Supreme Court of Ohio Clerk of Court - Filed October 06, 2015 - Case No. 2015-1640

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION
COVINGTON

Eastern District of Kentucky
FILED
DEC 31 2014
AT COVINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	**CASE NO.: 2:11-cr-00052-DCR-JGW**
vs.	)	
	)	
MEREDITH L. LAWRENCE,	)	
	)	
Defendant.	)	

DEFENDANT'S RULE 33 MOTION FOR A NEW TRIAL

I. MOTION

Comes now the Defendant, Meredith L. Lawrence, *Pro se* and moves for a new trial per Federal Rule of Criminal Procedure 33, and the Brady Rule.

II. FULL DISCLOURE REPRESENTATION

November, 2011 Defendant Lawrence requested Rule 16 discovery including all Brady, Giglio and Jencks materials.[1]

Defendant received assurances from Department of Justice that they were well aware of

[1] Kiefer Letter November 14, 2011, see Exhibit 1.

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their obligations under Brady, Giglio and Jencks and that all such materials would be produced.[2] This is known as a 'full disclosure representation'. It is reasonable and expected that a Defendant rely on the Prosecution that has made a 'full disclosure representation'.[3]

Post trial it has been learned the Department of Justice suppressed Brady and Giglio material evidence. A government agency may deny due process if it fails to obey its own regulations.[4] Because the government assured Defendant all Brady material would be provided, the defendant had cause to not investigate the potential for suppressed material. Kyles v Whitley, 514 US 419, 437 (1995).

III. COURT ORDERED RECTIFICATION OF TAXES

As part of this Court's sentencing Defendant was ordered to rectify his taxes with the Internal Revenue service (IRS).[5] Despite being incarcerated, Defendant located and retained a CPA firm to rectify the tax years for which he was indicted (2004 - 2006).

In 2014 the forensic CPA determined that Defendant had significantly overstated his adjusted gross income on each indicted years' 1040 return and had in fact overpaid his federal taxes in each year.[6] Defendant immediately notified the AUSA/DOJ in writing.[7]

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[2] McBride Letter December 16, 2011, see Exhibit 2.

[3] Berger v U.S., 295 U S 78, 88 (1935); Stricker v Greene, 527 U S 263, 281-282 (1999).

[4] U.S. v Bowen, 969 F Supp 2d 546 (9th Cir, 2013) citing: U S ex rel Accardi v Shaughnessy, 347 US 260, 266-268, (1954); Servie v Dallas, 354 US 363, 388-389 (1957); Yellini v U.S., 374 US 109, 120-121 (1963).

[5] TR page 2952(Exhibit 5 attached). Defendant was also ordered to pay to the government $128,253.26 which he promptly did. He also was ordered incarcerated for a term of 27 months. He has currently substantially served the sentence and is presently serving the remaining 45 days of his sentence.

[6] See affidavit and report of Associates in Accounting, CPA Rick Fields Exhibit 6 attached.

Court ordered tax rectification eliminates totally the basis for which Defendant was indicted and convicted.[8] Defendant was charged with violating 26 U.S.C. §7206 (1) only, filing a false statement.[9] Defendant was not charged with tax evasion – (26 USC 7201). Specifically the government alleged that Defendant's personal adjusted gross income [was] 'greater than' stated.[10] Contrary to the assurances of the IRS-CID methodology employed did not account for or accurately reflect mandatory policy and procedures of IRS to which Defendant is entitled when calculating adjusted gross income (26 USC 62). In fact, his adjusted gross income (and tax liability) were overstated. No crime under 26 USC 7206(1) as charged was committed.[11]

But there is more.

In this matter the IRS-CID seized Defendant's records by search warrant April 9, 2008. The IRS Manual contains numerous procedures to protect taxpayers from improper criminal charges. This manual and its procedures are so important that the United States Court of Appeals for the Sixth Circuit has determined that violation of its procedures is grounds for overturning a conviction.[12]

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[7] Letters to DOJ, Exhibit 7 attached.

[8] Eliminating monetary under reporting as alleged eliminates the alleged crime. "Tax law deals in economic realities, not legal abstractions". (PPL Corp v Comm 133 Sup. Ct. 1897 (2013).

[9] 26 U.S.C. §7206(1) is a perjury statute.

[10] Indictment – Document # 1 on Docket.

[11] Defendant was not charged nor convicted of tax evasion under 26 U.S.C. §7201. Had the government simply charged 26 U.S.C. §7201 tax evasion generically it could have used any theory but, where the government stated the particular "false statement" the particulars of the false statement(Adjusted Gross Income is greater than stated) became an essential and delimiting part of the charge itself. US v. Farr, 591 F3 1322 (10 Cir; 2010) An essential or material element of a crime is one where specification with precise accuracy is necessary to establish the very illegality of the behavior and thus the courts jurisdiction. Russell v US, 369 US 749 (1962); Proof of perjury must be of a specific false statement or statements (Galanos v U.S. 49 F 2d 898 (6th Cir, 1931) I R Manual 9781-330-533 (3) (a) (c) (d).

[12] *United States v. Mckee*, 192 F.2d 535, 541 (6th Cir. 1999).

IRS conducted no audit. IRS chose not to have a tax exam. Only Court ordered tax rectification post trial proved numerous provisions of the IR Code Manual could not have been satisfied concerning Defendant.

For example:

- Facts must be reported with exactness.[13]
- Accuracy in ever particular is mandated.[14]
- Nothing essential to a complete understanding of the case is to be omitted. Every statement of material fact bearing on the proof of the allegation of violation should be documented to the extend necessary and possible to establish its truth and accuracy.[15]
- Any weaknesses in the government's case are also to be made part of the investigating agents report.[16]

The IR Manual specifically requires the Special Agent to separately calculate the distributive share of partnership business profit and share of gross rents, etc.[17] The IRS agent's final report is then forwarded to the Department of Justice for review and action. The Department of Justice prosecutor is obligated to double check the accuracy of the report to make sure further proceedings are correct.[18] During trial, post conviction, and during the direct appeal the prosecutor is duty bound to "inform the appropriate authority" of after-acquired or

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[13] IR Manual 9781.621.3.(1). [Criminal Investigation: Handbook for Special Agents; IRS Intelligence Division; ISBN 0-89499-220-1, (2004)], Exhibit 13.

[14] IR Manual 9781-341.621.4.(1)

[15] *Id.*

[16] IR Manual 9781.621.4(2)

[17] IR Manual 9781-351.633.2(1)(e)

[18] *Fields v. Wharrie*, 672 F3 505, 514-515 (7Cir 2014)

other material information that casts doubt upon the correctness of the conviction.[19] After waiting six months, despite guidance of appellate courts, direction of the Supreme Court and ethical obligations the rectification results have until now not been reported to the Court.

In short, accurate, complete, and detailed calculations necessary to calculate the truth of whether the adjusted gross income stated on Defendant's tax returns 'was greater than stated' were required to be completed.[20] The correct formula is mandated by the Supreme Court.[21] All such computations were exculpatory, material and being suppressed created extreme prejudice to the Defendant.[22]

Instead, the government called a witness before the Grand Jury who testified that she had calculated Defendant's tax liability.[23] She also told the Grand Jury that deductions and expenses to which Defendant was entitled were accounted for as "additional monies that are coming off of that prior to actually figuring the tax."[24] However, court ordered rectification of taxes reveals a 'lesser/smaller' adjusted gross income than was on the 1040 returns. This was never presented to the Grand Jury.

In Rule 16 discovery the government said IRS computation of itemized deductions revealed that the calculation was 'incorrect, however was being allowed erring on the side of the

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[19] Imbler v Pachtman, 424 US 409,427 (1976).

[20] IR Manual chapter 600.9781.341.621.1

[21] Knight v. Comm. 552 U.S. 181 (2008).

[22] Courts are compelled to force agencies to follow their 'own procedures where the rights of individuals are affected'. 5 USCS 551 Administrative Procedures Act US v Caceres, 59 LED 2d 733; 440 US 741 (1979); CBS v U.S., 316 US 407, 422( ). See affidavit of CPA Rick Fields dated June 16, 2014 Exhibit 6.

[23] GJ Tr. p.6 and p. 14, attached Exhibit 23.

[24] GJ Tr. p. 14, see Exhibit 23.

subject'[Defendant]. In fact, the opposite is true.

Such questionable conduct continued at trial. The same IRS agent called by the prosecution testified that "certain deductions or allowances were permitted that affected those bottom line numbers"[25] and that the numbers she presented to the jury and Court "had been adjusted to give the greatest benefit to Mr. Lawrence."[26] Court ordered tax rectification proves this testimony is false. The principle that the government may not knowingly use false evidence, including false testimony, to obtain a tainted conviction is implicit in the concept of ordered liberty. Under Brady, intent or knowledge of the government is immaterial – fairness is the objective. It is of no consequence that the false testimony bore upon the witnesses' credibility rather than the Plaintiff's guilt.[27]

The "greatest benefit" was not afforded to the taxpayer. Numerous deductions were never incorporated into the IRS Agent's flawed calculations. Indeed, a $93,000 overpayment of income tax by Defendant in 2005 was never disclosed to the Grand Jury, the Jury or to the Court. Instead the IRS Agent's testimony wrongly inferred that she had accounted for all deductions the taxpayer was entitled to, that she had located them and accurately reflected them in her calculations.[28] Such testimony led all – the jurors, the Court and the defendant – to believe that proper procedures had been employed before concluding, indicting and prosecuting alleged false statements about adjusted gross income.[29]

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[25] Tr. 1672, attached Exhibit 25.

[26] Tr. 1673, attached Exhibit 26.

[27] Napue v Illinois 360 US 264 (1959)

[28] Tr. 1750, Exhibit 28 attached. And see Giglio v US, 405 US 150, 153 (1972)

[29] Partially false presentation to a jury in a fashion so highly misleading as to amount to falsity regarding veracity as a whole. US v Vozzella 124 F3 389, 392 (2/97) Even passive allowance of false evidence is not allowed. New trial is necessary if the evidence goes to the credibility of an

So where were the IRS agent's calculations? If in fact they were done accurately they would be exculpatory. If in fact they were done sloppily or incompletely they would be exculpatory. If in fact they were not done at all they would also be exculpatory as a violation of the IRS manual. All such calculations with completeness and accuracy – if they were done – must have been turned over before the trial. But they were not.[30] The IRS acknowledges some of the calculations are incorrect, but are used anyway because the errs are on the side of the subject [Defendant]. In fact, the opposite is true.[31] Proof is in the Court ordered tax rectification of Defendant's actual innocence.

Defendant is not culpable here. Rather, he is the victim. He paid his taxes and then some. As a defendant charged with a crime he was entitled to rely upon the honesty of his government to both conduct its investigation in a manner set out by its policy, procedure and manual and to provide all exculpatory material evidence to him for use in his defense.[32] When, as here, a Brady, Giglio or Jencks violation has been identified, a new trial is mandatory.[33]

It cannot be disputed that had the correct computations revealed there was no false statement - i.e. AGI was not greater than stated, the results of the trial would have been different. There would never have been a trial.

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important witness. US v Anderson, 574 F2 1347 (5/11th CCA, 1978)

[30] See Discovery and Letter from DOJ dated January 9, 2012, See Exhibit 30 attached.

[31] See IRS SA Moening computations of Itemized Deductions Adjustment @ p 3 attached to AUSA McBride letter dated January 9, 2012, Exhibit 30. See CPA Fields report, Exhibit 6.

[32] Where the government assures that all *Brady* material would be provided, as here, the defendant has cause not to investigate the potential for suppressed material. *Kyles v. Whitley*, 514 U.S. 419, 437 (1995). *See also Berger v. U.S.*, 295 U.S. 78 88, (1935)("Defendant does not have to 'scavenge' for hints of exculpatory undisclosed *Brady* material.")

[33] *United States v. Brodie*, 524 F.3d 259, 268 (D.C. Cir. 2012). Reliance on a prosecutor to produce exculpatory as well as impeaching evidence is permitted and expected. Banks v Dretke, 540 US 668, 675-676, 694 (2003) quoting Berger v US 295 US 78, 88 (1935)

IV. SUPPRESSION OF APPLICATION FOR MONETARY REWARD *UNDER JURAT* - IRS FORM #211 – DONNA BOND

Cumulative to the suppression of the calculations identified in Part III above, additional Brady/Giglio exculpatory and impeaching material evidence was known to the IRS, IRS-CID and the prosecution, but was not disclosed. Specifically,

A.) The completed IRS Form #211 and its signature of Donna Bond *under jurat*; (emphasis added)

B.) The acknowledgment letter from IRS dated August 7, 2007;

C.) The contents of IRS Claim File #29-72063.

The government knew that key witness Donna Bond had much more than just a passing or passive wish for money to be paid to her in exchange for information and testimony concerning the Defendant. In fact, the government's key lay witness had *under jurat* prepared and filed an official written application with accompanying statements and claimed for herself a monetary a stake in the outcome of the trial. While this was known to the IRS/government during trial, the fact that a monetary inducement provided by the Special Agent to the witness had been accepted, acknowledged and a claim number assigned was never disclosed to the Defendant. This deprived the defendant the opportunity and Constitutional right of effective cross examination. Complete examination of the veracity of this witness was crucial to the defense. Defendant's defense was prejudiced by this Constitutional error.

Prosecutors disclosed that on July 16, 2007 Special Agent Kelly Moening personally hand delivered to Donna Bond an official IRS Application for Reward. Not disclosed and in fact denied by the witness under oath in 2009, on July 17, 2007 the witness filled out Form #211 Application, signed her claim under jurat, and filed it with the IRS. Filing this Application for a Monetary Reward gave this key government witness a monetary stake in the outcome of the criminal trial. The size and amount of the reward hinge on the amount of information supplied by the witness that is actually beneficial to an investigation and/or prosecution and on the amount of any recovery won by the IRS. In other words, IRS-CID / IRS and the witness entered into a contingency arrangement for the payment of potentially tens of thousands or more in reward money to the witness.[34]

The result of this arrangement gives the key witness an incentive to criminalize the defendant. The Supreme Court has recognized the arrangement struck with this key witness is an inducement for her to assist the prosecution of the defendant in exchange for money. Such a practice is conditionally acceptable in federal jurisprudence, but there must be full disclosure to the defense.

