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Court of Common Pleas

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Confirmation Nbr. 2955014

GEORGEANNA M. SEMARY

CV 23 984974

vs.

LESLIE ANN CELEBREZZE, ET AL.

Judge: ANDREW J. SANTOLI

Pages Filed: 69

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

GEORGEANNA M. SEMARY

9920 Biddulph Rd.,
Brooklyn, Ohio 44144

Plaintiff,

v.

LESLIE ANN CELEBREZZE

8924 Stover Ln.,
Cleveland, Ohio 44141

JAMES ZAK

4946 Autumnwood Ln.,
Brunswick, Ohio 44212

SUSAN K. SWEENEY

6045 Redford Rd., NW
North Canton, OH 44720

JUSTIN SEETON

2531 Sourek Rd.,
Akron, Ohio 44333

and

SERPIL ERGUN

39199 Glenlivet Ct.,
Solon, Ohio 44139

Defendants.

Case No. _____

Judge _____

COMPLAINT WITH JURY DEMAND

NATURE OF ACTION AND INTRODUCTION

1. This is a civil-rights action brought by Plaintiff Georgeanna Semary under R.C. 2307.60, which establishes civil liability for criminal acts. The alleged criminal acts against Ms. Semary include witness and public-employee intimidation and retaliation, interference with civil and statutory rights,

falsification, tampering with records, and dereliction of duty. This action also alleges intentional infliction of emotional distress.

2. Ms. Searny was the longtime judicial assistant to Defendant Leslie Ann Celebrezze, administrative judge of the Cuyahoga County Court of Common Pleas Domestic Relations Division (“DR Court”). As recently as November 2022, Ms. Searny had received perfect scores from Celebrezze on performance evaluations, gushing praise from Celebrezze, and even performance bonuses. Ms. Searny and Celebrezze were also close friends.

3. But then in 2023, Defendant Celebrezze, and other Defendants working for her benefit, retaliated against Ms. Searny, and sought to intimidate her because she was a witness to an illicit amorous affair between Celebrezze, who is married, and Mark Dottore—a receiver to whom Celebrezze regularly and unnecessarily steered lucrative appointments to cases. Celebrezze ensured Mark Dottore, and his daughter, whom she also appointed, were handsomely rewarded despite Celebrezze’s being in a long-term, intimate relationship with Mark Dottore.

4. Defendants also retaliated against Ms. Searny because she discharged her job duties and complied with the obligations imposed by the First Amendment to the United States Constitution and the Supreme Court of Ohio’s Rules of Superintendence 44–47, by allowing a journalist, who was investigating Celebrezze and Dottore’s unseemly relationship, access to open court records. The journalist later exposed the relationship in a June 1, 2023 article published by The Marshall Project.

5. Once the journalist came sniffing around, Celebrezze—blinded by anger and fearing the truth was about to come out—sought to discredit and silence Ms. Searny and send a chilling warning to all court employees to remain silent. As detailed below, Celebrezze knew Ms. Searny knew too much about the affair. And she knew that, when Ms. Searny was identified as a witness, Celebrezze’s judicial—and possibly her legal—career would be over.

6. With her career unraveling, Celebrezze with the enablement of DR Court staff she controlled, including Defendants James Zak, Susan K. Sweeney, Justin Seeton, and Serpil Ergun—who all lacked the moral compasses to refuse—implemented a coordinated effort to retaliate against and intimidate Ms. Searny, resulting in, among other things, professional humiliation and isolation, a demotion, a substantial pay cut that will slash Ms. Searny’s lifetime pension as a longtime public servant, and her constructive discharge.

7. A primary purpose of this campaign was to try to discredit, intimidate, and retaliate against Ms. Searny as a witness and public servant, and to prevent corroborating details from emerging about Celebrezze’s extramarital and unethical dalliance with Dottore. Defendants sought to destroy Ms. Searny’s reputation and career—and to chill others from speaking truthfully about what they knew.

8. Other DR Court judges knew about the affair, Celebrezze’s steering of work to Dottore, and the retaliation. But they failed to try to stop it all. Some even helped Celebrezze try to cover it all up. Celebrezze steered cases from other judges to herself in furtherance of her scheme to reward her lover. And she never disclosed this personal interest to litigants.

