The Supreme Court of Ohio

ORIGINAL

Disciplinary Counsel, Relator,	)	Case No. 2010-1693
v.	)	
Dea Lynn Character, Respondent.	)	

FILED
JUL 05 2011
CLERK OF COURT
SUPREME COURT OF OHIO

Respondent's Motion for Reconsideration of Permanent Disbarment

Now comes the Respondent, Dea L. Character, Pro Se, and moves this Honorable Supreme Court for reconsideration of its Decision to permanently disbar Respondent for the reasons that follow.

1.) The Ohio Supreme Courts' adoption/determination of the Panel's Findings of Facts and misconduct was improper because many or most alleged facts were not supported by any evidence in accordance with this Courts prior decisions

and required dismissal or remand wherein there was no testimony at all or there was no testimony by the client that was alleged to be harmed. In addition the record does in fact weigh heavily against the Panel's Findings of Fact and misconduct. /

2.) The circumstances of the Respondent's incarceration was prejudicial and tainted the entire proceedings, which proceedings lacked due process and fundamental fairness, as well as precluded the Respondent from being able to present testimony and documents in her defense where evidence existed to contravene the Panel's Findings of Fact and misconduct but was unavailable and not accessible to Respondent.

3.) Moreover the manner in which the proceedings took place did not allow

for the Respondents presence and clearly affected Respondents ability to address the testimony and evidence against and lacked due process and fundamental fairness.

4.) The Disciplinary Procedure in general and as applied herein is inherently unfair, resulting in an unfair decision.

5.) The Disciplinary Procedure as applied herein resulted in disparate treatment and selective discipline regarding race, gender, and small firm versus large firm bias against Respondent, an African-American woman with her own small firm.

6.) The Disciplinary Procedure as applied was a concerted effort by Disciplinary Counsel and the Cuyahoga County Prosecutor to unfairly and without merit target Respondent.

In light of the foregoing issues, the case was required to be remanded to the Panel for further proceedings in accordance with this Ohio Supreme Court's prior decisions.

WHEREFORE, for the foregoing reasons, the Respondent, Dea Lynn Character respectfully prays that this honorable Supreme Court reconsider its Decision of permanent disbarment and remand the matter to the Hearing Panel for further proceedings.

Respectfully submitted

Dea L. Character

DEA L. CHARACTER, Respondent, Pro Se
Inmate #075852
NEPRC
2675 East 30th St.
Cleve., Ohio 44115

Certificate of Service

A copy of the foregoing Respondent's Motion for Reconsideration was served upon Disciplinary Counsel at his address by regular U.S. Mail, Postage Pre-paid, fax transmission and/or hand delivery, this 5th day of July, 2011.

Dea L. Character

DEA L. CHARACTER
The Respondent Pro Se