ORIGINAL

THE SUPREME COURT OF OHIO

LORAIN COUNTY BAR ASSOC.	)	**CASE NO.** 2014-1516
Relator,	)	**RELATOR'S NOTICE OF FILING INVESTIGATIVE SUMMARY WITH EXHIBITS *OMITTED* IN SUPPORT OF RELATOR'S BRIEF IN OPPOSITION TO RESPONDENT'S REQUEST TO TERMINATE INTERIM DEFAULT SUSPENSION**
v.	)	
RAMI MAJED AWADALLAH	)	
Respondent.	)	

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Now comes Relator, Lorain County Bar Association, by and through the undersigned Bar Counsel, and respectfully submits its Investigative Summary With Exhibits in Support *Omitted* in Support of Relator's Brief in Opposition to Respondent's Request to Terminate Interim Default Suspension: Motion to Convert Interim Default Suspension to Interim Remedial Suspension. (See Exhibit "A," Investigative Summary, attached and incorporated herein.)

Relator has filed concurrently herewith its Brief in Opposition to Respondent's Request to Terminate Interim Default Suspension: Motion to Convert Interim Default Suspension to Interim Remedial Suspension.

In support of the Brief, and in support of Relator's efforts to convince this Honorable Court to maintain, in one iteration or another, the Interim Suspension imposed upon Respondent, Relator submits it Investigative Summary originally filed with The Board to give this Court additional information and background on the allegations

FILED
OCT 24 2014
CLERK OF COURT
SUPREME COURT OF OHIO

contained in the Certified Complaint so that the Court may have a full picture of the seriousness and breadth of Respondent's alleged misconduct.

Respectfully, the Exhibits in Support of the Investigative Summary have been omitted in the interest of brevity as they comprise Twenty Seven (27) Exhibits, many certified and/or sworn to, including Affidavits, and consist of almost 200 pages.

WHEREFORE, for the forgoing reasons, Relator respectfully notifies this Honorable Court and all parties of the filing of Relator's Investigative Summary With Exhibits in Support *Omitted* in support of Relator's efforts to maintain, in one iteration or another, the previously ordered Interim Suspension of Respondent's license to practice law.

Respectfully Submitted,

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Bar Counsel - Attorney for Relator

PROOF OF SERVICE

This is to certify that a copy of the foregoing Notice of Filing was sent to the following by way of Regular U.S. mail this 23rd day of October, 2014:

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BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

BEFORE THE BOARD OF COMMIONERS
ON GRIEVANCES AND DISCIPLINE
OF
THE SUPREME COURT OF OHIO

In re:	:	
LORAIN COUNTY BAR ASSOCIATION: LEGAL ETHICS AND GRIEVANCE COMMITTEE c/o Lorain County Bar Association The Lawyer's Loft 627 W. Broad Street Elyria, Ohio 44035	: : : :	**CASE NO.** **INVESTIGATIVE SUMMARY**
Relator,	:	
-v-	:	
RAMI M. AWADALLAH, ESQ. Bernlohr, Niekamp, & Weisensell, LLP 23 South Main Street, Third Floor Akron, Ohio 44308 Registration No. 0079468	: : :	
Respondent.	:	

::::::::::::::::::

NOW COMES Relator, Lorain County Bar Association Legal Ethics and Grievance Committee, by and through the undersigned Bar Counsel, and alleges that Respondent, Rami M. Awadallah (Registration No. 0079468) Attorney at Law, duly admitted and in good-standing to practice law in the State of Ohio, is guilty of the misconduct more fully described below.

EXHIBIT
A

Relator respectfully submits the following Investigative Summary of Information and Exhibits in Support of its Complaint.

I. INTRODUCTION

Respondent, Rami M. Awadallah ("Respondent"), was admitted to the practice of law in the State of Ohio on November 7, 2005 and is subject to the Code of Professional Responsibility; The Ohio Rules of Professional Conduct; and, the Ohio Supreme Court Rules for the Government of the Bar.