9. And Celebrezze schemed with Dottore and his private attorney to try to cover it all up.

PARTIES

10. Plaintiff Georgeanna “Georgia” Searny, soon-to-formerly-be a DR Court employee, lives in Cuyahoga County, Ohio. At relevant times, she was the longtime judicial assistant to Defendant Judge Leslie Ann Celebrezze. Thanks to Defendants, she was, without justification, professionally isolated and humiliated, and demoted to working as a scheduler—the type of job she had held previously and for which she had long since become overqualified. Defendants slashed her pay (and thus her lifetime pension) and constructively discharged her from employment with the DR Court.

11. Defendant Leslie Ann Celebrezze is the DR Court's administrative judge and lives in Cuyahoga County, Ohio. She controls the other Defendants, who report, and are beholden, to her.
12. Defendant James Zak is the DR Court administrator and lives in Medina County.
13. Defendant Susan K. Sweeney is a DR Court administrator and lives in Summit County.
14. Defendant Justin Seeton is the DR Court's deputy administrator and lives in Summit County.
15. Defendant Serpil Ergun is the DR Court's executive director of judicial operations and lives in Cuyahoga County.

JURISDICTION AND VENUE

16. This Court has personal and subject-matter jurisdiction over the state-law claims against Defendants, who all conduct business in Cuyahoga County, Ohio. The claims are statutory claims under Ohio law. The amount in controversy exceeds \$25,000.
17. Venue is proper because all parties work or conduct business in Cuyahoga County, and the events giving rise to Plaintiff's claims took place within this county.

FACTS

Ms. Searny was a close friend of Celebrezze and worked for the DR Court for 15 years, with exceptional performance reviews and no blemish on her record.

18. Ms. Searny met Defendant Celebrezze in about 2007, while Celebrezze was still a magistrate at Cleveland Municipal Court and Ms. Searny worked in central scheduling. Ms. Searny worked on Celebrezze's campaign for the DR Court. After Celebrezze won election in 2008, the judge asked Ms. Searny to be her judicial assistant.
19. They remained close until Ms. Searny gave access to open court records to a journalist and posed a witness risk to Celebrezze.

20. Over the years, Defendant Celebrezze and Ms. Semaury formed a close personal bond. For example:

- a. Ms. Semaury helped Celebrezze on her campaigns.
- b. Celebrezze would confide in Ms. Semaury and the pair spent abundant time together outside of work.
- c. They went on a camping trip together with their children.
- d. They went to the Cedar Point amusement park together.
- e. Celebrezze came to Ms. Semaury's neighborhood for swimming and cookouts.
- f. Celebrezze came over with her children for a "Santa Claus" visit Ms. Semaury had arranged.
- g. They visited a shooting range and obtained their concealed-carry licenses together.
- h. They attended each other's children's graduations.
- i. They attended each other's birthday parties, including Ms. Semaury's 50th birthday party in February 2022.
- j. After Ms. Semaury had surgery in December 2022, Celebrezze brought her groceries and spent time with her.
- k. Celebrezze was also slated to attend a 2021 "girls' trip" with Ms. Semaury and her friends in Miami, which she ultimately didn't attend because a family medical emergency arose.
- l. They took smoking breaks together at work and talked about personal matters, including Celebrezze's relationship with Dottore.



Leslie Ann Celebrezze with Georgeanna "Georgia" Sema—buddies on the shooting range in 2020

21. In Ms. Sema's most recent, November 2022 performance evaluation, which Celebrezze personally signed, Celebrezze rated Ms. Sema with the highest rating, as "exceed[ing] expectations" on all five criteria: Quality of Work, Initiative, Communication and Teamwork, Decision Making and Problem Solving, and Public Service Skills. This was a perfect score.

22. In a November 21, 2022 letter, Celebrezze gushed to Ms. Sema:

I want to congratulate you on your successful 2022 Annual Performance Evaluation. Your hard work to make the Cuyahoga County Domestic Relations Court a safe and efficient

operation for the citizens we serve is very much appreciated. A review of the overall evaluation indicates that you met or exceeded expectations. I am pleased to let you know that your efforts have merited a performance bonus. This one-time lump sum payment is based on merit and will not be added to your base rate of pay.