In this case, despite the key government lay witness officially filing her application *under jurat* for the monetary reward, and despite the fact that the IRS had confirmed the receipt of the claim plus took the affirmative step of assigning the claim an official Claim File number (29-72063), there was no disclosure.

In the case of *U.S. vs. Bagley*, 473 US 667, (1985) the Supreme Court addressed just such a circumstance holding:

[34] Completed Form 211 and accompanying statements. See Exhibit 34 attached.

When an inducement is made to a key witness and the plaintiff failed to disclose 'that the possibility of a reward had been held out to witnesses' if the information the witness supplied led to the accomplishment of the government subjective, and that the witnesses 'stake in the outcome' was not guaranteed or binding, but was expressly contingent on the government satisfaction with the end result, it served only to strengthen any incentive to testify falsely in order to secure a conviction.

In *Bagley*, like the case at bar, the monetary inducement was undisclosed.

In *Bagley*, like the case at bar the witness under oath had denied making any application for reward/inducement.[35]

Not only was the government aware of the official application for reward being completed, filed and set up for processing, they were likewise made aware of the prior sworn deposition of the witness.[36]

Veracity and this particular witness's credibility were critical factors in the government's case. There was special effort and emphasis placed into the record and for the jury that the credibility of D. Bond was without blemish, i.e.: completely credible.[37] . This was done in open court while at the same time the government knew they had not disclosed the #211 jurat or contingency reward pending with the government office.

By failing to disclose evidence affecting the overall credibility of the witness the government corrupted the procedure by which ultimate truth is to be determined.[38] When, as in

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[35] See Deposition of D. Bond April 20, 2009, p.163-164. See Exhibit 35 attached.

[36] See Depo p. 14, see Exhibit 36 attached.

[37] See TR 1592, see Exhibit 37 attached.

[38] Giglio v US 405 US 150 (1972)

this case, the reliability of a given witness may well be determinative of guilt or innocence, and the government's case depends almost entirely on a certain witness's testimony, evidence of that witnesses possible bias simply may not be said to be irrelevant or harmless.

In such a case of non-disclosure of a contingent reward inducement the Supreme Court reversed the conviction. [39]

Further, by suppressing Form #211 as completed and filed *under jurat*, the government deprived the defendant of due process by denying an effective full cross examination of that witness. Allegations and accusations of witness D. Bond were not simply statements or comments. They went well beyond the initial conversation and interview conducted by Special Agent Moening. For her application for the monetary inducement offered by IRS-CID D. Bond had to declare under penalties of perjury that her application and 'accompanying statements' were to the best of her knowledge and belief true, correct and complete. This took her 'statements' filed with IRS up to the level of determining under FRE 607 et seq. the truthfulness or untruthfulness of this witness 'under oath.' Moreover, not just under oath as to a generality, but under oath when questioned particularly on the subject matter in controversy/at issue in this particular trial. Defendant would have shown the witness had and would lie under oath about issues relative to this case if the required disclosure had been made.[40] These impeaching facts, which the defense had a right to examine in trial, were denied Defendant because there was no disclosure under *Giglio* and *Brady*. The Brady Rule requires the government to supply evidence useful to the defendant simply for impeachment purposes.[41]

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[39] *Bagley*, id, @691; *Agurs*, id, @121.

[40] See deposition of Donna Bond April 2009 p 163-164, see Exhibit 35.

[41] U.S. v Deutsch, 475 F2 55, HN#2 (5thCir Ct of Appeals, 1973).

Brady violations are to be given a cumulative examination. Individually or collectively these Brady/Giglio violations meet the burden of showing the probability that the judgment of the jury may be affected. A conviction must be set aside if there is any reasonable likelihood that the false testimony could have affected the judgment of the jury.[42] Further, had witness Donna Bond been exposed as being less than credible, the result of the trial would have been different. There exists a 'reasonable probability' that such material suppressed evidence is sufficient to undermine confidence in the outcome of the trial.

CONCLUSION

Defendant moves this Court to take appropriate action.

More than six months has passed since Defendant notified the Prosecutors that Court Ordered Tax Rectification eliminates the element that is the pinion of a 26 USC 7206(1) case..., i.e.: the false statement. Citing appellate case law, Defendant's letters requested the Prosecutors notify the proper authorities.

That a key witness (bookkeeper) had a contingency agreement for tens of thousands of dollars as a monetary stake in the outcome of the trial, when undisclosed, creates a Constitutional error.

Specifically, Defendant moves for the following Court Orders:

1.) Order that the complete Final Report of the IRS Special Agent be disclosed now;

2.) Order that all IRS Reward Form(s) #211 and other incentives relative to this case be disclosed now;

3.) Order the complete IRS #211 Claim (file contents number # 29-72063) be disclosed now;

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[42] US v Agurs 427 US @112

4.) Order an evidentiary hearing at the next convenient date following complete Brady disclosure;

5.) Order a New Trial per Federal Rule of Criminal Procedure #33;

6.) Order that the Defendant's sentence be suspended pending the hearing/trial;

7.) Order the verdict of July 6, 2012 vacated.

Respectfully submitted,

Meredith L. Lawrence

MEREDITH L. LAWRENCE, *PRO SE* Pro Se

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was forwarded by U.S. Mail, postage prepaid, this 31st day of December 2014 to the following:

Hon. Robert K. McBride
Hon. Elaine K. Leonhard
U.S. Department of Justice
United States Attorney
Eastern District of Kentucky
207 Grandview Drive
Ft. Mitchell, KY 41017

Meredith L. Lawrence Pro se

MEREDITH L. LAWRENCE, *PRO SE*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION
COVINGTON

CRIMINAL ACTION NO. 11-52-DCR *ELECTRONICALLY FILED*

UNITED STATES OF AMERICA **PLAINTIFF**

V. **UNITED STATES'S RESPONSE TO DEFENDANT'S MOTION FOR NEW TRIAL**

MEREDITH L. LAWRENCE **DEFENDANT**

* * * * *

Pursuant to the Court's Order, the United States submits the following response to the Defendant's Motion for a New Trial. [R. 121: Motion.]

I. Factual Background and Procedural History

The Defendant was convicted following a two-week jury trial of three counts of filing false tax returns, in violation of 26 U.S.C. § 7206(1). [R. 47: Verdict.] The evidence presented at trial established that the Defendant failed to report income he earned from multiple sources during the tax years 2003 through 2006. This Court sentenced the Defendant to 27 months imprisonment, followed by one year of supervised release. [R. 87: Judgment.] The Defendant appealed his conviction and sentence, both of which were affirmed by the Sixth Circuit. [R. 117: Opinion.] The Defendant then filed a petition for certiorari with the Supreme Court, which was also denied. [R. 120:

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Letter.] The Defendant has now filed a motion for a new trial, pursuant to Federal Rule of Criminal Procedure 33, alleging *Brady* and *Giglio* violations.[1]

II. Argument

The Defendant's request for a new trial rests on two separate, yet equally flawed bases. First, the Defendant alleges that after his conviction, he retained a Certified Public Accountant (CPA) to prepare and file amended tax returns and those returns – completed in 2014 – reveal that he "significantly overstated his adjusted gross income … and had in fact overpaid his federal taxes in each year." [R. 121: Motion at 2.] According to the Defendant, the amended returns constitute material, exculpatory evidence, which was withheld by the government in violation of *Brady v. Maryland*, 373 U.S. 83 (1963). The Defendant also contends that the government failed to disclose impeachment material related to one its witnesses, Donna Bond, in violation of *Giglio v. United States*, 405 U.S. 150 (1972). Specifically, the Defendant alleges that the government failed to disclose that Bond applied for a monetary reward with the Internal Revenue Service (IRS) in July 2007. Both of the Defendant's claims are meritless.

Generally, "[t]o prevail on a motion for a new trial based on newly discovered evidence, a defendant must show that the new evidence (1) was discovered after the trial, (2) could not have been discovered earlier with due diligence, (3) is material and not merely cumulative or impeaching, and (4) would likely produce an acquittal." *United States v. Blackwell*, 459 F.3d 739, 768 (6th Cir. 2006).

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[1] Although not expressly stated, the government assumes the Defendant's Rule 33 motion is based on "newly discovered evidence." In that case, any such motion must be filed "within 3 years after the verdict or finding of guilty." *See* Fed. R. Crim. P. 33(b).

The standard, however, is different when a motion for new trial is based on a *Brady* violation. *See United States v. Frost*, 125 F.3d 346, 382 (6th Cir. 1997). *Brady* requires the government to turn over evidence favorable to the accused and material to guilt or punishment. *Brady*, 373 U.S. at 87. This includes evidence that could be used to impeach the credibility of a witness. *Giglio*, 405 U.S. at 154–55. "Not every failure to disclose favorable evidence requires a new trial, however." *United States v. Ferguson*, 385 F. App'x 518, 522 (6th Cir. 2010). Favorable evidence must be material, "and constitutional error results from its suppression by the government, 'if there is a reasonable probability that, had the evidence been disclosed to the defense, the result of the proceeding would have been different.'" *Kyles v. Whitley*, 514 U.S. 419, 433 (1995) (quoting *United States v. Bagley*, 473 U.S. 667, 682 (1985)). A defendant, therefore, must demonstrate that the new evidence "could reasonably be taken to put the whole case in such a different light as to undermine confidence in the verdict." *Kyles*, 514 U.S. at 435. In the context of impeachment evidence, "[w]hen the 'reliability of a given witness may well be determinative of guilt or innocence,' the nondisclosure of evidence affecting credibility falls within" the *Brady* rule requiring a new trial." *Giglio*, 405 U.S. at 154. The good faith or bad faith of the government is irrelevant in a *Brady* analysis. *Brady*, 373 U.S. at 87.

The Defendant's claim that the amended tax returns constitute *Brady* evidence demonstrates a fundamental misunderstanding of the law. Simply put, the amended tax returns are not evidence; rather, they are documents created by the Defendant post-trial. In fact, the Defendant's CPA acknowledges that, in the course of preparing the amended

returns, he reviewed: (1) the original returns filed by the Defendant (for which he was indicted and convicted); (2) the corrected returns prepared by the Defendant's expert witness at trial, Gary Stephens; (3) Special Agent Moening's calculations of unreported income; and (4) *"additional data ...provided by [the Defendant] and his staff."* See Affidavit of Rick Fields at ¶ 14 (emphasis added). The "evidence" the Defendant cites, therefore, as well as the some of the supporting documentation, is not – and has never been – in the government's possession. As such, it was impossible for the government to "produce" it.

The Defendant not only ignores this impossibility, but would go so far as to require the government to anticipate pretrial what a new expert might opine years later. New conclusions drawn by the Defendant's newly-hired expert (in the form of amended tax returns), based not upon the evidence admitted at trial but on "additional data" provided by the Defendant himself, are not *Brady* material. Instead, they are yet another attempt at introducing opinion testimony, which the Defendant was already afforded the opportunity to do before the jury. That the Defendant has now secured a second opinion that comports with his version of the facts cannot be considered a *Brady* violation.

The Sixth Circuit considered and rejected a similar argument in *United States v. Jones*, 399 F.3d 640 (6th Cir. 2005). In that case, the defendant was convicted of various drug and firearms offenses. He raised several arguments on appeal and the Sixth Circuit reversed his conviction and sentence, and remanded the case to the district court to compel discovery on the defendant's claim of selective prosecution. *Id.* at 642. On remand, the district court allowed the parties to engage in voluminous discovery

regarding local law enforcement practices, which led to an internal investigation in the local police department that handled the case. *Id.* at 643-44. Upon the conclusion of discovery, the defendant moved for a new trial, arguing that the government failed to disclose newly-discovered, exculpatory evidence that impeached the credibility of officers who testified, under *Brady* and *Giglio*. *Id.* at 644. The district court denied the motion, concluding that most of the documents sought by the defendant were created after trial; accordingly, they could not have been improperly suppressed under *Brady*. *Id.* On appeal, the Sixth Circuit held that the district court correctly concluded that the vast majority of the evidence of misconduct was discovered after the case was remanded, and because "such evidence did not exist at the time of trial, it was not *Brady* material." *Jones*, 399 F.3d at 647. [2] The same rationale applies in this case.

The Defendant's claim that the government failed to disclose impeachment evidence related to witness Donna Bond is likewise frivolous. In his motion, the Defendant contends that the government failed to disclose an IRS Form 211 (Application for Reward for Original Information) submitted by Donna Bond; a letter of acknowledgement from the IRS; and the information originally submitted by Bond that ultimately comprised the IRS claims file.

The Defendant's allegations of non-disclosure are meritless. In a letter dated June 20, 2012, the government provided, among other things, *Jencks* material to defense

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[2] The Defendant conflates the concepts of a *Brady* violation and "newly discovered evidence" sufficient to warrant to a new trial. Either way, his claim fails because, as noted above, the amended returns are not *Brady* evidence and, if they are considered "newly discovered evidence," the Defendant has failed to demonstrate both (1) that the evidence is material and not merely cumulative or impeaching, and (2) that the evidence would likely produce an acquittal. *See Blackwell*, 459 F.3d 739.

counsel, Robert Carran. Included in those materials was the information and documentation that Donna Bond provided to the IRS in July 2007. *See* Government's Exhibit #1 (Letter dated June 20, 2012). Although only the letter remains in the government's file, which has been purged from government storage pursuant to Department of Justice regulations, the government has confirmed with Bond that her referral packet included the Form 211 that she signed and submitted. The June 20 letter and its contents were hand-delivered by the undersigned to Carran that same day. In a recent conversation, Carran confirmed receipt of the materials, which he believed included the Form 211.[3] Importantly, Carran also confirmed that he was aware that Bond had applied for a monetary reward from the IRS, a fact that Bond herself admitted on cross examination during the trial:

> Carran: Is it your testimony, ma'am, and did you testify yesterday, that you created and came to the IRS because you just couldn't turn your head anymore and because there were illegal things going on in the office? Did you say that yesterday?
>
> Bond: I think I did say that yesterday, something to that effect.
>
> Carran: Now, is that -- did you say that yesterday to – because you felt that that was your sole and only motivation?
>
> Bond: I went to the IRS because there were illegal activities going on in the office.
>
> Carran: And that was your sole motivation? That's why you did it?
>
> Bond: That's why I did it.
>
> Carran: You had no other motive; is that correct?

