Padilla v. Kentucky: What you need to know

Carly Edelstein
Assistant State Public Defender, Appeals & Postconviction Section
Padilla v. Kentucky

• The Facts
  • Jose Padilla – Lawful Permanent Resident (LPR) for more than 40 years
  • Plead guilty to transporting large amount of marijuana
  • Placed in deportation proceedings
  • Filed postconviction petition claiming IAC
KY Supreme Court denied petition without evidentiary hearing.

Held: 6th Amendment doesn’t reach erroneous advice about deportation because it’s just a collateral consequence of conviction.
Padilla v. Kentucky

• SCOTUS granted cert to determine whether, as a matter of federal law, Padilla’s counsel had an obligation to advise him that the offense he pleaded guilty to would result in his removal from this country.

*The Court granted cert in 2009, so this image accurately depicts the Court’s composition at the time.
“Deportation as a consequence of a criminal conviction is, because of its close connection to the criminal process, uniquely difficult to classify as either a direct or a collateral consequence. . . . [A]dvise regarding deportation is not categorically removed from the ambit of the Sixth Amendment right to counsel.” Padilla v. Kentucky, 559 U.S. 356, 366 (2010).
“It is our responsibility under the Constitution to ensure that no criminal defendant – whether a citizen or not – is left to the mercies of incompetent counsel. To satisfy this responsibility, we now hold that counsel must inform her client whether his plea carries a risk of deportation. Our longstanding Sixth Amendment precedents, the seriousness of deportation as a consequence of a criminal plea, and the concomitant impact of deportation on families living lawfully in this country demand no less.” *Padilla v. Kentucky*, 559 U.S. 356, 374 (2010) (internal quotation marks and citation omitted).
“This is not a hard case in which to find deficiency: The consequences of Padilla’s plea could easily be determined from reading the removal statute, his deportation was presumptively mandatory, and his counsel’s advice was incorrect.” 

• SCOTUS expressly rejected limiting immigration-related IAC claims to cases involving misadvice.

• This means that a lawyer’s misadvice OR silence or wavering on the issue constitutes IAC.
After *Padilla*, defense attorneys have a constitutional duty to give affirmative, individualized, and accurate advice about immigration consequences of a criminal case.
By understanding basic elements of immigration law and immigration consequences, trial attorneys can avoid deportation triggers before they are sealed by a conviction and appellate attorneys can identify legal issues to raise on direct appeal and in postconviction.
Immigrant Defense Project’s 3 Pillars of the *Padilla* Duty

1. **ASK** all clients about citizenship (and gather other relevant info).

2. **ADVISE** about immigration consequences of charges and offers.

3. **NEGOTIATE** according to the client’s priorities.
ASK all clients about citizenship (and gather other relevant info)

• GET THE FOLLOWING:
  • Immigration status/history
  • Family ties
  • Criminal history
  • Current criminal charges
It is not a client’s responsibility to tell you whether he or she is a U.S. citizen or even to know that this is an important piece of information.

The attorney has an affirmative duty to inquire about specific immigration status.

See ABA Defense Function Standard 4-5.5(a); NLADA Performance Guidelines for Criminal Defense Representation § 2.2(b)(2)(A).
ASK all clients about citizenship (and gather other relevant info)

This intake form is available on OPD’s website under the Library’s Immigration tab.
Immigration Status/History

• Ask the right questions:
  • Where were you born?
  • When and how did you enter the U.S.?
  • Do you have any applications or removal proceedings pending?
  • Have you had any contact with immigration officials? When? Where?
  • Are your family members (spouse, children, parents) citizens? What are their statuses? Children’s ages? Parents’ naturalization dates, if any?
Criminal History

- Felonies, misdemeanors, other minor infractions
- Diversion, drug court, deferred prosecutions and judgments, juvenile dispositions, expunged, sealed
- ALL jurisdictions
- Sentences – prison, probation, anger management, suspended sentence, restitution, anything ordered by the court
- Exact code section
- Dates
- Age of and relationship to complainant (sometimes will be relevant)
Current Charges

• Date of alleged commission
• Exact charges, including age of and relationship to complainant (sometimes will be relevant)
• Plea offers?
• ICE requests/detainers?
ADVISE about immigration consequences of charges and offers

• Defense attorney must provide accurate, individualized advice about the immigration consequences of possible case dispositions.

• GET ADVICE: Defense attorney should contact immigration counsel before any disposition, especially if not sure what those consequences will be.

