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State ex rel. Prows v. Ohio Legislative Service Commission

Supreme Court of Ohio - January 21, 2026 - N.E.3d - 2026 WL 151904 - 2026-Ohio-149

Requester brought action against Ohio Legislative Service Commission (OLSC) seeking writ of mandamus to compel the disclosure, pursuant to the Public Records Act, of records related to the drafting of a bill that had been referred to a Senate committee and that pertained to local regulation and taxation of short-term rental properties, and also seeking a declaration that the statutory exemption for legislative documents from the Act's definition of a "public record," on which OLSC relied to withhold records, was unconstitutional as applied.

The Supreme Court held that:

- Statute exempting legislative documents from definition of a public record under the Act does not violate constitutional provision assuring public access to business transacted during General Assembly proceedings;
- Communications between legislative staff and individual members of General Assembly or General Assembly staff, which related to the bill were exempt from disclosure under the Act; and
- Requester did not provide clear and convincing evidence that OLSC withheld non-exempt records.