[3] The United States has requested an affidavit from Mr. Carran, but not yet received it. Once it is received, the United States will file a Notice of Filing with the affidavit attached as an exhibit.

Bond: You'll have to – you'll have to tell me what my other motive was.

Carran: No, ma'am, I would like for you to say to me and to this jury, did you have any other motive other than your belief that there were illegal things going on in the office?

Bond: That was my main motive for going. Mr. Lawrence and I had differences of opinion as to how the books should be kept. He wanted me to omit and ordered me to omit certain things and not put them in QuickBooks and I totally disagreed with him. But since he is the boss and Mr. Ryan said, he's the boss, you have to do what he says.

Carran: Now, today you have said that was your main motive?

Bond: That was my main motive.

Carran: Did you have and are you –

Bond: And I know exactly what you're trying to get me to say and I will say it. The government has a whistleblower's program, okay?

Carran: Uh-huh.

Bond: And they will compensate you, me, you, whoever turns in or turns in information to the IRS about a taxpayer. Now, they will give you a reward if taxes -- back taxes, penalties, whatever is collected. You find that information on the Internet. Everybody knows about it. Now, whether you get a reward is altogether different, because everybody knows getting money out of the government is harder than pulling your eyeteeth. Now, that's the answer you're looking for.

Carran: No, ma'am.

[R. 65: Colloquy, TR (Testimony of Donna Bond) at 669-71.]

The Defendant's claim that the government failed to disclose *Giglio* information, therefore, is refuted by the record, correspondence between the government and defense counsel, and defense counsel himself.

III. Conclusion

Based upon the foregoing, the Defendant's motion should be denied.

Respectfully submitted,

KERRY B. HARVEY
UNITED STATES ATTORNEY

By: /s/ Elaine K. Leonhard
Assistant United States Attorney
207 Grandview Drive, Suite 400
Ft. Mitchell, Kentucky 41017-2762
(859) 652-7035
Fax (859) 655-3211

CERTIFICATE OF SERVICE

On January 14, 2015, I electronically filed this document by using the CM/ECF system, and I mailed a copy to:

Meredith L. Lawrence
107 E. High Street
P.O. Box 1330
Warsaw, KY 41086
Pro Se Defendant

/s/ Elaine K. Leonhard
Assistant United States Attorney

U.S. Department of Justice

United States Attorney
Eastern District of Kentucky

207 Grandview Drive
Ft. Mitchell, Kentucky 41017

859.655.3200
Fax: 859.655.3211

June 20, 2012

Robert Carran
Taliaferro, Carran & Keys, PLLC
1005 Madison Avenue
Covington, Kentucky 41011-3113

J. Richard Kiefer
Bingham McHale, LLP
2700 Market Tower
10 West Market Street
Indianapolis, Indiana 46204

BY HAND DELIVERY

RE: *United States v. Meredith L. Lawrence*
Covington Criminal No. 11-52-DCR

Dear Gentlemen,

I am writing to provide *Jencks* Act material. Enclosed please find the following items:

1. Five compact discs containing recorded phone calls made by Wayne Menfee. This includes the recorded phone calls with your client, which was previously provided to you and misplaced;

2. IRS information referral made by Donna Bond;

3. Transcripts of grand jury testimony of Kelly Moening from 08/11/2011, 01/28/2011, and 08/14/2008;

4. Transcript of grand jury testimony of Donna Bond from 08/14/2008;

5. Transcript of grand jury testimony of Wayne Menefee from 07/09/2009;

6. Transcript of grand jury testimony of Kenny French from 03/10/2011;

7. Transcript of grand jury testimony of Scott Lindsay from 01/28/11;

8. Memoranda of Interview regarding the following:

    a. Anita Powers and Marie Jones;
    b. Donna and Larry Bond;
    c. Donna Bond;
    d. Scott Cammack;
    e. Lydia Dollar;
    f. Angie Miller and Paula Mullins;
    g. Kenny French;
    h. Peggy Hawkins;
    i. Theresa Parker;
    j. Scott Lindsay;
    k. Tracy Menefee-Brady;
    l. Pamela Menefee-Smith;
    m. Wayne Menefee;
    n. Michael Mills;
    o. Jack Osterhage;
    p. Robert Ryan
    q. Greg Evans;
    r. Beth Woodyard

9. Memorandum of Activity dated 04/15/2008.

In the course of preparing for trial, we have learned the following information, which although we do not consider *Giglio*, we are providing out of an abundance of caution:

1. Roy York was charged with Assault while he was employed at Racers, but was found not guilty; and
2. Bob Ryan filed bankruptcy in 2001 in the Western District of Kentucky.

You have already been provided the payments that Wayne Menefee has received from the FBI. Finally, Scott Lindsay, Roy York, and Beth Woodyard have agreements with the United States that they will not be prosecuted for any information that they have provided related to this case. The agreements are enclosed.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

KERRY B. HARVEY
UNITED STATES ATTORNEY

BY: Elaine K. Leonhard

Elaine K. Leonhard
Assistant United States Attorney

EKL/asj
Enclosures

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION
(at Covington)

UNITED STATES OF AMERICA, Plaintiff, V. MEREDITH L. LAWRENCE, Defendant.	)	Criminal Action No. 2: 11-52 **MEMORANDUM OPINION AND ORDER**

*** *** *** ***

This matter is pending for consideration of Defendant Meredith Lawrence's *pro se* motion for a new trial pursuant to Rule 33 of the Federal Rules of Criminal Procedure and *Brady v. Maryland*, 373 U.S. 83, 83 (1963). [Record No. 121] Lawrence claims that the government failed to disclose favorable evidence, thereby prejudicing his defense, and requests an evidentiary hearing on the issue. Having considered the record, the Court concludes that neither an evidentiary hearing nor a new trial is warranted.

I.

Following a jury trial, Lawrence was convicted of three counts of filing false tax returns in violation of 26 U.S.C. § 7206(1), stemming from his failure to report income earned from multiple sources during the 2003-2006 tax years. [Record No. 47] Lawrence was sentenced to 27 months of incarceration, followed by one year of supervised release. [Record No. 87] Lawrence promptly appealed to the United States Court of Appeals for the Sixth Circuit. However, his conviction was affirmed and Lawrence's subsequent petition for certiorari was denied by the United States Supreme Court. [Record Nos. 117, 120] The

CONSENT TO DISCIPLINE EXHIBIT 16

defendant's current motion alleges newly discovered evidence and the improper suppression of favorable evidence at trial. [Record No. 121]

II.

"The question of whether to decide [the] motion on the supporting evidence filed with the motion or to hold an evidentiary hearing is within the discretion of the trial court." *United States v. O'Dell*, 805 F.2d 637, 642 (6th Cir. 1986). Here, there is no need for an evidentiary hearing because there is no evidence from which the undersigned could conclude that the government violated its duty to disclose all material exculpatory evidence in its possession to the defendant prior to trial. Likewise, there is no evidence to support Lawrence's claim that the United States in prosecutorial misconduct. As a result, Lawrence's request for an evidentiary hearing will be denied.

III.

Under Rule 33 of the Federal Rules of Criminal Procedure, "[u]pon the defendant's motion, the court may vacate any judgment and grant a new trial if the interest of justice so requires." Motions "grounded on newly discovered evidence must be filed within 3 years after the verdict or finding of guilty. If an appeal is pending, the court may not grant a motion for a new trial until the appellate court remands the case." Fed. R. Crim. P. 33(b)(1). A motion on any other ground "must be filed within 14 days after the verdict or finding of guilty." Fed. R. Crim. P. 33(b)(2).

To fulfill its due process obligations, the government must disclose any favorable evidence before trial. *Brady v. Maryland*, 373 U.S. at 83. In *Brady*, the Supreme Court held that "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or punishment, irrespective

of the good faith or bad faith of the prosecution." *Id.* at 87. The essential elements of a *Brady* claim for the government's nondisclosure of evidence are: (i) evidence favorable to the accused, either exculpatory or impeaching; (ii) the evidence was suppressed by the government, either willfully or inadvertently; and (iii) resulting prejudice. *Banks v. Dretke*, 540 U.S. 668, 691 (2004). A defendant is prejudiced when there is "a reasonable probability that, had the evidence been disclosed to the defense, the result of the proceeding would have been different." *Kyles v. Whitley*, 514 U.S. 419, 433-34 (1995).

Similarly, motions for a new trial based on newly discovered evidence under Rule 33 are viewed with great caution. For the Court to grant a new trial on these grounds, the defendant bears the burden of establishing that the evidence: (i) was discovered after trial; (ii) could not have been discovered earlier with due diligence; (iii) is material and not merely cumulative or impeaching; and (iv) would likely produce an acquittal if the case were retried. *United States v. Kenny*, 505 F.3d 458, 462 (6th Cir. 2007). Lawrence argues that the government suppressed *Brady* material – information that was favorable to his defense – and violated Rule 33 in two ways: (i) withholding amended tax returns suggesting that Lawrence "had in fact overpaid his federal taxes" in the relevant years and (ii) failing to disclose impeachment evidence regarding government's witness Donna Bond.

A. Amended Tax Returns

Following his conviction, Lawrence retained a Certified Public Accountant ("CPA") to prepare and file amended tax returns for the years related to his charges. According to Lawrence, the CPA "determined Defendant had significantly overstated his adjusted gross income on each indicted years' 1040 return and had in fact overpaid his federal taxes in each year." [Record No. 121, p. 2] This purported "determination" was made in 2014. [*Id.*]

Relying on the CPA's findings, Lawrence argues that the amended returns constitute newly discovered evidence warranting a new trial under Rule 33.

Rule 33 requires that the evidence – not merely the legal implications of the evidence – be newly discovered. As the government correctly points out in its response, the tax returns cited by Lawrence do not constitute not "newly discovered evidence." Instead, they are post-trial documents created by the defendant that, at most, constitute an opinion. *See Barrow v. United States*, 1997 U.S. App. LEXIS 3401, at *6 (6th Cir. 1997) (Defendant's re-calculated tax returns were not "newly discovered evidence."). In essence, the defendant is attempting re-litigate his case by hiring a new expert to re-interpret the legal significance of evidence that was available and presented during trial: Lawrence's 2003-2006 tax returns. Moreover, Lawrence has not shown that the same evidence could not have been discovered earlier with due diligence. There is no reason why the defendant's trial team and tax experts could not have made the same calculations prior to his criminal trial. Thus, the amended tax returns do not suffice under Rule 33 to warrant a new trial.

In the alternative, Lawrence argues that the amended returns constitute material, exculpatory evidence that was withheld by the government in violation of *Brady*. However, because the returns were not available to anyone, including the prosecution, until 2014, the government could not have disclosed them in time for use at trial. Thus, they were not evidence improperly suppressed under *Brady*. *See United States v. Jones*, 399 F.3d 640 (6th Cir. 2005) (evidence that did not exist at the time of the trial was not *Brady* material).

Even assuming *arguendo* that the tax returns constitute improperly suppressed or newly discovered evidence, there is no reasonable possibility of a different outcome and the returns cannot justify a new trial. In light of the large volume of evidence presented during

the two-week jury trial supporting the defendant's guilt, the inclusion of the tax returns, which were based on "additional data [...] provided by [the defendant] and his staff," [Record No. 121-4, p. 4] would not result in a different outcome. Accordingly, neither *Brady* nor Rule 33 requires a new trial under these circumstances.

B. IRS Reward

Lawrence also claims that the prosecution failed to disclose the monetary informant's reward offered by the Internal Revenue Service ("IRS"). Specifically, Lawrence contends that prosecution witness Donna Bond submitted IRS Form 211 (Application for Reward for Original Information) and that the defendant was prejudiced by the non-disclosure for impeachment purposes at trial in violation of *Giglio v. United States*, 405 U.S. 150 (1972).

Although Lawrence correctly notes that *Brady* violations include withheld evidence that could be used to impeach the credibility of witnesses, the prosecution does not violate *Brady* if the defendant knew or should have known the essential facts permitting him to take advantage of the information in question or if the information was available from another source. *Carter v. Bell*, 218 F.3d 581, 601 (6th Cir. 2000). Contrary to Lawrence's contentions, information regarding the IRS reward was not only publicized, but was given to defense counsel *and used at trial.*

Robert Carran, Lawrence's trial counsel, has produced an affidavit confirming his receipt of Bond's Form 211 and referral to the IRS. [Record No. 26-1] In fact, Carran avers that "prior to the trial" he was "specifically aware of the fact that Donna Bond had applied for a reward." [*Id.*, p. 2] Moreover, during Lawrence's trial on June 27, 2012, Carran cross-examined Bond regarding the reward. [Record No. 65] When asked about her motive to come forward with information, Bond admitted that the government "will compensate you,

me, you, whoever turns in or turns in information to the IRS about a taxpayer. Now, they will give you a reward if taxes – back taxes, penalties, whatever is collected. You find that information on the Internet. Everybody knows about it." [*Id.*, p. 43] Because this information was neither newly-discovered nor suppressed by the government at trial, the circumstances do not amount to either a Rule 33 or *Brady* violation.

