

IN THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL,	:	
	:	CASE NO.: 2014-1905
Relator,	:	
	:	
	:	RELATOR’S MEMORANDUM
	:	IN OPPOSITION TO
	:	RESPONDENT’S MOTION TO
	:	DISSOLVE THE INTERIM
	:	REMEDIAL SUSPENSION
HON. ANGELA ROCHELLE STOKES,	:	ORDER OF DECEMBER 18,
	:	2014
Respondent.	:	

**RELATOR’S MEMORANDUM IN OPPOSITION TO RESPONDENT’S MOTION TO
DISSOLVE THE INTERIM REMEDIAL SUSPENSION ORDER
OF DECEMBER 18, 2014**

Introduction

This Court should deny Respondent’s Motion to Dissolve the Interim Remedial Suspension of December 18, 2014 (“Motion to Dissolve”), as it is procedurally improper and substantively deficient. Moreover, it rehashes the same arguments respondent raised in her *first* Motion to Dissolve, which this Court promptly denied on February 6, 2015.

Background and Procedural History

On October 14, 2013, relator filed a seven-count complaint against respondent. After filing the complaint, additional matters relating to respondent’s conduct were brought to relator’s attention, thus revealing that respondent had not only engaged in misconduct during the disciplinary investigation, but also after the filing of the formal complaint. After investigation of these additional matters, relator filed an eight-count First Amended Complaint against respondent on April 24, 2014.

One month before relator filed its First Amended Complaint, Judge Ronald B. Adrine, the Administrative and Presiding Judge of the Cleveland Municipal Court, issued a series of administrative orders removing respondent's criminal docket from her. Following the removal of respondent's criminal docket, Judge Adrine reported that the morale and productivity of the Cleveland Municipal Court had increased and that only one new complaint had been filed against respondent, who was then presiding solely over civil matters. *See* ¶¶ 32-33 of Judge Adrine's Affidavit, Attached to Relator's Motion for Immediate Interim Remedial Suspension as Ex. 2. Accordingly, while relator had given serious consideration to requesting an interim remedial suspension near the time of the amended complaint, relator ultimately determined that such action was not necessary given the fact that respondent was no longer presiding over criminal cases.

In late March 2014, however, respondent challenged Judge Adrine's administrative orders by filing a Complaint in Quo Warranto, Mandamus, and Prohibition with this Court requesting that her criminal docket be restored. *See* Case No. 2014-0467. On September 3, 2014, this Court dismissed respondent's writs of quo warranto and mandamus, but granted an alternative writ of prohibition. In accordance with this Court's alternative writ, Judge Adrine issued an administrative order on September 17, 2014 ostensibly restoring respondent's criminal docket to her, but delaying execution of the order until this Court had ruled on a Motion for Clarification that he filed, through counsel, on September 22, 2014.

In light of Judge Adrine's September 17, 2014 administrative order and this Court's granting of an alternative writ, it appeared likely that respondent's criminal docket would soon be restored. This, coupled with respondent's inability to admit any wrongdoing and her belief that the voluminous allegations in the First Amended Complaint were nothing but a conspiracy

against her, led relator to conclude that respondent's return to the bench would pose a substantial threat of serious harm to the public. Judge Adrine confirmed relator's belief. As stated in his affidavit,

I have seen major improvements in morale and productivity across all platforms at the court since criminal caseload responsibilities were temporarily transferred from Judge Stokes, pending the outcome of the disciplinary complaint against her. The restoration of Judge Stokes to criminal caseload responsibilities will reverse these improvements both as it relates to the public's perception of the court in the efficient, effective, timely, and professional administration of justice. Based upon prior experience, there is no reason to believe that Judge Stokes will modify her behavior if criminal caseload responsibilities are restored, and in fact, I believe that if her complaint for a Writ of Prohibition is granted, she will feel empowered and emboldened and that her conduct is likely to become even more stringent.

See ¶ 36 of Judge Adrine's Affidavit, Attached to Relator's Motion for Immediate Interim Remedial Suspension as Ex. 2. Accordingly, on November 4, 2014, relator filed a Motion for Immediate Interim Remedial Suspension to prevent the substantial threat of serious harm to the public from occurring.

On November 12, 2014, respondent requested an extension of time to respond to relator's Motion for Immediate Interim Remedial Suspension, including with her request over 200 pages of exhibits. This Court allowed respondent until November 24, 2014 to respond. On November 24, 2014, respondent filed a 12-page Memorandum in Opposition to Relator's Motion for Immediate Interim Remedial Suspension, a nine-page personal affidavit, and 33 exhibits consisting of over 500 pages (conservatively) of transcripts, journal entries, probation reports, etc. in support of her Memorandum in Opposition. After considering relator's Motion for Immediate Interim Remedial Suspension and respondent's Memorandum in Opposition, this

Court—in a unanimous decision—determined that respondent posed a substantial threat of serious harm to the public and suspended her on an interim basis effective December 18, 2014.

On January 20, 2015, respondent filed a “Motion for Dissolution or Modification of Order of Suspension under Gov. Bar R. V(5a)(C)(1).”¹ Respondent spent the first 96 pages of her 196-page motion attacking Judge Adrine’s affidavit. On February 6, 2015, this Court denied respondent’s motion. Respondent now seeks to dissolve her interim remedial suspension under Gov. Bar R. V(19)(C)(2) by again attacking Judge Adrine’s affidavit. For the reasons that follow, this Court should deny respondent’s motion.

Relator’s Memorandum in Opposition

1. Respondent’s Motion to Dissolve is Procedurally Improper.

Respondent’s Motion to Dissolve is procedurally improper as it is out-of-rule. Gov Bar R. V(19)(C)(2) states, in relevant part:

In addition to the motion allowed by division (C)(1) of this section, the respondent may file a motion requesting dissolution of the interim remedial suspension order, alleging that one hundred eighty days have elapsed since the entry of the order and the relator has failed to file with the Board a formal complaint predicated on the conduct that was the basis of the order.

Respondent’s ability to file a motion to dissolve under (C)(2) is contingent upon relator failing to file a timely complaint predicated on the conduct that was the basis of the order. Contrary to respondent’s assertions, relator’s filing of the First Amended Complaint *before* this Court suspended respondent precludes respondent from moving to dissolve the Interim Remedial Suspension Order under Gov. Bar R. V(19)(C)(2). The allegations in the First Amended

¹ Respondent’s motion cites Gov. Bar R. V(5a)(C)(1); however, this was the prior rule. On January 1, 2015, this Court adopted substantial amendments to the Rules for the Government of the Bar of Ohio, which resulted in the renumbering of several provisions. The correct citation is Gov. Bar R. V(19)(C)(1).

Complaint, almost exclusively, formed the basis for relator's Motion for Immediate Interim Suspension. By respondent's own admission, 12 of the 19 incidents that were included in relator's Motion for an Immediate Interim Remedial Suspension were pled in the First Amended Complaint. Moreover, respondent is well aware that a 13th incident involving Tabbatha Toon is part of relator's case against respondent.²

Since a great majority of the instances identified in relator's Motion for an Immediate Interim Remedial Suspension were pled in the First Amended Complaint, there's no question this Court based its unanimous decision to suspend respondent upon the voluminous allegations that were contained in the First Amended Complaint, which was attached to relator's Motion for an Immediate Interim Suspension as Exhibit 5. Relator's Motion for an Immediate Interim Remedial Suspension was *not* limited to the 19 instances of misconduct that were specifically set forth in the body of the motion. In fact, in its motion, relator stated, "The following are just some examples of respondent's misconduct. Additional examples can be found in the First Amended Complaint, filed by relator in April 2014 and attached hereto as Exhibit 5." There is simply no conceivable way for the Court to have suspended respondent without considering the allegations contained in the First Amended Complaint.

Gov. Bar R. V(19)(C)(2) is a procedural safeguard aimed at ensuring that a respondent under an interim suspension is afforded due process by requiring the relator to file formal disciplinary charges in a timely manner. Because relator had already filed the charges that formed the basis for this Court's order suspending respondent, Gov. Bar R. V(19)(C)(2) is inapplicable.

² Information regarding Ms. Toon was first provided to respondent on April 24, 2014 in response to her First Set of Interrogatories. On July 21, 2014, Ms. Toon was officially identified as a witness, and on October 14, 2014, relator specifically advised respondent that Ms. Toon would testify about her experiences in respondent's courtroom and that her testimony would relate directly to Paragraph 82 of the First Amended Complaint. (See Appendices 1, 2, 3)

The whole premise of respondent's motion is that relator should have filed a *Second* Amended Complaint within 180 days of the suspension order to add the six incidents cited in Judge Adrine's affidavit, since they were not expressly pled in relator's First Amended Complaint. But respondent's premise is fatally flawed. Gov Bar R. V(19)(C)(2) requires only that relator file a complaint predicated on the conduct that formed the basis of the order. And that is exactly what relator did by filing the First Amended Complaint. Adopting respondent's argument requires one to make the absurd assumption that this Court based its unanimous decision to impose an interim remedial suspension solely upon a single paragraph in Judge Adrine's 36-paragraph affidavit, while ignoring relator's direct references to the voluminous incidents that comprised the First Amended Complaint. Respondent's argument is beyond the pale—but not surprising—given her earlier arguments suggesting that this Court discriminated against respondent because of her race. (*See* p. 192 of Respondent's Motion for Dissolution or Modification of Order of Suspension under Gov. Bar R. V(5a)(C)(1), filed January 20, 2015).

Gov. Bar R. V(19)(C)(1) & (2) are narrowly tailored to provide respondents one merit-based challenge to an interim remedial suspension and one due process challenge contingent upon a relator's failure to file a complaint in a timely manner. Respondent availed herself of the first option by filing a 196-page "Motion to Dissolve or Modify the Order of December 18, 2014," which this Court denied. Respondent now attempts to avail herself of the second option, despite relator having already filed a complaint predicated on the conduct that formed the basis of the interim suspension order. The rule is unambiguous. Respondent is precluded from seeking relief under Gov. Bar R. V(19)(C)(2); consequently, this Court should deny her Motion to Dissolve.

