garfield Heights Municipal Court. The Special Master recommended judgment for the City, concluding that the first request was reasonably treated and answered as a criminal discovery demand and that the second request was duplicative or otherwise satisfied. The recommendation also advised that the requester bear the costs of the case.

CASE DETAILS

COURT	Court of Claims of Ohio
WRITING FOR THE COURT	Sarah Pierce, Special Master
JURISDICTION	Court of Claims of Ohio
DECIDED	March 10, 2026
DOCKET	2026-00056PQ
DISPOSITION	other
PROCEDURAL POSTURE	Requester brought a public-records action in the Ohio Court of Claims under R.C. 2743.75 concerning two requests for records related to a traffic case. The matter proceeded before a special master after mediation was bypassed, and the special master recommended judgment for the City and assessment of costs against the requester.
PRECEDENTIAL VALUE	Published special-master report and recommendation; subject to objection and possible adoption by the Court of Claims of Ohio
PARTIES	Orville McEachron v. City of Brecksville

TOPICS

- municipal law
- discovery criminal
- civil procedure
- evidence
- judicial notice

PRACTICE AREAS

- Ohio public records law
- municipal law
- criminal discovery
- civil procedure

QUESTIONS PRESENTED

1. Whether the City reasonably handled McEachron's first public-records request as a criminal-discovery demand and therefore had no further obligation under the Public Records Act to respond.
2. Whether McEachron was entitled to additional production in response to his second public-records request when the City stated that responsive records had already been provided.
3. Whether McEachron could pursue a delay claim that was not raised in the complaint.
4. Whether costs should be assessed against McEachron when the City did not violate the Public Records Act.

HOLDINGS

1. A public-records request made in the context of an ongoing criminal proceeding may reasonably be treated as a demand for discovery under Criminal Rule 16. Because the City provided the responsive discovery, it had no further obligation under the Public Records Act to respond to the first request.
2. The requester was not entitled to additional production because the City responded that the responsive records had already been provided, and records provided during litigation mooted any remaining production claim.
3. A delay claim not raised in the complaint is not properly before the Court of Claims or special master.
4. Because the City did not violate the Public Records Act, the requester should bear the balance of the costs of the action.

KEY QUOTATIONS

“In the context of a criminal proceeding, a “public records request is the equivalent of a demand for discovery.”” (¶ 11)

“Even if the City was required to reissue these records in response to the second request, those records have been provided during this litigation.” (¶ 21)

“the only matters properly before the Court or Special Master are those identified in the body of the complaint.” (¶ 22)

FACTUAL BACKGROUND

McEachron was cited for a traffic violation in November 2024, initially in Brecksville Mayor's Court, and the case was transferred to Garfield Heights Municipal Court in January 2025. He made a January 2025 request for the complete case file and confirmation of records transferred, followed by a December 2025 request listing twenty categories of records. The City treated the first request as a criminal-discovery demand, provided discovery through a digital portal, and responded to the second request that the responsive records had already been provided or docketed publicly.

PROCEDURAL HISTORY

McEachron was cited for a traffic violation in the Brecksville Mayor's Court, and the matter was later transferred to the Garfield Heights Municipal Court. He made public-records requests to the City of Brecksville for records concerning the traffic case and alleged that the City failed to provide the requested records. The City responded that the records had been provided through criminal discovery and were available through the Garfield Heights docket. After mediation was bypassed and the parties submitted evidence and memoranda, the special master recommended judgment for the City and costs against McEachron.

DISPOSITION

other

CASES CITED

- Gold v. Bertram, 2023-Ohio-4567, ¶ 18 (4th Dist.)
- State ex rel. Caster v. City of Columbus, 2016-Ohio-8394, ¶ 38
- State ex rel. Morgan v. Strickland, 2009-Ohio-1901, ¶ 18
- State ex rel. Fluty v. Raiff, State ex rel. Fluty v. Raiff, 2023-Ohio-3285, ¶ 24
- State ex rel. Adkins v. Dept. of Rehab. & Correction Legal Dept., 2024-Ohio-5154, ¶ 15
- State ex rel. Brown v. Village of N. Lewisburg, 2013-Ohio-3841, ¶¶ 19-20 (2nd Dist.)
- State ex rel. Laborers Internatl. Union of N. Am., Local Union No. 500 v. Summerville, 2009-Ohio-4090, ¶ 6
- Sell v. Trumbull Cty. Juv. Div., 2024-Ohio-6139, ¶ 6 (Ct. of Cl.)
- State ex rel. Striker v. Smith, 2011-Ohio-2878, ¶¶ 17-18, 22
- Kearns v. Boardman Twp. Police Dept., 2025-Ohio-475, ¶ 7
- Hastings v. Washington Court House Bldg./Zoning Dept., 2025-Ohio-1292, ¶ 7

OPINION

McEachron v. Brecksville

2026 Ohio 1323

PER CURIAM.