• GIVE ADVICE: Set aside time to have a careful discussion with client and document the advice given.
ADVISE about immigration consequences of charges and offers

• Example:
  • Client pleads guilty to aggravated felony, making deportation almost certain, and barring relief through cancellation of removal
  • Written plea said it “may have consequences.”
  • At sentencing, defense counsel said it was probably an aggravated felony and might lead to deportation
ADVISE about immigration consequences of charges and offers

• Example:
  • Client pleads guilty to deportable offense.
  • Attorney advised, “There is a plea to a crime here, and it may affect any future application to the Immigration an Naturalization Service.”
NEGOTIATE according to client’s priorities

TRIAL ATTORNEYS:
• Deportation may be a more devastating consequence for a client than jail time. TALK WITH YOUR CLIENT!
• Plea bargain based on this understanding of your client’s priorities.
• This may mean avoiding deportation triggers, maintaining eligibility for immigration benefits, and maintaining eligibility for relief from deportation if your client is already removable.

APPELLATE AND POSTCONVICTION ATTORNEYS:
• Look out for this issue with every noncitizen client. Can you raise in a motion to withdraw guilty plea or postconviction petition?
A BRIEF IMMIGRATION PRIMER
Immigration Statuses: Legal Permanent Residents (LPR)

• Become LPR through family member petitions, employer petitions, humanitarian relief (e.g., VAWA, SIJS, U visa, asylee, refugee)
• Can apply for naturalization after 3-5 years
• Can generally travel outside U.S. for specified periods
Immigration Statuses: Asylees/Refugees

• Admitted or allowed to stay due to well-founded fear of persecution in native land, on account of race, religion, nationality, membership in particular social group, political opinion
  • Asylee: entered first, then applied and granted asylum
  • Refugee: entered U.S. after getting visa
  • Eligible to apply for LPR status after 1 year
Immigration Statuses: Non-Immigrant Visa Holder

- Entered for temporary period
- Restricted to activities consistent with visa
- Examples: visitor visa, student visa, business visa, family-related visa, U/T visa
- Must avoid inadmissibility if want to work toward LPR status; also must avoid deportability
Immigration Statuses: Other Statuses

- Temporary Protected Status (TPS)
- VAWA
- DACA
- SIJS
- Pending asylum application
- Pending LPR application
- Pending cancellation of removal application
- Entered without inspection (EWI)
- Visa overstay
- Ordered deported
Immigration Consequences

• Deportability
• Inadmissibility
• Ineligibility for or denial of a pending application
• Barred from discretionary relief from deportation
Deportability

• A person gets deported through combination of LAW and POLICY
  • LAW defining who is removable
  • POLICY defining federal priorities about which removable people should be deported
Deportability: Removal Proceedings

DHS issues notice to appear and charges removability

Immigration Judge concludes NOT REMOVABLE/DEPORTABLE

Immigration Judge concludes REMOVABLE/DEPORTABLE

Application for relief from removability

Judge grants relief

Judge denies relief

DEPORTED
## Inadmissibility and Deportability

<table>
<thead>
<tr>
<th>Inadmissibility</th>
<th>Deportability</th>
</tr>
</thead>
<tbody>
<tr>
<td>(prevent lawful status or someone with lawful status can’t return after trip abroad)</td>
<td>(render deportable someone with lawful status or someone who is not lawfully present)</td>
</tr>
<tr>
<td>Crimes involving moral turpitude (except 1 not punishable by more than 1 year in prison and actual sentence under 6 months)</td>
<td>Crimes involving moral turpitude (1 with max sentence of 1+ years in first 5 years of admission or 2 at any time)</td>
</tr>
<tr>
<td>Controlled substance conviction</td>
<td>Controlled substance conviction (except single conviction for 30 grams or less of marijuana)</td>
</tr>
<tr>
<td>Prostitution-related offenses</td>
<td>Firearms offenses</td>
</tr>
<tr>
<td>Multiple convictions of any kind (felony or misdemeanor) with aggregate 5+ years confinement</td>
<td>Domestic violence offenses, crimes against children, stalking, violation of protection order</td>
</tr>
<tr>
<td></td>
<td>Aggravated felonies</td>
</tr>
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Bars to Asylum or Withholding of Removal Based on Threat to Life or Freedom in Country of Removal

