

ORIGINAL

No. 2012-2069

In The
Supreme Court of Ohio

Columbus Bar Association
Relator

v.

Sterling E. Gill III
Respondent

*On Appeal from the Board of Commissioners
On Grievances and Discipline
Case No. 12-007*

**RELATOR'S RESPONSE TO
RESPONDENT'S OBJECTIONS**

James L. Ervin, Jr. (0067016)
Benesch, Friedlander, Coplan & Aronoff, LLP
41 S. High Street, Suite 2600
Columbus, OH 43215
(614) 223-9300 / (614) 223-9330 (fax)
jervin@beneschlaw.com

COUNSEL OF RECORD FOR
RELATOR

Bruce A. Campbell (0010802)
A. Alysha Clous (0070627)
Columbus Bar Association
175 South Third Street, Suite 1100
Columbus, Ohio 43215-5134
(614) 221-4112 / (614) 221-4850 (fax)
bruce@cbalaw.org/alysha@cbalaw.org

COUNSEL FOR RELATOR

Kenneth R. Donchatz (0062221)
Donchatz Law
35 N. Fourth St., Ste. 200
Columbus, OH 43215
(614) 255-4257
ken@donchatz.com

COUNSEL OF RECORD FOR
RESPONDENT

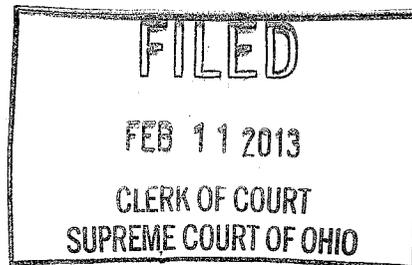


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STATEMENT OF FACTS

Sterling E. Gill III (“Respondent”) has been a lawyer since 1978. Except for a period of employment in state government, he has been a solo practitioner in Central Ohio. Ten years into his legal career, Respondent was given an interim suspension by this Court for “[m]isuse of client funds involving forgery and motivated in part by chemical dependency.” *Columbus Bar Assn. v. Gill*, 39 Ohio St.3d 4, 528 N.E.2d 945 (1988). He was reinstated two years later. *Columbus Bar Assn. v. Gill*, 56 Ohio St.3d 602, 565 N.E.2d 945 (1990). Respondent was later suspended for Continuing Legal Education deficiencies. *04/27/2007 Case Announcements*, 2007-Ohio-1970. He was reinstated two months later. *06/05/2007 Case Announcements*, 2007-Ohio-2710.

The proceeding now before the Court involves the 11 Counts of the Second Amended Complaint. It arises out of grievances filed by seven clients, three judicial complaints, and criminal charges stemming from a motor vehicle incident. In the shadows of these matters is Respondent’s long history of alcoholism and relapses from sobriety.

The details of the various Counts of the Second Amended Complaint and the related Rule violations are accurately summarized in the report of the Hearing Panel (“Panel”) of the Board of Commissioners on Grievances and Discipline (“Board”). Findings of Fact, Conclusions of Law and Recommendation (“Findings”) at 3-8. It is not necessary to rehearse them here.

The case as it was presented to the Panel was largely stipulated. The 167 Stipulations included the agreement of the parties as to the facts regarding Relator’s Second Amended Complaint; Respondent’s violations of the Ohio Rules of Professional Conduct as to each Count; the applicable mitigating and aggravating factors; and conditions that should be made part of whatever sanction is imposed.

As each of the matters incorporated in the Second Amended Complaint initially came to Relator's attention, it requested multiple times that Respondent address them. He failed to do so. Stip. at {¶ 10, 28, 40, 46, 66, 77, 90, 125, 140, 153, 165}. Respondent responded to Relator only after being subpoenaed for a deposition. *Id.* at {¶ 9, 10}. As the case progressed, Respondent engaged counsel and has since been fully cooperative.