Respondent has prior Discipline from the Supreme Court of Ohio, to wit:

A) Attorney Registration Suspension – 12/3/2007;

B) CLE Sanction – 12/17/2010;

C) CLE Sanction & Suspension – 11/13/12.

Respondent's current status as an attorney in the State of Ohio is "Active." (Exhibits "1(a-c)," attached and incorporated herein.)

Respondent is also currently licensed to practice law in the State of West Virginia and was duly admitted to that State's Bar on October 11, 2007. However, Respondent's current status as an attorney in the State of West Virginia is "Suspended" due to non-compliance with mandatory CLE requirements. (Exhibits "2(a-b)," attached and incorporated herein.)

On March 12, 2013 a Grievance ("The Grievance") was filed with the Lorain County Bar Association ("LCBA.") (Exhibit "3," attached and incorporated herein.)

The complaining party is one John P. Kilroy, Esq. ("Attorney Kilroy"). Attorney Kilroy is an Assistant Prosecuting Attorney for the Lorain County Prosecutor's Office and the Attorney for the Lorain County Auditor.

As a result of the foregoing, on May 6, 2013 Attorney Meckler sent Respondent a copy of Attorney Kilroy's May 3, 2013 letter (the "Third Request.") (Exhibit "10," attached and incorporated herein.)

Respondent failed and refused to respond to this request.

On May 8, 2013 Attorney Kilroy sent Attorney Meckler yet another correspondence with additional information regarding allegations of Respondent's misconduct. (Exhibit "11," attached and incorporated herein.)

On May 9, 2013 Attorney Kilroy forwarded an email from Jill Hall, Brown County Auditor, to Attorney Meckler regarding additional allegations of misconduct against Respondent. (Exhibit "12," attached and incorporated herein.)

As a result of the foregoing, on May 15, 2013 Attorney Meckler sent Respondent a copy of Attorney Kilroy's May 8, 2013 and May 9, 2013 letters and again requested that Respondent reply (the "Fourth Request.") (Exhibit "13," attached and incorporated herein.)

Respondent failed and refused to respond to this request.

On May 17, 2013 Attorney Meckler wrote Attorney Kilroy and requested that Attorney Kilroy re-send a CD-ROM that had information regarding The Grievance. Attorney Kilroy re-sent the CD-ROM to Attorney Meckler with the additional information contained therein regarding the "Albino" hearing. (Exhibit "14," attached and incorporated herein.)

On May 29, 2013 Attorney Kilroy sent Attorney Meckler yet another correspondence with yet additional information regarding allegations of Respondent's misconduct. (Exhibit "15," attached and incorporated herein.)

On June 18, 2013 Attorney Kilroy sent Attorney Meckler another correspondence with additional information regarding allegations of Respondent's misconduct. (Exhibit "16," attached and incorporated herein.)

As a result of the foregoing, on June 19, 2013 Attorney Meckler sent Respondent copies of Attorney Kilroy's May 29, 2013 and June 18, 2013 letters and again requested that Respondent reply (the "Fifth Request.") (Exhibit "17," attached and incorporated herein.)

Respondent failed and refused to respond to this request.

On June 21, 2013 Attorney Kilroy sent Attorney Meckler yet another correspondence with additional information regarding allegations of Respondent's misconduct. (Exhibit "18," attached and incorporated herein.)

As a result of the foregoing, on June 25, 2013 Attorney Meckler sent Respondent a copy of Attorney Kilroy's June 21, 2013 letter and again requested that Respondent reply (the "Sixth Request.") (Exhibit "19," attached and incorporated herein.)

Respondent failed and refused to respond to this request.

On August 7, 2013 Attorney Meckler sent Respondent, via Certified U.S. Mail, Return Receipt Requested, information regarding a new, but related Grievance (the "Simonson Investments, Inc. Grievance") and instructed Respondent to reply within 20 days, or by August 27, 2013 (the "Seventh Request.") (Exhibit "20," attached and incorporated herein.)

Respondent failed and refused to respond to this request.