IV.

For the reasons stated above, Lawrence's motion is without merit. Accordingly, it is hereby

ORDERED that Defendant Meredith Lawrence's motion for a new trial and request for a hearing [Record No. 121] are **DENIED**. Any other miscellaneous relief requested in his motion is also **DENIED**.

This 2nd day of February, 2015.

Signed By:
Danny C. Reeves DCR
United States District Judge

Eastern District of Kentucky
FILED
FEB 05 2015
AT COVINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON
CASE #: 2:11-CR-52-DCR-1

UNITED STATES OF AMERICA **PLAINTIFF**

VS.

MEREDITH L. LAWRENCE, *PRO SE* **DEFENDANT**

NOTICE OF APPEAL

Notice is hereby given that Defendant, Meredith L. Lawrence hereby appeals to the United States Court of Appeals for the Sixth Circuit from the February 2nd, 2015 Memorandum, Opinion and Order denying Defendant's Rule 33 Motion for New Trial/ Brady violations and an evidentiary hearing.

MEREDITH L. LAWRENCE, *Pro se*
107 East High Street
Warsaw, Kentucky 41095

CONSENT TO DISCIPLINE EXHIBIT 17

CERTIFICATE OF SERVICE

Meredith L. Lawrence, *Pro se* certifies that on the 5th day of February, 2015 a copy of this notice was mailed via U. S. Mail – certified to:

MEREDITH L. LAWRENCE, *Pro se*

Attorney Elaine K. Leonhard
Attorney Robert K. McBride
US Department of Justice
US Attorney's Office
Eastern District of Kentucky
207 Grandview Drive, Suite 400
Ft. Mitchell, KY 41017

Clerk, Court of Appeals
6th Circuit U. S. Court of Appeals
540 Potter Stewart, U.S. Courthouse
100 East 5th Street
Cincinnati, OH 45202-3988

Find an inmate.

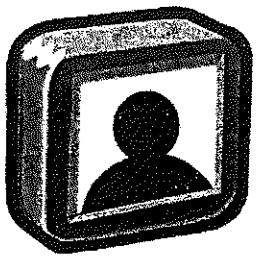
Locate the whereabouts of a federal inmate incarcerated from 1982 to the present.

Find By Number **Find By Name**

First	Middle	Last	Race	Age	Sex
meredith	l	lawrence			

1 Result for search **meredith l lawrence**

Clear Form Search



MEREDITH L LAWRENCE

Register Number: 15284-032

Age: 65
Race: White
Sex: Male

Released On: 02/13/2015

Related Links

Call or email
Send mail/package
Send money
Visit
Voice a concern

About the inmate locator & record availability

CONSENT TO DISCIPLINE EXHIBIT 18

Contact Us | FOIA | No FEAR Act | Privacy Policy | Information Quality | Website Feedback
USA.gov | Justice.gov | Open Government

Character Letters

Barry Alexander
William Baldwin
Stanley Billingsley
Rodger Bingham
Bonnie Bond
Danny Bond
E. Andre Busald
F. Scott Cammack
Gary Carey
Rebecca Carpenter
Sharon Cooley
Clarence Davis
Rhonda Haddix
Clifford and Joy Higgins
Travis Huber
Stephen Huddleston
Kristina Huey
J.P. (Pat) Jamison
Jay Langenbahn
Stephanie Lawrence
Sue LeGrand
Mary Jane McCarty
Debra Melchior
Michael Morrissey
John Osterhage
Floyd Poore
Denise Ratliff
Victoria Reinke
Steven Schletker
Wayne Scudder
Atha Stewart
Diane Taylor
Gary Thompson
Kelley Warnick
Bud Webster
William Wehr
Julia White
Joseph Wilson
Ferdie Wiltz
Joe Wright
John Wright

CONSENT TO
DISCIPLINE
EXHIBIT 19

Richard A. Dove, Director

Board of Professional conduct

Supreme Court of Ohio

65 South Front Street

Fifth Floor

Columbus, Ohio 43215-3431

Dear Mr. Dove,

Sir, my name is Barry Alexander and I am going to start by thanking you for taking the time to read this and taking everything into consideration. I have known Larry Lawrence for over 20 years and I would say that he is my friend. I have worked with him in many different capacities. I would like to share some of those with you. I've worked with him during trials where I was an expert witness, when he was Trial Commissioner in cases that involved accidents and with him and his family when responding to his home, with the Gallatin County Ambulance to treat either his father or one of his children due to illness.

Larry has always been an asset to the resident of Gallatin County. He donated 5 acres to the Gallatin County Fire & EMS, to build a second Fire Station, County Road Dept. Garage, County Park, and Civic Building for the residents of the Sparta District. He also donated 25 acres to the Gallatin County School Board, which, due to the soil testing was unable to locate their however, this land was instrumental in landing the Kentucky Speedway Race Track.

Larry has always been a go to person for helping local charities and nonprofit agencies such as the Gallatin County Fire & Rescue Department, also he alone donated some $17,000 to purchase a complete set of hydraulic rescue tools.

Larry is a family man who has the task of raising his children as a single parent. I feel Larry is a God fearing man and provides a great service to the citizens of

Gallatin County as a Father, Farmer, Property Owner, Businessman, Employer, and his love for his profession as a Lawyer. I think Larry has in all the things I have listed a great passion for all the missions in his life.

I hope that you will decide to allow him to continue as a Lawyer and allow him to continue to provide a valued service to the citizens of Gallatin County.

I want to again thank-you for your consideration on this matter. May God continue to bless you and yours...

Sincerely,

Barry Alexander

Barry Alexander, Chief Warsaw/Gallatin County Fire

TRANSYLVANIA UNIVERSITY
FOUNDED 1780

July 26, 2015

Ohio Board of Governors

Dear Sir:

I am writing on behalf of Meredith "Larry" Lawrence in connection with a determination to be made by the Ohio Supreme Court as to whether or not Mr. Lawrence's law license should be reinstated. Since 1968, my primary occupation has been that of college professor. I have just retired as Professor of Business Administration at Transylvania University (effective May 31, 2015), and I have also worked (and still work) as a forensic economist since 1986.

I first got to know Larry in the early 1970's at Georgetown College where Larry was a student and I was an economics professor. Based on this teacher-student relationship, I had a favorable and lasting impression of Larry. Time passed, and we did not re-connect until 7 or 8 years ago when Larry started retaining me as an economic expert in litigation matters. In this professional relationship, I have found Larry to be a very upstanding individual, always very cordial and complimentary of my assistance whether the outcome of any given case is favorable or unfavorable. Larry has never tried to influence my opinions, which reflects positively on his character. He has always paid me promptly, something I can't say about several of the attorneys for whom I have worked.

Given Larry's age, he does not have many potential working years left ahead of him. Thus, the amount of time he has left to write a final positive chapter on his professional career and (more importantly) his contributions to society is limited. Larry's previous conviction was devastating to his reputation and certainly a humiliating experience for someone of his stature in the community and in his profession. I am confident that Larry has learned from this painful experience and is anxious to put his best foot forward in every facet of his life. Without question, I firmly believe that Larry possesses sufficient professional capabilities to serve the public as a lawyer and is worthy of the trust and confidence of the public.

From a financial perspective, Larry has limited time to make up ground for the financial setbacks he suffered during his time away from law before, during, and after his period of incarceration. My understanding is that Larry has caretaking responsibilities for his two youngest daughters and his elderly father.

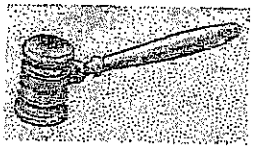
In addition to working with Larry, I have also worked as a forensic economist with his son Justin (an attorney) over the past few years, and I have found him to be one of the nicest, hardest working young men whom I have known. I think this reflects favorably on his father.

Thank you for taking the time to read this letter. I'm sure that Larry would love to have the opportunity that would come from having his law license reinstated to redeem himself by giving his time professionally to those in need of his services and contributing funding to support both his family and worthy causes in the community at large (in this regard, I know that Larry has a big heart). I believe that Larry is deserving of this opportunity and that he will make the most of it if he is fortunate enough to have his license reinstated.

Sincerely,

William T. Baldwin

William T. Baldwin
Retired Professor of Business Administration



JUDGE STANLEY M. BILLINGSLEY (Ret.)
Attorney-at-Law
314 7th. St.
Carrollton, Ky. 41008
Office (502) 732-4617 Fax (502) 732-4631 Cell (859) 322-1242

August 7, 2015

Ohio Supreme Court
% Ho. James Helmer
Helmer, Martins, Rice & Popham
600 Vine St., Suite 2704
Cincinnati, Ohio. 45202

RE:REINSTATMENT OF LARRY LAWRENCE

Mr. Helmer:

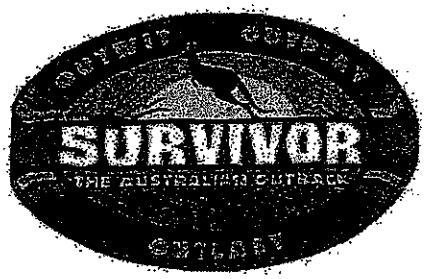
Please pass this letter on to the appropriate official at the Ohio Supreme Court. I have known Mr. Larry Lawrence for over 30 years. For 24 years I was a judge in the District and Circuit Courts. Mr. Lawrence is a highly respected and highly competent attorney. I sat on a personal injury trial in which he represented the Plaintiff and won a $5,000,000 verdict from the jury. He proved to me in that trial that he was a highly competent attorney.

I understand the Mr. Lawrence has applied for reinstatement of his license to practice in the State of Ohio. I am glad to express my opinion that he deserves to be reinstated in Ohio. I understand that his license was pulled by Ohio due to his loss of license in Kentucky. I have written two books on legal ethics and I have read many decisions on reinstatement where the applicant was reinstated even though their offense was far more serious than the charge against Mr. Lawrence.

I will not argue with the Ky. Bar Association, but I believe that he is of good character and deserves the opportunity to be reinstated in both Kentucky and Ohio. The procedures in Kentucky and Ohio provide for reinstatement in similar situations. I would point out that Mr. Lawrence did not steal anyone's money, he did not bring the bar into disrepute. Due to his hard working nature, honesty, moral character and willingness to serve others I believe he merit your consideration.

Sincerely,

Judge Stan Billingsley (Ret.)



Rodger W. Bingham
P. O. Box 461
Crittenden, Ky. 41030

August 4, 2015

Ohio Board of Governors
Hon. James Helmer
Cincinnati, Ohio 45202

This letter in in reference to Lawrence Lawrence and the possible reinstatement of Larry to the bar association.

I went to highs school with Larry in the late 1960 so I have known him for many years and have on several occasions used him as an attorney on a personal level. His entire family is very highly regarded in this area as they have been long time residents.

I know of Larry's past problems and was in the court room in Covington the day he was sentenced. I firmly believe that anyone found guilty of a crime should serve the time as he has done. I also believe that once that time has been served that an individual should also be treated fairly upon their release.

I am asking that you strongly consider reinstating Larry to the bar association. Yes I know he made some bad decisions, however I also know the Larry that has lived in the community, worked in the church, raised a good family, and has helped many, many people.

I always found Larry to be an extremely confident lawyer and strongly encourage you to consider him for reinstatement. If I did not think he had learned his lesson I would not be writing this letter.

Sincerely:

Rodger W. Bingham
A.K.A.
"Ky. Fox"

Bonnie Bond
Sparta Commissioner
P. O. Box D
Sparta, KY 41086
859-322-2091

August 10, 2015

Ohio Board of Governors

Re: Meredith Larry Lawrence

To Whom It May Concern:

This letter is on behalf of Larry Lawrence. I know Larry (as we all know him) through serving on the Sparta, KY City Council. Larry served as our City Attorney without pay from 1998 to 2010. During this period, he assisted the city in reorganizing the loss of paperwork due to the 1997 flood which destroyed most records within the city building.

Larry provided direction when needed in the issues that occur within our local government and all advise was true and helpful in any legal issue that occurred.

While I did not know him personally, he was always professional in our meetings and with discussions and/or explaining issues that might not be clear to me in a legal aspect.

I know he was committed of a crime and he has served his sentence. I believe justice has been served and he now wants to go back to work in what he knows.

Please consider his reinstatement.

Sincerely,

Bonnie Bond

Bonnie Bond
Sparta Commissioner

Bond Farms
Danny Bond, Owner
1400 Old Sparta Road
Sparta, KY 41086
Telephone: 859-643-2091

August 10, 2015

Ohio Board of Governors

Re: Meredith Larry Lawrence

To Whom It May Concern:

I am writing on behalf of Larry Lawrence, as a friend and neighbor farmer.

Larry is a well-known farmer in our community. In owning farms, he has provided employment to those who would perhaps have no means of earning a living. Being an owner/operator of a farm requires hard work both in the field and behind a desk. I've always known him to be an honest hard working man and have had many transactions with him.

Larry as a neighbor - he has given plots of land for burial of those who may not be able to afford a place in the cemetery. He is kind hearted to those in need.

Larry as a family man. He is dedicated to his children and to their care and education. He assists in the care of his aging father, as well as, a child with diabetes.

I know he was in trouble a few years ago and I believe he has been sufficiently punished for his wrong doings. It's time for him to go back to work and prove he is a law abiding citizens and has learned from the past.

Thank you for you time in considering my letter in support of his reinstatement.

Sincerely,

Danny Bond

BUSALD FUNK ZEVELY, P.S.C.

