

**MONTGOMERY COUNTY COMMON PLEAS COURT  
MONTGOMERY COUNTY, OHIO**

**BARBARA E. SCHNEIDER,** : **CASE NO: 2015 CV 00730**  
**Administrator of the Estate of Klonda S.** :  
**Richey, Deceased,** :  
 : **JUDGE: MARY WISEMAN**  
Plaintiff, :  
vs. :  
 :  
**MARK KUMPF, Director of Montgomery** :  
**County Animal Resource Center and** : **PLAINTIFF'S LIST OF TRIAL**  
**Montgomery County Dog Warden, in His** : **EXHIBITS**  
**Individual Capacity Only** :  
 :  
Defendant, :  
and :  
 :  
**BOARD OF COUNTY** :  
**COMMISSIONERS OF MONTGOMERY** :  
**COUNTY, OHIO** :  
 :  
Defendant. :

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1. Field Activity Record (Activity # 2012-0003982).
  2. Field Activity Record (Activity # 2012-0006400).
  3. Field Activity Record (Activity # 2012-0007886).
  4. Field Activity Record (Activity # 2011-0011647).
  5. Field Activity Record (Activity # 2012-0003982).
  6. Montgomery County Animal Resource Center Violation Report (Violation Number: V13-000022), an Activity Card (Reference No. A13-000113-1), and a related screen shot.
  7. Montgomery County Animal Resource Center Violation Report (Violation Number: V13-000503), an Activity Card (Reference No. A13-001829-1), and related screen shots.
  8. Montgomery County Animal Resource Center Activity Card (Reference No. A13-002001-1), and a related screen shot.
  9. Montgomery County Animal Resource Center Activity Card (Reference No. A13-003237-1).
  10. Montgomery County Animal Resource Center Violation Report (Violation Number: V13-000959), an Activity Card (Reference No. A13-003255-1), and related screen shots.
  11. Montgomery County Animal Resource Center Violation Report (Violation Number: V13-001036), an Activity Card (Reference No. A13-003608-1), and a related screen shot.
  12. Montgomery County Animal Resource Center Violation Reports (Violation Numbers: V13-001283 and V13-001313), and an Activity Card (Reference No. A13-004505-1), and a related screenshot.

13. Montgomery County Animal Resource Center Activity Card (Reference No. A13-004505-2) and a related screenshot.
14. Montgomery County Animal Resource Center Violation Report (Violation Numbers: V13-001283 and V13-001429), and an Activity Card (Reference No. A13-004976-1), and related screenshots.
15. Dangerous Dog Court Orders and Tags (revised 2-4-15).
16. Dangerous Dog Court Orders and Tags (Alphabetical) (revised 4-28-17).
17. Montgomery County Employee Schedule C/D Accountabilities (Mark T. Kumpf Annual Appraisal 2014).
18. Memo dated May 15, 2014 from Mark Kumpf to Amy Wiedeman regarding Field Procedure Revisions.
19. Summary of County Action Plan dated September 11, 2014.
20. Montgomery County Classification Specification for Animal Control Officer.
21. Email from Mark Kumpf to Tonya Oberer dated February 1, 2013.
22. Email from Mark Kumpf to Amy Wiedeman dated June 18, 2014.
23. Email from Kandi Broadus to Robert Sexton and Elizabeth Cusick dated December 17, 2016.
24. Email from Mark Kumpf to Danielle Cash and others dated March 14, 2016.
25. Email from Cathy Startzman to Mark Kumpf dated November 29, 2010.
26. Email from Mark Kumpf to Amy Weideman dated February 7, 2014.
27. Memorandum from Mark Kumpf to Robert Sexton dated March 10, 2014.
28. Montgomery County Staff Job Performance Appraisal of Josh Cusick for the rating period 2/16/13-2/16/14.
29. Montgomery County Staff Job Performance Appraisal of Josh Cusick for the rating period 2/16/14-2/16/15.
30. Citation Report for 1/1/13-12/31/16.
31. Email exchange between Cathy Peterson and Steven Matthews on February 27, 2014.
32. Email exchange between Robert Sexton and Brandye Russell on June 17, 2016.
33. Records relating to a dog at 31 East Bruce Street, Dayton, Ohio in April 2015.
34. Email exchanges between Amy Wiedeman, Cathy Peterson, Joseph Tuss, and Mark Kumpf on February 27, 2014.
35. Email exchange between Mark Kumpf and Emily Bradford on October 1, 2014.
36. Email from Amy Haines to Robert Sexton dated December 7, 2009.
37. Dangerous Encounters for Law Enforcement: Canine Contact Training by Mark Kumpf.
38. Email exchange between Mark Kumpf and Lori Kershner in February 2014.
39. ACCO truck logs (previously filed with the Court as Exhibit 50 of the Naylor Affidavit in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment).
40. Montgomery County Animal Resource Center 2006 Citation Totals and Citations Monthly Comparisons YTD 2013.
41. Email exchange between Mark Kumpf and Amy Weideman on January 16, 2014.
42. Montgomery County Employee Schedule C/D Accountabilities relating to Mark Kumpf for the period January 1, 2007-December 31, 2007.
43. Montgomery County Employee Schedule C/D Accountabilities relating to Mark Kumpf for the period 1/01/2008-12/31/2008.
44. Email from Mark Kumpf to Robert Sexton dated June 5, 2009.
45. Email from Mark Kumpf to Leon Daidone and others dated July 23, 2014.