On October 17, 2013 Attorney Kilroy sent to Attorney Meckler and undersigned Bar Counsel a copy of an Ohio Board of Tax Appeals Order finding Respondent in

contempt and ordering him to reimburse the Lorain County Board of Revision and the Lorain County Auditor the sum of $8,529.76. (Exhibit "21," attached and incorporated herein.)

On October 21, 2013 Attorney Kilroy sent to Attorney Meckler and undersigned Bar Counsel a "Letter from 74 Ohio Treasurers" sent to Ohio Attorney General Mike DeWine alleging additional misconduct against Respondent and warning the public about him. (Exhibit "22," attached and incorporated herein.)

As such, other than Respondent's incomplete and inadequate reply of April 9, 2013, Respondent failed and refused to reply, respond, or cooperate with the investigation instituted by The Committee and completely ignored six (6) letters of inquiry sent from the investigator.

On July 29, 2013 at a regularly scheduled meeting of The Committee, affirmative votes were recorded finding probable cause that Respondent had committed multiple violations of the Ohio Rules of Professional Conduct and the Ohio Supreme Court Rules for the Government of the Bar.

The matter was thereafter assigned to Attorney D. Chris Cook, undersigned, a member of The Committee and Bar Counsel to LCBA, for prosecution. (Exhibit "23," Affidavit of Steven G. Meckler, attached and incorporated herein.)

On April 24, 2014 a Notice of Intent to File and copy of the Certified Complaint were emailed to Respondent. (Exhibits "24," NITF & "25," E-Mail, respectively, attached and incorporated herein.)

Pursuant to the Notice of Intent to File and the local rules of The Committee, Respondent was given the opportunity to appear at a regularly schedule meeting of The

Committee to address the Certified Complaint, Investigative Summary, and allegations contained therein.

As of the date of service of the Certified Complaint, it is unknown whether Respondent will attend the meeting of The Committee, though he indicated that he would.

In addition to the above, Respondent has never produced professional liability insurance for the periods of representation at issue.

II. FACTUAL ALLEGATIONS

A) ATTORNEY JOHN P. KILROY GRIEVANCE

As previously stated, the Grievant, Attorney Kilroy, is an Assistant Prosecuting Attorney for the Lorain County Prosecutor's Office and the Attorney for the Lorain County Auditor. (Exhibit "26," Affidavit of John P. Kilroy, attached and incorporated herein.)

Attorney Kilroy became aware of Respondent's misconduct as a hearing board member of the Lorain County Board of Revision ("LCBR"). (Exhibits "3" & "26.")

On March 29, 2012 Respondent filed a complaint against the Valuation of Real Property with LCBR, Case No. 2012-1306, on behalf of one Keith Moore ("Moore"), the property owner of real estate located at 1607 Missouri Avenue, Lorain, Ohio 44052.

Moore did not retain Respondent or authorize Respondent to file the Complaint on his behalf. Respondent submitted in his Reply to the Committee that he filed the Complaint on behalf of the previous owner of the property, Adana Realty Co., with its consent. (Exhibits "3" & "26.")

Respondent specifically stated that he was retained by a Third-Party, Tax Compliance Services, to file seven Complaints with LCBR on behalf of Adana Realty Co. seeking reductions in valuation for certain property owners. (Exhibit "5.")

Respondent further stated that he was unaware that Adana Realty Co. was no longer the owner of the property subject to the complaint in LCBR 2012-1306, yet when Respondent filed the Complaint in LCBR 2012-1306, he identified Keith Moore as the owner of the subject property. (Exhibits "7" & "26.")

On August 6, 2012 Respondent failed to appear at the scheduled hearing before the LCBR on Moore's complaint. Due to Respondent's failure to appear at the hearing and the absence of evidence presented to the LCBR, LCBR dismissed the complaint. (Exhibits "7" & "26.")

On October 22, 2012 Respondent filed a notice of appeal with the Ohio Board of Tax Appeals (hereinafter, "OBTA"), on behalf of Moore; when Respondent filed the Notice of Appeal to the OBTA, he identified Keith Moore as the owner of the subject property.