Respondent has been under an interim remedial suspension for nearly eight months. If respondent's argument had any merit, she would have filed the Motion to Dissolve two months ago when the 180-day time period reflected in Gov. Bar R. V(19)(C)(2) expired. The two-month delay lends further credence to relator's belief that respondent's Motion to Dissolve is a meritless, desperate attempt to have her suspension lifted.

2. Respondent's Motion is Substantively Deficient.

Even if this Court were to assume that Respondent's Motion to Dissolve fit within the parameters of Gov. Bar R. V(19)(C)(2), it lacks merit and must be denied. Respondent's Motion to Dissolve focuses on six incidents contained in an affidavit from Judge Adrine, and one incident involving Tabbatha Toon. As noted above, respondent is well aware that the allegations concerning Ms. Toon are part of relator's case against her. This leaves the six incidents contained in Judge Adrine's affidavit that were not expressly pled in the First Amended Complaint.

In her motion, respondent disingenuously attempts to convince this Court that Relator's Motion for Immediate Interim Remedial Suspension was "supported largely" by Judge Adrine's affidavit and that the six incidents contained in his affidavit are the basis for this Court's interim remedial suspension. In truth, Judge Adrine's affidavit—and the six incidents contained therein—were just a small fraction of relator's Motion for Immediate Interim Remedial Suspension. The driving force behind relator's motion for an interim remedial suspension was respondent's impending return to her criminal docket, thus creating a substantial threat of serious harm to the public. The incidents contained in Judge Adrine's affidavit, along with all the other incidents listed in the motion, were included to show that respondent's misconduct was likely to continue if she was restored to her criminal docket.

Recognizing that her legal argument lacks any merit, respondent's Motion to Dissolve quickly devolves into an attack on Judge Adrine's credibility based upon snippets of his testimony in deposition and at the hearing. Aside from ignoring the large portions of Judge Adrine's testimony that were particularly damaging to respondent, the fact is that Judge Adrine's credibility is a matter before the panel and should not be subject to attack before this Court at this time. Moreover, in her first Motion to Modify or Dissolve the Order of December 18, 2014, respondent spent 96 pages attacking Judge Adrine's affidavit to no avail, as this Court appropriately denied the motion. This is not the appropriate forum within which to argue the witnesses' credibility. If it were, relator could spend pages documenting the testimony of the first 10 witnesses—all of whom have testified regarding respondent's irrational behavior and its negative impact upon the court and public. The practical impact of granting respondent's motion would be to subject every interim remedial suspension to attack based upon testimony during the disciplinary process.

3. Respondent still poses a substantial threat of serious harm to the public.

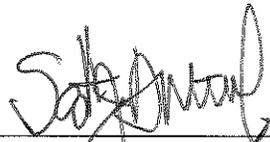
Nothing has changed since this Court voted unanimously to suspend respondent on an interim basis. And there is no valid reason to revisit that decision. To this day, respondent refuses to acknowledge any wrongdoing and through 15 days of hearing, respondent's defense has been clear—everyone else is wrong—and these proceedings are nothing but a conspiracy orchestrated by Judge Adrine. *See* Respondent's Opening Statement, Tr. Trans. p. 20, lines 7-22. In light of the fact that many of the allegations contained in the First Amended Complaint occurred while respondent was under investigation, coupled with her continued inability to admit wrongdoing or accept any responsibility for her actions, lifting respondent's interim suspension

would result in the same erratic and prejudicial behavior that led this Court to suspend respondent in the first place.

CONCLUSION

In December 2014, this Court voted unanimously to suspend respondent, determining that she posed a substantial threat of serious harm to the public. Respondent vigorously—but unsuccessfully—attacked the Court’s decision in her first Motion to Dissolve, as was her right. Since that time, respondent has done nothing to alleviate that threat, and her latest attempt to dissolve the interim remedial suspension is procedurally and substantively defective, and yet another example of her failure to acknowledge her wrongdoing and accept responsibility for her actions. Absent a failure by relator to file a formal complaint based upon conduct that gave rise to the interim remedial suspension, respondent is precluded from challenging the suspension. Accordingly, respondent’s Motion to Dissolve should be denied.

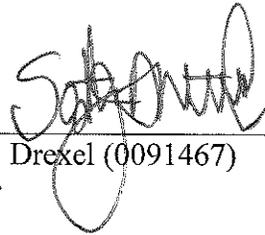
Respectfully submitted,



Scott J. Drexel (0091467)
Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215-7411
(614) 461.0256 (Phone)
(614) 461.7205 (Facsimile)
Scott.Drexel@sc.ohio.gov
Relator

CERTIFICATE OF SERVICE

A copy of the foregoing *Relator's Memorandum in Opposition to Respondent's Motion to Dissolve the Interim Remedial Suspension Order of December 18, 2014* has been served upon respondent's counsel, Larry W. Zukerman, Esq. (lwz@duiohio.com) and Paul B. Daiker, Esq. (pbd@duiohio.com), and upon respondent's counsel, Richard C. Alkire (rick@alkirelawyer.com) and Dean Nieding (d_nieding@earthlink.net), on this 21st day of August 2015, via electronic mail.



Scott J. Drexel (0091467)
Relator

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

FILED

APR 24 2014

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

IN RE: :
: :
Complaint against : Case No. 2013-057
: :
Angela Rochelle Stokes :
: :
Respondent, : Relator's Answers to Respondent's
: First Set of Interrogatories
: :
Disciplinary Counsel, :
: :
Relator. :

1. State the Identity of all persons providing answers to these Interrogatories.

ANSWER:

Scott J. Drexel, Esq., Disciplinary Counsel, 250 Civic Center Dr. Ste. 325, Columbus, Ohio 43215, (614) 461-0256 - Phone, (614) 461-7205 - Facsimile

Joseph M. Caligiuri, Esq., Chief Assistant Disciplinary Counsel, 250 Civic Center Dr. Ste. 325, Columbus, Ohio 43215, (614) 461-0256 - Phone, (614) 461-7205 - Facsimile

Karen H. Osmond, Esq., Assistant Disciplinary Counsel, 250 Civic Center Dr. Ste. 325, Columbus, Ohio 43215, (614) 461-0256 - Phone, (614) 461-7205 - Facsimile

Audrey E. Varwig, Esq., Assistant Disciplinary Counsel, 250 Civic Center Dr. Ste. 325, Columbus, Ohio 43215, (614) 461-0256 - Phone, (614) 461-7205 - Facsimile

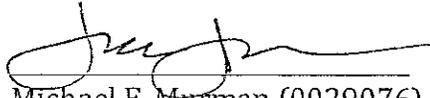
Michael E. Murman, Esq., Special Prosecutor to the Office of Disciplinary Counsel, 14701 Detroit Avenue, Suite 555, Lakewood, Ohio 44107, (216) 228-6996 - Phone, (216) 226-9011 - Facsimile

2. State whether The Relator has obtained statements, oral, written or otherwise, from anyone concerning the events which form the basis for the Complaint and Certificate.

ANSWER: Objection. This interrogatory is vague, ambiguous, and calls for speculation.

Appendix I

As to this objection:



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel

Without waiving this objection, relator states it has interviewed the individuals listed below in Interrogatory No. 3.

3. If the answer to the preceding Interrogatory is in the affirmative, for each such statement, state The Identity of each person giving such statement, the date upon which the statement was obtained, The Identity of the individual obtaining such statement and the present location of each such statement.

ANSWER: Objection. This interrogatory is vague, ambiguous, and calls for speculation. Further, this interrogatory seeks privileged attorney work product. Written or oral information transmitted to an attorney and recorded as conveyed is not discoverable absent a showing of good cause. *Jackson v. Greger*, 160 Ohio App.3d 258, 2005-Ohio-1599, 826 N.E.2d 900, ¶ 34. In addition, “[n]otes made by the attorney or his agents that record the witness’s statement, but that also convey the impressions of the interviewer, are protected opinion work product, because such notes reveal the attorney’s or agent’s thoughts.” *Id.* at ¶ 35.

As to this objection:



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel

Without waiving this objection, relator states that it has interviewed the following individuals. To the extent that a record or written summary exists, those materials are located at either the Office of Disciplinary Counsel, 250 Civic Center Dr., Ste. 325, Columbus, Ohio 43215 or at Murman and Associates, 14701 Detroit Avenue, Suite 555, Lakewood, Ohio 44107. Statements that are not privileged and that relate to the allegations in the formal complaint were produced with the grievance and any such additional statements will be produced in response to the relator’s Request for Production of Documents.