E. ANDRE' BUSALD*
WILBUR M. ZEVELY*
WILLIAM J. KATHMAN, JR.*
MICHAEL J. McMAIN**
GAIL M. LANGENDORF*
RYAN M. BECK
ETHAN A. BUSALD
GREGORY M. ERPENBECK
JONATHAN M. HART

ATTORNEYS AND COUNSELORS AT LAW

226 MAIN STREET

P.O. BOX 6910

FLORENCE, KENTUCKY 41022-6910

859/371-3600 · 859/371-2300

TELECOPIER 859/525-1040

www.bfzlaw.com

C. WILLIAM FUNK
1928-1989

*ADMITTED IN OHIO AND KENTUCKY

July 29, 2015

Ohio Board of Governors
c/o Supreme Court of Ohio
65 South Front Street
Columbus, Ohio 43215-3431

RE: Reinstatement of Meredith "Larry" Lawrence

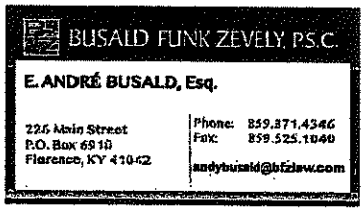
Greetings:

I am a member in good standing with the Ohio Bar Association (Registration No.: 0043584) since 1989. I am also past president of the Kentucky Justice Association (formerly the Kentucky Academy of Trial Attorneys) and the Northern Kentucky Bar Association.

I am writing this letter in support of the reinstatement of Meredith "Larry" Lawrence whom I understand has reapplied for admission to the Ohio Bar. I am aware that Larry ran afoul with the IRS (the details of which I am not fully aware) and has paid his debt to society.

I have been practicing law for over 44 years and have known Larry for 35 or 40 of those years. In fact, he and I have co-counseled several cases to a successful resolution. During those cases and over those years I have observed his hard working nature, honesty, moral character and willingness to serve the public (and the Kentucky Bar Association I might add). I can tell you from firsthand experience that he possesses exceptional legal skills and all the attendant professional capabilities necessary to serve the public. I believe he is worthy of the trust and confidence of the public and like every other American, deserves a second chance. I feel confident that if the Board of Governors and the Ohio Supreme Court grants him reinstatement they will have once again given the public the opportunity to be served by an outstanding attorney.

Very truly yours



F. SCOTT CAMMACK
ATTORNEY AT LAW

6900 Houston Road
Bldg. 600, Suite 19
Florence, KY 41042

Phone: (859) 444-8469
Email:scott@hurtinkentucky.com
Fax (502) 808-6067

July 27, 2015

Re: Meredith L. Lawrence

Dear Mr. Dove,

I have known Meredith "Larry" Lawrence very well since 1995. I have known Larry both as a business associate and friend.

In 1995, I graduated from Chase College of Law. I began practicing with Larry as a law clerk. When I obtained my bar results, I began sharing office space with Larry. Over the years, Larry taught me many valuable lessons regarding the practice of law. Larry is an outstanding trial attorney and has helped numerous individuals that were injured through no fault of their own. Larry taught me the workings of an injury case. Larry taught me the value of respecting not only the injured client but respect for the opposing side and Judiciary. Larry's skills as an attorney stem from his compassion for all individuals associated with a case. Larry truly takes every case to heart and understands what it is to be injured.

Larry and I shared an office and practiced law together until 2008. Larry and I worked together countless personal injury cases. There was never any question that money was kept straight in the office IOLTA account and we never had a client file a complaint of any form against us.

Over the years, I came to know Larry as a very dear personal friend. Larry is not only a respected businessman but is also a valuable contributor to the community. Larry has been extremely generous to all of Gallatin County.

Larry has employed countless people from Gallatin County. These people have and still depend on Larry for their livelihood.

In addition to being an employer, Larry has been a friend to the community. Larry has served as Gallatin County Trial Commissioner and as Sparta City Attorney. These roles were often served with little if any compensation. Larry has volunteered countless hours of time in an attempt to improve the quality of life for everyone in Gallatin County. Larry has donated numerous hours and dollars to improving the community in which he lives. He has contributed to the Gallatin Schools as a sponsor for events too numerous to mention. As a result, Larry has become a figure that is looked up to as a community leader by many.

On a personal level, Larry is a model father, grandfather, son and family man. Larry has raised six children (two of which are now attorneys). These children all still depend on Larry. Larry is a single father of two minor daughters. These girls totally depend on their father and would be completely lost without him. Larry is responsible for meeting the girls' every need. Larry also cares for his elderly father. Mr. Lawrence is in his 80's and lives beside Larry on the family farm.

I am aware that Larry has been convicted of a felony and has lost his license to practice law. However, based upon the above facts, I respectfully ask the bar association take into consideration all of these facts and reinstate his license to practice law. Larry Lawrence is 64 years old and has spent his life helping others. I am forever indebted to and grateful for Larry giving me a start in the legal field. In addition, I am proud to have considered Larry as a very dear friend for the past 20 years. Meredith "Larry" Lawrence is a valuable asset to the legal community and should be reinstated to the practice of law.

Very truly yours,

F. Scott Cammack

Gary S. Carey
332 Southern Drive
Williamstown, KY 41097

July 30, 2015

Ohio Board of Governors

RE: Meredith L. Lawrence

Dear Board of Governors:

My name is Gary S. Carey. I am retired from the Kentucky State Police. I worked for the Kentucky State Police from 1974-1999. I retired as Senior Trooper at Post 6 in Dry Ridge, Kentucky. During nearly all of my time on active duty and since my retirement, I have known, been associated with, and have worked with the Defendant in your Court, Meredith L. Lawrence. I am very knowledgeable about his traits, habits, the way he thinks and have personally been physically with him during various and different types of situations over the years. I know Meredith L. Lawrence not only from the stand point of Law Enforcement, but also from the stand point of a farmer, a lawyer and a fellow citizen of the Commonwealth of Kentucky.

I recognize from years of Law Enforcement that as Judge, you will take into consideration many, many things before admitting Meredith L. Lawrence back to the bar to practice law again. In that regard, please allow me to state that in our region of northern Kentucky, there exists no finer, honest man than Meredith. His character is known throughout the northern counties by many lawyers, the Judges, the clerks, the court house personnel generally and hundreds of people throughout Gallatin and Grant counties particularly. He is always a man with a huge heart and would follow the rules and instructions of the law to the letter, perhaps even to a fault.

Please admit Meredith Lawrence back to the bar to allow him to practice law again. Thank you for your consideration.

Best regards,

Gary S. Carey
RET. TPR K.S.P.
Gary S. Carey

Gallatin County Schools

Wallace Central Office Building
75 Boardwalk
Warsaw, KY 41095

Travis Huber
SUPERINTENDENT

Raymond A. Spahn
ASSISTANT SUPERINTENDENT

Roxann Booth
DIRECTOR OF DISTRICT WIDE SERVICES/DPP

Debra Foltz
DIRECTOR OF DISTRICT WIDE SERVICES I

Renee Cameron
DIRECTOR OF SPECIAL EDUCATION

Mark Hale
DIRECTOR OF TRANSPORTATION

Kelley Gamble
FINANCE OFFICER/TREASURER

Michelle Lawrence
CHIEF INFORMATION OFFICER

"Maximizing Student Learning & Achievement"

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859-567-2828/182
Fax
859-567-4528
www.gallatin.kyschools.us

July 21, 2015

Mr. Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Re: Meredith L Lawrence

Dear Mr. Dove,

In September 2010 I found myself in dire need of immediate legal counsel regarding an extremely sensitive situation. I picked up the phone and called my former employer whom I hadn't spoken to in years, Meredith "Larry" Lawrence. I explained my situation and expected him to respond with "call my office and schedule an appointment with my secretary and I'll see what I can do." Much to my surprise he asked me if I needed him to meet with me immediately and within a few hours met with me to discuss the matter.

That was 5 years ago and as a result of that initial legal consultation I've learned that's the type of person, lawyer, friend and father he is. Whether it's a legal situation, someone in need, or his children and family he is the most dependable, trustworthy and capable person I know. He takes care of those he is responsible for and has for years lent a helping hand to anyone who needs it.

As his former legal secretary I watched him "fight the fight" for clients when other attorneys would have likely chalked the case up to a lost cause. He didn't. Even when it became blatantly obvious that the initial desired amount of monetary relief wasn't going to come through, he kept on working the case until an acceptable settlement was reached. The client ALWAYS came first and was represented to the very best of Larry's ability. He didn't just take the cases he knew could be won. He took care of clients whom no one else would fight for no matter how small the return. If it needed attention, I soon found he was the lawyer, friend and father who never gave up in the courtroom or in daily duties.

Over the 20 plus years I've known Larry I've observed his commitment and dedication to others; often giving monetarily and donating his time to those in need. Perhaps the most incredible, charitable act I've personally witnessed was his response to a person in need who had testified against him in the action brought forth by the federal government in which he was pronounced guilty and sentenced to 2 plus years in prison. A witnesses' daughter phoned Larry and stated her father had no means to heat his home and asked Larry for assistance. I was sitting in Larry's office when the call came in and was absolutely appalled that she had the nerve to phone with such a request. Larry told her he would look into it and get back with her. I assumed this was the end of the situation. A few days later I jokingly asked if he had "addressed that situation." He responded with "I took him a load of wood so he'd be warm. He's not in good health and someone had to do it."

I realized very quickly this was not your average person. The man who testified did so knowing it would cause Larry harm. And the kindness and compassion shown in return was something I'd never witnessed outside the church. I saw the Larry I knew in a different light and my respect and admiration for him grew that day. In recent years I watched him be both dad and mom to his children, two of whom require extensive medical care. His Monday - Friday routine: arrive at the office very early, spend the day working diligently, arrive home for time with his children and then visit with his elderly father. His time is devoted to others with very little relaxation or quality time for himself. He does this willingly and never complains.

There have been countless times when Gallatin County students didn't have enough money to cover trips, school expenses, etc. Larry would come through for them when asked. I know of many, many people who have lived in his rental properties for free for as long as needed. His charity, honesty and integrity are above reproach.

There are many who practice law. There are millions of fathers, sons, and friends who will say they're committed to others. But in my 47 years of life I've never met an individual who cares as deeply, forgives completely, fights as diligently and works as tirelessly as Larry Lawrence. From sun up to sun down, he's putting forth his best effort to be productive and helpful to others. There is no other person on this earth I've found to be more worthy of trust and loyalty. He's the most honest, caring lawyer and family man I've ever met. I've worked with many attorneys, but several simply don't and won't work for clients as he will. If there's a fight to be fought, he is without a doubt the attorney you want in your corner. He gives of himself and his services completely and without hesitation; not only in the form of attorney, but as a valued member of the Gallatin County community.

I respectfully ask his request for reinstatement to the Ohio Bar Association be granted.

Sincerely,

R. Carpenter

Rebecca Carpenter
Administrative Assistant

Mr. Jim Helmer
Helmer, Martins, Rice & Popham Co., L.P.A.
600 Vine St.
Suite 2704
Cincinnati, OH 45202

Dear Jim Helmer,

July 27, 2015

I am writing to you regarding Mr. Meredith Lawrence. I am requesting your consideration and affirmation of Mr. Lawrence being reinstated to practice law.
When one ponders who should represent our incredible country's constitution and citizens in need, Larry Lawrence is one that definitely comes to mind. I have known Larry for almost fifty years. It began at Princeton High School and I have had the privilege of continuing this friendship across these fleeting decades. His integrity and giving personality are two characteristics that instantly come to mind. In addition, Larry Lawrence is incredibly dependable and always there to lend a hand as well as has financially help numerous folks throughout the years. Part of this is probably due to Larry's high esteem concerning civic duty and responsibility. Those qualities also are evident in his value he holds for all people, young and old, regardless of personal wealth or lack of it, ... whoever is in need. Couple these qualities with how he has reared his children (absent of a wife that left not wanting to be tied down with her children) or taking care of his elderly father, whom he is blessed to still have, and one sees the true qualities of an incredible person that I pray has the opportunity to continue his future as a conscientious attorney, licensed in our State of Ohio.

In appreciation for your time and consideration,
Respectfully,

Sharon Cooley

Sharon Griggs Cooley
Literacy Specialist
4 Hickory Woods Ln.
Loveland, Ohio
45140
513-683-1941

August 7, 2015

Ohio State Bar Association
Columbus, Ohio

Re: Meredith L. Lawrence
Reinstatement

Dear Sir or Madam;

I write to support the reinstatement of Meredith L. Lawrence to the practice of law.

I have known Mr. Lawrence for well over 30 years. Having been very active in our shared community as County Sheriff and County Judge/Executive for 32 years, I am familiar with his public and professional record.

Mr. Lawrence is hard-working and vigorous in his representation of clients. He is generous toward chartable and civic causes, and respectful and courteous at all times.

Past transgressions have been duly punished. I believe he deserves a second chance.

Clarence Davis

Clarence Davis

July 27, 2015

Mr. Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Re: Meredith L. "Larry" Lawrence

Dear Mr. Dove,

Larry Lawrence has been of friend to my family for as long as I can remember. I grew up in Gallatin County and have over the years witnessed his many acts of kindness, charity and generosity to anyone in need.

Mr. Lawrence is a very down to earth man and attorney. He doesn't believe in turning a blind eye to someone in need whether it be in the form of legal counsel or simply lending a helping hand to those less fortunate. He believes if he's been given much, it's his to share with his neighbors, family, friends and even a perfect stranger who may be down on their luck.

As an attorney he leaves no stone unturned in pursuing the best interests of his clients. When his law license was revoked, the entire community suffered. Everyone in this area knows when they need effective, sound legal advice and help he will be there for them.

This county itself suffered finically right along with Mr. Lawrence and his family during his incarceration. Many people who depended on him and his business ventures found themselves without employment and no means to provide for their families. At one point Mr. Lawrence paid more in property taxes than any other individual in Gallatin County. He was and is a vital member of our community.

I strongly urge you to allow Larry Lawrence to be re-instated as an attorney. He is an asset to all.

Sincerely,

Rhonda Haddix

09-01-15
921 Hwy 455
Sparta, Ky
41086

Ohio Board of Governors
Honorables James Helmer
Helmer, Martins, Rice + Popham

Honorable Gentlemen
Re: Larry Meredith Lawrence
Re-instatement of License to practice Laws.