Respondent did not advise Moore of the appeal to the OBTA. Moore became aware that a property tax appeal was pending when he received a hearing notice from the OBTA. And, Moore did not initiate a tax appeal on his property, nor did he authorize Respondent to do so; did not engage the services of Respondent or retain Respondent for any purpose at any time; and, upon information and belief, Moore has never met Respondent. (Exhibits "7" & "26.")

In addition to filing a complaint on behalf of Moore with the LCBR, Respondent filed complaints on behalf of numerous other individuals with the LCBR in March, 2012 but failed to appear at *any* of the respective hearings, including:

A. Daniel Gerbick: LCBR #2012-1377

B. Six Lions Development: LCBR #2012-646

C. Andrew & Cassandra Burns: LCBR #2012-1398

D. 2217 Wisteria: LCBR #2012-723

E. Timothy and Lisa Volzer: LCBR #2012-1358

F. Raymond & Jo Ann Nedwick: LCBR #2012-1391

G. Arthur & Carol Gibbs: LCBR #2012-1391

H. Monica Seo: LCBR # 2012-655

I. Daniel & Neimaliz Ortiz: LCBR #2012-1301

Respondent did not waive the hearings or communicate to the LCBR that he would not appear at said hearings. As a result of Respondent's failure to prosecute the complaints and the lack of evidence presented before LCBR, LCBR denied the requested valuations. (Exhibits "7" & "26.")

Respondent failed to obtain his clients' informed consent to waive the hearings and failed to inform them of the potential adverse consequences of failing to appear at said hearings. (Exhibits "7" & "26.")

In addition to the above, Respondent filed complaints on behalf of numerous individuals but failed to appear at the respective hearings on May 1, 2013 including:

A. Victor & Laverne Sedivec: LCBR #2013-678

B. Victor Sedivec: LCBR #2013-679

C. Elizabeth Smith: LCBR #2013-684

D. Elizabeth Smith: LCBR #2013-685

E. Iplan Group, LLC: LCBR #2013-686

F. Leon Hamrick: LCBR #2013-687

Respondent did not waive the hearings or communicate to the LCBR that he would not appear at said hearings. (Exhibits "9" & "26.")

In addition to the above, Respondent failed to appear at nine hearings on the May 6, 2013 docket of LCBR for which he was either the Complainant/Agent or listed as attorney of record on the complaint form. (Exhibits "11" & "26.")

In those cases, the client/property owners appeared at three of the hearings on the May 6, 2013 LCBR docket but Respondent did not.

On May 6, 2013 in LCBR 2013-791, the client property/owner, Carmen Albino, stated under oath that she did not authorize Respondent to represent her and was unaware that he was doing so. (Exhibits "11" & "26.")

Further, on March 25, 2013 Respondent filed a complaint against the Valuation of Real Property with LCBR on behalf of Terry J. Liebhardt ("Liebhardt"), the property owner. (Exhibits "15" & "26.")

On May 9, 2013 Respondent again failed to appear at the scheduled hearing before LCBR; Liebhardt never authorized or retained Respondent to act his attorney; Liebhardt did not wish to file a complaint with the LCBR or intend to seek a reduction in valuation and Liebhardt never met Respondent. (Exhibits "15 & "26.")

In addition to the above, on March 25, 2013 Respondent filed a complaint against the Valuation of Real Property with LCBR on behalf of Matthew Pedraza ("Pedraza"), the property owner. (Exhibits "15" & "26.")

On May 9, 2013 Respondent failed to appear at the scheduled hearing before LCBR for Pedraza's case; Pedraza never authorized or retained Respondent to act his attorney; and, Pedraza never met Respondent.

Pedraza received unsolicited mail from a company known as Tax Compliance Services which Respondent has some unknown relationship with.

Respondent invoiced Pedraza $150.00 plus late fees for services that Pedraza did not request or authorize. (Exhibits "15" & "26.")

In toto, Respondent filed twenty-five (25) complaints with LCBR in 2012 and 2013 yet failed to appear at a single hearing for any of them. (Exhibits "16" & "26.")

Further, Respondent filed a complaint against the Valuation of Real Property, LCBR #2013-01431, with LCBR on behalf of Betty Jane Coates ("Coates"). (Exhibits "18" & "26.")