23. Likewise in 2012, Celebrezze rated Ms. Searny in her performance evaluation at the highest “Well Above Standard” rating across all 18 criteria—a perfect score.

24. In every evaluation, Celebrezze lavished Ms. Searny with praise for her work.

25. On top of regular salary increases that would boost her lifetime pension based on the highest three years of compensation, Ms. Searny even received bonuses for exceptional performance.

26. Ms. Searny had never received even oral counseling or a reprimand in her entire career with the DR Court. She had a flawless record as a public servant.

“What happens in Miami stays in Miami”: Ms. Searny was a witness with knowledge of Judge Celebrezze’s affair with Mark Dottore—because Celebrezze confided in her about it.

27. Defendant Celebrezze regularly appointed Mark Dottore (or his daughter) as the receiver of parties’ assets and finances on the cases on her docket, resulting in lucrative fees to them.

28. According to Black’s Law Dictionary, a “receiver” is a “disinterested person appointed by a court, or by a corporation or other person, for the protection or collection of property that is the subject of diverse claims (for example, because it belongs to a bankrupt, or is otherwise being litigated).” The dictionary entry continues:

An approved definition of a receiver is this: “an indifferent person between the parties, appointed by the court to collect and receive the rents, issues, and profits of land, or the produce of real estate, or other things in question, pending the suit, which it does not seem reasonable to the court that either party should do, or where a party is incompetent to do so, as in the case of an infant.”

BLACK’S LAW DICTIONARY (10th ed. 2014) at 1460 (internal citation omitted).

29. As a close friend of Judge Celebrezze's for over 15 years, and as Celebrezze well knew, Ms. Smary knew about and was witness to the years-long affair between Celebrezze and Mark Dottore.

For example:

- a. Since 2011, Ms. Smary saw Celebrezze and Dottore, who had known Celebrezze since she was seven years old and whose father, as a judge, used to appoint him to cases, attend several political events together. Celebrezze would make a point to tell Ms. Smary that she liked Dottore (in a romantic sense).
- b. Once, before Dottore's divorce in 2018, Ms. Smary was working when Celebrezze entered the office crying. Ms. Smary asked if she was okay, and Celebrezze told her Dottore's then-wife had caught her "making out" with Dottore outside of his office. Celebrezze said Dottore's wife was upset and called the pair names.
- c. In about November 2018, Lisa Dottore (now Lisa Moran) filed for a divorce from Mark Dottore. Around that time, Celebrezze told Ms. Smary that she was considering divorcing her own husband and had even consulted a divorce attorney.
- d. After Mark Dottore's divorce, Ms. Smary, from her workstation in Celebrezze's chambers would hear Celebrezze call Dottore when he was dating someone new and scream at him over the phone.
- e. Celebrezze would often invite Ms. Smary for smoke breaks, where she would complain about Dottore's other girlfriends, exclaiming bitterly, "Fuck that bitch!"
- f. Celebrezze would complain and wonder about how it was that Dottore's other girlfriends would call while she was with Dottore. Celebrezze reported how she got one woman to stop calling whenever she was with Dottore by stopping her location-sharing on a phone app.

- g. In about September 2021, Ms. Smary invited Celebrezze on a “girls’ trip” to Miami. Celebrezze told Ms. Smary that Dottore would try to join them for the weekend. On a smoke break with Ms. Smary, Celebrezze quipped about Dottore coming with her: “What happens in Miami stays in Miami!” But Celebrezze ultimately canceled because of a family medical emergency.
- h. In February 2022, Ms. Smary invited Celebrezze to her 50th birthday party, which would take place on a Friday night. Dottore planned to attend the party to meet up with Celebrezze, but ultimately canceled, telling Celebrezze that having arrived back from travel, he was too tired to attend. In the presence of multiple witnesses, Celebrezze wept, upset that Dottore was no longer attending. To cheer her up, Ms. Smary invited Celebrezze outside to talk and smoke. Consoling Celebrezze, Ms. Smary told her that she did not trust Dottore, and she believed Celebrezze could do better (even though she was a married woman).
- i. Celebrezze spent the weekend stewing over that conversation.
- j. The following Monday, Celebrezze asked Ms. Smary to go outside for a smoke and interrogated her about her comments about not trusting Dottore. Celebrezze was upset about Ms. Smary’s comments at her birthday party about not trusting Dottore and about being able to do better. Since then, Ms. Smary observed that Celebrezze became more cautious about sharing information about her ongoing relationship with Dottore with Ms. Smary.
- k. For a judge who was supposed to be detached and neutral, Celebrezze was inordinately protective of Dottore. Recently, when a divorce lawyer in court criticized Dottore’s actions as a Celebrezze-appointed receiver, Celebrezze stormed back into chambers and

