

SUPREME COURT OF OHIO

State ex rel. Cook v. Magee

2026-Ohio-1106 · No. 2025-0007 · Decided April 1, 2026

SUMMARY

The Supreme Court of Ohio denied as moot Joshua D. Cook’s petition for a writ of mandamus seeking video surveillance records under Ohio’s Public Records Act. The court also denied statutory damages because the records were made available for inspection on the day Cook filed his mandamus action, and the court found insufficient evidence that the mailed DVD was corrupted.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per curiam; Kennedy, C.J.; Fischer, J.; DeWine, J.; Deters, J.; Hawkins, J.; Shanahan, J.
JURISDICTION	Supreme Court of Ohio
DECIDED	April 1, 2026
DOCKET	2025-0007
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Original action in mandamus under Ohio's Public Records Act seeking production of prison-surveillance video and statutory damages.
STANDARD OF REVIEW	To obtain a writ of mandamus, the relator must establish a clear legal right to the requested record and a clear legal duty on the respondent to provide it. The court also determines whether any record remains outstanding and whether statutory damages are authorized under R.C. 149.43(C)(2).
PRECEDENTIAL VALUE	Published and precedential Supreme Court of Ohio opinion
PARTIES	Joshua D. Cook v. Natalie Magee

TOPICS

- administrative law
- remedies
- civil procedure

PRACTICE AREAS

- public records
- mandamus
- administrative law
- civil procedure
- remedies

QUESTIONS PRESENTED

1. Whether Cook's mandamus claim was moot after the records custodian offered him access to the surveillance video and mailed a copy to an outside person designated by him.
2. Whether Cook was entitled to statutory damages under R.C. 149.43(C)(2) when the custodian made the record available for inspection on the day the mandamus action was filed.

HOLDINGS

1. A writ of mandamus is moot when the respondent provides the requested public record or otherwise gives the relator access to it, leaving no outstanding record for the writ to compel. Because Magee offered Cook access to the video and mailed a DVD according to his preference, the petition was moot.
2. Cook was not entitled to statutory damages because Magee made the requested record available for viewing on the same day Cook filed the mandamus action, and no compensable business days elapsed during which he lacked access to the record.

KEY QUOTATIONS

“Magee has provided the record requested, and Cook has not submitted evidence showing that the record was somehow incomplete or otherwise not properly produced. Therefore, we deny as moot Cook’s petition for a writ of mandamus.” (¶ 14)

“Cook seeks a writ of mandamus to order the production of a record he has been provided access to. The writ would, therefore, be redundant, so we deny it as moot.” (¶ 18)

FACTUAL BACKGROUND

Joshua Cook, an inmate at Chillicothe Correctional Institution, requested surveillance video from the institution's mental-health area. The records custodian initially stated that the footage had been preserved and sent to the attorney general's office and that Cook could not possess security footage. On the day Cook filed his mandamus action, the custodian offered him an opportunity to view the footage and later mailed a DVD to an outside person designated by Cook. Cook claimed that the DVD was corrupted, but he submitted only his own affidavit and no supporting evidence.

PROCEDURAL HISTORY

Cook filed an original mandamus action after requesting surveillance footage from Chillicothe Correctional Institution. On the day he filed the action, Magee offered him an opportunity to view the footage, and she later mailed a DVD to an outside person designated by Cook. After an answer, the Supreme Court of Ohio granted an alternative writ and received evidence and briefs. The court denied the writ as moot and denied statutory damages.

DISPOSITION

writ_denied

CASES CITED

- State ex rel. Griffin v. Szoke, 2023-Ohio-3096, ¶ 3
- State ex rel. Physicians Comm. for Responsible Medicine v. Ohio State Univ. Bd. of Trustees, 2006-Ohio-903, ¶ 6
- State ex rel. Cincinnati Enquirer v. Sage, 2015-Ohio-974, ¶ 10
- State ex rel. Ware v. Viglucci, 2024-Ohio-3131, ¶ 10
- State ex rel. Payne v. Rose, 2023-Ohio-3801, ¶ 8
- State ex rel. Martin v. Greene, 2019-Ohio-1827, ¶ 7
- State ex rel. Woods v. Lawrence Cty. Sheriff's Office, 2023-Ohio-1241, ¶ 7
- State ex rel. Slager v. Trelka, 2024-Ohio-5125, ¶ 30
- State ex rel. McDougald v. Sehlmeier, 2020-Ohio-3927, ¶ 15
- Briscoe v. Dept. of Rehab. & Corr., 2003-Ohio-3533, ¶ 16 (10th Dist.)