

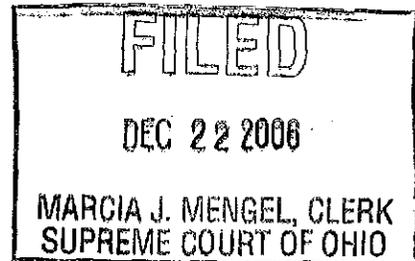
IN THE SUPREME COURT OF OHIO

Disciplinary Counsel, : Case No. 06-738
Relator, : (BCGD Case No. 05-044)
v. :
Thomas J. Manning, :
Respondent. :

RESPONDENT'S AFFIDAVIT OF COMPLIANCE

William G. Knapp, III (0024226)
800 East Franklin Street
Centerville, OH 45459
(937) 291-3400
(937) 291-0757 (Fax)
WGKLaw@aol.com
Counsel for Respondent

Jonathan E. Coughlan (0026424)
Disciplinary Counsel
Joseph M. Caliguri (0074786)
Assistant Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, OH 43215
(614) 461-0256



b. Bess, James: This matter is pending in the Preble County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. The client also was notified by phone on November 30, 2006, and opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 1, 2006. The client has also indicated that he wishes to retain William G. Knapp, III, so his file remains here as we received a fax copy of his notarized request to transfer the file on December 11, 2006 with the hard copy received soon thereafter. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 2.

c. Boggs, Paula: This matter was pending in the Montgomery County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. Opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 4, 2006. The client indicated that she also wished to retain William G. Knapp, III, so her file remained here as we received her notarized request to transfer the file on or about December 8, 2006. Mr. Knapp has since resolved all pending issues and the matter is closed. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 3.

d. Boyle, Cathleen: At the time of my suspension, there were no active matters for this client in which I had appeared. The client was notified of my suspension by certified mail with a letter dated November 30, 2006. The client has indicated that she also wishes to retain William G. Knapp, III, so her file is remaining here pending receipt of her notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 4.

e. Cleyrat, Daniel: This matter is pending in the Greene County Common Pleas Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. Opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 5, 2006. The client has indicated in a subsequent phone call that he also wishes to retain William G. Knapp, III, so his file remains here following receipt of his notarized request to transfer the file. There was \$637.52 held in trust for this client on the date of my suspension, which is owed to me as an earned fee. This amount is being disbursed to me pursuant to the written authorization from the client to disburse the funds to myself as payment. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 5.

f. Cleyrat, Daniel & Karen: This matter is a personal injury case in the initial claims workup stage. The clients were notified of my suspension by certified mail with a letter dated November 30, 2006. The clients have indicated that they wish to retain David F. Rudwall, an attorney with his own office at a separate address, so their file remains here following receipt of their notarized request to transfer the file. Arrangements are being made to physically transfer the file to David Rudwall's office. There were neither funds nor other property held in trust for

these clients. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 6.

g. Cox, Jody: This matter is pending in the Warren County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. The client also was notified by phone on November 30, 2006, and opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 11, 2006. The client has indicated that she also wishes to retain William G. Knapp, III, so her file remains here as we received a copy of her notarized request to transfer the file on December 6, 2006. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 7.

h. Driscoll, Laura: This matter is pending in the Montgomery County Domestic Relations Court. The client's ex-husband is representing himself in this matter. The client and the adverse party were notified of my suspension by certified mail with a letter dated November 30, 2006. A notice of disqualification was filed with the court on December 4, 2006. The client has indicated that she also wishes to retain William G. Knapp, III, so her file is remaining here as we received a copy of her notarized request to transfer the file on or about December 5, 2006. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 8.

i. Fanjoy, James & Geanie: This matter is pending in the U.S. District Court for the Southern District of Ohio, Western Division at Dayton. The client, opposing counsel, and co-counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. The client also was notified by phone on November 30, 2006, and opposing counsel and co-counsel were notified by fax on that date as well. Opposing counsel and co-counsel were also notified by telephone of my suspension at or near this same time. A notice of disqualification was electronically filed with the court on November 30, 2006. The client has indicated that they also wish to retain William G. Knapp, III, so their file remains here pending receipt of their notarized request to transfer the file. There were neither funds nor other property held in trust for these clients. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 9.

j. France, Sanford: This matter is pending in the Montgomery County Domestic Relations Court. The client's ex-wife is representing herself in this matter. The client and the adverse party were notified of my suspension by certified mail with a letter dated December 4, 2006. The client was also notified of my suspension via a phone call which also occurred on December 4, 2006. A notice of disqualification was filed with the court on December 4, 2006. The client has indicated that he also wishes to retain William G. Knapp, III, so his file is remaining here pending receipt of his notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 10.

