

IN THE SUPREME COURT OF OHIO

**In Re:** :  
**Certified Grievance Committee of the** :  
**Cuyahoga County Bar Assn.,** : **CASE NO. 08-824**  
: :  
**Relator** : :  
: :  
**v.** : :  
: :  
**Anne Veneziano,** : :  
: :  
**Respondent** :

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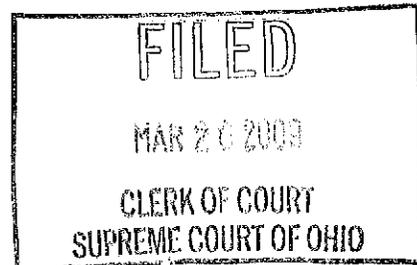
**MOTION BY RESPONDENT, ANNE VENEZIANO, TO  
MAKE MONTHLY PAYMENT ARRANGEMENTS**

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Jonathan W. Marshall, Esq., Secretary  
The Supreme Court of Ohio  
Board of Commissioners on Grievances  
66 South Front Street, 5<sup>th</sup> Floor,  
Columbus, Ohio 43215-3431

Anne D. Veneziano (0064382)  
2440 SOM Center Road  
Pepper Pike, Ohio 44124  
Tel (216) 461-6191  
*Respondent*

Anne Zimmerman, Esq.  
Cleveland Metropolitan Bar Association  
1301 East 9<sup>th</sup> Street, Second Level  
Cleveland, OH 44114  
(216) 696-3525



Now comes Anne D. Veneziano, Respondent in the above-captioned case, and respectfully requests this Honorable Court that she be able to make monthly payment arrangements of the money owed by Respondent in Case No.08-824.

Respondent appeared for oral argument in Case No. 08-824. Following the opinion of this Court, respondent received a bill for \$7500.00 to be paid on March 31, 2009. Since September 15, 2008, Respondent has been caring for her elderly mother. As is explained more fully in the affidavit attached hereto and incorporated herein, Respondent is financially unable to pay the sum owed by March 31, 2009. Respondent respectfully requests that she be able to make monthly payments on the amount owed.

Respectfully Submitted,

  
Anne D. Veneziano  
Anne D. Veneziano (0064382)

## AFFIDAVIT

State of Ohio  
County of Cuyahoga

BEFORE ME, the undersigned Notary personally appeared Anne D. Veneziano, who being by me first duly sworn, says:

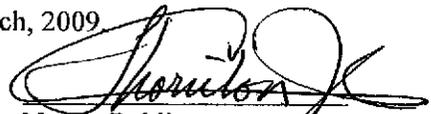
1. My name is Anne D. Veneziano,
2. I am an attorney licensed to practice in the State of Ohio.
3. On 26 April 2008 I brought my 88-year old mother to Beachwood, Ohio from Lake Worth, Florida. My mom is a widow and I am an only child. She entered Stone Gardens Assisted Living Facility in Beachwood and did very well until 15 September 2008.
4. On 15 September 2008 my mother contracted shingles of the face, scalp, and right eyelid. She was hospitalized at the Cleveland Clinic Foundation main campus in Cleveland, Ohio. Her shingles became exacerbated and she developed meningo-encephalitis. Upon discharge, she went to Menorah Park Center for Senior Living for rehabilitation from the shingles and to address the cognitive impairment she sustained as a result of the shingles.. Stone Gardens is part of the Menorah Park complex. There, my mother received infusions of Acyclovir, the standard treatment for shingles. While there, she was on one-to-one supervision and was not to be left unattended. Unfortunately, one night she got up at 3 a.m. with no assistance. She fell and fractured her right arm, and struck her head on tile and sustained a closed head injury.
5. Pursuant to sustaining the closed heard injury my mother was re-hospitalized and treated. She became psychotic and the neurologist suspected that the closed head injury precipitated a traumatic Alzheimer's. Upon release from the hospital she returned to Menorah Park but not until I talked with the medical director, administrator, and director of nursing in order to ensure her safety.
6. After my mom was at Menorah Park for approximately eight days, she complained of chest pains. She was re-hospitalized again and it was determined that she had a severe urinary tract infection as well as a mild heart attack approximately two weeks prior to her complaints about chest pains. She remained in hospital for approximately eight days. Upon release from hospital I brought her back to Stone Gardens and I began to stay with her because she could no longer live alone.
7. My mother is hypothyroid and requires 175 micrograms of Synthroid daily. Despite the fact that her physician ordered the Synthroid upon discharge from hospital, his orders never got transferred to the nurse's home going instructions. Thus, unbeknownst to me my mother was not administered Synthroid upon her return to Stone Gardens. Within four weeks she was near death. I brought her

back to the hospital and she was readmitted. Her doctor discovered the omission and began to re-administer Synthroid. The drug must be administered slowly and I was told it would take at least one month to return to 175 micrograms.

8. While my mother was in the hospital, her cognitive status continued to decline. She became delusional and experienced hallucinations. A psychiatrist at the hospital administered Zyprexa, which made her more agitated. The Zyprexa was discontinued and Remeron was administered in its place. Unfortunately, the Remeron was administered in a dose that exceeded that which my mother should have received. As a result of that, her internist was unable to rouse her. She was immediately admitted to the Intensive Care Unit where she remained for approximately ten days. Once again, she was near death at the time of her transfer. Her blood pressure was approximately 40/36.
  
9. Upon release from the hospital I brought her back to Stone Gardens and have been residing with her since then. Being at Stone Gardens requires a certain amount of self-sufficiency that my mother now lacks. She cannot be left alone and may never be able to be left alone again. In order to remain at Stone Gardens she needs the help that I provide.
  
10. At this time, my husband and I take care of her full-time. I have hardly worked since 15 September 2008. On 31 January 2009 I had to give up my office because I could no longer afford to keep it. I have little source of income and have no means, at the present time, to earn the \$7,500 fee that I must pay for my Panel hearing.
  
11. In light of these facts I implore this Court to allow me to make monthly payment arrangements. If I cannot do so, I will lose my home to foreclosure. I am responsible and will commit to monthly payments. In light of my mother's condition, however, my ability to work outside of the home is severely constrained.

  
Anne. D. Veneziano

Sworn to and subscribed before me this 17 day of March, 2009

  
Notary Public



A. C. THORNTON, JR., Notary Public  
NOTARY PUBLIC - COUNTY OF OHIO  
W. 12000 ...

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Motion to Make Monthly Payments has been served upon the following by regular U.S. mail this \_\_\_ day of March, 2009:

Anne Zimmerman, Esq.  
Cleveland Metropolitan Bar Association  
1301 East 9<sup>th</sup> Street, Second Level  
Cleveland, OH 44114  
(216) 696-3525

Jonathan W. Marshall, Esq., Secretary  
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Anne D. Veneziano (0064382)