

IN THE SUPREME COURT OF OHIO

In re:

Complaint against

Case No. 2015-057

Mohammed Noure Alo

Respondent

Disciplinary Counsel

Relator

CERTIFICATION OF DEFAULT

**Mohammed Noure Alo (0078288)
Registration No. 71548-061
FCI Morgantown
446 Greenbag Road, Route 857
Morgantown, WV 26501**

**Disciplinary Counsel
Attn: Scott Drexel (0091467)
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215**

**Richard A. Dove (0020256)
Board of Professional Conduct
65 South Front Street, 5th Floor
Columbus, Ohio 43215
614.387.9370
rick.dove@sc.ohio.gov**

**Donald M. Scheetz (0082422)
Assistant Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215
614.461.0256
donald.scheetz@sc.ohio.gov**

IN THE SUPREME COURT OF OHIO

In re:

Complaint against

Mohammed Noure Alo

Respondent

Disciplinary Counsel

Relator

CERTIFICATION

Gov. Bar R. V, Section 14

Pursuant to Rule V, Section 14, of the Supreme Court Rules for the Government of the Bar of Ohio, I hereby certify that the respondent in the above-captioned matter has failed to file an answer to the formal complaint certified to the Board of Professional Conduct on October 2, 2015.

Attached to this certification is an affidavit setting forth the attempts to serve the complaint on the respondent and copies of documents referenced in the affidavit.



RICHARD A. DOVE
Director, Board of Professional Conduct
of the Supreme Court of Ohio

STATE OF OHIO

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ss:

COUNTY OF FRANKLIN

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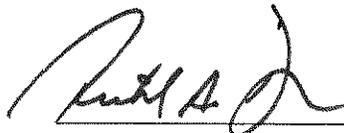
AFFIDAVIT

I, Richard A. Dove, having been duly sworn according to the laws of Ohio, hereby depose and say:

1. I am the Director to the Board of Professional Conduct of the Supreme Court of Ohio ("Board"). Pursuant to Rule V of the Supreme Court Rules for the Government of the Bar of Ohio, I am responsible for serving certified disciplinary complaints on the parties and maintaining the records of cases certified to the Board.
2. On October 2, 2015, a formal complaint was certified to the Board in the matter of *Disciplinary Counsel v. Mohammed Noure Alo*, Board Case No. 2015-057.
3. On October 2, 2015 and October 16, 2015, a notice and copy of the certified complaint were sent via certified mail to the respondent at 4249 Easton Way, Suite 125, Columbus, Ohio 43219. The address to which the certified mail was sent is the respondent's business address as reflected in the attorney registration records maintained by the Supreme Court of Ohio, Office of Attorney Services.
4. On October 15, 2015 and November 3, 2015, the certified mail referenced in ¶ 3 was returned to the Board from the United States Postal Service and marked "return to sender, attempted-not know, unable to forward."
5. On October 21, 2015, a notice and copy of the certified complaint were sent via certified mail to the respondent at FCI Morgantown, 446 Greenbag Road, Route 857, Morgantown, WV 26501.
6. On October 26, 2015, the Board received a return receipt from the United States Postal Service acknowledging receipt of the formal complaint.
7. On November 18, 2015, a notice of intent to certify to the respondent's default was sent to the respondent at the address referenced in ¶ 5.
8. As of the date of this affidavit, the respondent has not filed an answer to the formal complaint pending before the Board or otherwise responded to the certification of the complaint or the notice of intent to certify his default.
9. Attached to the affidavit are true and accurate copies of the following documents contained in the case file that is maintained in the Board offices:
 - a. The formal complaint certified to the Board on October 2, 2015 (Attachment A);

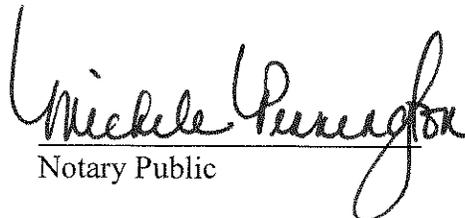
- b. The envelope sent to the respondent by certified at the address referenced in ¶ 3 of this affidavit and returned as undeliverable to the Board by the United States Postal Service on October 15, 2015 and November 3, 2015 (Attachment B and C);
- c. The return receipt showing the respondent receipt on October 23, 2015 of the certified mail sent to the respondent at the address referenced in ¶ 5 of this affidavit (Attachment D); and
- d. The notice of intent to certify the respondent's default sent the respondent's address referenced in ¶ 5 on November 18, 2015 (Attachment E).