At the hearing, Relator offered 48 exhibits into evidence to supplement the Stipulations. Hr'g. Tr. at 17. Respondent did not object to introduction of any exhibit except as to the "truth, completeness, conclusions, or meaning" of the written grievances submitted to Relator by Respondent's clients. All exhibits were received in evidence by the Panel. *Id.* at 18. Relator dismissed all unstipulated violations charged in the Second Amended Complaint. Stip. at 18-19.

Additional evidence adduced at the hearing centered primarily on Respondent's physical and mental health, as well as matters regarding the organization of his practice. Respondent testified on direct and cross examination and responded to questions by the members of the Panel. He acknowledged that he is an alcoholic and that he has had numerous relapses from sobriety over his years in practice. *Id.* at 23-26. Respondent attributed his admitted ethical lapses to his alcoholism and to his then-undiagnosed mental health problems. *Id.* at 49.

A representative of the Ohio Lawyer's Assistance Committee ("OLAP"), Stephanie S. Krznarich, LISW, CCDC-1, was called by Respondent, and was questioned by Relator and the Panel. She reviewed Respondent's history with OLAP and his compliance with his current five-year contract. *Id.* at 122-123. She discussed a report from psychologist April Mancuso, Ex. at 48, in which Dr. Mancuso opined that in addition to his alcoholism, Respondent also suffers from bipolar disorder and a mood disorder. Hr'g. Tr. at 123-129. Respondent did not call upon Dr. Mancuso to testify; however, the members of the Panel and counsel asked Ms. Krznarich to

interpret some of the findings in her report and to comment on what implications they might have regarding Respondent's future fitness to practice. *Ibid.* Relator's counsel inquired about "stressors" in Respondent's life, identified in Dr. Mancuso's report, and the likely effect on the Respondent's mental health. Relator's counsel asked Ms. Krznarich if there was "anything that you've seen that gives you the reason to think that those stressors will not cause him to relapse in the future?" She responded, "No, there's nothing that I've seen that will not produce a potential for relapse in the future, whether it be these stressors or things that we've not predicted." Hr'g. Tr. at 131. Ms. Krznarich went on to state her belief that Respondent now has "the best foundation that I've ever seen in place for him since I started working with him in 2002" *Id.* at 132.

The Parties did not agree on what sanctions might be appropriate. They submitted individual briefs to the Panel on this issue. Respondent recommended a completely stayed suspension on the stipulated conditions. Relator recommended a two-year, unstayed suspension on these conditions.

The Panel found clear and convincing evidence to support 40 stipulated Rule violations. It did dismiss a charge of violation of Prof.Cond.R. 1.5(d)(3) as to Count One. It recommended a two-year suspension, with 18 months stayed on conditions "based in part on the stipulated conditions of the parties." Findings at ¶40. The Panel's recommendation of conditions, in summary, included the establishment and maintenance of an IOLTA account; extra CLE on law office management; compliance with an existing OLAP contract; no further violations of the Rules; and readmission to practice being contingent on certification of competence to practice by a qualified mental health professional. *Id.* at ¶41.

The Board adopted all of the Findings and Conclusions of the Panel. As to a sanction recommendation, however, the Board concluded that “the more appropriate sanction” would be an indefinite suspension with the conditions suggested by the Panel. Findings at {p. 15, unnumbered ¶}.

The Respondent timely filed his Objection. It is based solely on the sanction recommendation of the Board.

ARGUMENT

For the Protection of the Public, a Lengthy Unstayed Suspension with Stringent Readmission Requirements is Warranted when a Lawyer: has a Long History of Alcoholism; has had Many Relapses from Sobriety; has a Prior Indefinite Suspension Based on Dishonest Conduct; has Again Engaged in Extensive Ethical Misconduct; and Only Recently has been Diagnosed with, and Treated for, a Mental Health Condition in Addition to his Alcoholism.

INTRODUCTION:

In the years since Respondent was admitted to the practice law in Ohio, there have many ups and downs. On the up side, he has served as counsel in a state agency and, thereafter, served many private clients competently and professionally. Throughout his legal career, Respondent has battled with the disease of alcoholism. As long as he was able to hold his disability in check, he was a good lawyer and a valuable partner to others in the recovery community.