k. Goodnight, James: This matter is pending in the Montgomery County Common Pleas Court. As suit was just recently filed, counsel has yet to appear on behalf of the adverse

party. The client and the adverse party, through their statutory agent, were notified of my suspension by certified mail with a letter dated December 4, 2006. A notice of disqualification was filed with the court on December 4, 2006. The client indicated in a subsequent phone call that he also wished to retain William G. Knapp, III, so his file remains here as he executed a notarized request to transfer the file on December 11, 2006. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 11.

l. Greenberg, Jeff: This matter is a divorce case that was still in negotiations to see if a dissolution could be worked out. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 28, 2006. The client also was notified by phone on November 27, 2006, and opposing counsel was notified by fax on November 28, 2006. The client had indicated that he wished to retain William G. Knapp, III, but he subsequently has decided to hire new counsel, as confirmed by the enclosed letter and affidavit provided by his new counsel. Mr. Greenberg's file was sent to his new counsel on or about December 18, 2006. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 12.

m. Hancock, Stephanie: This matter is pending in the Greene County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. The client also was notified by phone on December 4, 2006, and opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 5, 2006. The client has indicated that she wishes to retain William G. Knapp, III, so her file remains here pending receipt of her notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 13.

n. Heflin, Kacie: This matter is pending in the Hamilton County Common Pleas Court. The matter has been settled, and a guardianship and minor's settlement proceeding are being filed with the Montgomery County Probate Court. The client, through her parents, and opposing counsel were notified of my suspension by certified mail with a letter dated December 7, 2006. Opposing counsel was notified by fax on that date as well. The client's parents were also notified by a phone call on December 7, 2006. A notice of disqualification was filed with the court on December 11, 2006. The clients indicated in a phone call that they wish to retain William G. Knapp, III to finalize the probate matters, so the file is remaining here pending receipt of the parents' notarized request to transfer the file. There is \$41,000.00 held in trust for this client as of the date of my suspension, which represents the settlement proceeds from the personal injury case. Of this amount, I am owed \$13,666.66 as an earned fee by contract, and \$1,310.66 is owed to my firm for reimbursement of costs advanced. This amount is being held pending written authorization from the client to disburse the funds to Mr. Knapp's trust account pending approval of the settlement by probate court and disbursement of the proceeds pursuant to court order. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 14.

o. Jones, Christopher & Catherine: This matter was a step-parent adoption pending in Montgomery County Probate Court. The final hearing was set to go forward on December 1, 2006. The clients were notified of my suspension via phone call with Catherine Jones on December 4, 2006, followed up by a certified mail letter the same date. There was no adverse party or opposing counsel. A notice of disqualification was filed with the court on November 28, 2006. Ron Maurer, with whom I share office space and who had been acting as co-counsel on the case, substituted as counsel and completed the hearing as scheduled on December 1, 2006, which terminated the matter. There was \$574.59 held in trust, which is to be disbursed as earned fees and reimbursement for costs advanced. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 15.

p. Jones, Elaine: This is a criminal matter which had been pending in the Montgomery County Common Pleas Court, but was inactive, awaiting the filing of a motion for judicial release. The client was notified of my suspension by certified mail with a letter dated December 4, 2006. In order to keep a promise I had made to Elaine that her judicial release motion would be filed the first week of December, Mr. Knapp filed the motion under his signature, and I made it clear to Elaine that if she wanted someone else to represent her, the file would be available to transfer. Elaine has indicated in her written response that she has retained new counsel, but I've yet to hear from anyone, so the file remains here pending further instructions. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 16.

q. Kent, Jacqlyn: This matter is pending in the Montgomery County Common Pleas Court. The client was notified of my suspension during a meeting at my office on November 29, 2006, and again via certified mail letter sent December 4, 2006. Opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006, which was also faxed to them on the same date. A notice of disqualification was filed with the court on December 4, 2006. The client indicated during the November 29th meeting that she also wished to retain David F. Rudwall, so her file remains here as she executed a notarized request to transfer the file on November 29, 2006. Arrangements are being made with Mr. Rudwall's office for the transfer of the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 17.

r. Keucher, Stefanie: This matter is pending in the Greene County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 7, 2006. Opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 5, 2006. Ronald J. Maurer, an attorney with whom I share office space, was of record as co-counsel, so her file remains here with him proceeding as sole counsel. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 18.