Individual:	Date	Interviewed by:
Keevin Berman	12/28/11, 3/7/13	Jonathan E. Coughlan
Margaret Walsh	1/23/12, 11/7/12	Jonathan E. Coughlan
Eleanor M. Brown	5/22/2012	Donald R. Holtz
Karen Stanton	3/28/2012	Jonathan E. Coughlan
Gregory Sims	1/7/2013	Jonathan E. Coughlan
Cherlyn Powell	1/18/2013	Jonathan E. Coughlan
Jerry Krakowski	3/28/2012	Robert R. Berger
Allen J. Peterson	5/22/2012	Donald R. Holtz
Robneeka Robinson	5/23/2012	Donald R. Holtz
Elsie S. Valentine	5/23/2012	Donald R. Holtz
Audene Vazquez	12/12/2013	Jonathan E. Coughlan
Shelby Player	12/12/2013	Jonathan E. Coughlan
Shirlee Moss	1/7/2013	Jonathan E. Coughlan
Judge Ronald B. Adrine	1/7/2013 Multiple Occasions	Jonathan E. Coughlan Michael E. Murman
Ledice Leach	1/18/2013	Jonathan E. Coughlan
Qwanza Hall	1/18/2013	Jonathan E. Coughlan
Jason Beyer	1/22/2013 11/6/2013	Jonathan E. Coughlan Donald R. Holtz
Victor Perez	11/29/2011 5/9/2013	Jonathan E. Coughlan Karen H. Osmond
Gus Rini	12/27/2011 11/6/2013	Jonathan E. Coughlan Donald R. Holtz
Tina Tricarichi	12/27/2011 8/12/2013	Jonathan E. Coughlan Donald R. Holtz
Wendy C. Regoeczi, Ph.D	1/23/2012	Jonathan E. Coughlan
Judge Larry Jones	Unknown	Michael E. Murman
Dana J. Hubbard, Ph.D	1/23/2012	Jonathan E. Coughlan
Linda Gonzalez	2/16/2012	Jonathan E. Coughlan
Sandra Harding	3/16/2012	Jonathan E. Coughlan
Scott Hurley	2/17/2012	Jonathan E. Coughlan
Henry Hilow	11/7/2012 8/8/2013	Jonathan E. Coughlan Donald R. Holtz
Stanley Stein	5/8/2013	Joseph C. Caligiuri

Stephanie Jerlstrom	11/7/2011	Jonathan E. Coughlan
Elliott Miller	1/20/2013	Jonathan E. Coughlan
Denise Rudolph	1/30/2012	Jonathan E. Coughlan
Thurmond Caldwell	1/30/2013	Jonathan E. Coughlan
Jose Lozada Jr.	1/22/2013	Jonathan E. Coughlan
Fernado L. Taylor	6/17/2013	Donald R. Holtz
Carolyn Massengale-Hasan	6/17/2013	Donald R. Holtz
Charlotte D. Shutes	6/17/2013	Donald R. Holtz
Kenneth Taylor	7/10/2013	Donald R. Holtz
James K. Johnson	6/17/2013	Donald R. Holtz
Timothy Alan Hess	7/31/2013	Donald R. Holtz
Steve Fialkowski	7/31/2013	Donald R. Holtz
Michael David Winston	8/7/2013	Donald R. Holtz
Scott M. Malbasa	8/12/2013 8/14/2016	Donald R. Holtz Donald R. Holtz
C. Ellen Connally	Multiple Occasions	Michael Murman
Bryan Keith Ramsey	6/20/2013	Donald R. Holtz
Angela Luisa Rodriguez	8/14/2013 11/29/2011	Donald R. Holtz Jonathan E. Coughlan
Jasmine A. Edwards	8/28/2013	Donald R. Holtz
Dezi Lamont Walker	9/26/2013	Donald R. Holtz
Denise Pederson	10/2/2013	Donald R. Holtz
Ron Tabor	1/31/2013	Jonathan E. Coughlan
Ashley Jones	5/8/2013	Karen H. Osmond
Kimberly Barnett-Mills	5/9/2013	Karen H. Osmond
Joanna Lopez	5/9/2013	Karen H. Osmond
Angela A. Beckwith	6/17/2013	Donald R. Holtz
Vincent Zvomuya	11/6/2013	Donald R. Holtz
Jovani Leon	11/6/2013	Donald R. Holtz
David K. Eidenmiller	11/6/2013	Donald R. Holtz
Myron Lavender	11/13/2013	Donald R. Holtz
Joseph W. Karthan	11/13/2013	Donald R. Holtz

Robert Flanagan	11/13/2013	Donald R. Holtz
Kenneth W. Jones	11/18/2013	Donald R. Holtz
Randall J. Card	11/13/2013 4/22/2013	Donald R. Holtz Michael E. Murman
Jodi Williams	12/5/2013	Donald R. Holtz
Ashley Thomas	11/21/2013	Donald R. Holtz
Thomas Mulgrew	12/12/2013	Donald R. Holtz
Kathy L. Turner	12/12/2013 4/23/2013	Donald R. Holtz Michael E. Murman
Bobby Davis	4/22/2013	Michael E. Murman
Terri Bock	4/23/2013	Michael E. Murman
Michael Ivy	12/12/2013	Donald R. Holtz
Dr. Arcangela Wood	Unknown	Michael E. Murman
Rita Haynes	Multiple Occasions	Michael E. Murman
Bob Tobik	Multiple Occasions	Michael E. Murman
Mike Negray	Multiple Occasions	Michael E. Murman
Ian Friedman	6/20/2013	Donald R. Holtz
Sharon Lawson-Dennis	10/3/2013	Donald R. Holtz
Michael Harvey	4/23/2013	Michael E. Murman
Teresa S. Thompson	4/23/2013	Michael E. Murman
Beverly S. Camp	4/23/2013	Michael E. Murman
Fred Bourjaily	4/22/2013	Michael E. Murman
Nicole Berlotone	3/4/14	Donald R. Holtz
Bettye Rhinehart	2/6/2014	Donald R. Holtz

4. With reference to the Complaint and Certificate, state The Identity of each and every person The Relator expects to call as an expert witness at the formal hearing in this matter, and set forth the expert's opinions, the bases thereof and the qualifications of such expert which enables him/her to render such opinions.

ANSWER: Relator expects to call Dana J. Hubbard, Ph.D, Cleveland State University, and Wendy C. Regoeczi, Ph.D, Cleveland State University, as expert witnesses. With respect to their opinions, see the Evaluation of Cleveland Municipal Court Programs. Relator reserves the right to name additional expert witnesses.

5. With reference to the Complaint and Certificate, state The Identity of each and every person, other than experts, who The Relator intends to call to testify at the formal hearing in this matter.

ANSWER: If not otherwise listed, each individual below can be reached at The Cleveland Municipal Court, 1200 Ontario St., Cleveland, Ohio 44113, (216) 664-4700.

Hon. Angela R. Stokes, on cross-examination

Al Kaniewski

Angela Beckwith, 11851 Summerland, Cleveland, OH 44111, 304.207.8219

Angela Rodriguez, Esq., Assistant Prosecuting Attorney, City of Cleveland, 301 Lakeside Avenue, Room 106, Cleveland, OH 44114, 216.664.4831

Ashley Jones, Esq., 75 Public Square, Suite 714, Cleveland, OH 44113, 216.736.8551

Audene Vazquez

Betty Rhinehart, 4152 Brookside Blvd., Cleveland, OH 44135, 216.374.7042

Beverly Camp

Robert Tobik, Esq., Cuyahoga County Public Defender's Office, 310 Lakeside Avenue, Suite 400, Cleveland, OH 44113-1021, 216.443.8388

Bobbi Williams, Contact Information Unknown at Present Time

Bobby Davis

Brian K. Ramsey, Esq., 14532 Pearl Road, Suite 101, Strongsville, OH 44136, 440.785.344

C. Ellen Connally, Esq., 13507 Cormere Avenue, Cleveland, OH 44120, 216.664.4972

Carolyn Massengale-Hasan, 634 E. 124th Street, Cleveland, OH 44108, 216.541.1930

Catherine Pina

Charlotte Shutes, 10131 Creekview Court, Streetsboro, OH 44241, 216.773.6391

Colleen Radeff

Connor Nathanson, Esq., City of Cleveland Prosecutor's Office, 1200 Ontario Street, 8th Floor, Cleveland, OH 44113, 216.664.4825

Daniel O'Reilly, Contact Information Unknown at Present Time

David Eidenmiller, Esq., Cuyahoga County Public Defender's office, 310 Lakeside Avenue, Suite 200, Cleveland, OH 44113, 216.698.3211

Denise Pederson, 1850 Superior Ave., Apt. 411, Cleveland, OH 44114, 216.624.0359

Denise Rudolph

Dennis Butler

Dezi Walker, 1386 E. 92nd Street, Cleveland, OH 44106, 216.970.2997

Dr. Arcangela Wood

Dr. Robert Schweid

Elliot Miller

Fernando Taylor, 19714 Shawnee Avenue, Cleveland, OH 44119, 216.990.2910

Fred Bourjaily

Gary Potts, Esq., Cuyahoga County Public Defender's Office, 310 Lakeside Avenue, Cleveland, OH 44113, 216.443.2190

Gina Villa, Esq., Assistant Prosecutor, City of Cleveland, Justice Center – 8th Floor, 1200 Ontario – Courts Tower, Cleveland, OH 44113, 216.664.4827

Gregory Sims

Gus Rini, Esq., Cuyahoga County Public Defender's Office, 310 Lakeside Avenue, Cleveland, OH 44113, 216.698.3221

Henry Hilow, Esq., McGinty, Hilow & Spellacy Co., LPA, 614 West. Superior Avenue, Suite 1300, Cleveland, OH 44113, 216.344.9220

Ian Friedman, Esq., Friedman & Frey LLC, 1304 W. 6th Street, Cleveland, OH 44113, 216.928.7700

Irene Cook

James C. Young, Esq., The Young Legal Clinic, 75 Public Square, Suite 600, Cleveland, OH 44113, 216.752.9937

Jamese Johnson, 20206 Sumpter Road, Warrensville Heights, OH 44128, 216.902.1580

Jamie Barlay-Soto, 3354 Marpat Lane, Brunswick, OH 44212, 216.215.1049

Jasmine Edwards, 216.258.1156, e-mail cpht.jasmineedwards@gmail.com

Jason Beyer

Jay Schlachet, Esq., 55 Public Square, Suite 1600, Cleveland, OH 44113, 216.456.2488

Jerome Saunders

Jerry Krakowski

Joanna Lopez, Esq., Cuyahoga County Prosecutor's Office, 9300 Quincy Avenue, Cleveland, OH 44115, 216.443.7863

Joe Kochis

John Forristal

Jose Lozada Jr.