Unfortunately, Respondent has lapsed into numerous and extended periods during which he was unable to sustain sobriety and/or mental stability. During those times, his standards of legal practice declined significantly to the detriment of his clients, the public, and the legal profession. As a result of an earlier relapse, this Court found it necessary to indefinitely suspend

Respondent from the practice of law. *Columbus Bar Assn. v. Gill*, 39 Ohio St.3d 4, 528 N.E.2d 945 (1988).

Recently, Respondent has once again fallen into a pattern of substandard professional conduct, as he has acknowledged in the Stipulations. He says -- and Relator has no reason to doubt -- that these behaviors were due, at least in part, to his inability to maintain sobriety during this period. Additionally, Respondent suggests that his misconduct was also a product of a previously undiagnosed mental health disorder.

The issue then becomes what sanction is appropriate and sufficient to protect the public from future misconduct by this lawyer. Respondent suggests that he should be given a short (six-month) period of actual suspension followed by probation for 18 months. Relator contends that even though recent decisions by this Court could well justify an indefinite suspension as recommended by the Board, a two-year, unstayed suspension would accomplish the desired goal if accompanied by the exacting conditions to which the parties have stipulated:

- a. Follow the prescribed treatment plan as set forth by Dr. Mancuso or any subsequent mental health provider;
- b. Comply with the terms of his contract with OLAP;
- c. Attend Alcoholic Anonymous ("AA") meeting three to four times a week, unless OLAP and his mental health provider agree that a different frequency of meetings is appropriate;
- d. Maintain an AA sponsor;
- e. Complete random drug testing, the frequency determined by OLAP;
- f. Comply with all requests for information from OLAP or any disciplinary authority in a timely fashion;
- g. Abstain from the use of alcohol and unprescribed drugs;
- h. Maintain and IOLTA/trust fund;

- i. Complete 12 hours of CLE classes on law office management;
- j. Commit no further violations of the Ohio Rules of Professional Conduct.

Stip. at ¶ 167.

In addition to these conditions stipulated to by the parties, the Panel and the Board also recommended that Respondent be required, prior to readmission, to present a certificate from a qualified psychiatrist or psychologist that he is able to return to the competent, ethical, and professional practice of law. Findings at 15. Relator agrees that this condition should also be imposed.

Respondent has suggested that two additional conditions be imposed. He suggests a requirement that he be ordered to wear what is called a SCRAM (“Secure Continuous Remote Alcohol Monitor”) bracelet and that he have be required to have an attorney monitor during any period of probation. Relator agrees with the Respondent’s suggestion of a monitoring requirement, but it takes no position regarding the SCRAM bracelet proposal.

VIOLATIONS:

As Respondent has stipulated, and the Panel and Board have found, Respondent disregarded his ethical duties with respect to multiple clients, court officials, and disciplinary authorities. He admits to having committed 40 violations of the Rules of Professional Conduct. These include: not acting with reasonable diligence and promptness in representing his clients (Prof.Cond.R. 1.3) (3 counts); failing to engaging in reasonable consultation with a client so that the client can make informed decisions (Prof.Cond. R.1.4[a]) (1 count); not explaining matters to a client as needed to make informed decisions (Prof.Cond.R. 1.4[b] (1 count); neglecting to obtain the prescribed acknowledgment by clients regarding the his lack of malpractice coverage (Prof.Cond.R. 1.4[c]) (3 counts); not explaining the basis of flat fee arrangement and the

possibility of a refund (Prof.Cond.R. 1.5[d][3]) (1count); improper division of fees with another lawyer (Prof.Cond.R. 1.5[e]) (1 count); failing to establish an IOLTA account for the safekeeping of client funds (Prof.R. 1.15[a]) (2 counts); not responding to grievances (Prof.Cond.R. 8.1[b])¹ (10 counts); engaging in conduct prejudicial to the administration of justice (Prof.Cond.R. 8.4[(d)]) (2 counts); engaging in conduct adversely reflecting fitness to practice law (Prof.Cond.R. 8.4[h]) (11counts); and not assisting in a disciplinary investigation (Gov. Bar R. V[4][G]) (2 counts).