FURTHER AFFIANT SAYETH NAUGHT.



Richard A. Dove (0020256)
Director, Board of Professional Conduct

Sworn to before me and subscribed in my presence this 21st day of December, 2015.



Notary Public



MICHELE PENNINGTON
Notary Public, State of Ohio
My Commission Expires 10/10/17

BEFORE THE BOARD OF PROFESSIONAL CONDUCT
OF
THE SUPREME COURT OF OHIO

RECEIVED

SEP 18 2015

In re:

Complaint against

Mohammed Noure Alo, Esq.
Partner
Harrison Alo
4249 Easton Way Suite 125
Columbus, OH 43219

BOARD OF PROFESSIONAL CONDUCT

No. 15 - 057 a a

Attorney Registration No. (0078288)

COMPLAINT AND CERTIFICATE

(Rule V of the Supreme Court Rules for
the Government of the Bar of Ohio.)

Respondent,

Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215-7411

FILED

OCT 02 2015

Relator.

BOARD OF PROFESSIONAL CONDUCT

Now comes the relator and alleges that Mohammed Noure Alo, an Attorney at Law, duly admitted to the practice of law in the state of Ohio, is guilty of the following misconduct:

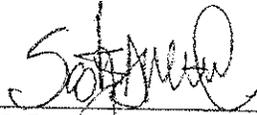
1. Respondent, Mohammed Noure Alo, was admitted to the practice of law in the state of Ohio on November 8, 2004. Respondent is subject to the Rules of Professional Conduct and the Rules for the Government of the Bar of Ohio.
2. On December 20, 2013, respondent appeared before the Honorable Michael H. Watson in the United States District Court for the Southern District of Ohio.
3. On that day, respondent pled guilty to Count Three of an indictment charging him with Honest Services Wire Fraud, in violation of 18 U.S.C. 1343, 1346 and 2. Count One was dismissed.

Attachment A

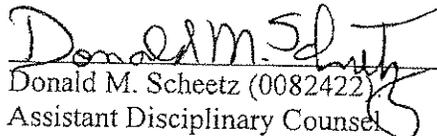
4. As a part of his plea, respondent admitted that he knowingly, and with an intent to defraud, participated in a scheme to defraud the public of its right to the honest services of a public official through bribery or kickbacks. He admitted that he furthered the scheme by receiving a \$123,622.50 wire transfer into his personal bank account. Additionally, he admitted that he facilitated a \$100,000 wire transfer from a co-conspirator's personal account into a business account owned and/or controlled by other co-conspirators.
5. On November 12, 2014, respondent was sentenced to 48 months in federal prison.
6. On June 30, 2014, the Supreme Court suspended respondent for an interim period pursuant to Gov. Bar. R. V (18)(A)(1) due to his felony conviction.
7. Respondent's conduct, as alleged in this complaint, violates the following provisions of the Ohio Rules of Professional Conduct: Prof. Cond. R. 8.4(b) [A lawyer shall not commit an illegal act that reflects adversely on the lawyer's honesty or trustworthiness]; Prof. Cond. R. 8.4(c) [a lawyer shall not engage in conduct involving dishonesty, fraud, deceit, or misrepresentation]; and his conduct is sufficiently egregious to violate 8.4(h) [a lawyer shall not engage in any other conduct that adversely reflects on the lawyer's fitness to practice law].

CONCLUSION

Wherefore, pursuant to Gov. Bar R. V, the Code of Professional Responsibility and the Rules of Professional Conduct, relator alleges that respondent is chargeable with misconduct; therefore, relator requests that respondent be disciplined pursuant to Rule V of the Rules of the Government of the Bar of Ohio.



Scott J. Drexel (0091467)
Disciplinary Counsel

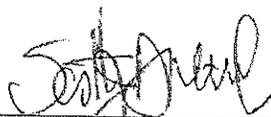


Donald M. Scheetz (0082422)
Assistant Disciplinary Counsel
250 Civic Center Drive, Suite 325
Columbus, Ohio 43215-7411
614.461.0256
614.461.7205 – fax
Donald.Scheetz@sc.ohio.gov

CERTIFICATE

The undersigned, Scott J. Drexel, Disciplinary Counsel, of the Office of Disciplinary Counsel of the Supreme Court of Ohio hereby certifies that Donald M. Scheetz is duly authorized to represent relator in the premises and has accepted the responsibility of prosecuting the complaint to its conclusion. After investigation, relator believes reasonable cause exists to warrant a hearing on such complaint.