Joseph W. Karthan

Jovani Leon

Hon. Larry Jones

Hon. Ronald B. Adrine

Karen Stanton

Katherine Taylor

Kathy L. Turner

Keevin Berman, Esq., Cuyahoga County Public Defender's Office, 310 W. Lakeside, Cleveland, OH 44113, 216.443.7223

Kenneth Taylor, 8610 Hadden Road, Twinsburg, OH 44087, 330.425.1542

Kimberly Barnett-Mills, City of Cleveland Prosecutor's Office, 1200 Ontario Street,
8th Floor, Cleveland, OH 44113, 216.664.4850

Ledice Leach

Linda Gonzalez, Cuyahoga County Public Defender's Office, 310 Lakeside Avenue,
Suite 200, Cleveland, OH 44113, 216.698.3221

Lisa Barbee-Leonard, 20206 Sumpter Road, Warrensville Heights, OH 44128,
216.618.9570

Lisa Stevens

Maggie Hollman

Marc Knipper

Margaret Walsh, Cuyahoga County Public Defender's Office, 310 Lakeside Avenue,
Cleveland, OH 44113, 216.698.3222

Matthew Gabriel, Contact Information Unknown at Present Time

Maurice Tucker, Contact Information Unknown at Present Time

Melvin Cary, Address Unknown, 216.712.8339

Michael Harvey

Michael Winston, Esq., 3914 W. 21st Street, Cleveland, OH 44109, 216.225.8967

Mike Negray

Myron Lavender

Novella Black – Address Unknown at Present Time, 216.310.9726

Paul Durch

Paul Kuzmins

Paul Mizerak

Phillip Resnick

Qwanza Hall

Rita Haynes

Randall J. Card

Robert (Bob) Lewis

Robert (Bob) Townsend

Robert Downing, c/o Ashley Jones, Esq., 75 Public Square, Suite 714, Cleveland, OH 44113, 216.736.8551

Ronrico Shutes, 10131 Creekview Court, Streetsboro, OH 44241, 216.773.6391

Scott Malbasa, Esq., Cuyahoga County Public Defender's Office, 310 Lakeside Avenue, Cleveland, OH 44113, 216.698.3209

Sharon Lawson-Dennis, 1821 Noble Road East, Cleveland, OH 44112, 216.323.1540, 216.451.9400

Sheronda Dobson, Esq., 503 E. 200th Street, Suite 202, Euclid, OH 44119, 216.291.2290

Shatauna Moore, Contact Information Unknown at Present Time

Shelby Player (formerly Paulk)

Cherlyn Powell

Shirlee Moss

Stephanie Jerlstrom

Steven Gaulding

Terri Bock

Terry Gallagher

Theresa Thompson

Thomas Kraus, Esq., One Berea Commons, #216, Berea, OH 44017, 440.816.0603

Thomas Mulgrew

Thurmond Caldwell

Tiffany Wright

Timothy Alan Hess, 1370 Ontario Street, Suite 1520, Cleveland, OH 44113,
216.696.2915

Tina Tricarichi, Esq., Cuyahoga County Public Defender's Office, 310 W. Lakeside, 1st
Floor, Cleveland, OH 44113, 216.698.3206

Victor Perez, Esq., Chief Prosecutor, City of Cleveland, 1200 Ontario Street, 8th Floor,
Cleveland, OH 44113, 216.664.4850

Catherine Meehan, Patituce and Associates, LLC, 26777 Lorain Road, Suite 708,
North Olmstead, OH 44070, 440.471.7784

Aric Kinast, City of Cleveland Prosecutor's Office, 1200 Ontario Street, 8th Floor,
Cleveland, OH 44113, 216.664.4850

Ashley Thomas, 1074 E. 146 St., Cleveland, Ohio 44110
Defendant

Jodi Williams, 36950 N. Royalton Rd., Grafton, OH 44044

Christopher Belohlavek, 1194 Blueberry Hill, Brunswick, Ohio 44212

Cynthia George, 3347 W. 94 St., Cleveland, Ohio, 216.939.8583, 216.410.2148
Defendant

James London, Cuyahoga County Public Defender's Office, 310 W. Lakeside, 1st Floor,
Cleveland, OH 44113, 216.698.3206

Relator reserves the right to identify additional lay witnesses, including any
individual identified in response to Interrogatory No. 8.

6. With reference to the Complaint and Certificate, identify each and every exhibit
which The Relator intends to use, enter or introduce into evidence at the time of the formal
hearing in this matter.

ANSWER: Relator has not decided which exhibits it intends to use and/or enter into
evidence; however, relator anticipates using all materials produced in response to
respondent's Request for Production of Documents. Relator reserves the right to
amend or supplement this list.

Volume I

1. Respondent's attorney registration record
2. Respondent's biography

3. Information about the Cleveland Municipal Court
4. Letter regarding respondent's conduct, date and author unknown
5. Letter from Judge Larry Jones, October 16, 2000
6. Inter-Office Correspondence from Judge Larry Jones, April 29, 2004
7. Letter from Judge Larry Jones, June 1, 2006
8. Letter from Judge Larry Jones to respondent, June 19, 2007
9. Journal Entry in re: Order of Court to Adopt Operational Efficiency Guidelines May 8, 2008
10. Letter from Bailiff Paul Mizerak, November 24, 2008
11. Inter-Office Correspondence from Judge Ronald B. Adrine, February 9, 2009
12. Memo from Jerry Krakowski re: Offender Pay Urinalysis Testing, May 20, 2009
13. Inter-Office Correspondence from Judge Ronald B. Adrine, June 22, 2009
14. Inter-Office Correspondence from Judge Ronald B. Adrine, December 23, 2009
15. Administrative Order 2009-003, June 22, 2009
16. Administrative Order 2011-004, June 2, 2011
17. Administrative Order 2011-011, July 25, 2011
18. Administrative Order 2011-012, July 25, 2011
19. Rules for Various Departments/Outside Agencies
20. Psychiatric Clinic Referrals, Various Dates
21. Memorandum from Jerome Krakowski, September 17, 2008
22. Letter from Psychiatric Clinic to Jerome Krakowski, September 23, 2008
23. Transcript of proceedings, September 24, 2008 (Darren Penson)
24. Video of proceedings, September 24, 2008 (Darren Penson)
25. Inter-Office Correspondence from Mike Negray, September 28, 2011
26. Letter from Jerry Krakowski, January 7, 2013
27. Letter from Jerry Krakowski, April 23, 2009
28. Letter from Jerry Krakowski, May 1, 2009
29. Letter from Jerry Krakowski, July 16, 2010
30. Letter from Jerry Krakowski, July 14, 2011
31. Letter from Jerry Krakowski, September 18, 2012
32. Letter from Jerry Krakowski, April 29, 2013
33. Graphs of Indigent Driver Alcohol Assessments and Urinalysis Referrals in 2008
34. Probation Department Graphs of Referrals in 2012
35. Probation Department Graphs of Referrals in 2013
36. Letter from Rita Haynes, July 15, 2011
37. Ksandra Mitchell Judgment Entry, 1012 CRB 033006

38. Letter from Catherine Pina, October 3, 2011
39. Probation Banned/Unwelcome List
40. Bailiff Restricted Assignment List
41. Inter-Office Correspondence from Grace Evanglou, January 5, 2009
42. Incident Report Form, December 29, 2008
43. Letter from Security Bailiff Thurmond Caldwell III, June 20, 2011
44. Letter from Security Bailiff Lisa Stevens, February 26, 2009
45. Letter from Greg Sims to Lisa Stevens, March 3, 2009
46. Incident report form from Security Bailiff Denise Rudolph, December 16, 2010
47. Incident report from Security Bailiff Katherine Taylor, March 25, 2009
48. Letter from Shirlee A. Moss, April 30, 2009
49. Resignation letter from Shirlee A. Moss, May 6, 2009
50. Incident Report from Thurmond Caldwell, May 16, 2011
51. Thurmond Caldwell Video, May 16, 2011
52. Incident Report from Thurmond Caldwell, June 14, 2011
53. Thurmond Caldwell Video, June 14, 2011
54. Incident report from Audene Vasquez, May 2, 2013
55. Audene Vasquez Video, May 2, 2013
56. Memorandum from Katherine H. Taylor, March 25, 2011
57. Incident Reports and Conclusions re: December 7, 2011
58. Incident Report from Marc Knipper, January 30, 2012
59. Incident Reports and Conclusions re: September 12, 2012
60. Section 6-14 of the Personnel Policy Manual
61. Section 1-1.1 of the Personnel Policy Manual
62. Inter-Office Correspondence from Gregory Sims, October 30, 2012
63. Documentation of Removal from Assigned Posts, Various Dates in 2008
64. Documentation of Removal from Assigned Posts, Various Dates in 2009.
65. List of respondent's personal bailiffs and service dates
66. Appointment Letters, Various Dates
67. End of Assignment Letters, Various Dates
68. Cover Sheet and Docket for Case No. 2008 TRD 071751 (Matthew Gabriel)
69. David Eidenmiller/Matthew Gabriel Video, May 21, 2009
70. Cover Sheet and Docket for Case No. 2010 CRB 021617 (Keynan Williams)
71. Cover Sheet and Docket for Case No. 2010 TRD 038170 (Keynan Williams)
72. Michael Winston/Keynan Williams Video, August 23, 2010
73. Transcript of proceedings, October 28, 2010 (Darius Andrews)
74. Video of proceedings, October 28, 2010 (Darius Andrews)
75. Transcript of proceedings, January 13, 2011 (Kristina Peterson)
76. Transcript of proceedings, January 13, 2011 (Wesley Ely)
77. Transcript of proceedings, January 13, 2011 (Ingshaw Brown)
78. Scott Malbasa Video, June 16, 2011
79. Letter from Henry Hilow, September 27, 2012
80. Henry Hilow Video, August 25, 2012
81. Affidavit of Disqualification, May 14, 2013

82. Memorandum from Michael Negray, August 5, 2011
83. Citizen complaints against respondent
84. Transcript of proceedings, October 28, 2010 (Brittanne Hodge)
85. Video of proceedings, October 28, 2010 (Brittanne Hodge)
86. Cell Phone Confiscation, July 20, 2011
87. Cell Phone Confiscation, August 9, 2011
88. Cell Phone Confiscation, March 21, 2013

