

ORIGINAL

IN THE SUPREME COURT OF OHIO

In re:
Complaint Against
SHAWN J. BROWN (0079331)
1460 Ansel Road
Cleveland, OH 44113
Respondent,

CASE NO. 2013-1885

**RELATOR'S MOTION TO
REMAND TO INITIATE DEFAULT
PROCEEDINGS AND CLAIMS OF
RESTITUTION**

**CLEVELAND METROPOLITAN
BAR ASSOCIATION**
1301 East Ninth Street - Second Level
Cleveland, OH 44114-1253
Relator.

FILED
MAY 12 2014
CLERK OF COURT
SUPREME COURT OF OHIO

Relator, Cleveland Metropolitan Bar Association, by its undersigned counsel, hereby moves this Honorable Court pursuant to Gov. Bar R. V(6a)(D) for an Order remanding this action to the Board of Commissioners on Grievances and Discipline in order to seek permanent disbarment of Respondent Shawn J. Brown.

On December 2, 2013, the Board of Commissioners on Grievances and Discipline certified Respondent's default for failing to file an answer to Relator's Complaint. The Complaint alleged Respondent continued to practice law while under suspension, accepted fees and neglected legal matters, made material misrepresentations to his clients about the status of their legal matters, and failed to cooperate with Relator's investigation of the ten grievances filed against him.

If this Honorable Court grants this Motion, Relator intends to file a Motion to Initiate Default Proceedings pursuant to Gov. Bar R. V(6a)(F), setting forth sworn and

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certified documentary evidence supporting the allegations in its Complaint. Relator's Motion for Default will demonstrate that disbarment is the proper sanction in this matter, and Respondent's former clients are entitled to restitution based on Respondent's misconduct.

Respectfully Submitted,



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Attorneys for Relator, Cleveland Metropolitan Bar Association

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2014, a copy of Relator's Motion to Remand to Initiate Default Proceedings and Claims of Restitution was sent to Respondent Shawn J. Brown, via certified and regular U.S. Mail, at his last known address:

Shawn J. Brown
1460 Ansel Road
Cleveland, OH 44113



Andrew C. Geronimo (#0086630)

Attorney for Relator, Cleveland Metropolitan Bar Association