told her bailiff, “Get that motherfucker [the lawyer] out of my courtroom. How dare he talk to Mark that way!?”

- I. Celebrezze told Ms. Semaury that when Celebrezze and Dottore were in a bar together, she jumped up in between Dottore and a man and “got in the man’s face,” and almost got into a fight with him. She had been worried about getting red wine on her white coat.

30. Celebrezze has an Instagram account entitled @undertherobes (available at <https://www.instagram.com/undertherobes/>) on which she posts daily morning selfies at the top of her home stairs, in front of a full-length mirror dressed fashionably, in a model-like pose. She brands the account to be, “Daily fashion from a sitting judge.” Plaintiff is informed and believes that Dottore would click on the “heart” button to convey his love of these daily until The Marshall Project story discussed below, about her relationship with Dottore, broke or was about to break. Celebrezze then turned the previously open account private, requiring requests for access.

Ms. Semaury provides records to an investigative reporter after DR Court clerks direct him to her office; she tells Celebrezze, “it’s about several of your cases.”

31. On April 28, 2023, Marshall Project reporter Mark Puente visited the court clerk’s office and reviewed many closed Celebrezze case files for records about her appointments of Dottore and his daughter as receivers. The court’s clerks, whom Celebrezze did not know to have firsthand knowledge of her affair with Dottore, handed those files to Mr. Puente without inspecting them beforehand.

32. Unlike Ms. Semaury, who knew about the affair, the clerks faced no consequence for making open court records available.

33. What Mr. Puente was seeking about Dottore was in an active case file and thus in Celebrezze’s chambers. The clerks directed Mr. Puente upstairs to her chambers.

34. So Mr. Puente went to then-judicial-assistant Ms. Semaury’s office.

35. Ms. Searny, on the DR Court’s behalf, was required by the First Amendment and Supreme Court of Ohio’s Rules of Superintendence 44–47 to permit access to public court records stored in Judge Celebrezze’s office. Under Rule of Superintendence 45(A), “Court records are presumed open to public access.” And under Rule 45(B)(1), “A court or clerk of court shall make a court record available by direct access, promptly acknowledge any person’s request for direct access, and respond to the request within a reasonable amount of time.”

36. Regardless of any formal written policy—and with Celebrezze’s full knowledge and consent—Ms. Searny had provided direct access to such records throughout her 15 years of service to the DR Court, usually in response to requests from lawyers or law-firm court runners.

37. Indeed, this was the same protocol followed by staff in other chambers of the DR Court.

38. Celebrezze never told her to do otherwise.

39. And there would have been nothing reasonable about delaying direct access to a single court file in response to Mr. Puente’s request for direct access.

40. Under Supreme Court of Ohio Rule of Superintendence 44(H), “Personal identifiers” can include “a juvenile’s name in an abuse, neglect, or dependency case.” Domestic-relations cases are not listed included in that definition. And the Supreme Court of Ohio’s standardized practice forms for domestic-relations cases require juvenile names and birthdates, with no indication that those forms are to be filed under seal.

41. In any event, under Rule of Superintendence 45(D)(3):

The responsibility for omitting personal identifiers from a case document submitted to a court or filed with a clerk of court pursuant to division (D)(1) of this rule shall rest solely with the party. *The court or clerk is not required to review the case document to confirm that the party has omitted personal identifiers*, and shall not refuse to accept or file the document on that basis.

(Emphasis added.)