Coates received notice from LCBR regarding a hearing on her complaint and contacted LCBR to advise that although she had received solicitations from Tax Compliance Services, she did not approve of any filing of a complaint for her property.

Coates has been invoiced by Tax Compliance Services and has been pressured about incurring possible late charges. (Exhibits "18" & "26.")

In addition to the above, Respondent filed four complaints against the Valuation of Real Property for individual property owners which were scheduled for hearings on June 17, 2013 at the Lorain County Administration Building in front of LCBR.

In each of the respective cases, Respondent filed a Notice Waiving Appearance at the hearing on behalf of each of the property owners and in each of the respective cases, the property owners appeared at their respective hearings and stated that they had no knowledge of a waiver being filed on their behalf.

Moreover, each property owner indicated to LCBR that he or she wanted a hearing.

On July 25, 2013 the Lorain County Prosecutor's Office ("The Prosecutor") filed a *Motion to Dismiss: Motion for Sanctions* with OBTA relative to several of the aforementioned complaints. (Exhibits "21" & "26.")

The Prosecutor filed motions in each appeal before OBTA requesting that they be dismissed and that Respondent be suspended from appearing or practicing before the OBTA on the basis of his involvement in the preparation and filing of the initial complaints with the LCBR and his subsequent filing of appeals with the OBTA, both of which The Prosecutor believed to be frivolous. (Exhibits "21" & "26.")

On September 4, 2013 a hearing was held before OBTA wherein The Prosecutor presented testimony that Respondent has frequently been involved in the filing of complaints with both LCBR and appeals with OBTA and routinely fails to appear or waive hearings scheduled by both tribunals. (Exhibits "21" & "26.")

In addition, OBTA received testimony from a property owner, Lawrence Adams ("Adams"), who indicated that he engaged the services of Tax Compliance Services to assist in the tax valuation process.

Adams testified that Tax Compliance Services offered several packages, depending upon the level of service desired, with varying fees, and that due to his lack of

familiarity with tax matters, he selected the more expensive option which ensured the presence of an attorney at future valuation proceedings. (Exhibits "21 & "26.")

Adams also testified that he understood that Respondent would be his representative although he had no direct communication with Respondent and that all of his interactions were with the administrative personnel of Tax Compliance Services.

Based on the September 4, 2013 hearing and the testimony presented therein, OBTA issued an order in, *Simonson Investments, et al. v . Lorain Cty. Bd. of Revision* (Interim Order, Sept. 5, 2013), OBTA No. 2013-1852, et al. unreported, requiring Respondent to appear for a hearing on September 30, 2013 to show cause why sanctions should not be imposed. (Exhibits "21" & "26.")

Despite the show cause order, Respondent did not appear before OBTA nor did he appear as scheduled at other merit hearings on the same date. Regardless, The Prosecutor presented information reflecting time and expenses incurred in prosecuting the sanctions sought and requested fees in the amount of $3,529.76.

After hearing the matter, OBTA issued a sanction against Respondent ordering him to remit to The Prosecutor $8,529.76 for the costs sought by The Prosecutor, *plus* the costs of the two sanctions hearings convened and a punitive award to be paid within fourteen (14) days of the issuance of the order. (Exhibits "21" & "26.")

Finally, upon information and belief, during the listed periods of representation, Respondent did not at all times carry professional liability insurance or advice any of his clients (both those he was authorized to represent and those that he was not) of this fact.

B) SIMONSON INVESTMENTS, INC. GRIEVANCE

The Grievants in this matter, Cliffton Simonson and Mary Beth Simonson ("The Simonsons"), are the sole owners of Simonson Investments, Inc. ("SII"). (Exhibits "20" & "26.")

SII owns certain rental properties, five of which are the subject of the instant grievance.

On November 30, 2012 SII received a solicitation from Tax Compliance Services which advertised their services and offered a 100% guaranteed reduction in real estate taxes and further indicated that they offered a money back guarantee if the property owner's taxes were not reduced by at least $125.00 which was the one-time filing fee for the tax reduction. (Exhibits "20" & "26.")

