

IN THE SUPREME COURT OF OHIO

Disciplinary Counsel,

Relator,

v.

Angela Rochelle Stokes,

Respondent.

Case No. 14-1905

MATTER RELATED TO THE PRACTICE OF  
LAW AUTHORIZED BY S.C.T. PRAC.R.  
SECTION 13

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RESPONDENT'S MOTION FOR DISSOLUTION OF INTERIM REMEDIAL  
SUSPENSION

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Record)  
Dean Nieding (0003532)

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Counsel for Relator

Pursuant to Gov. Bar. R. V(19)(C)(1), Respondent Angela Rochelle Stokes hereby moves this Honorable Court for an Order dissolving the Interim Remedial Suspension ordered by this Honorable Court on December 18, 2014. (Order attached hereto as Ex. A) On February 4, 2016, this Honorable Court granted Respondent leave to file her Motion for Dissolution of Interim Remedial Suspension. (Order attached hereto as Ex. B) The instant motion is timely filed pursuant to this Honorable Court's Order of February 4, 2016.

In this regard, the Amended Complaint filed with the Board and which was pending at the time of the issuance of the aforementioned Order of Interim Remedial Suspension has been dismissed by the Panel Chair upon Relator's Motion to Dismiss to which Respondent's Affidavit was attached (the Dismissal Order of January 6, 2016 is attached hereto as Ex. C). Further, Respondent has retired from her position as Judge of the Cleveland Municipal Court. (See Ex. D, copy of letter to Chief Justice Maureen O'Connor and copy of letter to Governor John Kasich, with copies of return receipts applicable to each letter). Lastly, Respondent has agreed to refrain from seeking or accepting appointment to any State Court judicial position. (See Ex. C.) Thus, Respondent no longer poses "a substantial threat of serious harm to the public," within the meaning of Gov. Bar. R. V(19)(C)(1), if she ever did.

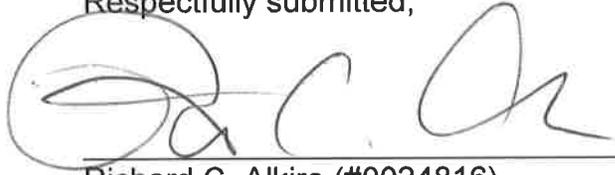
After Respondent filed her Motion for Leave to File Motion for Dissolution of Interim Remedial Suspension, Relator responded indicating that "based upon Respondent's irrevocable retirement from the Cleveland Municipal Court, the dismissal of the Amended Complaint, and her sworn statement that she will never run for, seek appointment to or hold any judicial position in any Ohio state court, it has no objection to

Respondent's Motion for Leave." Presumably, Relator will have the same response to the instant motion since each of the Relator's bases for not objecting to the Motion for Leave remain.

Accordingly, Respondent respectfully requests that this Honorable Court grant her Motion for Dissolution of Interim Remedial Suspension Order of December 18, 2014 based upon all of the grounds asserted herein and those previously set forth in Respondent's Motion for Leave to File Motion for Dissolution of Interim Remedial Suspension.

\* \* \*

Respectfully submitted,



Richard C. Alkire (#0024816)  
Dean Nieding (#0003532)

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Attorneys for Respondent

# **EXHIBIT A**

The Supreme Court of Ohio

FILED

DEC 18 2014

Disciplinary Counsel,  
Relator,  
v.  
Angela Rochelle Stokes,  
Respondent.

Case No. 2014-0926  
CLERK OF COURT  
SUPREME COURT OF OHIO

ORDER

On November 4, 2014, and pursuant to Gov. Bar R. V(5a)(A)(1)(b), relator, disciplinary counsel, filed with this court a motion for immediate interim remedial suspension pursuant to Gov. Bar R. V(5a), alleging that respondent, Angela Rochelle Stokes, has engaged in conduct that violates the Ohio Rules of Professional Conduct, the Ohio Code of Professional Responsibility, and the Ohio Code of Judicial Conduct and poses a substantial threat of serious harm to the public and the administration of justice. Respondent filed a response, and this matter was considered by the court.

Upon consideration thereof and pursuant to Gov. Bar R. V(5a)(B), it is ordered and decreed that an interim remedial suspension is immediately entered against Angela Rochelle Stokes, Attorney Registration No. 00025650, last known business address in Cleveland, Ohio, and that the suspension be effective as of the date of this entry, pending final disposition of disciplinary proceedings predicated on the conduct threatening the serious harm. It is further ordered that the underlying disciplinary case in this matter is to proceed expeditiously.