[Cite as McEachron v. Brecksville, 2026-Ohio-1323.]

IN THE COURT OF CLAIMS OF OHIO

ORVILLE MCEACHRON Case No. 2026-00056PQ Requester Special Master Sarah Pierce

v. REPORT AND RECOMMENDATION

CITY OF BRECKSVILLE

Respondent {¶1} This matter is before me for a report and recommendation. R.C.2743.75(F). I recommend that the Court (1) enter judgment for respondent, and (2) order requester to bear the costs of this case. I. Background {¶2} In November 2024, Requester Orville McEachron was cited for a traffic violation. Complaint, filed Jan. 16, 2026, p. 13-14. The case was docketed in the Brecksville Mayor’s Court under case number 24TRD00912. Id. On January 8, 2025, the case was transferred to the Garfield Heights Municipal Court and docketed in case number TRD250061.

Compl., p. 11-12; see also *Brecksville v. McEachron*, Garfield Heights Mun. Ct. No. TRD2500061, Docket (attached at Appendix A).¹ {¶3} Requester contests the response to two public records requests he made to Respondent the City of Brecksville. Compl., p. 1. These requests generally relate to the 1 I take judicial notice of the docket in the Garfield Heights traffic case and the filings available on that docket. Courts can take judicial notice of filings readily accessible from a court’s website. *Gold v. Bertram*, 2023-Ohio-4567, ¶ 18 (4th Dist.); see also Evid.R. 201. The Garfield Heights traffic case docket is available at: <https://docket.ghmc.org/recordSearch.php?k=docket1828Z7Qzc8szh8fnUwBUIsutOZnQ92Vpmbxv7ssoVA9M20194715625179443378942383099711128094482018568016835371122009546043576648529426> (last accessed Mar. 9, 2026). The docket is also attached to this report and recommendation at Appendix A, for the reader’s convenience.

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Brecksville Mayor’s Court traffic case and its transfer to the Garfield Heights Municipal Court. See Compl., p. 2-3, 58-61. A. The January 2025 public records request (First Request) {¶4} The first request was made on January 14, 2025, and submitted by fax to the Brecksville Mayor’s Court Clerk. Compl., p.1, 34-35. The request was titled a “Request for Complete Case File and Confirmation of Records Transferred to Garfield Heights Municipal Court.” Compl., p. 35, 37. It asked for,

1. A copy of the complete case file associated with my case [Brecksville Mayor’s Court case no. 24TRD00912], including but not limited to all records, filings, and docket entries held by Brecksville Mayor’s Court,
2. Confirmation of what records were transferred to Garfield Heights Municipal Court as part of the case transfer. This request specifically includes but not limited to all motions and filings, such as the Emergency Combined Motion to Object to Transfer and to Clarify and Correct the Record, filed on January 8, 2025, as well as any other documents relevant to this matter. Compl., p. 35-36 (emphasis omitted).

{¶5} In the request letter, Requester notes that he “spoke with a Deputy Clerk from the Garfield Heights Clerk of Courts as part of a follow-up regarding access/copies to my case records.” Compl., p. 36. That conversation led to “additional concerns about the completeness of the case transfer and the availability of important case materials for my preparation.” *Id.* Requester therefore made the request to “ensure access to all relevant records and to preserve procedural fairness.” *Id.*, p. 37. He also provided a copy of the request to the “Garfield Heights Clerk of Courts to ensure it is added to the record in Garfield Heights Municipal Court and to document my efforts to address the completeness of the case file.” *Id.* He asked for “a prompt response, as access to these records is critical for preparing for my upcoming hearing on January 15, 2025.” *Id.* Requester was heard on these issues by a magistrate in the Garfield Heights Municipal Court. *Brecksville v. McEachron*, Garfield Heights Mun. Ct. No. TRD2500061, Decision (Jan. 24, 2025).² A copy of this decision is attached to this report and recommendation at Appendix B.