On January 1, 2013 Mary Beth Simonson contacted Tax Compliance Services who provided evaluations of five (5) of SII's rental properties which Tax Compliance Services represented would be worth pursuing tax reductions on through LCBR.

Tax Compliance Services initially quoted The Simonsons a fee of $100.00 per parcel plus and additional $25.00 for attorney fees to obtain their services.

On January 23, 2103 The Simonsons received an invoice from Tax Compliance Service charging $150.00 per parcel for their services. The Simonsons inquired as to why they were not charged according to the initial quote and were advised by Tax Compliance Services that the additional $25.00 fee was added because Tax Compliance Services was filing on behalf of a corporation. (Exhibits "20" & "26.")

On March 21, 2013 The Simonsons paid $750.00 to Tax Compliance Services and on April 11, 2013 SII received copies of hearing notices which were issued to Respondent

one month and further advised that it would cost The Simonsons an additional $150.00 per parcel to have an attorney represent SII before the OBTA. (Exhibits "20" & "26.")

On June 19, 2013 SII received correspondence from Tax Compliance Services confirming that it appealed the LCBR's decision to the OBTA and that there would be no additional charges for their services.

SII was further advised by Tax Compliance Services that SII would receive a Notice of Filing and a Merit Hearing Notice directly from OBTA and directed SII to immediately forward the Notice to Tax Compliance Services.

On July 25, 2013 the Lorain County Prosecutor's Office ("The Prosecutor") filed a *Motion to Dismiss: Motion for Sanctions* with OBTA relative to SII's Appeal. The Simonsons' appeals were not dismissed by the OBTA, however, Respondent was sanctioned in an amount of $8,529.76 for the costs sought by The Prosecutor, plus the costs of the two sanctions hearings convened and a punitive award to be paid within fourteen (14) days of the issuance of the order. (Exhibits "20," "21," & "26.")

Finally, in addition to the above, upon information and belief, during the listed periods of representation, Respondent did not at all times carry professional liability insurance or advice The Simonsons or SII of this fact.

III. ETHICAL VIOLATIONS

All as outlined above, Respondent failed to diligently represent his clients (both those he was authorized to represent and those that he was not) by failing to do anything other than file complaints (generally without his "client's" knowledge) which were usually thereafter dismissed without the consent, permission, or knowledge of his clients due to Respondent's failure to prosecute the complaints or appear at hearings.

As a direct and proximate result of Respondent's failure to act diligently, multiple clients (both those he was authorized to represent and those that he was not) were harmed by the dismissal of their claims.

As a further direct and proximate result of Respondent's failure to act diligently, multiple governmental agencies were harmed by processing numerous complaints and/or appeals that were never prosecuted, by scheduling untold hearings that did not go forward, and by managing cases that were frivolous and/or often filed without the informed consent of the "clients."

Respondent's failure to represent his clients (both those he was authorized to represent and those he was not) with reasonable diligence constitutes a violation of **ORPC 1.3**.

Further, Respondent failed to properly and adequately communicate with his clients (both those he was authorized to represent and those that he was not) as a result of the following:

A. Failing to reasonably consult with his clients about the status of their cases;

B. Failing to return emails, make telephone calls, or schedule appointments;

C. Failing to communicate with his clients regarding the filing of a lawsuits and/or complaints;

D. Failing to advise or discuss with his clients the voluntary dismissals of their claims and/or the dismissal of their claims to due his failure to prosecute them and the ramifications thereto.

Respondent's failure to properly and adequately communicate with his clients (both those he was authorized to represent and those that he was not) constitutes a violation of **ORPC 1.4(a)(1-4)**.

In addition, at all times relevant hereto, Respondent was required by the Ohio Rules of Professional Conduct to either maintain professional liability insurance or to inform his clients in writing that he did not.

Upon information and belief, during the entire course of Respondent's representation of the multiple clients at issue (both those he was authorized to represent and those that he was not), upon information and belief, Respondent failed to either maintain professional liability insurance or inform his clients in writing that he did not.