It is further ordered that respondent immediately cease and desist from the practice of law in any form and that respondent is hereby forbidden to appear on behalf of another before any court, judge, commission, board, administrative agency, or other public authority.

It is further ordered that effective immediately, respondent is forbidden to counsel, advise, or prepare legal instruments for others or in any manner perform legal services for others.

It is further ordered that respondent is hereby divested of each, any, and all of the rights, privileges, and prerogatives customarily accorded to a member in good standing of the legal profession of Ohio.

It is further ordered that pursuant to Gov. Jud. R. III(7)(A), respondent is immediately suspended from judicial office without pay for the term of the suspension, pending further proceedings pursuant to law.

It is further ordered that before entering into an employment, contractual, or consulting relationship with any attorney or law firm, respondent shall verify that the attorney or law firm has complied with the registration requirements of Gov. Bar R. V(8)(G)(3). If employed pursuant to Gov. Bar R. V(8)(G), respondent shall refrain from direct client contact except as provided in Gov. Bar R. V(8)(G)(1) and from receiving, disbursing, or otherwise handling any client trust funds or property.

It is further ordered that pursuant to Gov.Bar R. X(13), respondent shall complete one credit hour of continuing legal education for each month, or portion of a month, of the suspension. As part of the total credit hours of continuing legal education required by Gov.Bar R. X(13), respondent shall complete one credit hour of instruction related to professional conduct required by Gov.Bar R. X(3)(B) for each six months, or portion of six months, of the suspension.

It is further ordered that respondent shall not be reinstated to the practice of law in Ohio until (1) respondent complies with the requirements for reinstatement set forth in the Supreme Court Rules for the Government of the Bar of Ohio, (2) respondent complies with this and all other orders issued by this court, (3) respondent complies with the Supreme Court Rules for the Government of the Bar of Ohio, and (4) this court orders respondent reinstated.

It is further ordered by the court that within 90 days of the date of this order, respondent shall reimburse any amounts that have been awarded by the Clients' Security Fund pursuant to Gov.Bar R. VIII(7)(F). It is further ordered by the court that if after the date of this order the Clients' Security Fund awards any amount against respondent pursuant to Gov.Bar R. VIII(7)(F), respondent shall reimburse that amount to the Clients' Security Fund within 90 days of the notice of that award.

It is further ordered that on or before 30 days from the date of this order, respondent shall do the following:

1. Notify all clients being represented in pending matters and any co-counsel of respondent's suspension and consequent disqualification to act as an attorney after the effective date of this order and, in the absence of co-counsel, also notify the clients to seek legal service elsewhere, calling attention to any urgency in seeking the substitution of another attorney in respondent's place;
2. Regardless of any fees or expenses due, deliver to all clients being represented in pending matters any papers or other property pertaining to the client or notify the clients or co-counsel, if any, of a suitable time and place where the papers or other property may be obtained, calling attention to any urgency for obtaining such papers or other property;
3. Refund any part of any fees or expenses paid in advance that are unearned or not paid and account for any trust money or property in his possession or control;
4. Notify opposing counsel or, in the absence of counsel, the adverse parties in pending litigation of his disqualification to act as an attorney after the effective date of this order and file a notice of disqualification of respondent with the court or agency before which the litigation is pending for inclusion in the respective file or files;
5. Send all notices required by this order by certified mail with a return address where communications may thereafter be directed to respondent;

6. File with the clerk of this court and disciplinary counsel of the Supreme Court an affidavit showing compliance with this order, showing proof of service of the notices required herein, and setting forth the address where respondent may receive communications; and
7. Retain and maintain a record of the various steps taken by respondent pursuant to this order.

It is further ordered that respondent shall keep the clerk and disciplinary counsel advised of any change of address where respondent may receive communications.

It is further ordered that all documents filed with this court in this case shall meet the filing requirements set forth in the Rules of Practice of the Supreme Court of Ohio, including requirements as to form, number, and timeliness of filings. All case documents are subject to Sup. R. 44 through 47, which govern access to court records.

It is further ordered that service shall be deemed made on respondent by sending this order, and all other orders in this case, by certified mail to the most recent address respondent has given to the Office of Attorney Services.