CASE LAW:

Examination of some of the Court's recently-decided cases may be of some assistance in the search for the most efficacious remedy in this matter. None are directly parallel to this one -- the facts of disciplinary cases rarely are -- but they may serve as reference points in the survey.

Cases in which the sanction was indefinite suspension

In *Disciplinary Counsel v. Gosling*, 114 Ohio St. 3d 474, 2007-Ohio-4267, 873 N.E.2d 282, the attorney, Mr. Gosling, had a previous two-year suspension with one-year stayed based on dishonest conduct, neglect, and non-cooperation. In the new matter, he had failed to communicate with his client; neglected her case; conducted himself in a deceitful manner; and failed to return the client's documents and unearned fees. Moreover, Mr. Gosling did not respond to the grievance until the Disciplinary Counsel subpoenaed him for deposition. He then admitted the facts in the grievance and returned his unearned fees and the client's files.

During the deposition, Mr. Gosling acknowledged being a recovering alcoholic and that he had recently relapsed. Believing the relapse to be a contributing factor in his professional misconduct, the Disciplinary Counsel urged Mr. Gosling to contact OLAP for treatment. When

¹ The Stipulations erroneously refer to this violation as ORPC 1.8(b) instead of 8.1(b).

he did not, the Disciplinary Counsel filed a formal Complaint. Mr. Gosling did not file an Answer, and the matter went to a default.

The Court agreed that Mr. Gosling's violations, his prior suspension, his refusal to fully cooperate in the disciplinary process, and his failure to comply with OLAP constituted aggravating factors. Mr. Gosling's earlier misconduct was presumed by the Court to have been alcohol-related, as evidenced by the condition it had placed on his prior suspension requiring compliance with OLAP recommendations. In mitigation, the Court found that Gosling had not acted with intentional dishonesty or selfish motive and that he made a good faith effort to rectify the consequences of his actions.

The Court ruled that “. . . an indefinite suspension will protect the public from respondent's recurring pattern of neglecting his clients' affairs and will emphasize to him the importance of addressing his apparent abuse of alcohol.” *Gosling* at {¶11}.

Respondent, like Mr. Gosling, has a prior disciplinary history involving his abuse of alcohol and at least some of his recent misconduct can be attributed to his current relapse. Also, like Mr. Gosling, Respondent did not initially cooperate with the disciplinary investigation. Unlike Mr. Gosling, however, Respondent cooperated during the formal ethics proceeding, has admitted to his transgressions, and has set about to rectify his problems.

In *Columbus Bar Assn. v. Culbreath*, 134 Ohio St.3d 24, 2012-Ohio-5031, __ N.E.2d __ (“Culbreath II”), Mr. Culbreath was found to have grossly mismanaged his trust account, failed to supervise non-lawyers in his office, failed to respond to grievances, and to have engaged in conduct reflecting adversely on fitness to practice. In a prior disciplinary case, Mr. Culbreath had been found to have misled a judge and assisted the unauthorized practice of law. *Columbus*

Bar Assn. v. Culbreath, 88 Ohio St. 3d 271, 2000-Ohio-271, 725 N.E.2d 629. He was given a six-month, stayed suspension. *Id.*

In the recent *Culbreath II* case, Mr. Culbreath, like Respondent does here, asserted that he had mental health issues arising out of a series of personal difficulties. At issue was the diagnosis, the causal relationship of the condition to the misconduct, the treatment, and the prognosis by medical professional. The Board concluded that Mr. Culbreath should be permanently disbarred, given his discipline history, his initial non-cooperation, and what it saw as evasiveness and irrational thinking. *Culbreath II* at ¶21}. In his Objections to these findings, Mr. Culbreath contended that the Board had erroneously concluded that he had “failed to cooperate in the disciplinary process...and failed to consider in mitigation his medical diagnosis presented by Judith Fisher.” *Id.* at ¶5}. The Court sustained the Objection. *Id.* at ¶6}. Citing *Ohio State Bar Assn. v. Weaver*, 41 Ohio St.2d 97, 322 N.E.2d 665 (1975), the Court concluded that an indefinite suspension “fulfills the underlying purpose of the disciplinary proceedings, i.e., ‘to safeguard the courts and to protect the public.’” *Culbreath II* at ¶ 25}.