46. Letter from Amy Weideman to Mark Kumpf dated June 14, 2006.
47. Animal Resource Center Budget/License Options.
48. Montgomery County Classification Specification for Animal Resource Director.
49. Email exchange between Mark Kumpf and Thomas Cope on February 7, 2014.
50. Email from Mark Kumpf to Danielle Cash and others dated March 14, 2016.
51. Animal Resource Center Statistics 2006 through 2015.
52. Animal Resource Center Statistics 2007 through 2014.
53. Email exchange between Mark Kumpf and Tonya Turner on February 7, 2014.
54. Email from Mark Kumpf to Robert Sexton dated May 26, 2015.
55. Email from Mark Kumpf to Atiya Pope dated May 1, 2012.
56. Email exchange between Mark Kumpf and Stephanie Cook on April 22 and 23, 2015.
57. Email exchange between Mark Kumpf and Kelli Wynn on February 7 and 8, 2014.
58. Montgomery County Animal Resource Center ACCO License Sales for 2005.
59. Montgomery County Animal Resource Center ACCO Monthly Comparison License Sales.
60. Email from Mick Sagester to Mark Kumpf on February 7, 2014.
61. Email exchange between Mick Sagester and Mark Kumpf on February 7, 2014.
62. Printout from Montgomery County Animal Resource Center's canine license system dated 2/7/14.
63. Guidelines Relating to Problem Dogs published on a Montgomery County website.
64. Email exchange between Mark Kumpf and Cathy Petersen and others on February 10 and 11, 2014.
65. Emails between Cathy Petersen, Mark Kumpf, and Amy Wiedeman on February 10 and 11, 2014.
66. Emails between Mark Kumpf, Amy Wiedeman, and Cathy Petersen on February 27, 2014.
67. Emails between Mark Kumpf, Cathy Petersen, and Steven Matthews on February 10 and 11, 2014.
68. Printouts from the calls-for-service inquiry response system maintained by the City of Dayton and/or its police department dated 5-14-12, 8-7-12, 8-8-12, 8-24-12, 9-25-12, 4-18-13, 5-28-13, 7-2-13, 7-21-13, 8-30-13.
69. Dayton Incident Based Reporting System ("DIBRS") report relating to the investigation of the death of Klonda Richey.
70. November 2018 Report prepared by Team Shelter USA, LLC titled "Animal Resource Center of Montgomery County Dayton, Ohio."
71. June 22, 2004 Report prepared by American Humane titled "Montgomery County Re: Montgomery County Animal Shelter Dayton, Ohio."
72. Montgomery County Animal Resource Center policy manual dated January 11, 2006 (with updates).
73. "Request to Impound Dog" and supporting affidavit forms.
74. Email from Mark Kumpf to Amy Wiedeman, Robert Sexton, and Mick Sagester dated July 27, 2012.
75. Montgomery County Animal Resource Center Activity Card (Reference No. A13-004976-1) and a related screenshot.
76. Letter from the Ohio County Dog Wardens Association dated April 8, 2013.