My wife and I have known Larry since he was a new born - knew his parents and both pair of grand-parents.

He has lived here in our county (smallest) county in state of Ky - so we are known and thankfully have a reputation of honesty. We have been married for 48 years so you can see in a small community you can make inquiries as to our characters.

Larry is needed in this county and as a licensed attorney. As a sheriff here for 9 years I saw his performances, many times working as hard, doing extensive research for indigents; knowing he'd never collect any fee, just as if he was working for wealthy clients. He is needed to practice here - needed in his church - in the support at school, needed all over his community. Please give this very serious consideration. Thank you. Clifford + Joy Hopkins

Gallatin County Schools

Wallace Central Office Building
75 Boardwalk
Warsaw, KY 41095

Travis Huber
SUPERINTENDENT

Raymond A. Spahn
ASSISTANT SUPERINTENDENT

Roxann Booth
DIRECTOR OF DISTRICT WIDE SERVICES/DPP

Debra Foltz
DIRECTOR OF DISTRICT WIDE SERVICES I

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Kelley Gamble
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Michelle Lawrence
CHIEF INFORMATION OFFICER

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July 21, 2015

Mr. Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Re: Meredith L Lawrence

Dear Mr. Dove,

During my time as Superintendent of Gallatin County Schools I've met people in this community who can be depended upon to lend a helping hand in various situations. Larry Lawrence is such an individual. Whether it be chaperoning an event, funding a scholarship, sponsoring a child on a trip or allowing students to use his farm for activities he is always willing to assist.

In his capacity as a former attorney I've heard nothing but praise for Mr. Lawrence. Throughout the years he's assisted many clients in obtaining desired settlements and isn't afraid to take on the most challenging cases.

I fully support his reinstatement to the Ohio Bar Association and ask for your consideration of same.

Sincerely,

Travis Huber
Superintendent

HUDDLESTON LAW OFFICE, PLLC

"Serving Gallatin County since 1979"

Admitted to Practice 1976
Warsaw City Attorney 1979-1988
Gallatin County Attorney 1988-2002
District Court Judge 2009-2010

Stephen P. Huddleston, Attorney
Post Office Box 988
307 West Main Street
Warsaw, Kentucky 41095

Ofc: 859.567.2818
Fax: 859.567.2404

July 31, 2015

Ohio State Bar Association
Columbus, Ohio

Re: Reinstatement of Meredith L. Lawrence

Dear Sir or Madam;

This is to recommend favorably the readmission of Meredith L. Lawrence to your Association and the reinstatement of his license to practice his profession.

I have known Lawrence in excess of 30 years. Many times I have practiced cases with and against him (mostly against). I know him to be thorough, hard-working, skilled and vigorous in the pursuit of his client's interest.

He is a man of considerable compassion, empathy and generosity. He is polite and responsive in personal and professional matters. His debt to society has been paid without public complaint or whine.

I should say that some five years ago I rented office space from Lawrence for six months. We have never been partners.

While I have a friendly professional relationship with him, we are not social friends. We do not spend time together socially. Neither has ever been to the home of the other.

What's done is done. He has lived with and suffered the not inconsiderable consequences of his past acts. As we live in the same small community, I know of which I speak in that regard.

Very truly yours,

Stephen P. Huddleston

SPH/cje

Dear Ohio State Bar Association,

I have known Larry Lawrence since I was in grade school. His daughter and I have been friends all through grade school to the present. Over the years, I have been able to judge his character accordingly.

I feel that Larry Lawrence has always been caring and compassionate. He has always offered to help me whenever needed. I have gone on multiple family vacations with Mr. Lawrence and he has always made sure that everyone was well taken care of. He has demonstrated to me that he not only thinks of himself, but cares for others.

I think that Larry Lawrence could help his community and those around him if he is given back the ability to practice law. I, personally, have never witnessed him abuse his power and he is always there to help those around him. His many years of experience could also help to influence others who are interested in law in a positive manner.

In conclusion, I hope you take my letter into consideration as I do believe that Larry Lawrence should be able to practice law again. If you have any questions, please feel free to contact me.

Sincerely,

Kristina M. Huey, PharmD

859-640-0500

Kmhuey2@uky.edu

J.P. (Pat) Jamison
Marine Consulting, Inc.

Any Gross Ton Master - Pilot • Issue #10

220 South College St. • Marion, KY 42064 Cellular Phone: 270-853-9070 Home Phone: 270-965-4745

Expert Witness • River Navigation • Personal Injury (Jones Act)

July 27, 2015

Dear Ohio Board of Governors:

I am a professional riverboat captain and have 50-plus years experience in the river industry. I am a licensed Master Pilot with Any Gross Ton License (10th Issue) with over 49 years in the wheelhouse as the captain of the vessel. I have owned and operated J.P. (Pat) Jamison Marine Consulting, Inc. since 1983.

I have known Mr. Meredith L. Lawrence for several years. When we first met I found out that he was a deckhand for M/G Transport at one time. I have worked for the Meredith L. Lawrence, PSC law firm as an expert witness on numerous occasions. I have always found Mr. Lawrence to present himself in a very respectful and professional manner when he was representing the plaintiff in cases involving the Jones Act. We have not only shared a professional relationship but also a personal one in our mutual interest in horticulture primarily in organic gardening. I have met his family and have visited his home and farm at different times. I have also shared with Mr. Lawrence and his family the honey I have from my beekeeping hobby.

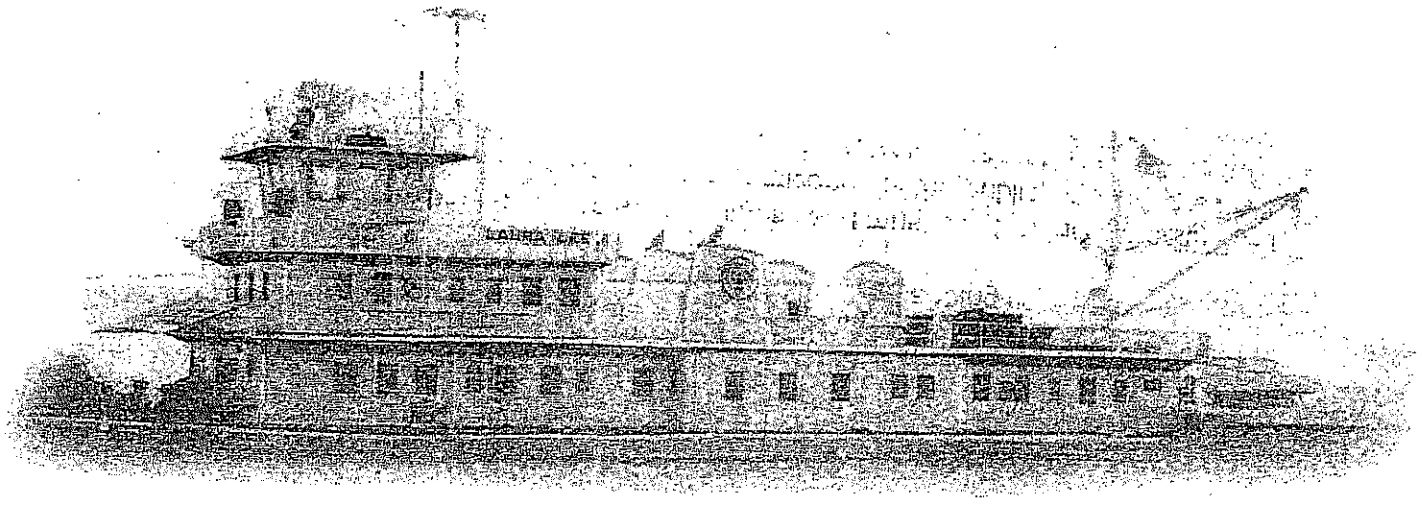
In the past 32 years I have worked as an expert witness and must say that Mr. Meredith "Larry" Lawrence, in my travels, is worthy of the trust and confidence of the public, and that it is my opinion, that Mr. Meredith "Larry" Lawrence does possess sufficient capabilities to serve the public as a lawyer.

It is my professional opinion that Mr. Meredith "Larry" Lawrence would be an asset to the Bar Association by allowing him to have his Law License back.

Respectfully submitted,

Captain James P. Jamison

Captain James P. 'Pat' Jamison



LINDHORST & DREIDAME

A LEGAL PROFESSIONAL ASSOCIATION

312 WALNUT STREET, SUITE 3100
CINCINNATI, OHIO 45202-4048
TELEPHONE: (513) 421-6630
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WWW.LINDHORSTLAW.COM

JAMES L. O'CONNELL
JAY R. LANGENBAHN (1)
JAMES H. SMITH III
MICHAEL F. LYON
THOMAS E. MARTIN
JAMES F. BROCKMAN
BARRY F. FAGEL (1)
MICHELLE L. CLEMONS
BRADLEY D. McPEEK
DAVID E. WILLIAMSON (1)
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AMBROSE H. LINDHORST 1913-1997
ROBERT F. DREIDAME 1914-1978
WILLIAM J. WALSH 1919-1996
LEO J. BRESLIN 1928-2000

(1) ALSO ADMITTED IN KENTUCKY

WRITER'S DIRECT DIAL

(513) 345-5760
jlangenbahn@lindhorstlaw.com

July 24, 2015

Ohio Bar Disciplinary Counsel
Attention: Mr. Dove

IN RE: Application for Reinstatement of Meredith L. Lawrence

Dear Sir/Madam:

I have known Meredith L. Lawrence ("Larry") since we were first year law students at Northern Kentucky University Salmon P. Chase College of Law in 1972. This is over 40 years. After we graduated from Law School, Larry became a prominent plaintiff's lawyer prosecuting many personal injury claims in the Commonwealth of Kentucky and State of Ohio. Meanwhile, I became a successful defense lawyer working for Lindhorst & Dreidame. Larry and I have crossed paths a number of times during our legal careers and have actually tried a number of cases against each other.

I found Larry to be a good advocate for his clients and someone you can trust in handling your case.

I am aware of Larry's criminal case. I know that Larry has served his time and his sentence. Now is a good opportunity to give Larry a second chance to continue his legal career.

Sincerely yours,

LINDHORST & DREIDAME

Jay R. Langenbahn

JRL/kjs

605856

August 3, 2015

Ohio State Bar Association

Re: Meredith (Larry) Lawrence

To Whom It May Concern:

I am writing in reference to the reinstatement of Mr. Lawrence's law license.

I worked for Mr. Lawrence from 1979 through approximately 1985 as a legal secretary. I was also married to Mr. Lawrence from 1984 through 1994, and have been associated with him since 1979 to the present. We share three adult children and 5 grandchildren. I see him and associate with on a regular basis.

By this letter, I am respectfully requesting that he be considered for reinstatement of his law license. I know him to be the hardest working person that I know, especially in his law practice. I witnessed his legal work with clients and in the courtroom while I worked there and found him to be honest and loyal. I always felt he worked to the maximum of his ability to do what was best for his clients. I watched his work make the lives of many people become better and/or the best that they could be.

I never heard any complaints about his role as an upstanding attorney and feel he should receive his license back so that he may continue to serve future clients.

Sincerely,

Stephanie Lawrence

Stephanie Lawrence
2489 High Crossing Drive
Crescent Springs, KY 41017
859-331-8021

Gallatin County Coroner's Office

Sue LeGrand RN, Coroner

106 W Main Street
P.O. Box 1051
Warsaw, KY 41095
(859) 655-5741 Office
(859) 567-7928 Fax

Jack Webster, Deputy **Ken Lafferty, Deputy**

July 27, 2015

Mr. Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Re: Meredith L. "Larry" Lawrence

Dear Mr. Dove,

I have lived in Gallatin County for 35 years and have known Larry Lawrence for at least 25 years. I am writing this letter to enlighten you on my thoughts of Larry Lawrence, and why I think he should be reinstated.

Larry has always been a family man; providing for his children and taking care of his elderly father. He is a very hard worker in many areas of this community.

Larry is a very compassionate man and has helped many people in our community, never seeking recognition. He is very well educated and our community would benefit greatly from his services. He is fair and trust worthy and would be a great asset to the bar association.

Larry has paid dearly for the legal actions brought against him. Everyone deserves a second chance in this life so they can make a better ending. Please consider him for reinstatement to the bar.

Sincerely,

Sue LeGrand

Sue LeGrand
Gallatin County Coroner

MARY JANE McCARTY
P.O. BOX 1125
WARSAW, KY 41095
mccarty2101@gmail.com

July 28, 2015

Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Dear Mr. Dove:

I would like to submit this character reference on behalf of Meredith L. Lawrence. I met Larry approximately twenty years ago when we became neighbors. Larry has proven himself time after time to be not only a wonderful neighbor, but also an outstanding citizen. I have been witness to his constant contributions to the community throughout our association. His willingness to be an active part of the community is evident in his every day activities.

The law offices that have operated under his influence in the past have been a stable business for our small town. They have provided legal services for the citizens here, and in many of our surrounding counties. I have personally recommended him to family members and friends. I hope to be able to do so again soon. Larry has proven himself to be a trusted professional in the past and I trust him still.

I would like to thank you for considering the reinstatement of Meredith L. Lawrence to the practice of Law in the State of Ohio. I hope that this letter will help you to understand what an asset Mr. Lawrence and his practice have been to our community. If you have any questions please do not hesitate to contact me. My personal cell phone number is 859-567-4134.

Sincerely,

Mary Jane McCarty

July 22, 2015

Mr. Dove
Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front St.
Fifth Floor
Columbus, OH 43215 – 3431

Dear Mr. Dove,

I am writing to you regarding Mr. Meredith Lawrence. I whole-heartedly, without any reservations, recommend to you that Mr. Lawrence be reinstated to practice law.