Volume II

89. Cover Sheet and Docket for Case No. 2010 CRB 021049 (Novella Black)
90. Transcript of proceedings, October 28, 2010 (Novella Black)
91. Novella Black Video, October 28, 2010
92. Complaint from Charlotte Shutes
93. Cover Sheet and Docket for Case No. 2012 TRD 007856 (Shatauna Moore)
94. Shatauna Moore Video, November 20, 2012
95. Cover Sheet and Docket for Case No. 2012 CRB 038736 (Kenneth Taylor)
96. Kenneth Taylor Video, November 27, 2012
97. Cover Sheet and Docket for Case No. 2011 CRB 043197 (James Johnson)
98. Cover Sheet and Docket for Case No. 2012 TRD 068011 (Jasmine Edwards)
99. Cover Sheet and Docket for Case No. 2011 TRC 002970 (Jasmine Edwards)
100. James Johnson/Jasmine Edwards Video, March 5, 2013
101. Letter from Ian Friedman, June 13, 2013
102. Sign in Sheets
103. Complaint from Deputy Bailiff Scott Sazpansky
104. Restrooms Video, June 25, 2013
105. Complaint from Carolyn Massengale-Hasan
106. Cover Sheet and Docket for Case No. 2010 TRC 077438 (Massengale-Hasan)
107. Carolyn Massengale-Hasan Video, January 20, 2011
108. Cover Sheet and Docket for Case No. 2011 TRD 007301 (Dezi Walker)
109. Dezi Walker Video, March 2, 2011
110. Complaint from Fernando Taylor
111. Cover Sheet and Docket for Case No. 2011 CRB 015357 (Fernando Taylor)
112. Fernando Taylor Video, May 25, 2011
113. Video of proceedings, March 19, 2013
114. Transcript from Case No. 01 TRD 108484 (James Luster)
115. Appellant's Brief, Case No. 80887, April 10, 2002
116. Appellee's Response Brief, Case No. 80887, May 6, 2002
117. Journal Entry and Opinion, November 27, 2002
118. Cover Sheet and Docket for Case No. 2009 CRB 014228 (Daniel O'Reilly)
119. Transcript, Daniel O'Reilly, June 3, 2009
120. Daniel O'Reilly Video, June 3, 2009
121. Transcript, Daniel O'Reilly, June 5, 2009
122. Daniel O'Reilly Video, June 5, 2009
123. Cover Sheet and Docket for Case No. 2010 TRD 064130 (Melvin Cary)
124. Melvin Cary Video, December 21, 2010
125. Cover Sheet and Docket for Case No. 2011 CRB 029832 (Denise Pederson)

126. Denise Pederson Audio, August 29, 2011

Volume III

127. Project Hope Description
128. Cover Sheet and Docket for Case No. 2008 TRD 003752 (Sharon Dennis)
129. Cover Sheet and Docket for Case No. 2009 CRB 015822 (Sharon Dennis)
130. Journal Entry Sheets regarding Sharon Lawson-Dennis
131. Request for Termination of Community Control, July 13, 2011 (Sharon Dennis)
132. Sharon Lawson-Dennis Video, Various Dates
133. Evaluation of Cleveland Municipal Court Programs, June 24, 2011

134. Letter from Jerry Krakowski to respondent, June 9, 2011
135. Cover Sheet and Docket for Case No. 2013 TRD 004239 (Bobbi Williams)
136. Cover Sheet and Docket for Case No. 2013 TRD 007466 (Freddie Johnson)
137. Cover Sheet and Docket for Case No. 2013 TRD 004192 (Freddie Johnson)
138. Bobbi Williams Video, February 21, 2013
139. Cover Sheet and Docket for Case No. 2008 TRD 052369 (Maurice Tucker)
140. Cover Sheet and Docket for Case No. 2009 TRD 040682 (Maurice Tucker)
141. Maurice Tucker Video, June 30, 2009
142. Cover Sheet and Docket from Case No. 2012 CRB 002544 (Angela Beckwith)
143. Angela Beckwith Video, December 19, 2012
144. Complaint from Jamie Barlay-Soto
145. Cover Sheet and Docket for Case No. 2013 TRC 031821 (Jamie Barlay-Soto)
146. Jamie Barlay-Soto Video, Various Dates
147. Cover Sheet and Docket for Case No. 2011 TRD 066038 (Ashley L. Thomas)
148. Cover Sheet and Docket for Case No. 2013 TRD 041774 (Ashley L. Thomas)
149. Cover Sheet and Docket for Case No. 2013 TRD 050135 (Ashley L. Thomas)
150. Ashley L. Thomas Video, Various Dates
151. End of Day Video, October 23, 2013
152. Cover Sheet and Docket for Case No. 2013 CRB 025290 (Jodi Williams)
153. Jodi Williams Video, Various Dates
154. Complaint from Christopher Belohlavek
155. Cover Sheet and Docket for Case No. 2013 TRD 053634 (Christopher Belohlavek)
156. Christopher Belohlavek Video, Various Dates
157. Complaint from Cynthia George
158. Cover Sheet and Docket for Case No. 2013 TRD 061612 (Cynthia George)
159. Cynthia George Video, November 26, 2013
160. Cover Sheet and Docket for Case No. 2013 TRD 040636 (Tabbatha Toon)
161. Tabbatha Toon Video, August 13, 2013

7. With reference to the Complaint and Certificate, state whether The Relator took a statement, oral, written or otherwise, from The Respondent, and if so, state the date of such statement and The Identity of all individuals participating in securing such statement.

ANSWER: Objection. This interrogatory is vague, ambiguous, and calls for speculation.

As to this objection:



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel

Without waiving this objection, relator states that it has not interviewed and/or taken the deposition of respondent.

8. State The Identity of all individuals having knowledge of the events set forth in the Complaint and Certificate.

ANSWER: Relator objects to this interrogatory to the extent that it is unduly burdensome to provide residential and/or business addresses and phone numbers for individuals that relator does not intend to call as witnesses during the hearing on this matter.

As to this objection:



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel

Without waiving this objection:

Ahmed Salem, Defendant
Al Kaniewski, Chief of Security
Alan Cummings, Defendant
Allen Peterson, Defendant
Alvin White, Officer
Amy Gillock, Defendant
Andora Sanders, Witness
Andrew Williams, Bailiff
Angel Perez, Defendant
Angel Rivera, Defendant
Angela Beckwith, Defendant
Angela Rodriguez, Prosecutor
Ann Marie Feighan, Magistrate
Anthony (Tony) Williams, Bailiff

Anthony Evans, Defendant
Anthony Johnson, Witness
Anthony Phillips, Bailiff
Anthony Ridenour, Probation
Antione Smith, Witness
Antoinette Knox, Defendant
Aqueelah Jordan, Prosecutor
Arnette Sanders, Bailiff
Asbury Johnson, Bailiff
Ashley Garrett, Prosecutor
Ashley Jones, Lawyer
Ashley Thomas, Defendant
Audene Vazquez, Bailiff
Bailiff Noss, Bailiff
Barbara Fuller, Court Administration
Bettye Rhinehart, Witness
Beverly Camp, Bailiff
Beverly Greer, Court Administration
Bill Gulla, Bailiff
Birdie Hunter, Bailiff
Bob Tobik, Public Defender
Bobbi Williams, Defendant
Bobby Davis, Bailiff
Brandon Jones, Bailiff
Brittanne Hodge, Defendant
Bryan K. Ramsey, Lawyer
C. Ellen Connally, Retired Judge
Calvin Robinson, Defendant
Carolyn Massengale-Hasan, Defendant
Carolyn Smith, Bailiff
Caryn Hart, Defendant
Catherine Pina, Interpreter
Charlotte Shutes, Defendant
Chelisa Thompson, Defendant
Cherlyn Powell, Journalizer
Chris Williams, Bailiff
Christina Gary, Public Defender
Christopher Tripp, Bailiff
Cindy King, Court Administration
Colleen Radeff, J. Adrine's Assistant
Connor Nathanson, Prosecutor
Cornelius Golden, Defendant
Corrine Savage, Bailiff
Dale Evert, Lawyer
Dana Hubbard, Professor
Daniel O'Reilly, Defendant

Daniel Russell, Bailiff
Darius Andrews, Defendant
Darren Penson, Defendant
David Brown, Defendant
David Eidenmiller, Lawyer
David King, Public Defender
David Michaels, Bailiff
David Rothorn, Lawyer
Dean Jenkins, Probation
Debbie McDonald, Probation
Deena Oliver, Probation
Denise Pederson, Defendant
Denise Rudolph, Bailiff
Dennis Butler, Lawyer
Denny Alvarado, Defendant
Devonna Tucker, Court Reporter
Dezi Walker, Defendant
Diane Oriti, scheduler
Donald Gallick, Defendant
Donteau Love, Defendant
Dr. Arcangela Wood, Probation
Dr. Robert Schweid, Probation
Dunn, Defendant
Dwayne Jackson, Bailiff
Dyanthea Taylor, Defendant
Ebony Hayes, Defendant
Ed Wade, Lawyer
Edward Kennerly, Bailiff
Edward LaRue, Lawyer
Eleanor M. Brown, Defendant
Elizabeth Chipman, Defendant
Elliot Miller, Bailiff
Elsie S. Valentine, Defendant
Elva Witcher, Defendant
Emmanuel Pagan, Defendant
Eric Baca, Bailiff
Erin Novelli, Defendant
Fareed Hasan Bey, Witness
Fatima Johnson, Defendant
Fernado Taylor, Defendant
Florence Brown, Defendant
Frank Petrucci, Defendant
Fred Bourjaily, Bailiff
Freddie Johnson, Defendant
Gabriel Cintron, Defendant
Gandee, Defendant