<table>
<thead>
<tr>
<th>Bars to Asylum</th>
<th>Bars to Withholding of Removal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conviction of a “Particularly Serious Crime” (PSC)</td>
<td>Conviction of a “Particularly Serious Crime” (PSC)</td>
</tr>
<tr>
<td>Includes:</td>
<td>Includes:</td>
</tr>
<tr>
<td>All aggravated felonies</td>
<td>Aggravated felonies with aggregate 5-year prison sentence</td>
</tr>
<tr>
<td>Violent or dangerous crimes - presumptive bar</td>
<td>Aggravated felonies involving unlawful trafficking in controlled substances are presumptive bar</td>
</tr>
<tr>
<td>Other PSCs (no definition, see case law)</td>
<td>Other PSCs (no definition, see case law)</td>
</tr>
</tbody>
</table>
If LPR for 5+ years and resided in U.S. for 7+ years with some form of legal status, the following bars LPR cancellation of removal:

<table>
<thead>
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<th>Bars to Cancellation of Removal for LPRs</th>
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<tr>
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</tr>
<tr>
<td>2+ convictions of any type with aggregate sentence of 5+ years if committed before 7 years of continuous residency</td>
</tr>
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</table>
Cancellation of Removal for Non Permanent Residents

Defensive application – only available to someone who is in removal proceedings.

4 Requirements for Relief
1. Physically present continuously for 10+ years
2. Good moral character for 10+ years
3. Not convicted of certain offenses (listed under INA §§ 212(a)(2), 237(a)(2), 237(a)(3))
4. To deport him or her would cause exceptional and extremely unusual hardship to LPR or U.S. citizen spouse, child, or parent.

Offenses Barring this Relief

<table>
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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>CIMT</td>
</tr>
<tr>
<td>Controlled substance conviction (or conspiracy or attempt)</td>
</tr>
<tr>
<td>Any 2+ offenses, regardless of whether in single trial or arose from single scheme of misconduct, aggregate sentence 5+ years</td>
</tr>
<tr>
<td>Aggravated Felony</td>
</tr>
<tr>
<td>Certain firearm offenses</td>
</tr>
<tr>
<td>Bars to DACA*</td>
</tr>
<tr>
<td>--------------</td>
</tr>
<tr>
<td>1 felony (punishable by prison term exceeding 1 year)</td>
</tr>
<tr>
<td>1 “significant misdemeanor” (punishable by 1 year or less but more than 5 days)</td>
</tr>
<tr>
<td>- DV, sexual abuse/exploitation, burglary, unlawful possession/use of firearm, drug distribution/trafficking, DUI/OVI</td>
</tr>
<tr>
<td>Any offense punishable by 1 year or less and received sentence of more than 90 days</td>
</tr>
<tr>
<td>Any 3 misdemeanors not arising out of same act</td>
</tr>
<tr>
<td>- Punishable by 1 year or less but more than 5 days</td>
</tr>
<tr>
<td>- Sentenced to 90 days or less, including time served</td>
</tr>
</tbody>
</table>
How is “conviction” defined?

• Formal judgment of guilt
• General rule: deferred adjudication of guilt is still a conviction
  • Where formal adjudication of guilt is withheld, still conviction if
    • (1) guilty verdict, entry of guilty plea or nolo contendere, admission of sufficient facts to warrant guilty finding
    AND
    • (2) imposition of punishment, penalty, or restraint on liberty

**An expunged conviction will still be visible to ICE and can be considered**
# What is a Crime Involving Moral Turpitude (CIMT)?

Crimes based on the perpetrator having “evil intent.” Not an exhaustive list:

<table>
<thead>
<tr>
<th>Crimes against the person</th>
<th>Sex crimes</th>
<th>Crimes against property</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Murder</td>
<td>• Rape</td>
<td>• Theft (w/ intent to permanently deprive)</td>
</tr>
<tr>
<td>• Manslaughter</td>
<td>• Failure to register</td>
<td>• Fraud</td>
</tr>
<tr>
<td>• Most aggravated assaults</td>
<td>• Prostitution</td>
<td>• Arson</td>
</tr>
<tr>
<td>• Kidnapping</td>
<td></td>
<td>• Robbery</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Knowingly transporting stolen property</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Passing bad checks</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Willful tax evasion</td>
</tr>
</tbody>
</table>

Youthful offense exception: applies to 1 CIMT only, must have been committed when under 18
What is an Aggravated Felony?