s. Kovach, Chris & Jennifer: This matter is a personal injury case in the initial claims workup stage. The clients were notified of my suspension by certified mail with a letter dated December 4, 2006, and were also notified of my suspension during a telephone call on or

about November 28, 2006. The clients have indicated that they also wish to retain David F. Rudwall, so their file is remaining here pending transfer of the file to Mr. Rudwall's office, following the Kovachs' execution of the request to transfer form on December 11, 2006. There were neither funds nor other property held in trust for these clients. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 19.

t. Kuruvilla, Saju & Heather: This matter is pending in the Greene County Common Pleas Court. The clients and opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. A notice of disqualification was filed with the court on December 5, 2006. The clients have yet to indicate whom they wish to retain in my place, so the file remains here pending a response from them. There were neither funds nor other property held in trust for these clients. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 20.

u. Larrick, Charles: This matter is currently on appeal before the Second District Court of Appeals. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. Opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 4, 2006. Ronald J. Maurer and William G. Knapp, III, attorneys with whom I share office space, were of record as co-counsel, so his file remains here with them proceeding as counsel. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 21.

v. Lewis, Laura: This is a foreclosure matter which is pending in the Montgomery County Common Pleas Court, but should imminently be dismissed due to the sale of the property at issue. The client, opposing counsel and all other parties were notified of my suspension by certified mail with a letter dated December 4, 2006. At present, her file remains here awaiting direction from the client as to what she wants to do for counsel, if anything. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 22.

w. Liddy, Mark: This matter is pending in the Montgomery County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. The client also was notified by phone on December 1, 2006, and opposing counsel was notified by fax on December 4, 2006. A notice of disqualification was filed with the court on December 4, 2006. The client has indicated that he wishes to retain William G. Knapp, III, so his file remains here following receipt of his notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 23.

x. Martin, Roger: This matter is pending in the Greene County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. Opposing counsel was notified by fax on that date as well. A notice of disqualification was filed with the court on December 5, 2006. Ronald J. Maurer was of record as co-counsel, so his file remains here with him proceeding as sole counsel. There

were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 24.

y. Mitchell, Benjamin: This matter is pending in the Montgomery County Common Pleas Court. The client, opposing counsel, and co-counsel were notified of my suspension by certified mail with a letter dated December 4, 2006. Opposing counsel and co-counsel were also notified of my suspension by fax on that same date. A notice of disqualification was filed with the court on December 4, 2006. The client has indicated that he wishes to retain William G. Knapp, III, so his file remains here following receipt of his notarized request to transfer the file which he signed on December 11, 2006. There were neither funds nor other property held in trust for these clients. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 25.

z. Nicoll, Kim: This matter is a traffic case pending in Dayton Municipal Court. The client was notified of my suspension by telephone on November 27, 2006, and a notice of disqualification was filed with the court on December 4, 2006. The client and opposing counsel were notified of my suspension by certified letter dated December 4, 2006. The client has indicated that she also wished to retain William G. Knapp, III, so her file remains here pending receipt of her notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 26.

aa. Pools by Design: This client involves several collection accounts, only one of which is active in the court system. The client, through its corporate representative, has been notified of my suspension by certified mail dated December 5, 2006. All counsel in the active litigation matter were notified by certified mail dated December 5, 2006. A notice of disqualification was filed with the court in the active matter on December 11, 2006. The client's representative has indicated that they also wished to retain William G. Knapp, III, so their file remains here pending receipt of her notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 27.

bb. Purvis, Jennifer: This matter was a traffic case pending in Kettering Municipal Court. The client was notified of my suspension by telephone on November 27, 2006, and a notice of disqualification was filed with the court the same date. The client and opposing counsel were notified of my suspension by certified letter dated November 30, 2006. The client has indicated that she also wished to retain William G. Knapp, III, so her file remains here pending receipt of her notarized request to transfer the file. In the interim, and with her authority, Mr. Knapp was able to negotiate a resolution to the traffic case, which was terminated on December 11, 2006. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 28.

cc. Putnam, Josh: This matter is pending before the Greene County Juvenile Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated November 30, 2006. The client also was notified by phone on November 30, 2006, and

opposing counsel was notified by fax on that same date. A notice of disqualification was filed with the court on December 5, 2006. The client has indicated that he also wishes to retain William G. Knapp, III, so his file remains here pending receipt of his notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 29.

dd. Tubbs, Bobbi: This matter is a personal injury case in the initial claims workup stage. The client was notified of my suspension by certified mail with a letter dated December 7, 2006, and was also notified of my suspension during a telephone call on that same date. The client has indicated that she wishes to retain David F. Rudwall, an attorney with his own office at a separate address, so the file is remaining here pending receipt of her notarized request to transfer the file. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 30.