Gary Potts, Public Defender
Gayl Berger, Defendant
Gina Villa, Prosecutor
Grace Evangelou, Court Reporter
Gracie Davis, Probation
Greg Troyan, Lawyer
Gregory Sims, Bailiff
Gus Rini, Public Defender
Harold M. Cohen, Grievant
Henry Hilow, Lawyer
Hines, Defendant
Ian Friedman, Lawyer
Ignshaw Brown, Defendant
Irene Cook, Bailiff
Jackeline Marcano, Defendant
James Butler, Defendant
James C. Young, Lawyer
James London, Public Defender
James Luster, Defendant
James Johnson, Defendant
Jamie Barlay-Soto, Grievant
Jasmine Edwards, Defendant
Jason Beyer, Bailiff
Javier Oritz, Defendant
Javier Sanchez, Defendant
Jay Schlachet, Lawyer
Jeff Blake, Bailiff
Jennifer Gallagher, Defendant
Jennifer Pace, Defendant
Jerome Saunders, Probation
Jerry Krakowski, Probation
Jewel Hall, Bailiff
Jim Kersey, Lawyer
Joan Bascone, Prosecutor
Joanna Lopez, Prosecutor
Jodi Williams, Defendant
Joe Dowling, Judge
Joe Kochis, Lawyer
Joe Morris, Lawyer
Joe Pattituce, Lawyer
John Forristal, Lawyer
Jorge Jiminez, Defendant
Jose Lozada Jr., Bailiff
Joseph Nagy, Defendant
Joseph W. Karthan, Bailiff
Joshua Jaskolka, Defendant

Jovani Leon, Bailiff
Juan Marrero, Defendant
Juanita Gramajo, Witness
Judge Larry Jones
Judge Ronald Adrine
Julio Jiminez, Defendant
Karen Stanton, Probation
Katherine Taylor, Bailiff
Kathy Turner, Bailiff Supervisor
Keevin Berman, Public Defender
Ken Thomas, Probation
Kenneth Taylor, Defendant
Kenneth W. Jones, Defendant
Kenyatta Wilson, Defendant
Keynan Williams, Defendant
Kimberly Barnett-Mills, Prosecutor Supervisor
Kimberly Oxner, Probation
Krista Peterson, Defendant
Kristin Erenburg, Prosecutor
Krystopher Rankin, Defendant
Ksandra Mitchell, Defendant
Larkin Defendant
Ledice Leach, Bailiff
Len'nard Hubard, Defendant
Linda Adams, Defendant
Linda Cleveland, Journalizer
Linda Dilillo, Court Administration
Linda Gonzalez, Public Defender
Lisa Barbee-Leonard, Witness
Lisa Stevens, Bailiff
Loftis (Female), Defendant
Looney, Defendant
Lorenzo Seaberry, Defendant
Luis Francisco, Defendant
Lynus M. Allen, Defendant
Maggie Hollman, Bailiff
Mainos Gramajo, Defendant
Marc Knipper, Bailiff
Margaret Walsh, Public Defender
Maria Rodriguez, Interpreter
Maritsa Del Rio Brown, Court Reporter
Mark, Bailiff
Mark Schultz, Probation
Mary Ann Koster, Bailiff
Mary Reddy, Court Administration
Matthew Gabriel, Defendant

Maureen Flavin (formerly Vesely), Court Administration
Maurice Tucker, Defendant
Maxine Anderson, Bailiff
McGlaun, Defendant
Medlock, Defendant
Melvin Cary, Defendant
Merle Stewart, Court Reporter
Michael Collins, Bailiff
Michael Flanagan, Court Administration
Michael Graves, Bailiff
Michael Harvey, Bailiff
Michael Ivy, Bailiff Supervisor
Michael Latkovic, Bailiff
Michael Winston, Lawyer
Michelle Ball, Bailiff
Mihsah Burrell, Defendant
Mikael Raheem, Defendant
Mike Heffernan, Public Defender
Mike Negray, Deputy Court Administrator
Mitchell Sheehan, Officer
Monica Williams, Defendant
Mr. Hardy, Defendant
Mr. Render, Defendant
Ms. Gay, Defendant
Ms. Stewart, Social Worker
Mustafa Shabazz, Bailiff
Myron Lavender, Bailiff
Neida Miller, Personnel Specialist
Nichole Taylor, Defendant
Nicole Howard, Bailiff
Nicole Kloos, Defendant
Noel Hernandez, Bailiff
Novella Black, Defendant
Nydvia Ruiz, Interpreter
Officer Clemmons, Officer
Olek Chepek, Defendant
Pastor Ella Fowler, Witness
Patricia Donnelly, Bailiff
Patricia Schneider, Probation
Paul Durch, Bailiff
Paul Kuzmins, Public Defender
Paul Mizerak, Bailiff Department Head
Pauline Arrington, Bailiff
Pete Roche, Probation
Phillip Resnick, Psychiatric Clinic Director
Qwanza Hall, Bailiff

R.J. Carr, Bailiff
Rachel Hamilton, Defendant
Randall (R.J.) Card, Bailiff
Ray Allen, Defendant
Raymon George, Defendant
Raymone Frett, Defendant
Rebecca Gibson, Public Defender
Regina Daniel, Court Administration
Risel Maldonado, Probation
Rita Haynes, Psychiatric Clinic
Robert (Bob) Lewis, Public Defender Supervisor
Robert (Bob) Townsend, Interpreter Supervisor
Robert (Bobby) Flanagan, Bailiff
Robert Downing, Defendant
Robert Griffin, Defendant
Robneeka Robinson, Defendant
Rochelle Edwards, Bailiff
Rochelle VanLeer, Defendant
Rod Mastandrea, Lawyer
Roger Bundy, Lawyer
Ron Tabor, Court Administration
Ronrico Shutes, Witness
Ruben Guzman, Defendant
Russell R. Brown, III, Court Administration
Salvador Pastrana Lopez, Defendant
Sandra Harding, Public Defender
Santos Vasquez Jr., Defendant
Scott Hurley, Public Defender
Scott Malbasa, Public Defender
Scott Sazpansky, Bailiff
Shameka Jones, Court Administration
Shanda Williams, Bailiff
Shannon Millard, Prosecutor
Sharon Lawson-Dennis, Defendant
Sharonda Dobson, Lawyer
Shatauna Moore, Defendant
Shayla Williams, Defendant
Shelby Player (formerly Paulk), Bailiff
Shelmeta Drewery, Defendant
Sheronda Dobson, Lawyer
Shirlee Moss, Bailiff
Shondel Young, Defendant
Sign Language Interpreter
Silvia Lopez, Defendant
Simone, Officer
Stanley Stein, Lawyer

Stephanie Cruz, Defendant
Stephanie Jerlstrom, Prosecutor
Steven Fialkowski, Defendant
Steven Gaulding, Lawyer
Tanya Gibson, Court Reporter
Tanya Jones, Human Resources Director
Teresa Thompson, Bailiff
Terrence Johnson, Defendant
Terrence Sanders, Bailiff
Terri Bock, Bailiff
Terry Gallagher, Bailiff
Thomas Kraus, Lawyer
Thomas Mulgrew, Bailiff Supervisor
Thurmond Caldwell, Bailiff
Tiffany Jennings, Journalizer
Tiffany Wright, Lawyer
Timothy Alan Hess, Lawyer
Timothy Clark, Defendant
Timothy Jones Sr., Defendant
Tina Janis, Bailiff
Tina Tricarichi, Lawyer
Tom Greer, Bailiff
Tyisha Morrison, Defendant
Vicki Banda, Court Reporter
Vickie Thurman, Bailiff
Victor Perez, Prosecutor
Victor Rodriguez, Defendant
Victoria Stevens, Bailiff
Vince Semoia, Bailiff
Vincent Gonzalez, Defendant
Vincent Zvomuya, Bailiff
Wallace Green, Probation
Walter Bray, Witness
Walter Edwards, Public Defender
Wendy Regoeczi, Professor
Wesley Dumas, Lawyer
Wesley Ely, Defendant
William Crawford, Defendant
William Hoskins, Defendant
William Napier Jr., Bailiff
Yolanda Gordon, Probation
Zino Kirby, Bailiff
Nancy Huntsman, Psychiatric Clinic
Pastor Arthur Fowler, Witness
Nicole Bertolone, Witness/Social Worker
Diane Eggleston, Defendant

Catherine Meehan, Lawyer
Christopher Belohlavek, Defendant
Cynthia George, Defendant
Demetrius Kern, Defendant
Derrick Washington, Defendant
Erica Robinson, Defendant
Linda Roy, Defendant
Estella Brour, Witness
Detaysha Greene, Defendant
Meghan Waitkus, Witness
Jennifer (Jenni) Bowers, Witness
Brenda Brown, Defendant
Thomas Graham, Witness
Genneice Perkins, Defendant
Linda Briggs, Witness
Emmanuel Grant, Defendant
Jasmine Horn, Defendant
Chevon Smith, Defendant
Kym Wallace, Defendant
Josh Voelker, Bailiff Supervisor
Laurie Morton and Mr. Morton, Witnesses
Barnett, Bailiff
Burks, Bailiff
Cutright, Bailiff
Ector, Bailiff
Fensik, Bailiff
Gaines, Bailiff
Griffin, Bailiff
Gulla, Bailiff
Haynes, Bailiff
Hicks, Bailiff
Kozel, Bailiff
Lamar, Bailiff
Motton, Bailiff
Novak, Bailiff
Reid, Bailiff
Richardson, Bailiff
Sledge, Bailiff
Supp, Bailiff
Vaughn, Bailiff
Vega, Bailiff
Walker, Bailiff
G. Williams, Bailiff
R. Williams, Bailiff
Furda, Bailiff
King, Bailiff

Meadows, Bailiff
Mirola, Bailiff
Reddy, Bailiff
Rodriguez, Bailiff
Rodgers, Bailiff
McKinney, Bailiff
Willie Jackson, Defendant
Michael Patterson, Defendant
Terry Smith, Defendant
Tomika Lessears, Defendant
Anthony Smith, Defendant
Ibrahim Salti, Defendant
Charita Forbes, Defendant
Tan-ya Brown, Witness
Leonard Marshall, Witness
Gloria Jackson, Witness
Ashley Price, Defendant
Andre Sylvester, Witness
Frieda Wallace, Witness
Aric Kinast, Prosecutor

Relator reserves the right to supplement this answer.