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{¶6} Requester alleges that he has received no response or records from the City on this request. Compl., p. 1. B. The December 2025 public records request (Second Request) {¶7} The second request was made on December 23, 2025 by email. Compl., p. 1, 8. The request asked for “electronic copies of the following public records from City of Brecksville / Brecksville Mayor’s Court in Case No. 24TRD00912” and listed 20 separate items. Compl., p. 8-9. Requester alleges that he has received no records in response to that request. Compl., p. 1. {¶8} The City responded to the second request on December 29, 2025. Compl., p.

7. The City notified Requester that any responsive records had already been provided to him, stating All records held by the Brecksville Mayor’s Court were transferred to the Garfield Heights Municipal Court on January 8, 2025 and were docketed on the Garfield Heights Municipal Court website. Further, the City of Brecksville timely filed its Discovery Response and State’s Motion for Discovery dated January 20, 2025, which was uploaded to the Garfield Heights Municipal Court Case Center portal in which you were given access to review. Redundant requests for records pertaining and resulting from the charge of Failure to Control on or about November 10, 2024 are unnecessary as you have been provided all records via discovery as well as your public access to the Garfield Heights Municipal Court docket. Compl., p. 9. C. Procedural history {¶9} On Requester’s motion, mediation was bypassed in this case. A schedule was set for both parties to file evidence and memoranda supporting their positions. That schedule has run its course, making this case ripe for decision. Order Bypassing Mediation, entered Jan. 23, 2026. II. Analysis A. Requester is not entitled to relief on his first request. {¶10} Requester alleges that he has not received a response or records from the City on his first request. Compl., p. 1. In the preliminary complaint sent to the City,

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Requester made the same allegation and stated that the request had been pending for over 11 months. Compl., p. 25-28. {¶11} Production claim. The City argues that the first request was handled as a request for discovery under Criminal Rule 16. Resp. Brief, filed Feb. 18, 2026, p. 2. In the context of a criminal proceeding, a “public records request is the equivalent of a demand for discovery.” *State ex rel. Caster v. City of Columbus*, 2016-Ohio-8394, ¶ 38. {¶12} Given the context, the City’s treatment of the first request as a discovery demand was a reasonable response. Requester submitted the request on January 14, 2025. Compl., p. 34. Requester had an ongoing criminal case before the Garfield Heights Municipal Court. See Appendix A. Requester referenced that case in his request and predicated his need for records on the needs of that case. Compl., p. 36-37. Requester was provided access to that discovery via a digital evidence portal on January 21, 2025. See Appendix A. That docket entry is consistent with the discovery response and other email correspondence filed by the City in this public records case. Resp. Ev., p. 3-5; Resp. Br., p. 10. {¶13} The City filed its discovery response in the Garfield Heights traffic case with this court. See Resp. Evidence, filed Feb. 4, 2026, p. 3-92. The discovery response included the original traffic investigation, the transfer entry, internal case notes from the Brecksville Mayor’s Court,

case entries from the Garfield Heights Municipal Court, and Requester's correspondence to both courts. Resp. Ev., p. 3-92. This response encompasses the material required by Criminal Rule 16(B). See Resp. Ev., p. 1-2; 4-29. It also includes material responsive to the first request for "[a] copy of the complete case file associated with my case." Compl., p. 35; Resp. Ev., p. 32-92 (internal case notes, case entries, and correspondence). From my review of the documents provided to Requester, I conclude that this criminal discovery production includes records responsive to his first request and confirms that the City treated the first request as a criminal discovery demand. {¶14} Requester is correct that he is not obligated to follow up with the City about a public records request. Req. Reply, filed Mar. 2, 2026, p. 4. Having answered the discovery request, however, the City had no further obligation under the Public Records Act to respond to the first request. I also note that the City had no indication that the