Respondent's failure to either maintain professional liability insurance or inform his clients (both those he was authorized to represent and those that he was not) in writing that he did not constitutes a violation of **ORPC 1.4(c)**.

Respondent also engaged in a business relationship with a company known as Tax Compliance Services.

Upon information and belief, Respondent.

A) Shared legal fees with a non-lawyer;

B) Formed a partnership with a non-lawyer where activities consist of the practice of law.

Respondent's professional relationship with Tax Compliance Services may constitute a violation of **ORPC 5.4(a)**.

Further, and also upon information and belief, Respondent,

A) Controls an interest in a business that provides law-related service and requires customers of the business to agree to legal

representation by Respondent as a condition of the engagement of that business;

B) Failed to disclose his interest in Tax Compliance Services to his clients (both those he was authorized to represent and those that he was not); and

C) Failed to disclose to his clients (both those he was authorized to represent and those that he was not) that those clients who were customers of Tax Compliance Services could obtain legal services elsewhere before performing legal services for them.

Respondent's professional relationship with Tax Compliance Services also may constitute violations of **ORPC 5.7(b)**.

In addition, Respondent failed on multiple occasions to cooperate with the investigation by The Committee.

Examples of Respondent's failure to cooperate include, but are not limited to:

A. Respondent's failure to timely, adequately, and properly respond to the initial letter of inquiry sent by Attorney Meckler;

B. Respondent's failure to ever respond *to any* of the six (6) additional letters of inquiry sent by Attorney Meckler;

C. Respondent's failure to cooperate, participate, or in any way, shape, or form engage in the investigation by The Committee that pended from March 18, 2013 to August 7, 2013- a period of five (5) months.

Respondent's failure to cooperate in a disciplinary investigation constitutes violations of **ORPC 8.1(b)** and **Gov. Bar R V§4(G)**.

Moreover, by holding himself out as representing multiple individuals in numerous forums that he had no professional relationship with or authorization or consent to represent, Respondent engaged in dishonest, fraudulent, and deceitful conduct

and misrepresented himself to multiple governmental forums and agencies as an attorney with the authority to act on his "clients" behalf.

As alleged above, Respondent accepted compensation from some of the clients he represented yet gave them no value by way of legal services for the funds he received as most, if not all, of the complaints he filed were dismissed for want of prosecution.

Respondent's dishonesty, fraud, deceit, and misrepresentation constitute violations of **ORPC 8.4(c)**.

Finally, as alleged above, multiple governmental agencies were harmed by processing numerous complaints and/or appeals that were never prosecuted; by scheduling untold hearings that did not go forward; and, by managing cases that were frivolous and/or often filed without the informed consent of the "clients."

Respondent's misconduct constitutes violations of **ORPC 8.4(d)**. (Exhibit "27," Affidavit of D. Chris Cook, Bar Counsel, attached and incorporated herein.)

IV. CONCLUSION

It is the position of The Committee and counsel undersigned that Respondent, Rami M. Awadallah, committed eight (8) violations of the Ohio Rules of Professional Conduct and multiple violations of the Ohio Rules For The Government of The Bar as outlined above and that this matter should be certified by the Board of Commissioners on Grievances and Discipline of the Supreme Court of Ohio for prosecution.

Respectfully submitted,

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PROOF OF SERVICE

The undersigned represents that a copy of the foregoing Investigative Summary With Exhibits in Support was served upon the following via Hand-Delivery and/or Fed-Ex this 25th day of April, 2014:

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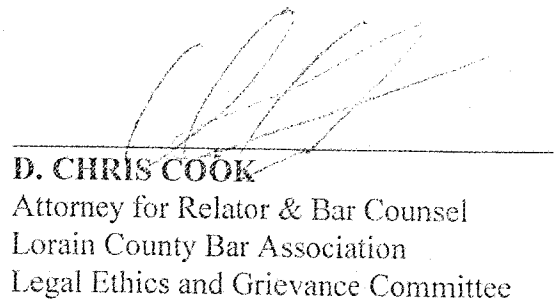

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