9. State The Identity of all individuals supplying information in connection with The Relator's investigation of the events set forth in the Complaint and Certificate, including The Identity of all grievants and include the date each grievance was made.

ANSWER:

Allen Peterson
Angela Beckwith
Angela Rodriguez
Ashley Jones
Ashley Thomas
Audene Vazquez
Bettye Rhinehart
Beverly Camp
Robert (Bob) Tobik
Bobby Davis
Bryan K. Ramsey
Hon. C. Ellen Connally
Carolyn Massengale-Hasan
Charlotte Shutes
Dana Hubbard
David Eidenmiller

Denise Pederson
Denise Rudolph
Dezi Walker
Dr. Arcangela Wood
Eleanor M. Brown
Elliot Miller
Elsie S. Valentine
Fernado Taylor
Fred Bourjaily
Gregory Sims
Gus Rini
Henry Hilow
Ian Friedman
James Johnson
Jasmine Edwards
Jason Beyer
Jerry Krakowski
Joanna Lopez
Jose Lozada Jr.
Joseph W. Karthan
Jovani Leon
Judge Larry Jones
Judge Ronald B. Adrine
Karen Stanton
Kathy L. Turner
Keevin Berman
Kenneth Taylor
Kenneth W. Jones
Kimberly Barnett-Mills
Ledice Leach
Linda Gonzalez
Lisa Stevens
Marc Knipper
Margaret Walsh
Maurice Tucker
Melvin Cary
Michael Ivy
Michael S. Harvey
Michael Winston
Mike Negray
Myron Lavender
Nicole Berlotone
Paul Mizerak
Qwanza Hall
Randall (R.J.) Card
Rita Haynes

Robert (Bobby) Flanagan
Robneeka Robinson
Ron Tabor
Sandra Harding
Scott Hurley
Scott Malbasa
Sharon Lawson-Dennis
Shelby Player (formerly Paulk)
Cherlyn Powell
Shirlee Moss
Stanley Stein
Stephanie Jerlstrom
Steven Fialkowski
Teresa Thompson
Terri Bock
Thomas Mulgrew
Thurmond Caldwell
Timothy Alan Hess
Tina Tricarichi
Victor Perez
Vincent Zvomuya
Wendy Regoeczi

Grievant & Date:

Hon. Ronald B. Adrine (11/10/11)
Angela Beckwith (1/14/13)

Relator reserves the right to supplement this answer.

10. In respect to the allegations made and contained in Paragraph 15 of the Complaint, state The Identity of all witnesses who will testify to each of the facts set forth on Paragraph 15 and its subparts.

ANSWER:

Judge Larry A. Jones
Judge Ronald B. Adrine
Jerry Krakowski
Wendy C. Regoeczi, Ph.D
Dana J. Hubbard, Ph.D
Margaret Walsh
Gina Villa
Melvin Cary
Thomas Kraus

Relator reserves the right to supplement this answer.

11. State the case name and number of each and every case that supports the contention in Paragraph 15 of the Complaint that Respondent "orders defendants to undergo drug and alcohol testing even when it has no reasonable relation to the charges against the defendant."

ANSWER:

James Luster, Case No. 2001 TRD 108484
Melvin Cary, Case No. 2010 TRD 064130

Relator reserves the right to supplement this answer.

12. State The Identity of each and every witness who will testify at the formal hearing of this matter in connection with the allegations made and contained in Paragraph 26 of the Complaint.

ANSWER:

Judge Ronald B. Adrine
Judge Larry A. Jones
Shirlee A. Moss
Michael Harvey
Randall (R. J.) Card

Relator reserves the right to supplement this answer and to call any and all individuals associated with documents submitted in response to Document Production Request # 7.

13. State The Identity of each and every witness who will testify at the formal hearing of this matter in connection with the allegations made and contained in Paragraph 81 of the Complaint, including all subparts thereof.

ANSWER:

Judge Larry Jones
Judge Ronald B. Adrine
Michael Negray
Tina Tricarichi
Charlotte D. Shutes
Ronrico Shutes

Shelby Player (formerly Paulk)
Carolyn Massengale-Hasan
Kenneth Taylor
Fernado Taylor
Ian Friedman
Lisa Barbee-Leonard
Jasmine Edwards
James Johnson
Bryan Keith Ramsey
Henry Hilow
Audene Vazquez
Dezi Walker
Thomas Mulgrew
Catherine Pina
Jamie Barlay-Soto
Cynthia George

Relator reserves the right to supplement this answer.

14. State The Identity of each and every witness who will testify at the formal hearing of this matter in connection with the allegations made and contained in Paragraphs 123 through 132, inclusive.

ANSWER:

Ian Friedman
Lisa Barbee-Leonard
Jasmine Edwards
James Johnson
Bryan Keith Ramsey

Relator reserves the right to supplement this answer.

15. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraphs 135 through 138 of the Complaint, inclusive.

ANSWER: In addition to the witnesses identified in Relator's answer to Interrogatory No. 12, Relator reserves the right to call:

Karen Stanton
Sharon Lawson-Dennis
Scott Malbasa
James C. Young

Angela Rodriguez
Carolyn Massengale-Hasan
Fareed Hasan Bey
Dezi Walker
Fernado Taylor
Wendy C. Regoeczi, Ph.D
Dana J. Hubbard, Ph.D
Jerry Krakowski
Charlotte D. Shutes
Ronrico Shutes
Timothy Alan Hess
Novella Black
Kenneth Taylor
Jason Beyer
Angela Beckwith
Joseph W. Karthan
Kathy Turner
Stephanie Jerlstrom

Relator reserves the right to supplement this answer.

16. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraphs 161 through 166 of the Complaint, inclusive.

ANSWER: Fernado Taylor.

Relator reserves the right to supplement this answer.

17. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraphs 169 through 171 of the Complaint, inclusive.

ANSWER:

Cherlyn Powell
Rita Haynes
Jerome Saunders
Karen Stanton
Bob Tobik
Gary Potts
Keevin Berman
Linda Gonzalez
Margaret Walsh
Paul Kuzmins
Victor Perez

Daniel O'Reilly
Melvin Cary
Thomas Kraus
Denise Pederson
Scott Malbasa
Wendy C. Regoeczi, Ph.D
Dana J. Hubbard, Ph.D
Sharon Lawson-Dennis
Kenneth Taylor
Timothy Alan Hess
Shatauna Moore
James C. Young
Novella Black
Connor Nathanson
Tina Tricarichi
Robert (Bob) Lewis
Joanna Lopez
Stephanie Jerlstrom
Angela Rodriguez
Gina Villa
Dezi Walker
Robert Downing
Ashley Jones
Jovani Leon
Cynthia George

Relator reserves the right to supplement this answer.

18. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraph 223 and each of its subparts of the Complaint.

ANSWER:

Karen Stanton
Sharon Lawson-Dennis
Scott Malbasa
James C. Young
Cherlyn Powell
Judge Ronald B. Adrine
Wendy C. Regoeczi, Ph.D
Dana J. Hubbard, Ph.D
Jerry Krakowski
Angela Beckwith

Relator reserves the right to supplement this answer.

19. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraph 237 of the Complaint.

ANSWER:

Michael Winston
Margaret Walsh
Shatauna Moore
Gina Villa
Keevin Berman
Timothy Alan Hess
Scott Malbasa
Judge Ronald B. Adrine
Bob Tobik
Denise Pederson
Shatauna Moore
David Eidenmiller
Matthew Gabriel
Dezi Walker
Robert Downing
Joanna Lopez
Tina Tricarichi
Angela Rodriquez
Henry Hilow
Ashley Jones
Ian Friedman
Victor Perez
Kimberly Barnett Mills
Karen Stanton

Relator reserves the right to supplement this answer.

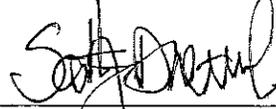
20. State The Identity of each and every witness who will testify at the formal hearing in connection with the allegations made and contained in Paragraphs 240 through 243 of the Complaint, inclusive.

ANSWER: See Relator's answer to Interrogatory No. 5. Relator reserves the right to call any individual identified in answer to Interrogatory No. 8 and reserves the right to supplement this answer.

21. State The Identity of each and every individual employed by Relator's counsel, Michael E. Murman, Esq., including Mr. Murman, who has appeared before the Respondent representing a client from 2005 to the present.

ANSWER: None.

Respectfully submitted,



Scott J. Drexel (0091467)
Disciplinary Counsel
Relator



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel
14701 Detroit Avenue, Suite 555
Lakewood, Ohio 44107
(216) 228-6996 - Phone
(216) 226-9011 - Facsimile

CERTIFICATE OF SERVICE

A hereby certify that the foregoing *Relator's Answers to Respondent's First Set of Interrogatories* was served by upon respondent's counsel, Richard C. Alkire, at 250 Spectrum Office Building, 6060 Rockside Woods Blvd., Independence, OH 44131-7300 on this 24 day of April 2014 via U.S. Mail, postage prepaid.