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request was not satisfied from Requester's perspective. Some cooperation is envisioned by the Public Records Act. *State ex rel. Morgan v. Strickland*, 2009-Ohio-1901, ¶ 18; see also *State ex rel. Fluty v. Raiff*, 2023-Ohio-3285, ¶ 24. {¶15} Delay claim. Requester argues that his first request has been pending, unanswered, since January 14, 2025. Compl., p. 25-28. I disagree. As noted above, I find that the City reasonably treated the request as a criminal discovery demand. That demand was answered on January 21, 2025. See Appendix A. The City was not obligated by the Public Records Act to provide a further response to requester. {¶16} Summary. I recommend that the court find that Requester is not entitled to relief on his first request. The City reasonably treated the request as a criminal discovery demand and answered it accordingly. The City had no further obligation under the Public Records Act to respond to the request. B. Second request {¶17} Requester alleges that he has not received records from the City in response to his second request. Compl., p. 1. The second request listed 20 separate items. Compl., p. 8-9. Each request asked for a particular type of document from the Brecksville Mayor's Court traffic case "dated on or before January 7, 2025." *Id.* {¶18} Requester received a response to this request. On December 29, 2025, the City informed Requester that "[a]ll records held by the Brecksville Mayor's Court were transferred to the Garfield Heights Municipal Court" and docketed on that court's public website. Compl., p. 9. The City also reminded Requester that he received the City's discovery response in that case on January 20, 2025. *Id.* The City concluded by stating that "you have been provided all records via discovery as well as your public access to the Garfield Heights Municipal Court docket." *Id.* {¶19} Production. In general, a public office is not obligated to respond to duplicative public records requests. *State ex rel. Adkins v. Dept. of Rehab. & Correction Legal Dept.*, 2024-Ohio-5154, ¶ 15; see also *State ex rel. Brown v. Village of N. Lewisburg*, 2013-Ohio-3841, ¶ 19-20 (2nd Dist.); *State ex rel. Laborers Internatl. Union of N. Am., Local Union No. 500 v. Summerville*, 2009-Ohio-4090, ¶ 6. The City responded to the second request to state that Requester had already received any responsive records. Compl., p. 9. While the second request did not use phrasing identical to the first

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request, the second request sought case documents associated with the Brecksville Mayor's Court traffic case. The City informed Requester that these records had already been provided to him. {¶20} Requester argues that he is entitled to a further response on his second request. First, Requester argues that he has not received a complete set of responsive records. Req. Reply, p. 7-8, 9-10. The City has responded that it has already provided all responsive records to him. Requester does not provide any evidence that further responsive records exist. See *Sell v. Trumbull Cty. Juv. Div.*, 2024-Ohio-6139, ¶ 6 (Ct. of Cl.) (noting "some evidence" of the existence of records may be sufficient). Second, Requester argues that the City was required to respond individually to each of his 20 requests. Req. Reply, p. 7. I do not find support for this argument. The response to each of the requests was, essentially, responsive records have already been provided. {¶21} I recognize that the initial production of responsive records was made as a discovery production under Criminal Rule 16. Even if the City was required to reissue these records in response to the second request, those records have been provided during this litigation. *State ex rel. Striker v. Smith*, 2011-Ohio-2878, ¶¶ 17-18, 22 (public- records claim mooted when records provided during litigation); *Kearns v. Boardman Twp. Police Dept.*, 2025-Ohio-475, ¶ 7 (same), adopted at Ct. of Cl. No. 2024-00776PQ (Mar. 19, 2025). There is no further relief that this court can order. I therefore recommend that the court find that Requester is not entitled to any further production of records in response to his second request. {¶22} Delay. Requester did not raise a delay claim in his complaint. *Hastings v. Washington Court House Bldg./Zoning Dept.*, 2025-Ohio-1292, ¶ 7 (Ct. of Cl.) ("[T]he only matters properly before the Court or Special Master are those identified in the body of the complaint."). C. Costs. {¶23} Revised Code 2743.75(F)(3)(b) provides that the court shall award a requester their filing fee and "any other costs associated with the action" if it finds a

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violation of the Public Records Act. Because I do not find a violation, I recommend that the court order the balance of costs assessed against Requester. III. Conclusion {¶24} Based on the above considerations, I recommend that the court: 1) Enter judgment for respondent; and 2) Order requester to bear the costs of this case. {¶25} Pursuant to R.C. 2743.75(F)(2), either party may file a written objection with the clerk of the Court of Claims of Ohio within seven (7) business days after receiving this report and recommendation. Any objection shall be specific and state with particularity all grounds for the objection. A party shall not assign as error on appeal the court's adoption of any factual findings or legal conclusions in this report and recommendation unless a timely objection was filed thereto. R.C. 2743.75(G)(1).

SARAH PIERCE

Special Master Filed March 10, 2026 Sent to S.C. Reporter 4/13/26

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APPENDIX A

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APPENDIX B

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