I have known no other person in my entire life who has the sterling qualities that Larry possesses. We attended Princeton High School together and have remained stead-fast friends ever since....nearly 50 years of observations. His honesty and integrity has been prominent in his life for all to see, for all these years. Obviously, I have seen him in many situations & circumstances and I have never ONCE seem him display, in speech or actions, anything less than exemplary behavior. He is the friend we should all pray to have. No one was ever more firmly rooted in American patriotism nor has anyone in my acquaintance ever so strongly held the trust & belief in our system of law and order.

He has consistently exhibited both generosity & compassion in all arenas of life.
I know he has donated both land & money to peoples & organizations in need.
Starting with the Fire Department & Church in the near vicinity of his residence.
For years, he financially helped our class, with the greatest good deed being the fact that he paid to get our beloved and retired high school counselor back to Cincinnati on a regular basis. Many of Larry's employees were also beneficiaries of his good heart.

Larry has had custody of his two underage daughters and has single-handedly raised them since they were mere toddlers. They are his whole world & being away from them was excruciating. He has total love, respect & admiration for his 88 year old Father. Larry has been his caregiver, best-friend & source of financial support for many years . Besides a total of 6 children, there are also 6 grandchildren who look up to this man for comfort and love because he had provided them with an extremely admirable family-life.....being a superb role-model to these generations of family.

I appreciate your time in reading this letter and I hope you recognize the value & worth of Mr. Lawrence. His practice of law in the past has been virtually life-saving to many of his clients. He works diligently for justice and no-one is unimportant to him. I'm sure many of his clients would concur with this sentiment...myself being one of them. He was there for me professionally when I encountered difficulties with my daughter. Larry kept me sane!!

I pray you allow him the opportunity to keep up the good work he is so aptly qualified to render to those who might require future representation by a conscientious attorney, licensed in the State of Ohio.

Most sincerely,

Debra K. Melchior

Debra K. Melchior
7961 Laurelwood Dr.
Maineville, OH 45039

2015 Wood Brook Drive
Amelia, Ohio 45102

July 24, 2015

Mr. Dove
Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

RE: Meredith L. Lawrence

Dear Mr. Dove:

By way of introduction my name is Michael W. Morrissey. I retired on January 2, 2002 from the U. S. Treasury Department's Bureau of Alcohol, Tobacco and Firearms (ATF) after completing nearly 30 years of honorable service to my country, which included a brief tour of duty as a commissioned officer in the United States Air Force. My last official position with ATF was the Special Agent in Charge of the Detroit, Michigan Field Division. After retiring, I was employed by the School of Criminal Justice at Michigan State University where I developed and managed a training program for executive level law enforcement officers relative to counter-terrorism and incident command. This two day program was conducted around the nation for almost 4 and ½ years. In October 2007 I retired from Michigan State University. I currently reside in Amelia, Ohio with my wife and together we are responsible for taking care of our aging parents.

In June of 1968, I graduated from Princeton High School, Sharonville, Ohio, with Meredith Larry Lawrence. I have personally known him by his nickname of "Chick". Our relationship is strictly a personal one of friendship. Although we did attend the same high school and graduated together, our social activity was not in the same circles. We knew who each other was but had limited socialization while we were in high school. I saw Mr. Lawrence very infrequently from 1968 until my return to the greater Cincinnati, Ohio area in May of 2010. Most of our contacts were at high school reunions that were held approximately every five years.

Upon returning to the greater Cincinnati area, my wife and I began associating with a group of men and women who had graduated from Princeton High School in 1968. These were strictly social functions that rotated from house to house every two to three months. Mr. Lawrence attended most of these functions and I conversed with him on numerous occasions. I found him to be quite pleasant, friendly, and responsible to his family and his friends. Not once did he mention to me his legal problems or his personal concerns. I have always found Mr. Lawrence to be forthright with me and I have come to appreciate him as a good friend.

I am now well aware of Mr. Lawrence's legal problems relative to his Federal conviction for failure to report income, or for making false statements on his Federal tax returns over a period of three years. I am also aware that Mr. Lawrence was sentenced to serve a period of time in prison and that he has fulfilled his period of imprisonment with a clean record. I believe he is currently on parole or probation. To my knowledge he has not violated any conditions of his parole or probation and he has remained a dedicated father to his two minor daughters and is the sole caretaker for his aging father.

I have had contact with Mr. Lawrence after his release from prison at social functions related to the reunions of our high school friends and associates. He remains a friend of mine and someone I believe I could count on in an emergency. He always exhibits the highest degree of integrity and honesty when we are together and I am aware that he remains a dedicated father and son. He has assumed a great deal of responsibility to resume a prioritized life with the needs of his family first and foremost on his list. Part of that responsibility is in the area of returning to work as an attorney and I maintain a full confidence and faith that Meredith L. Lawrence would be an outstanding attorney and a tremendous asset to the Ohio Bar Association.

Thank you in advance for considering this matter in light of the information I have provided in this correspondence. Should you need to contact me regarding this matter, you may telephone me at (513) 843-7727. I am fully aware of the responsibility you bear in the matter of returning Mr. Lawrence to the bar association. I simply ask for some consideration on his behalf for reasons as stated in this correspondence.

Sincerely,

Michael W. Morrissey

Michael W. Morrissey

JOHN J. OSTERHAGE

Attorney at Law
6900 Houston Road
Building 600, Suite 19
Florence, Kentucky 41042

Telephone Number (859) 525-1160
Fax Number (859) 525-0076
osterhage@fuse.net

July 25, 2015

Ohio State Bar Association

Re: Meredith L. Lawrence

To The Reader:

I have known Meredith L. Lawrence personally and professionally for more than 25 years. Throughout all of that time-and currently- I considered him an excellent attorney.

I am not trying to re-litigate the case that resulted in his disbarment but, it was so out of character for him that I have a difficult time believing it was an intentional course of criminal conduct and not more akin to a civil dispute that took on a life of its own.

Consistently over those 25 years I have seen Meredith L. Lawrence work hard for his clients. He took on many cases that other attorneys passed on and because of his hard work, obtained favorable results for clients that were in need of assistance from the court system. I knew him to be an active supporter of his local community and Bar Association.

Never once in my time with him did I observe anything other than an honest, hard-working, professional attorney. He did a good job for his clients and obtained a fair wage. I do believe Meredith L. Lawrence is worthy of the trust and confidence of the public; that he possess the requisite professional capabilities to return to serve the public as an attorney.

Very Truly Yours,

John J. Osterhage

JJO:dim

August 6, 2015

Ohio Board of Governors

Re: Meredith "Larry" Lawrence

Concerning: Reinstating Larry Lawrence to The bar Association and allowing him to have his Law License Back

To Whom it may Concern,

I have known Larry Lawrence for over 60 years. We grew up Together in Grant County, Kentucky. He has Always been a well Intended, Community oriented, forthright Individual with everyone. He has Represented his clients in an Admirable way. He has been a good man.

Larry made a mistake in Judgment and has paid a dear price. He needs a second Chance to practice his profession and to meld back into his Legal Profession and his community. He will be a great Example of what it means to get a second chance.

I urge you to give him that second Chance, He will be worthy of your trust and confidence. He has Always been Hard working, worthy of the trust and confidence of The public and he possesses great professional capabilities as a Lawyer.

I wish for him a very positive outcome.

Floyd G. Boone, MD
6201 Doulletree Ln,
Florence, Ky. 41042
cell- 859-240-2506

AUGUST 4, 2015

Ohio Board of Governors,

Denise Ratliff

PO Box 7

Glencoe, Ky 41046

I am writing this letter to you regarding the reinstatement of the law license of Meredith Larry Lawrence.

I have known of Larry Lawrence for years, I had heard of his dedication to his clients and his career. Over the past 15 years I have been able to see the kind of man Larry Lawrence can be. He is a man who helps a neighbor in need, donates time to his community. He is a parent who, like the rest of us, is concerned about his children. Being supportive, whether it is helping one start a career or teaching one to drive.

I have also seen the kind of attorney he can be. He is courteous and respectful to the clerks and court personnel. He is a professional in the courtroom. Most importantly, he respects his clients and works hard to get the best results for them.

Larry Lawrence is a nice man. He is a benefit to his family, his community and to any client that may walk through his door.

Please consider reinstating the law license of Larry Lawrence.

Thank you for your time,

Denise Ratliff

Denise Ratliff

August 4, 2015

To: Ohio Board of Governors

From: Victoria L. Reinke

245 Wilson Lane

Glencoe, KY 41046

I would like to lend my support to M. Larry Lawrence and his request to have his Ohio law license and bar privileges reinstated.

I have known Larry Lawrence for the past ten years as a dedicated father, a caring son and a supportive neighbor.

I have seen his work in the courtroom, a true professional. I have also seen him riding shopping carts in the Walmart parking lot with his children.

He was the first person to offer support to me during my husband's fatal work related injury. He was not my attorney, just a caring friend, making sure my children and I were taken care of.

I ask that you consider him for reinstatement. He deserves a second chance.

Thank you,

Victoria Reinke

Steven Schletker
ATTORNEY AT LAW

July 27, 2015

Ohio State Bar Association
1700 Lake Shore Drive
Columbus, OH 43204

Re: Meredith L. Lawrence

Dear Ohio State Bar Association:

In May 1983 I graduated from the University of Kentucky College of Law. I was sworn in to the Kentucky Bar in November 1983. For the next ten years I practiced with Larry. I know Larry well, both as a professional associate and as a friend.

Larry's work helped make interstate highways safe from tractor-trailer tire blowouts and inland waterways safe from poisonous towboat bilge wastewater. His trial advocacy has earned a great deal of notoriety. What is less known is the degree to which Larry helped hundreds of people over the years that did not have million dollar cases. I do not recall him turning anyone away who needed legal assistance. Whether it was a towboat captain who lost his job because of diminished maritime skills or a farmer who had lost his land, Larry was always there to help. He stepped up to help the Kentucky Bar Foundation, his local school board, every school he attended and countless other civic organizations.

As a young lawyer I was fortunate to watch Larry practice his craft. He was an extraordinary teacher of litigation skills and a zealous advocate for his clients. Larry insisted that everyone associated with his office exercise a high degree of respect not just for Judges, but also for clerks, staff attorneys, bailiffs and everyone associated with the Court system.

Larry's work and generosity have benefited many in the community. I anticipate this will continue in the future. Thank you for your review of this correspondence and for your consideration given to Larry's re-admission to the Ohio Bar.

Respectfully,

Steven Schletker

50 E RiverCenter Boulevard, Suite 220, Covington, Kentucky 41011
p 859.491.3999 f 859.655.3066
www.schletker.com
Licensed in Kentucky, Ohio and West Virginia

Wayne Scudder

1009 Sparta Pike

Sparta, Ky. 41086

Dear Mr. Dove,

This letter is in regard to Larry Lawrence, who will be coming before you for your consideration for reinstatement to the bar.

My relationship with Mr. Lawrence spans more than thirty years and within several capacities. I have served as his realtor on a couple of occasions. Mr. Lawrence has always been honest in every situation. Transactions were often handled over the phone with papers being signed later. I am very comfortable relying on Mr. Lawrence's word and I trust him explicitly.

Although Mr. Lawrence has not represented me as my attorney, I have sought his legal advice on multiple occasions. He has always offered this advice freely and genuinely. I also have taught three of Mr. Lawrence's children. His role as a father is the one that I most admire. His children come before anything else and he is very active in their lives. Whenever he was needed to come to school for one of his children, he listened to all parties involved and supported the teachers and their decisions. Mr. Lawrence also supports the local school system as an organization by offering scholarships, legal advice, and donations.

In conclusion, even though Mr. Lawrence and I do not see each other socially, I count him as one of my friends. I know I can depend on him if the need arises. His family, the community, and the legal profession are Mr. Lawrence's life. His career and services to Gallatin County have impacted the community for decades and many people have felt the void created when Mr. Lawrence could no longer run his practice. Please consider his reinstatement to the bar and show compassion and forgiveness to Mr. Lawrence. I believe he has learned from his mistakes and will be a better attorney and community leader because of this experience.

Sincerely,

Wayne Scudder

ATHA STEWART
1945 HIGHWAY 465 WEST
SANDERS, KY 41083
859-643-5444

July 27, 2015

Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, OH 43215-3431

Dear Mr. Dove:

I would like for you to consider my statements here in your decision regarding reinstating Meredith L. Lawrence into the Practice of Law in the State of Ohio.

I have known Larry for approximately 30 years. We have resided in the same community, and attended church together. Larry has always conducted himself as a good moral man. He has proven himself to be a concerned and active citizen of our county Larry's knowledge and expertise fills a need in not only our community, but in surrounding communities. His law practice provides jobs, legal advice, and support for our small regional area. I have always endorsed him personally, and professionally in the past, and feel that he is still worthy of the highest endorsement.

Thank you for your consideration in this matter. I hope that you will find that Meredith L. Lawrence is more than worthy of being reinstated to The Practice of Law in the State of Ohio. If you have any questions or would like any further information, please feel free to contact me at the address and phone number listed above.

Sincerely,

Atha Stewart

Atha Stewart

July 22, 2015

Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Dear Mr. Dove,

I am writing this letter to encourage you to reinstate the law license of an individual that I feel has been a strong part of our community for several years. His name is Meredith L. Lawrence. I have known Mr. Lawrence for approximately 20 years and during that time I have had the pleasure of dealing with him on professional basis. I work in the district court and have seen how Mr. Lawrence has shown his concern for his clients and their best interest, while also maintaining a cordial and business persona with opposing colleagues. I have also, witnessed his generosity in the community by helping those that could not do things for themselves. He would make it his mission to see that these people were helped or, he would do it himself if necessary to make sure they did not go hungry, or they had someone to stand up for them and could not afford it. He has always given selflessly in a person's time of need without anything in return. He helped the local police to establish a working relationship with the public allowing the community the protection and relationship you want to have in a community.
Mr. Lawrence is a devoted family man. He has raised his children to respect the law and to follow the law. He encourages each one of his children to be the best at anything they try to achieve. He has had to deal with the daily problems that most of us do while raising children with one exception; he had a daughter that was very ill while she was growing up. Mr. Lawrence would be at her side to help her get through these trying times. He would spend endless hours with her to make sure she was getting the care and attention she needed to continue to live as a normal young lady. You could tell if he was worried, but he never let it get him down. I feel his moral ethic and dedication to his family is a testament to his values and integrity. That is why I feel it would be a great misfortune if he is not reinstated and allowed to continue his legacy as a fine attorney as well as a wonderful pillar of our community.