Dated: September 18, 2015



Scott J. Drexel, Disciplinary Counsel



2031 7047 54
T REQUESTED

REPOSTAL
10/03/2015
US POSTAGE

\$07.67⁰

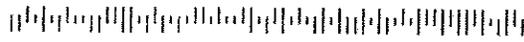


ZIP 43215
041L11241268

RECEIVED

OCT 15 2015

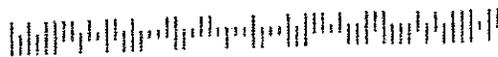
BOARD OF PROFESSIONAL CONDUCT



Mohammed Noure Ato
4249 Easton Way Suite 125
Columbus, OH 43219

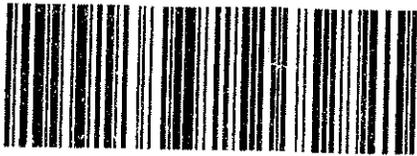
NIXIE 432193007-1N 10/08/15

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
RETURN TO SENDER



Attachment B

CERTIFIED MAIL



9414 7266 9904 2031 7047 09
RETURN RECEIPT REQUESTED

10/16/2015
US POSTAGE

\$07.67⁰



ZIP 43215
041L11241265

AWK

RECEIVED

NOV 03 2015

BOARD OF PROFESSIONAL CONDUCT

Mohammed Noure Ale
4249 Easton Way Suite 125
Columbus, OH 43219

NIXIE 432192101-1N 300 10/26/15

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
RETURN TO SENDER

Attachment C

2. Article Number



9414 7266 9904 2031 7060 93

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) <i>W. Suckell</i>	B. Date of Delivery 10-23-15
C. Signature <i>[Signature]</i>	
<input type="checkbox"/> Agent <input type="checkbox"/> Address	
D. Is delivery address different from item 1? If YES, enter delivery address below:	
<input type="checkbox"/> Yes <input type="checkbox"/> No	

3. Service Type **CERTIFIED MAIL®**

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:
 Mohammed Alo
 Register Number 71548-061
 446 Greenbag Road
 Route 857
 Morgantown, WV 26501

Reference Information

2015-057 PC Materials
 BPC

The Supreme Court of Ohio

BOARD OF PROFESSIONAL CONDUCT

65 SOUTH FRONT STREET, 5TH FLOOR, COLUMBUS, OH 43215-3431
Telephone: 614.387.9370 Fax: 614.387.9379
www.supremecourt.ohio.gov

PAUL M. DE MARCO
CHAIR
WILLIAM J. NOVAK
VICE-CHAIR

RICHARD A. DOVE
DIRECTOR
D. ALLAN ASBURY
SENIOR COUNSEL
HEIDI WAGNER DORN
COUNSEL

November 18, 2015

Mohammed Noure Alo
Registration Number 71548-061
FCI Morgantown
446 Greenbag Road, Route 857
Morgantown, WV 26501

Re: Disciplinary Counsel v. Mohammed Noure Alo, Case No. 2015-057

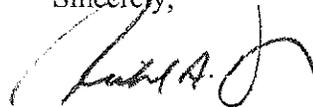
Dear Mr. Alo:

On October 2, 2015, the Board of Professional Conduct certified a formal complaint naming you as the respondent in the above-captioned disciplinary matter. A copy of the enclosed complaint was sent to you via certified mail and service was completed on October 23, 2015. As of the date of this letter, the Board has not received your answer to the formal complaint or a motion to extend the time for filing an answer.

Pursuant to Gov. Bar R. V, Section 14, you are hereby notified that the Board will certify your default to the Supreme Court thirty days from the date of this letter. To avoid certification of default, you must file an answer to the formal complaint with the Board prior to the expiration of the thirty-day period. No extension of time to file an answer is authorized by the rule.

Please note that the certification of default may result in your immediate suspension from the practice law by the Supreme Court of Ohio.

Sincerely,



Richard A. Dove

Enclosure

cc: Scott Drexel, Disciplinary Counsel
Donald Scheetz, Assistant Disciplinary Counsel

Attachment E