Defined in 8 U.S.C. § 1101(a)(43)

<table>
<thead>
<tr>
<th>Common conviction-based AFs</th>
<th>Common sentence-based AFs</th>
<th>Common circumstance-specific AFs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Murder</td>
<td>Require sentence of 1+ year:</td>
<td>• Fraud or deceit with loss of more than $10,000 (e.g., mail/wire/bank fraud, forgery, passing bad checks, embezzlement, theft by deception)</td>
</tr>
<tr>
<td>• Rape</td>
<td>• Crimes of violence not listed as conviction-based AFs (e.g., arson, criminal possession of a weapon, assault of police officer)</td>
<td></td>
</tr>
<tr>
<td>• Sexual abuse of a minor</td>
<td>• Theft offenses</td>
<td>• Certain tax evasion offenses with loss of more than $10,000</td>
</tr>
<tr>
<td>• Drug trafficking</td>
<td>• Burglary</td>
<td></td>
</tr>
<tr>
<td>• Firearm trafficking</td>
<td>• Obstruction of justice</td>
<td></td>
</tr>
<tr>
<td>• Prostitution business</td>
<td>• Forgery</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Bribery</td>
<td></td>
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21 Savage: A Case Study

21 Savage Was Noticeably Absent From The Grammys

Why it matters that 21 Savage is ICE's latest victim

U.S. Rep. Hank Johnson writes immigration judge on behalf of 21 Savage

21 Savage Was Scheduled to Perform at Grammys Prior to ICE Arrest

Rapper 21 Savage will be released from ICE detention on Wednesday

Supporting 21 Savage

Alexandria Ocasio-Cortez criticized for backing rapper

21 Savage reportedly born in London, arrived in United States at age 7

21 Savage implies ICE targeted him over new music where he slams immigration officials
21 Savage, aka Shéyaa Bin Abraham-Joseph

- Born in London
- According to his attorneys, entered U.S. legally in approximately 1999
- Left U.S. in 2005 for a month and returned with H-4 visa, expired in 2006
- Has 3 U.S. citizen children
21 Savage

• October 2014: convicted in Fulton County, GA
  • (1) marijuana possession with intent to distribute
  • (2) possession of a firearm or knife during commission of certain felonies
  • (3) manufacturing, delivery, distribution and/or possession of controlled
    substance with intent to distribute

• All were expunged
21 Savage

• 2017: filed application for U-Visa 4 years after was shot 6 times during incident when his friend died – application still pending with USCIS

• 2/3/2019: taken into custody by ICE after being pulled over with another rapper
  • Firearm with extensive magazine found in glove box of car he was traveling in
  • Placed in removal proceedings
  • Denied bond, not released to attend the Grammys (2 nominations)

• 2/13/2019: Released on bond after spending over a week in detention
Expunged convictions are not invisible to ICE

Convictions: 2 possession with intent to distribute convictions and 1 possession of a firearm or knife during commission of certain felonies conviction

Does not currently have a legal status (his visa expired in 2006)

**Deportability** (render deportable someone who has lawful admission status or who is not lawfully present)

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**Firearms offenses**

Domestic violence offenses, crimes against children, stalking, violation of protective order

Aggravated Felonies
Pending U Visa application, and appears to meet requirements
If charged with a firearm offense, would want to:
  • Minimize impact on U Visa application, which may be possible (if inadmissible due to a record of criminal convictions, USCIS will consider number and seriousness of the offenses and weigh them against the positive factors in the U visa application)
  • Minimize impact on discretionary relief from deportation (although other past crimes likely barriers to cancellation of removal)
Case Study #2

LPR since 1990 and resident of U.S. since 1985 walks into your office with this criminal history:

<table>
<thead>
<tr>
<th>Arrest Date</th>
<th>Charges</th>
<th>Disposition</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Possession of criminal tools</td>
<td>Dismissed.</td>
</tr>
<tr>
<td>10/7/2015</td>
<td>Misdemeanor petty theft.</td>
<td>Plead not guilty. Dismissed.</td>
</tr>
<tr>
<td>2/5/2019</td>
<td>Possession of controlled substance</td>
<td>N/A</td>
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Case Study #2

- Unless client can plead to minor misdemeanor possession of marijuana (and gets it on the record that it was under 30g), may want to go to trial.

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Case Study #2

- Can qualify for LPR cancellation of removal as long as not an aggravated felony – make sure it’s not labeled trafficking.