Cases in which the Court issued a two-year suspension

In other cases, this Court has used a two-year suspension, with or without a partial stay, rather than an indefinite suspension. In these cases, it concluded that the lawyer in question demonstrated a reasonable prospect of reform and the ability to eventually return to the ethical and competent practice of law. Although this sanction is nearly equivalent to an indefinite suspension, it may be used by the Court because it offers more flexibility and can be crafted in a way that incentivizes respondents to restructure their lives and prepare to resume professional duties. Several cases illustrate the Court’s use of this sanction. They may be useful in calculating the optimum sanction in this case.

In *Columbus Bar Assn. v. King*, 132 Ohio St.3d 501, 2012-Ohio-873, 974 N.E.2d 1180, the respondent failed to keep a balance in his trust account sufficient to satisfy obligations to clients; comingled personal funds in the account; held funds to which a client was entitled, claiming that a portion of the funds was in dispute when, in fact, that portion was minimal; and otherwise failed to maintain his trust account as required. Mr. King also failed to notify clients that he did not carry malpractice insurance. The aggravating factors found were a selfish motive, a pattern of misconduct, multiple offences, and false statements in the disciplinary proceedings (by fabricating a fee dispute). The Court noted, in mitigation, that Mr. King had no prior discipline. Because he had initially misrepresented the fee dispute, Mr. King was not given credit for cooperation, even though he had fully stipulated to all charges against him. *Id.* Citing *Disciplinary Counsel v. Crosby*, 124 Ohio St. 3d 226, 2009-Ohio-6763, 921 N.E.2d 225, the Court found that a two-year suspension (conditioned on extra, subject-specific CLE and a one-year, monitored probation) was the appropriate sanction. *King* at ¶15.

In *King*, the Board found that the respondent had engaged in deceitful conduct during the course of the investigation. *Id.* at ¶13. While that is not a factor in the instant case, Respondent does have a history of dishonest conduct in his first disciplinary case.

After *King*, the Court imposed a two-year suspension with six months stayed in *Medina Cty. Bar Assoc. v. Malynn*, 131 Ohio St.3d 377, 2012- Ohio-1293, 965 N.E.2d 299. That case involved trust account issues; multiple counts of neglect; failure to inform clients; dishonest conduct; and failure to cooperate initially, “narrowly avoiding a default judgment.” *Id.* at ¶15. Mr. Malynn had prior suspensions for CLE and non-registration but had never been involved in a disciplinary proceeding. While Mr. Malynn claimed to have an anxiety disorder, he did not provide proof of the necessary elements to receive mediation credit for it. He was, however,

given good-character mitigation for his long service in the Marine Corps. The Court followed the Board's sanction recommendation and held that Mr. Malynn, when applying for reinstatement, must provide evidence as to his mental health and his competence to return to ethical practice.

After *Malynn*, the Court also issued a two-year suspension, with six-months stayed in *Trumbull Cty. Bar Assn. v. Large*, 134 Ohio St.3d 172, 2012-Ohio-5482, ___N.E.2d.___. Mr. Large had previously been suspended for failure to pay income taxes, and in this case, was charged with three counts of client neglect, mishandling client funds and failing to notify clients of his prior suspension. The Court adopted the Board's recommended sanction. The case did not involve substance abuse or mental health issues.