77. Audio recordings of phone calls from Klonda Richey to the Dayton Police Department from July 2, 2013, July 21, 2013, and July 30, 2013.
78. Defendant's Responses to Plaintiff's First Set of Admissions.
79. Defendant's Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents.
80. Article titled, "Out of Control, Into Compassion."
81. Printed pages from Mark Kumpf's "Out of Control, Into Compassion" presentation dated May 21-23, 2012.
82. Article titled "Design for Living" from Animal Sheltering magazine, November/December 2014.
83. Article written by Mark Kumpf for ACO Voice, January 2017 titled "Management and the Law."
84. March 31, 2015 Public Records Request directed to Montgomery County Animal Resource Center.
85. Montgomery County Animal Resource Center's response to March 31, 2015 Public Records Request.
86. Handwritten list of documents destroyed by ARC in or around November 2017.
87. Handwritten list of documents destroyed by ARC in May 2013.
88. Montgomery County Records Management Manual (2014).
89. Photos of Klonda Richey from before February 7, 2014.
90. Celebration of Life video played at Klonda Richey's funeral.
91. R.C. 149.351.
92. R.C. 149.38.
93. R.C. 955.11.
94. R.C. 955.12.
95. R.C. 955.222
96. R.C. 955.23.
97. R.C. 2307.60.
98. R.C. 2901.21
99. R.C. 2921.44.
100. Coroner's Case file including Autopsy Report, Necropsy Report, and 159 photographs taken during the post-mortem examination of Klonda Richey.
101. Scene photos from February 7, 2014 as produced to Plaintiff (404 photographs).
102. Scene photos from February 8, 2014 as produced to Plaintiff (18 photographs).
103. Drawings of scene of attack done by Dayton Police Office and two photographs attached to the drawings as produced to Plaintiff.
104. Klonda Richey certified death certificate.
105. Dr. Kelly Meyer forensic exam report on Animal ID# A-009584 and A-009585.
106. Email from Mark Kumpf to Amy Wiedeman on July 22, 2014.
107. Email from Mark Kumpf to Richard Biehl and Mark Ecton from July 23, 2014.
108. Third-party Defendant Andrew Nason's response to Plaintiff's First Set of Admissions.
109. Documents from U.S. Postal Service regarding dog attacks on mail carriers.
110. Email from Mark Kumpf to Amy Wiedeman and John Theobald from June 24, 2014.
111. Dog Laws and Legislation agenda at Sinclair Community College for October 2014.
112. Chart created by Amy Wiedeman titled "Bruce Ave. Calls" with handwritten comments (Wiedeman subpoena00500).

113. Chart created by Amy Wiedeman title "Bruce Ave. Calls" without handwritten comments.
114. Cites year to date 2014 with Amy Wiedeman notes (Wiedeman subpoena00568).
115. New Employee Orientation Form signed by Mark Kumpf on July 24, 2006.
116. Email from Cathy Peterson to group dated February 12, 2014 titled "Final Responses and Talking Points," with attachments.
117. Email from Jim Vangrov to Dan Foley dated February 12, 2014 titled "Bruce Ave Facts," with attachments.
118. Handwritten statement of Chris Gottschich as provided to Dayton Police Department.
119. Dangerous Dog "Notice."
120. Dangerous Dog "Notice."
121. Email from Mark Kumpf to group dated February 7, 2014 titled "Calls regarding 35 Bruce Street (Media or interested in cat info).
122. Email from Amy Wiedeman to Mark Kumpf dated July 2, 2014 titled "Bullet Points."
123. Montgomery County Prosecutor Press Release from September 11, 2014.
124. Email from Mark Kumpf to group dated July 25, 2014 titled "Telephone System Update."
125. Email from Mark Kumpf to group dated July 25, 2014 titled "Telephone System Updates."

Respectfully submitted,

/s/Todd B. Naylor

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed electronically in accordance with this Court's electronic filing guidelines on September 10, 2019. Notice of this filing will be sent to all parties by operation of this Court's electronic filing system or will be served by ordinary U.S. mail, postage prepaid, pursuant to applicable Montgomery County Local Rules, upon counsel or parties who are *not* sent electronic notification. Parties may access this filing through the Court's electronic filing system.

*/s/Todd B. Naylor*

Todd B. Naylor