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Case Study #3: *State v. Romero*

- Carlos Romero lived in U.S. for 30 years, 20 years as LPR
- Has 5 U.S. citizen children
- Charged with:
  - Trafficking in marijuana, F3
  - Possession of marijuana, F3
  - Possession of cocaine, F5
- Pledged to indictment, received nothing in return for guilty plea
  - During hearing, court warned plea may have consequence of deportation.
  - Said he was satisfied with quality of legal services received
- Sentenced to community control
Case Study #3: State v. Romero

- Placed in removal proceedings soon after sentencing
  - The other offenses are also deportable offenses
- Would have been eligible for relief from deportation had he not pleaded guilty to trafficking

Bars to Cancellation of Removal for LPRs

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Filed motion to withdraw plea and included affidavit stating:

- the facts above
- he did not know immigration ramifications of a guilty plea
- his attorney did not tell him he would be subject to immediate deportation
- he did not believe there was enough evidence to convict him, but his attorney advised that pleading guilty was in his best interest
- if he had known his plea would lead to automatic deportation, “he would have been able to provide a defense to the charges brought against him at a trial of the matter”
- his attorney’s failure to tell him of mandatory immigration consequences of his plea was IAC

This case was argued to the Ohio Supreme Court on 1/29/2019. It appears fairly clear that this attorney failed to meet his obligations under *Padilla*. 

Case Study #3: *State v. Romero*
Case Study #4: Jae Lee v. United States

- Jae Lee moved to the U.S. from South Korea in 1982. Had LPR status.
- 2008: Officials found 88 ecstasy pills, 3 Valium tablets, $32,432 in cash, and a loaded rifle during search of his home.
- Admitted the drugs were his and he gave ecstasy to his friends.
- Indicted on one count of possessing ecstasy with intent to distribute.
Case Study #4: Jae Lee v. United States

• Told attorney he was not a citizen.
• Asked whether he would face deportation.
• Attorney said he would not be deported because the government can’t deport you if deportation wasn’t in the plea agreement.
• With that advice, pleaded guilty and sentenced to one year and a day.
Case Study #4: Jae Lee v. United States

- The attorney’s advice was entirely incorrect.

### Deportability
- (render deportable someone who has lawful admission status or who is not lawfully present)
  - Crimes involving moral turpitude (1 with max sentence of year or more in first 5 years of admission or 2 at any time)
  - Controlled substance conviction (except single conviction for 30 grams or less of marijuana)
  - Firearms offenses
  - Domestic violence offenses, crimes against children, stalking, violation of protection order
  - Aggravated felonies

### Bars to Cancellation of Removal for LPRs
- Conviction of aggravated felony
- CIMT conviction if committed before 7 years of continuous residency
- Controlled substance conviction if committed before 7 years of continuous residency
- Prostitution conviction if committed before 7 years of continuous residency
- 2+ convictions of any type with aggregate sentence of 5+ years if committed before 7 years of continuous residency
Case Study #4: Jae Lee v. United States

- Filed motion to vacate conviction on IAC grounds

- D.Ct. applied *Strickland*: (1) counsel performed deficiently; but (2) in light of overwhelming evidence of guilt, couldn’t show prejudice.

- 6th Circuit affirmed: creating per se rule that “no rational defendant charged with a deportable offense and facing overwhelming evidence of guilt would proceed to trial rather than take a plea with a shorter prison sentence.” *Lee v. United States*, 825 F.3d 311, 314 (6th Cir. 2016)
Case Study #4: Jae Lee v. United States

- 6-2 SCOTUS decision reversed
  - prejudice must be a fact-intensive inquiry
  - Lee’s main priority was avoiding deportation
  - court must consider what the individual defendant would have done, including considering the possibility of even a highly improbable result. The likelihood of conviction is only one of several factors for a court to look at.
Case Study #4: Jae Lee v. United States

“We cannot agree that it would be irrational for a defendant in Lee’s position to reject the plea offer in favor of trial. But for his attorney’s incompetence, Lee would have known that accepting the plea agreement would certainly lead to deportation. Going to trial? Almost certainly. If deportation were the ‘determinative issue for an individual in plea discussions, as it was for Lee; if that individual had strong connections to this country and no other, as did Lee; and if the consequences of taking a chance at trial were not markedly harsher than pleading, as in this case, that ‘almost’ could make all the difference.” Lee v. United States, 137 S.Ct. 1958, 1968-1969 (2017)
• Prong 1: provide evidence of the advice given to your client and how that was inaccurate/misleading.

• Prong 2: 2 theories of prejudice
  • (1) Defendant would have opted for a trial
  • (2) Defendant would have sought an alternative plea

• Provide as much evidence as possible to show avoiding deportation was your client’s top priority and he would have gone to trial absent the deficient advice he received.
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