I know Mr. Lawrence will abide by the decision handed down, but I feel this is important enough that I make my voice heard. I have a lot of respect for him and I feel that we need more people like Mr. Lawrence in our communities to help to defend our rights and stand up for those that cannot help themselves. Too many people get wrapped up in their own lives and they don't have the compassion and drive that Mr. Lawrence has shown for his fellow man.
I thank you for allowing me this opportunity to have my voice heard; and I hope it will have a positive impact on the outcome of your decision.

Sincerely;

Diane W. Taylor

Diane W. Taylor
Deputy Clerk
Gallatin District Court

July 21, 2015

Mr. Dove
Director, Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Dear Director Dove,

It is with great pleasure that I write this letter of personal recommendation on behalf of Mr. Larry Lawrence. I have known Mr. Lawrence for over 45 years and consider him to be a close friend.

We were high school friends and fellow graduates of Cincinnati Princeton High School.

Larry "Chick" Lawrence was a vital part of our class and a member of what we referred to as, " The Shipmates Class of 1968 ".

Larry has always been a friend to many and a trusted member of our class. His high spirits and caring attitude towards his fellow classmates and those who know him, have followed him throughout his life.

I believe I speak for all fellow classmates and those who know him, "We trust him and hold his friendship close". I believe, that should any of us need his help, whether it be for professional help or just a little muscle power around the house, he would come to help.

I know Mr. Lawrence to be a loving, caring father and grandfather and a vibrant and productive member of his community.

Director Dove, I believe that all of us would greatly benefit from the services that Mr. Lawrence could provide should he be afforded the opportunity to practice Law again.

Thank you Sir for your consideration.

Gary Thompson

Gary Thompson
125 Rosetta Ct.
Cincinnati, Ohio
45246-2459

The Gallatin County News
211 Third St., P.O. Box 435
Warsaw, KY 41095

July 24, 2015

Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front St.
Fifth Floor
Columbus, Ohio 43215-3431

Dear Mr. Dove:

I've been the editor of the *Gallatin County News* in Warsaw, Kentucky, for 25 years. During that time, it has been my pleasure to know Larry Lawrence as a friend and fellow businessman in our county.

I encourage you to look favorably at his request to be reinstated as a practicing attorney in Ohio.

Larry has been a valuable and generous contributor to our community in many ways for as long as I have known him. He has given his time and money to help our county be a better place to live.

Every year, he hosts a free Thanksgiving dinner and invites everyone to attend and that's only one of his many acts of charity several of which are performed anonymously. He also has been happy to provide legal counsel to the City of Sparta at no charge for as long as I can remember.

He is a loving father, a man of good character and a valuable asset to our county and the people who live here.

Larry would be a lawyer you could trust and be proud of. I hope he'll have an opportunity to once again do a job he loves and through which he can serve others.

Sincerely,

Kelley Warnick

Kelley Warnick
Editor/Publisher
(859) 567-5051

Bud Webster

3575 Hwy 16

Glencoe, KY 41046

July 23, 2015

Richard A. Dove, Director

Board of Professional Conduct

Supreme Court of Ohio

65 South Front Street Fifth Floor

Columbus, OH 43215

Dear Mr. Dove

I am writing this letter today to give my support and ask you to consider reinstating Meredith L. Lawrence as a practicing attorney. I have known Larry Lawrence for 20+ years, he has always been generous to my family and I. Larry and my father grew up together working on Larry's family farm. My father used to tell me stories of the hard work they did together in rough times to help their parents make it through financial hardships. My father introduced me to Larry when I was a kid, Larry allowed my dad and I to spend time together recreationally hunting and fishing on his property in Sparta Kentucky. Larry has always valued family, his means the world to him, and he was generous enough to allow other families to create everlasting moments enjoying the things that he had.

I got to know Larry on a more professional level as I grew up and became the Fire Chief for the Glencoe Fire Department near his home. He is a very competent attorney and I have seen him help multiple families when in need. Some families were wronged by big corporate businesses, Larry fought to give the families the closure they needed to move forward and the financial ability to carry one after a death or injury had occurred. The area we live in is predominately middle to lower class families with little to no education. These families would probably have never gotten help from a less caring attorney or have been treated fairly by someone who wasn't familiar with their situations. This is why I believe Larry is very much needed in our community and his services are of extreme value.

As the Fire Chief I have also seen Larry's generosity! He has donated to the local fire & EMS organizations on more than one occasion and helped them acquire the things they need to protect the community. He has helped with equipment, and even gave the Sparta Fire Department a place to call

home for several years by allowing them to use one of his buildings as a fire station. Larry served the City of Sparta well as their City attorney providing them guidance many times when needed. Sparta is a very small City, they would surely have struggled to pay legal counsel to remain on retainer and provide service for them.

In closing I would like to thank you for taking the time to consider this request. Feel free to contact me if you would like to discuss this matter further.

Respectfully,

Bud Webster

JUDGE WILLIAM J. WEHR, RET.

57 Memory Lane • Fort Thomas, Kentucky 41075
Home (859) 441-5714 • Cell (859) 801-6032 • FAX (859)442-7281
wmwehr@fuse.net

Mediation **Arbitration**

August 11, 2015

Ohio Board of Governors
c/o James Helmer
600 Vine Street
Suite 2704
Cincinnati, Ohio 45202

RE: Meredith "Larry" Lawrence
Application for Reinstatement

Dear Members of the Board:

I have been asked to write you a letter of support for the reinstatement of Mr. Lawrence's law license. I am happy to add my name to those encouraging you to allow him to resume his legal career.

I have known Larry since the 1970's when we attended Chase Law School together in 1972 to 1976. After that date, I practiced law in Northern Kentucky for the next twelve (12) years and made referrals to Larry for cases which were within his expertise and not mine. I then went on the Circuit Bench in 1988 and had the occasion to observe Larry in his representation of his clients until this tax situation came up. I always felt that Larry served his clients well, was hard working on their behalf and was worthy of my trust. It is my belief that he possesses sufficient professional capabilities to once again serve the public as a lawyer.

Thank you for your consideration.

Respectfully submitted,

WILLIAM J. WEHR

WJW:ks
wjw/ohio board governors letter

"Ohio State Bar Association"
Re: Meredith "Larry" Lawrence

Larry was my son-in-law for ten years, so I know him pretty well, almost thirty years and more. I think his moral character and honesty are without question. He's had the trust and confidence in the public for many years. He's also been serving his community for a long, long time!

Larry would be a welcome plus to the court system if he is reinstated. He's very professional and able.

Thank You,
Judith White

Gallatin County Schools

Wallace Central Office Building
75 Boardwalk
Warsaw, KY 41095

Travis Huber
SUPERINTENDENT

Raymond A. Spahn
ASSISTANT SUPERINTENDENT

Roxann Booth
DIRECTOR OF DISTRICT WIDE SERVICES/DPP

Debra Foltz
DIRECTOR OF DISTRICT WIDE SERVICES I

Renee Cameron
DIRECTOR OF SPECIAL EDUCATION

Mark Hale
DIRECTOR OF TRANSPORTATION

Kelley Gamble
FINANCE OFFICER/TREASURER

Michelle Lawrence
CHIEF INFORMATION OFFICER

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July 21, 2015

Mr. Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street
Fifth Floor
Columbus, Ohio 43215-3431

Re: Meredith L. "Larry" Lawrence

Dear Mr. Dove,

Every community has a need for individuals who are civic minded, willing to volunteer their time and services, charitable and dependable. In today's society these qualities are hard to find collectively; much less in one person.

Larry Lawrence exhibits these characteristics and gives of himself freely when the need arises. I have known Larry for years and find him to be an asset to our county and THE lawyer that people turned to when they needed legal help. He will most assuredly represent a client to the very best of his ability and has always been known to exhaust all efforts in fighting for their relief.

I believe it would be to the benefit of all lost not only did he and his family suffer, the entire community lost a very valuable contributor.

Sincerely,

Joseph R. Wilson
Board of Education Member

August 5, 2015

Ohio State Bar Association

Re: Meredith "Larry" Lawrence

To whom it may concern,

My name is Ferdie P. Wiltz. (DOB 12.25.33). I am a retired diesel engineer. Currently, My wife, Dorothy, and I reside in Henderson, Louisiana, where I have raised my family and lived my entire adult life.

I have been a personal friend and acquaintance of Meredith "Larry" Lawrence since 1972. Larry and I worked for MG Transport Service at the time; I as a Chief Engineer and Larry an oiler / deck hand. I was Larry's superior during his initial employment until his transfer within the company to the main office as a barge dispatcher. He worked with the company through college as a young man. Larry's work ethics were superb and most responsible for a man of his age.

Over the past forty plus years, Larry and I have never broken ties. Our bond has flourished and strengthened through life's trials and tribulations both personal and professional.

In the eighties, I had the pleasure of being a witness for one of Larry's cases then later as an actual client in a class action suit. His hard working nature and outstanding moral character were second to none. Larry was passionate about his work yet treated each and every client with utmost respect on a personable level. After countless hours during an unsuccessful class action case, Larry refused any compensation.

In 2005, the Louisiana and Mississippi coast was devastated by Hurricane Katrina. During the aftermath, we were contacted by Larry inquiring if anyone in our family experienced loss from the storm. Several days after the call, I received a generous monetary donation from Larry to be given to my niece from Mississippi who lost her new home to the storm.

My wife and I again were overcome by Larry's generosity in 2006. Our daughter was diagnosed with stage four breast cancer and required treatment from the Texas Medical Center in Houston. Upon hearing about her diagnosis, Larry immediately contacted our family and generously offered the full use of his apartment located within a mile of the hospital. This may seem like a small gesture but to our family this meant the world. During her short battle and the remainder of her life, we as a family were able to care for her and support her in the comfort of a home, rather than an impersonal and costly hotel room.

The following year, our granddaughter was diagnosed with a rare blood disorder, again forcing her to require medical treatment from the same research hospital. Larry graciously lent my daughter and her family the use of the same apartment.

In the course of our friendship, Larry has been the most giving individual. Although Larry has been very generous to myself and my family, I would have befriended him if he was a man

of lesser worth. His worth has never interfered with his morals nor his ethics. His willingness to serve others shines in both his personal and professional sides of life.

His noble character and loving personality is what makes this man so extraordinary. He has touched the lives of so many through his generous nature and his selfless acts. I have had the pleasure of knowing Larry for most of his adult life; a life filled with many blessings. He has always been a person of great character and a person that I am proud to call my friend. My personal opinion of Larry Lawrence is shared by many people. I believe he is worthy of the trust and confidence of the public and he possesses a phenomenal professional talent capable of serving the public once again as a lawyer; a lawyer of the highest utmost respect.

Sincerely,

Ferdie Paul Wiltz

GALLATIN CO. ELEMENTARY SCHOOL

Joe Wright
Principal

Debra Allen
Assistant Principal

"Leader in Me"
25 Boaz Drive
Warsaw, Kentucky 41095
Primary: (859) 567-6340
Fax: (859) 567-6205
www.gallatin.kyschools.us

Learn together, Live together, Lead together

Angela Bledsoe
Counselor

July 23, 2015

Dear Mr. Dove,

I am writing this letter to recommend the reinstatement of Larry Lawrence as a practicing member of the Bar Association. I have known Larry Lawrence for the past 10 years as his daughters- Carly and Laramie- went through Primary school. I was their Principal.

Mr. Lawrence was an active and enthusiastic father attending school meetings and activities. He is supportive of our school and the programs we have. Larry is a positive voice in our community for progressive change.

I believe our community will be served well with Larry Lawrence's reinstatement to the Bar.

Joe Wright

101 E. Market Street
P.O. Box 966
Warsaw, Kentucky 41095

Commonwealth of Kentucky
Gallatin County Attorney
John G. Wright

Assistant County Attorney
Corey T. Gamm
E-mail: ctgamm@prosecutors.ky.gov

Phone: (859) 567-5555
Fax: (859) 567-1458
E-mail: jgw966@twc.com

July 22, 2015

Richard A. Dove, Director
Board of Professional Conduct
Supreme Court of Ohio
65 South Front Street, Fifth Floor
Columbus, Ohio 43215-3431

RE: Meredith L. Lawrence

Dear Mr. Dove,

I am writing in support of Meredith L. "Larry" Lawrence being reinstated to the practice of law. I have known Larry Lawrence since the early 1970s. I have been a member in good standing of the Kentucky Bar Association since October 1986 and have served as Gallatin County Attorney since 2003. I have practiced law in the same courtrooms as Larry throughout my career and have been in Masonic Lodge with him, his father and his son.

Larry is a responsible family man, both to his children and to his aging father. He is honest, trustworthy, and charitable. He is an asset to our community. Our county has benefited greatly from his legal talents. He has served as Sparta City Attorney -- for years without pay -- and as Trial Commissioner. He has represented many who could not find help anywhere else. He created an annual scholarship for a local high school graduate and donated land to Gallatin County that someday will be the home of a new fire department and community center. He assisted a local church in obtaining a new building.

I am aware of his legal issues and have discussed his current bar association status with Larry. Knowing all that, I am comfortable asserting that our community would be better off if he had his license to practice law reinstated. He deserves a second chance.

Sincerely,

John G. Wright

JGW/bcw

Kentucky
UNBRIDLED SPIRIT