In November 2012, the Court issued a two-year unstayed suspension in *Cleveland Metro. Bar Assn. v. Westfall*, 134 Ohio St.3d 127, 2012-Ohio-5365, ___N.E. 2d___ (O'Donnell, C.J., dissenting). The case involved a lawyer who failed to keep bankruptcy clients reasonably informed about their cases, improperly withdrew from representation, did not properly supervise non-lawyer employees, and did not respond to the bar association's initial inquiries. The Court also found that Mr. Westfall engaged in improper advertising (by falsely posing as something other than a solo practitioner) and failed to remit payroll taxes for his employees. Aggravating factors found to be present included a pattern of misconduct, multiple offenses, lack of cooperation, harm to clients, and failure to make restitution. In mitigation, the Court recognized that Mr. Westfall had no prior discipline, exhibited a cooperative attitude during the panel proceedings, demonstrated good character and reputation, and had received other penalties for his failure to pay taxes. Although the Hearing Panel had recommended a two-year suspension with six months stayed, the Board and the Court felt that there should be no stay on the two-year

suspension. The Court conditioned reinstatement to practice on full restitution and payment of taxes owed.

Respondent contends that the sanction here should be a two-year suspension with 18 months stayed on conditions specified in the Stipulations. His argument for this suggestion is pinned primarily on two cases in which the Court issued fully-stayed suspensions. Relator suggests that neither of these cases is apposite here.

Respondent first cites *Butler Cty. Bar Assn. v. Minamyner*, 129 Ohio St.3d 433, 2011-Ohio-3642, 953 N.E.2d 315. Objections at 6. In that case, the respondent was charged with actions and inaction regarding a single client. Specifically, Mr. Minamyner failed to act with reasonable diligence; did not keep the client reasonably informed; did not advise the client that he did not maintain malpractice insurance; and mislead her by not telling that her case had been dismissed. Mr. Minamyner initially cooperated in the disciplinary investigation but failed to file an Answer to the Complaint. The matter went to the Court by default after a review by a Master Commissioner; however, at that point, respondent filed a response to the Show-Cause Order. He asserted that he suffered from posttraumatic-stress disorder (“PTSD”) arising out of a 2002 helicopter crash in which he suffered head trauma while serving in the Navy Reserve. The Court remanded the case to the Board for a panel hearing. In the absence of medical testimony offered by either party, the panel appointed an independent psychiatric evaluator who confirmed a nexus between the PTSD, Mr. Minamyner’s misconduct, and failure to respond. The Board recommended a two-year suspension with 18 months stayed. This Court, however, issued a one-year suspension, fully stayed on conditions (Stratton, J., concurring and O’Connor, C.J., Lansinger J., Cupp, J., dissenting [would fully stay the suspension]).

The Court's reasoning for the fully-stayed suspension in *Minamyer* clearly is not applicable to the instant case. It noted there that, "[s]ince respondent was first diagnosed with depression, PTSD and traumatic brain injury, he has received substantial treatment Realizing the seriousness of his conditions, respondent has also taken significant measures to ensure that his cognitive deficits will not have any negative effect on his clients." (Emphasis supplied). *Id.* at ¶22. Moreover, the Court pointed out that, "[t]his is the first disciplinary action that respondent has faced in his more than 30 years of practice, and it involves respondent's conduct with respect to a single client matter." *Id.* at ¶23

In contrast to Mr. Minamyer's nine years of comprehensive treatment and therapy, Respondent has only a few months of mental health treatment and, at this point, can hardly be said to have taken significant measures to protect clients from harm. Added to this is the fact that Respondent here was previously suspended indefinitely. These dissimilarities would seem to negate *Minamyer* as support for a fully or even largely-stayed suspension in this case.

In the other case cited by Respondent, *Disciplinary Counsel v. Meehan*, 133 Ohio St.3d 51, 2012-Ohio-3894, 925 N.E.2d 972, the Court faced an unusual matter in which the respondent's mental health problems were the direct cause of subsequent misconduct. When Mr. Meehan was suspended from practice for non-registration, he was experiencing a major depressive episode. Because of his depression, Mr. Meehan was not opening his mail which included the Notice of his suspension. Ignorant of the suspension, during the ensuing six months he filed eight eviction Complaints for a single client. When Mr. Meehan finally discovered that he had been suspended, he immediately stopped practicing until his registration issue was cleared up and his suspension was lifted. He then participated fully and freely in the disciplinary investigation, agreed to stipulations, and was cooperative during the panel hearing. The Panel