42. Consistent with Rule 45(D)(3)’s placement of redaction burdens on attorneys—and the definition of “personal identifiers” not including child-custody domestic-relations proceedings—the

DR Court had no clear policy requiring court staff like Ms. Searny or the clerk's office to inspect open court files for juvenile names and birthdates before affording direct access to the public. It was not the practice in the DR Court to do so. Administrative Judge Celebrezze, knowing Ms. Searny's practices as her judicial assistant, had never directed or trained her, or anyone else in the DR Court, to do so. On the countless occasions Ms. Searny had made court files available to people other than Mr. Puente—the reporter investigating Celebrezze—this had never been an issue.

43. Mr. Puente provided Ms. Searny with the name and number of the case he wished to review. It was not an “abuse, neglect, or dependency case.” She pulled the relevant file and examined it to ensure the judge's personal notes were not in it and that nothing was marked as being under seal or confidential. Ms. Searny's review was standard protocol when someone requested a case to review. She handed only open court records to Mr. Puente. Again, Celebrezze had never objected to this practice or directed Ms. Searny otherwise.

44. No attorney for any litigant in the case had redacted any information or moved to place anything under seal.

45. Ms. Searny handed Mr. Puente the files and asked him to sit at a table that was about 10 feet away from her. At some point as he looked quickly through the file, she, standing in the doorway watching him, asked Mr. Puente if he was an attorney or working for one. He said, “I am a writer.”

46. When, in a matter of minutes, Mr. Puente had found what he was looking for, which was court filings related to Dottore, he asked Ms. Searny to make a copy of them, which she did, just as she would have done for anyone else. She knew he hadn't taken anything from that file. And she knew that these were copies of court papers listed on the docket. *She copied nothing confidential for him.*

47. Nothing about this interaction was unusual to Ms. Searny. With Celebrezze's knowledge, she had provided court records to attorneys and their staff members many times and knew that the records she provided were public.

48. As he left, Mr. Puente handed her his business card showing her he was a journalist, and said, “I am working on several of Judge Celebrezze’s cases.” He asked Ms. Searny to give the judge a message to have her call him. Ms. Searny took his card and, after he had left, took a photo of it and texted it to Judge Celebrezze with this message: “This guy stopped by the office asked if you can give him a call it’s about several of your cases he said” *[sic]*.

49. Celebrezze did not respond.

50. Ms. Searny began to feel anxious. She had noticed that, in the past, Judge Celebrezze seemed leery of reporters looking at Celebrezze’s case files (even though they are just as entitled as other members of the public to inspect court records). Ms. Searny did not know why. But ultimately, Ms. Searny concluded she had followed the correct protocol because she knew the records did not concern domestic violence, were not sealed, contained no judicial notes, and were not marked as confidential. Thus, they were public, open court records.

51. Ms. Searny did not know then that Mr. Puente had been in the clerk’s office seeking similar open court records, that the clerks had afforded direct access to them, and that the clerks had then directed Mr. Puente to Celebrezze’s chambers. Those clerks were never disciplined. Nor did Celebrezze ask the Clerk of Courts to investigate or discipline them. Celebrezze didn’t know those clerks to have firsthand knowledge of her romance with Dottore.

Court officials immediately raise alarm bells about Ms. Searny’s interaction with the reporter.

52. Within minutes of her text to Celebrezze, court administrator Defendant James Zak called and interrogated Ms. Searny. Zak specifically demanded to know why Ms. Searny allowed Mr. Puente to review the files. Zak also asked several questions about what Mr. Puente had done with the files, whether he took pictures, and where he reviewed the files. Ms. Searny answered his questions, specifically telling Zak that Mr. Puente had asked for copies of the Dottore-related court filings.

53. Zak seemed perturbed that Ms. Semaury allowed Mr. Puente to obtain copies of the Dottore-related court filings, even though they were all public court records. Ms. Semaury told him that she wasn't concerned when Mr. Puente asked to see the records because they were public.