It is further ordered that the clerk of this court issue certified copies of this order as provided for in Gov. Bar R. V(8)(D)(1), that publication be made as provided for in Gov. Bar R. V(8)(D)(2), and that respondent bear the costs of publication.



Maureen O'Connor  
Chief Justice

# **EXHIBIT B**

The Supreme Court of Ohio

FILED

FEB -4 2016

CLERK OF COURT  
SUPREME COURT OF OHIO

Disciplinary Counsel,  
Relator,  
v.  
Angela Rochelle Stokes,  
Respondent.

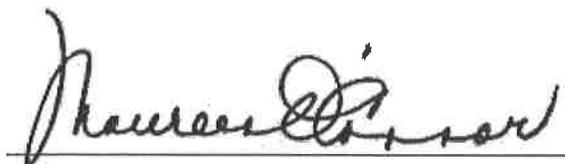
Case No. 2014-1905

ORDER

FEB 8 2016

This cause came on for further consideration upon the filing by respondent of a motion for leave to file motion for dissolution of interim remedial suspension. On January 29, 2016, relator filed a response to respondent's motion for leave.

Upon consideration thereof, it is ordered by the court that respondent's motion for leave to file motion for dissolution of interim remedial suspension is granted. Respondent is ordered to file her motion for dissolution within ten days of the date of this order.



Maureen O'Connor  
Chief Justice

# **EXHIBIT C**

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

In re:

Complaint against

Angela Rochelle Stokes

Respondent

Disciplinary Counsel

Relator

Case No. 2013-057

FILED

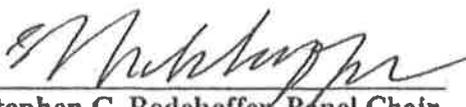
JAN 06 2016

BOARD OF PROFESSIONAL CONDUCT

ORDER

This matter comes before the panel chair upon consideration of Relator's December 22, 2015 motion to dismiss its first amended complaint filed in this matter. The panel chair, *sua sponte*, considers Relator's motion as a motion for leave to voluntarily dismiss in accordance with Board Proc. Reg. 9.

Relator's motion is made in consideration of Respondent's agreement, as reflected by her affidavit attached to the Relator's motion, to immediately retire from the Cleveland Municipal Court and to refrain from seeking election or accepting appointment to any state court judicial position in Ohio. Upon consideration of the Relator's motion and Respondent's affidavit attached thereto, and after having conducted a hearing on the motion to dismiss on January 6, 2016, the panel chair grants leave to voluntarily dismiss, finds the motion dismiss to be well-taken and grants the motion, and hereby orders that this matter be dismissed. The director shall provide notice of the dismissal to the parties.

  
Stephen C. Rodeheffer, Panel Chair

# **EXHIBIT D**

Angela Rochelle Stokes  
38 Oakshore Drive  
Bratenahl, Ohio 44108

January 6, 2016

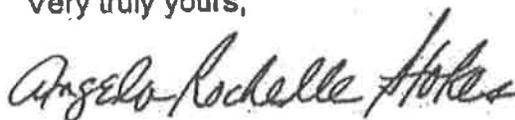
**Via Certified Mail**  
Chief Justice Maureen O'Connor  
The Supreme Court of Ohio  
65 South Front Street  
Columbus, Ohio 43215-3431

Dear Chief Justice O'Connor:

Pursuant to Rule VII, Section 1(B) of the Rules of the Government of the Judiciary, hereby submit my notification to you of my retirement from the Office of Cleveland Municipal Court Judge for the term January 2, 2012 to January 1, 2018, effective January 6, 2016. A copy of the letter I have submitted to the Governor of the State of Ohio is enclosed herewith, pursuant to Rule VII, Section 1(A) of the Rules of the Government of the Judiciary.

I am thankful to the citizens of the City of Cleveland for the opportunity and privilege to have served them as Judge of the Cleveland Municipal Court since 1995.