and Board held that Mr. Meehan had supplied proof of the requisite circumstances to allow for mitigation for his mental health condition, and that he had “undergone a sustained successful period of treatment” *Id.* at ¶8. He had also provided evidence of good character. The Court gave him a 24-month, fully-stayed suspension with conditions, including a monitored probation for an additional two-year period. Unlike Respondent in this case, Mr. Meehan had already dealt with his mental health issue sufficiently to give the Court confidence that the public would be protected. Thus, *Meehan* does not serve as precedent for Respondent’s sanction recommendation.

In neither *Meehan* nor *Minamyler* was there a prior indefinite suspension for dishonest conduct and substance abuse. There was no background of lapses from sobriety casting doubt on the lawyers’ ability to maintain ethical, professional behavior. Finally, there was no previously undiagnosed and untreated mental health issue. Thus, *Meehan* and *Minamyler* are inapplicable to the present matter.

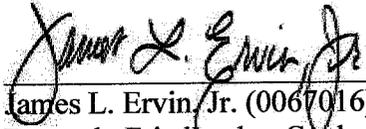
CONCLUSION

The Court has precious little assurance of Respondent’s near-term, let alone long-term, ability to ethically and professionally remain in practice, and/or to resume it after a short break. The only underpinning for the sanction Respondent would have the Court issue is the tenuous conclusion of the OLAP representative that he now has “the best foundation that I’ve ever seen in place since I started working with him in 2002” Hr’g. Tr. at 131-133. “. . . [h]e is beginning to make a significant turnaround again, with additional insight and knowledge about his mood disorder, his mental health diagnosis” (Emphasis supplied.) *Id.* at 135. Even as the OLAP representative made these tentative appraisals, she acknowledged that “. . . [t]here is

nothing that I've seen that will not produce a potential for relapse in the future, whether it be these stressors of other things that we've not yet protected." *Id.* at 131.

Given Respondent's history and the seriousness of his admitted misconduct, a better foundation and a guardedly optimistic prognosis is simply not enough to support his plea for a rapid return to practice. The Court should not entrust Respondent with a license to represent clients again, unless and until he has demonstrated -- for a sustained period -- a reliable ability to conform his actions and control his afflictions to a degree that truly will ensure that his clients will not be subjected to sub-standard legal services and the profession will not be tarnished by his misconduct. He should be suspended from practice for two years, and his readmission should be subject to rigorous conditions.

Respectfully submitted,

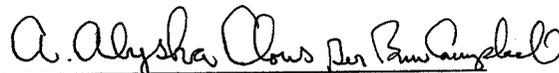


James L. Ervin, Jr. (0067016)
Benesch, Friedlander, Coplan & Aronoff, LLP
41 S. High Street, Suite 2600
Columbus, OH 43215
(614) 223-9300 / (614) 223-9330 (fax)
jervin@beneschlaw.com

COUNSEL OF RECORD FOR RELATOR



Bruce A. Campbell (0010802)
Columbus Bar Association
175 South Third Street, Suite 1100
Columbus, Ohio 43215-5134
(614) 340-2053 / (614) 221-4850 (fax)
bruce@cbalaw.org



A. Alysha Clous (0070627)
Columbus Bar Association
175 South Third Street, Suite 1100
Columbus, Ohio 43215-5134
(614) 340-2034 / (614) 221-4850 (fax)
alysha@cbalaw.org

COUNSEL FOR RELATOR

CERTIFICATE OF SERVICE

I certify that on this 11th day of February 2013, I mailed a true copy of Relator's Response to Respondent's Objections to Respondent Sterling E. Gill, II, Esq., at his registration address, 1445 Garywood Ave., Columbus, OH 43227 and to his counsel, Kenneth R. Donchatz, Esq., 35 North Fourth St., Ste. 200, Columbus, OH 43215.

A handwritten signature in black ink, appearing to read "Bruce A. Campbell", written over a horizontal line.

Bruce A. Campbell (0010802)