Michael E. Murman (0029076)
Special Prosecutor to the
Office of Disciplinary Counsel

Disciplinary Counsel

THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL
SCOTT J. DREXEL

CHIEF ASSISTANT DISCIPLINARY COUNSEL
JOSEPH M. CALIGIURI

250 CIVIC CENTER DRIVE, SUITE 325
COLUMBUS, OHIO 43215-7411

(614) 461-0256
FAX (614) 461-7205
1-800-589-5256

ASSISTANT DISCIPLINARY COUNSEL
STACY SOLOCHEK BECKMAN
MICHELLE R. BOWMAN
BRUCE T. DAVIS
KAREN H. OSMOND
CATHERINE M. RUSSO
DONALD M. SCHEETZ
AMY C. STONE
AUDREY E. VARWIG

July 21, 2014

PERSONAL AND CONFIDENTIAL

Peter T. Cahoon, Esq.
Michael R. Puterbaugh, Esq.
Joshua D. Nolan, Esq.
Buckingham Doolittle and Burroughs, LLP
3800 Embassy Parkway, Suite 300
Akron, Ohio 44333

Re: Hon. Angela Rochelle Stokes
File No. 13-057

Dear Mssrs. Cahoon, Puterbaugh and Nolan:

In supplement to Relator's Answers to Respondent's First Set of Interrogatories pursuant to Rule 26(E) of the Ohio Rules of Civil Procedure, please be advised that Relator intends to call the following individuals as additional witnesses at the trial of this matter:

- Russell R. Brown, III, Court Administrator
- Merle Stewart, Court Reporter
- Tiffany Larson, 13611 Emery Avenue, Cleveland, Ohio 44135
- Scott Sazpansky, Bailiff
- Tabatha Toon, 3138 West 17th Place #F, Cleveland, Ohio 44109
- Carl Collins, 12621 Walnut Hill Drive, North Royalton, Ohio 44133
- Justin M. Weatherly, Esq., 3238 Lorain Avenue, Cleveland, Ohio 44113; (216) 774-0000

Due to the number of witnesses that have been identified, we are working to pare down our list and will provide a revised list within the next week or so.

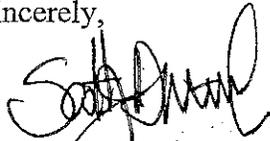
Appendix 2

Joshua David Nolan, Esq.
July 21, 2014
Page 2

Additional documents that are responsive to Respondent's Request for Production of Documents are enclosed. Relator reserves the right to identify any one of these documents as an exhibit.

Please do not hesitate to contact me if you wish to discuss this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Drexel", written in a cursive style.

Scott J. Drexel
Disciplinary Counsel

SJD/aev

Disciplinary Counsel
THE SUPREME COURT OF OHIO

DISCIPLINARY COUNSEL
SCOTT J. DREXEL
CHIEF ASSISTANT DISCIPLINARY COUNSEL
JOSEPH M. CALIGIURI

250 CIVIC CENTER DRIVE, SUITE 325
COLUMBUS, OHIO 43215-7411
(614) 461-0256
FAX (614) 461-7205
1-800-589-5256

ASSISTANT DISCIPLINARY COUNSEL
STACY SOLOCHEK BECKMAN
MICHELLE R. BOWMAN
DIONNE C. DeNUNZIO
KAREN H. OSMOND
CATHERINE M. RUSSO
DONALD M. SCHEETZ
AMY C. STONE
AUDREY E. VARWIG

October 14, 2014

VIA ELECTRONIC AND REGULAR U.S. MAIL
PERSONAL AND CONFIDENTIAL

Richard C. Alkire, Esq.
250 Spectrum Office Building
6060 Rockside Woods Boulevard
Independence, OH 44131-7300

Re: Hon. Angela Rochelle Stokes
File No. 13-057

Dear Mr. Alkire:

In your brief in opposition to Relator's Motion to Compel and Request for Discovery Deadline, you state that it is "noteworthy" that relator disclosed additional witnesses in July 2014 and that "respondent has undertaken an effort to retrieve all information about these nine witnesses without the benefit of having any idea as to what issue or allegation they relate."

While I understand that you have only recently re-entered your Notice of Appearance in this matter, you are sorely mistaken with regard to the above mentioned statements. On or about September 12, 2014, ADC Audrey Varwig and ADC Karen Osmond had an extensive conversation with your client's prior counsel regarding these witnesses, which were disclosed in compliance with our continuing obligation to provide information in response to your client's discovery requests. Prior to this conversation, no formal or informal requests were made of my office regarding these witnesses.

During the September 12, 2014 conversation, Ms. Varwig and Ms. Osmond briefly informed prior counsel why each witness was disclosed and the facts and circumstances to which relator believed each witness would testify. Furthermore, Ms. Varwig and Ms. Osmond offered to provide detailed information regarding each witness and circumstance; however, they inquired into how prior counsel wanted this information to be provided, i.e. via a second amended complaint, a second disciplinary complaint, or an informal letter. This request was made in response to prior counsel's concern that the disciplinary process does not require amended complaints to be reviewed by a probable cause panel. Prior counsel informed Ms. Varwig and Ms. Osmond that counsel would contact them when they had decided how they wanted the additional information regarding the nine witnesses to be provided. However, shortly after the September 12, 2014 conversation, prior counsel contacted my office and informed Ms. Varwig and Ms. Osmond that they had been

Appendix 3

Richard C. Alkire, Esq.
October 14, 2014
Page 2

instructed by your client to take no further action in this matter and that they would likely be entering a notice of withdrawal. As you know, prior counsel filed a Notice of Withdrawal on September 29, 2014, and to date, you have made no requests (formal or informal) for information regarding the nine additional witnesses that we disclosed.

Despite our belief that the subject of each witnesses' anticipated testimony is readily apparent from the documentation and video that has already been provided to you and/or to prior counsel, we have summarized the anticipated testimony of each witness below.

Witnesses disclosed in July 21, 2014 letter to Msrs. Cahoon, Puterbaugh, and Nolan

- Russell R. Brown III – As you know, Mr. Brown is currently serving as the Court Administrator for the Cleveland Municipal Court. Relator intends to call Mr. Brown to testify about how your client's actions and conduct have impacted the operations of the Cleveland Municipal Court. Mr. Brown's testimony will relate directly to Counts 1, 2, and 4 of the Amended Complaint. In addition, Mr. Brown will identify and testify about various exhibits previously produced to you or to prior counsel that he drafted, received, and/or has knowledge of.
- Merle Stewart – Ms. Stewart previously worked in your client's courtroom as a court reporter. Relator intends to call Ms. Stewart to testify about her experiences in your client's courtroom. Ms. Stewart's testimony will relate directly to Paragraphs 19-21 and 23-25 of the Amended Complaint. In addition, relator anticipates that Ms. Stewart will identify and testify about Relator's Exhibits 41 and 42.
- Tiffany Larson – Ms. Larson appeared as a defendant before your client. Relator intends to call Ms. Larson to testify about her experience in your client's courtroom. Video and documentation regarding Ms. Larson's appearances in your client's courtroom was previously produced to you and/or your client's prior counsel as Relator's Exhibits 162, 171, and 172. Moreover, Paragraph 283 I of the Amended Complaint specifically relates to Ms. Larson's appearance in your client's courtroom.
- Scott Sazpansky – Mr. Sazpansky previously worked as a bailiff in your client's courtroom. Relator intends to call Mr. Sazpansky to testify about his experiences in your client's courtroom. Mr. Sazpansky's testimony will relate directly to Paragraph 135 of the Amended Complaint. In addition, relator anticipates that Mr. Sazpansky will identify and testify about Relator's Exhibits 103 and 104.
- Tabbatha Toon - Ms. Toon appeared as a defendant before your client. Relator intends to call Ms. Toon to testify about her experience in your client's courtroom. Ms. Toon's testimony will relate directly to Paragraph 82 of the Amended Complaint. Video and documentation of Ms. Toon's appearance in your client's courtroom was previously produced to you and/or your client's prior counsel as Relator's Exhibits 160 and 161.

Richard C. Alkire, Esq.
October 14, 2014
Page 3

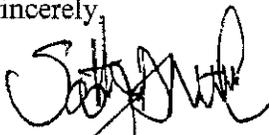
- Carl Collins – Mr. Collins appeared as a defendant before your client. Relator intends to call Mr. Collins to testify about his experiences in your client's courtroom. Mr. Collins testimony will relate directly to Paragraphs 138, 279-282, and 283 D of the Amended Complaint. Video and documentation of Mr. Collins' appearances in your client's courtroom was previously produced to you and/or your client's prior counsel as Relator's Exhibits 151, 162, 168, 169, 179, and 180.
- Justin Weatherly, Esq. – Attorney Weatherly appeared in front of your client on behalf of a defendant who was assigned to your client's docket. Mr. Weatherly submitted a letter to our office concerning his experiences before your client, which was previously produced to your client's prior counsel as Relator's Exhibit 164. Relator intends to call Mr. Weatherly to testify about his experiences before your client, as well as to identify and authenticate the letter that he wrote regarding his experiences. Relator anticipates that Mr. Weatherly's testimony will directly support Paragraph 29 of the Amended Complaint.

Witnesses disclosed in September 12, 2014 letter to Mssrs. Cahoon, Puterbaugh, and Nolan

- Tarah Hernandez – Ms. Hernandez appeared before your client on May 16, 2013. She was represented by Assistant Public Defender Scott Malbasa. During Ms. Hernandez's case, your client ordered her bailiffs to place Attorney Malbasa in the holding cell. Relator intends to call Ms. Hernandez to testify about her experience in your client's courtroom. Video and documentation concerning Ms. Hernandez was previously provided to your client's prior counsel as Exhibits 177 and 178. Moreover, Ms. Hernandez's testimony will relate directly to Paragraph 29 of the Amended Complaint.
- Charles Swanson, Esq. – Mr. Swanson appeared before your client on May 7, 2013 on behalf of a defendant who was assigned to your client's docket. Relator intends to call Attorney Swanson to testify about his experiences before your client. Relator anticipates that Mr. Swanson's testimony will directly support Paragraph 29 of the Amended Complaint. Video of Mr. Swanson's appearance will be provided to you as soon as possible and/or may be requested from the Cleveland Municipal Court.

As always, if you have any questions, please do not hesitate to contact my office.

Sincerely,



Scott J. Drexel
Disciplinary Counsel

SJD/kho