Very truly yours,



Angela Rochelle Stokes

ARS:Imm

Cc: Stephen C. Rodeheffer, Esq., Panel Chair  
Janica Pierce Tucker, Esq.  
The Honorable Robert P. Ringland  
Joseph Caligiuri, Esq., Chief Assistant Disciplinary Counsel

Angela Rochelle Stokes  
38 Oakshore Drive  
Bratenahl, Ohio 44108

January 6, 2016

**Via Certified Mail**

The Honorable John Kasich  
Governor, State of Ohio  
Riffe Center – 30<sup>th</sup> Floor  
77 S. High Street  
Columbus, Ohio 43215-6117

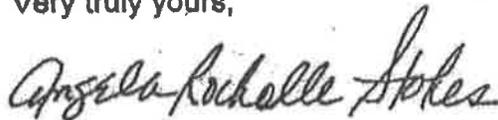
Re: Notice of Intent to Leave Office Before End of Term

Dear Governor Kasich:

Pursuant to Rule VII, Section 1(A) of the Rules for the Government of the Judiciary, I hereby notify you of my retirement from the office of Cleveland Municipal Court Judge to which I was elected for the term January 2, 2012 to January 1, 2018. This retirement will be effective January 6, 2016.

I am thankful to the citizens of the City of Cleveland for the opportunity and privilege to have served them as Judge of the Cleveland Municipal Court since 1995.

Very truly yours,



Angela Rochelle Stokes

Cc: Chief Justice Maureen O'Connor  
Stephen C. Rodeheffer, Esq., Panel Chair  
Janica Pierce Tucker, Esq.  
The Honorable Robert P. Ringland  
Joseph Caligiuri, Esq., Chief Assistant Disciplinary Counsel

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Chief Justice Maureen O'Connor  
The Supreme Court of Ohio  
65 South Front Street  
Columbus, Ohio 43215-3431

2. Article Number

(Transfer from service label)

7032 1640 0000 0682 3610 111

PS Form 3811, February 2004

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Jill Winn*

Agent

Addressee

B. Received by (Printed Name)

Jill Winn

C. Date of Delivery

11-12-16

D. Is delivery address different from Item 1?

Yes

If YES, enter delivery address below.

No

3. Service Type

Certified Mail

Express Mail

Registered

Return Receipt for Merchandise

Insured Mail

O.D.D.

4. Restricted Delivery? (Extra Fee)

Yes

Domestic Return Receipt

10295-02-01-1540

Angela Rochelle Stokes  
38 Oakshore Drive  
Bratenahl, Ohio 44108

January 6, 2016

**Via Certified Mail**  
The Honorable John Kasich  
Governor, State of Ohio  
Riffe Center – 30<sup>th</sup> Floor  
77 S. High Street  
Columbus, Ohio 43215-6117

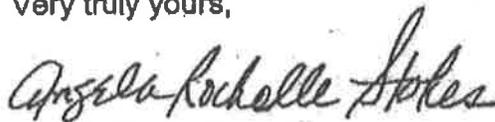
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Dear Governor Kasich:

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I am thankful to the citizens of the City of Cleveland for the opportunity and privilege to have served them as Judge of the Cleveland Municipal Court since 1995.

Very truly yours,



Angela Rochelle Stokes

Cc: Chief Justice Maureen O'Connor  
Stephen C. Rodeheffer, Esq., Panel Chair  
Janica Pierce Tucker, Esq.  
The Honorable Robert P. Ringland  
Joseph Caligiuri, Esq., Chief Assistant Disciplinary Counsel

**SENDER: COMPLETE THIS SECTION**

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1. Article Addressed to:

The Honorable John Kasich  
Governor, State of Ohio  
Riffe Center - 30<sup>th</sup> Floor  
77 S. High Street  
Columbus, Ohio 43215-6117

2. Article Number  
(Transfer from service label)

7014 0510 0002 0809 3976

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
x *D. Callas*  Addressee

B. Received by (Printed Name) *D. Callas* C. Date of Delivery *1/11/16*

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  NO

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**CERTIFICATE OF SERVICE**

A copy of **RESPONDENT'S MOTION FOR DISSOLUTION OF INTERIM REMEDIAL SUSPENSION ORDER** has been filed via e-filing with the Supreme Court of Ohio and a service copy e-mailed this 10<sup>th</sup> day of February, 2016 to:

Scott J. Drexel  
Office of Disciplinary Counsel  
250 Civic Center Drive, Suite 325  
Columbus, OH 43215-7411  
[Scott.drexel@sc.ohio.gov](mailto:Scott.drexel@sc.ohio.gov)

Counsel for Relator

Joseph M. Caligiuri  
Chief Assistant Disciplinary Counsel  
250 Civic Center Drive, Suite 325  
Columbus, OH 43215-7411  
[Joseph.caligiuri@sc.ohio.gov](mailto:Joseph.caligiuri@sc.ohio.gov)



Richard C. Alkire (#0024816)

Attorney for Respondent