ee. Valentine, Ken: This matter was pending in the Clark County Domestic Relations Court, and a related foreclosure action was pending in the Clark County Common Pleas Court, but both cases are inactive. The client was notified of my suspension by certified mail with a letter dated December 6, 2006. Ronald J. Maurer was of record as co-counsel when the cases were active, so the file remains here with him proceeding as sole counsel for any matters that may arise in the future. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 31.

ff. Voke, Kacie: This matter is pending in the Montgomery County Domestic Relations Court. The client and opposing counsel were notified of my suspension by certified mail with a letter dated December 6, 2006. The client also was notified by phone on December 6, 2006, and opposing counsel was notified by fax on that same date. A notice of disqualification was filed with the court on December 4, 2006. The client has indicated that she was able to negotiate a resolution to her case with her husband and his attorney, and that she did not need any materials from her file. As such, the file will remain here closed pending any further instructions from the client. There were neither funds nor other property held in trust for this client. All pertinent notices and correspondence regarding these clients are collectively attached hereto as Exhibit 32.

gg. Williams, Anna Maria: This matter is a traffic case pending in Mount Vernon Municipal Court. The client, through her father, was notified of my suspension by telephone on December 5, 2006, and a notice of disqualification was faxed to the court for filing on December 6, 2006. The client and opposing counsel were notified of my suspension by certified letter dated December 6, 2006. The client has indicated that she also wished to retain William G. Knapp, III, so her file remains here following receipt of her father's notarized request to transfer the file. There were neither funds nor other property held in trust for this client. The \$250.00 check that the client's father had sent me for this case was signed over to Mr. Knapp for his fee per authorization. All pertinent notices and correspondence regarding this client are collectively attached hereto as Exhibit 33.

4. On December 14, 2006, I surrendered my attorney registration card for the 2005/2007 biennium to the clerk of this court via certified mail through my counsel. In addition, and in further compliance with the court's order, addresses and phone numbers where I may receive communications were provided to the clerk in the same cover letter that accompanied my registration card. The clerk's office received this on December 18, 2006. A copy of this correspondence is attached hereto as Exhibit 34.

5. On the effective date of my suspension, November 22, 2006, my IOLTA account contained a balance of \$47,079.71. This amount is accounted for as follows:

<u>CLIENT</u>	<u>AMOUNT IN TRUST</u>
Kacie Heflin	\$41,000.00
Daniel Cleyrat	637.52
Orysia & Gaspare Aluzzo*	4,857.60
Christopher & Catherine Jones	584.59

*-Represents check number 1999 issued 10/30/06 to the Aluzzos as and for their share of their personal injury claim settlement. Said check was not deposited by the Aluzzos until December 14, 2006.

On November 30, 2006, check number 2000 was issued to the Montgomery County Probate Court for \$10.00 as and for costs owed for the Jones' adoption case, leaving a trust balance for them of \$574.59, and a total current trust balance of \$47,069.71. Of this balance, discounting the funds already sent to the Aluzzos, the \$41,000.00 held for Kacie Heflin will be transferred to the IOLTA account of William G. Knapp, III, the \$637.52 for Dan Cleyrat will be paid to me as an earned fee, and the \$574.59 for the Jones will be paid to myself and to Ronald J. Maurer for fees and costs owed, all as set forth above.

FURTHER AFFIANT SAYETH NAUGHT.

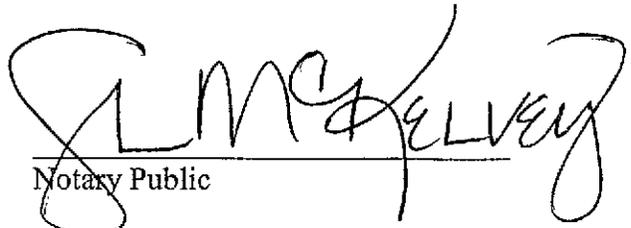


 Thomas J. Manning

Sworn and subscribed before me, a Notary Public, in and for the State of Ohio, this 21st day of December, 2006.



S.L. McKELVEY, Notary Public
 In and for the State of Ohio
 My Commission Expires 7/8/11



 Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to Jonathan E. Coughlan, Esq./Joseph M. Caliguiri, Esq., Office of Disciplinary Counsel, 250 Civic Center Drive, Suite 325, Columbus, OH 43215, this date of filing herein.



William G. Knapp, III
Counsel for Respondent

Attachments not scanned