54. Ms. Semaury texted Judge Celebrezze again and said:

I'm sorry I didn't know who he was he made it seem like he was a runner for an attorney and said the clerks told him to come upstairs if he wanted to review a file he didn't give me his card till after cuz I asked if he was working for an attorney and that's when he handed me the card and said he was working on several cases

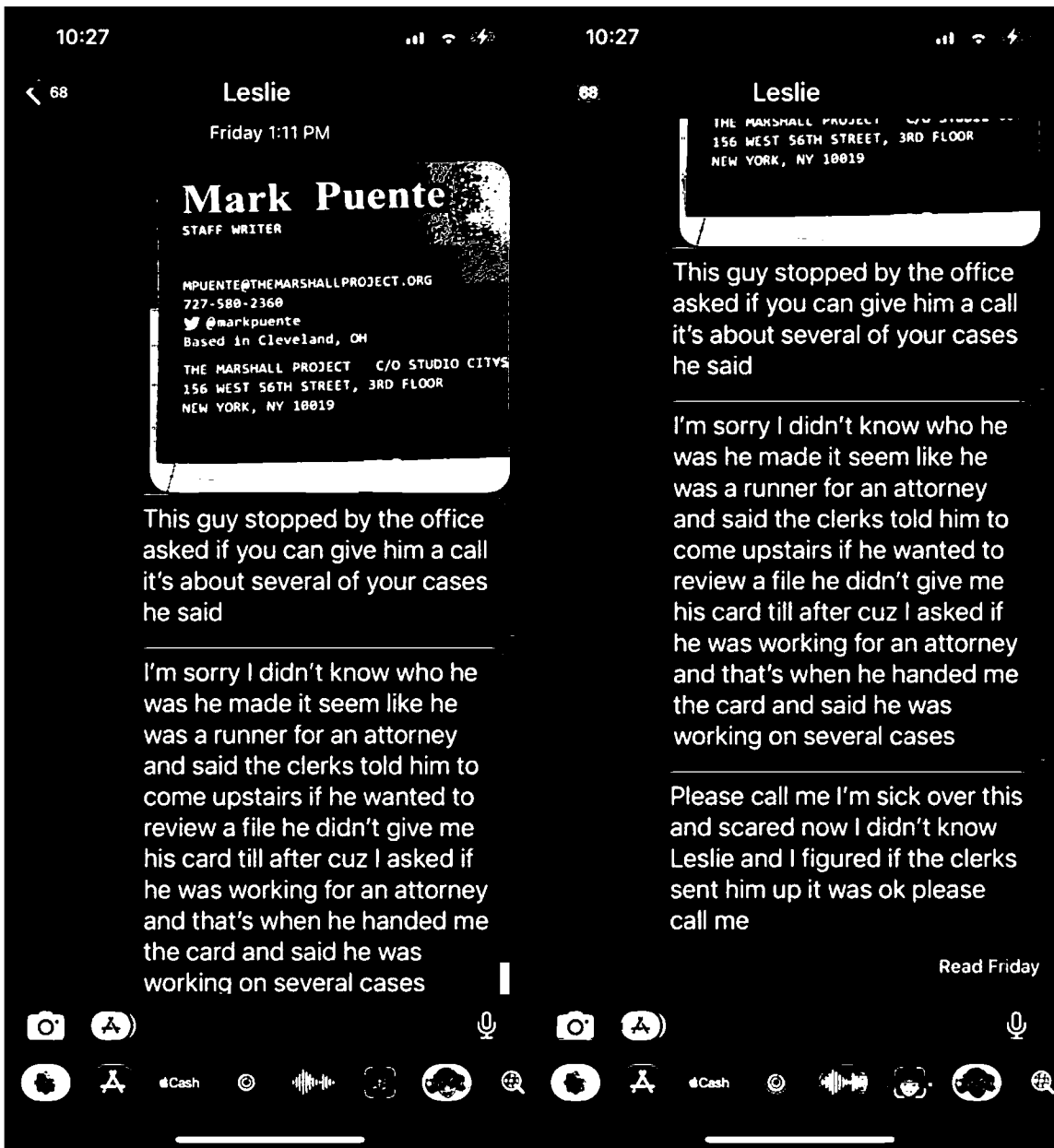
[sic].

55. Celebrezze still didn't respond.

56. Ms. Semaury then tried calling Celebrezze, but she didn't answer.

57. This wasn't normal behavior for Celebrezze toward Ms. Semaury, her close friend.

58. Ms. Semaury then texted, "Please call me I'm sick over this and scared now I didn't know Leslie and I figure if the clerks sent him up it was ok please call me" [sic].



Screenshots of Ms. Semaury's April 28, 2023 unanswered texts to Celebrezze.

59. Celebrezze ignored Ms. Semaury's calls and texts, which filled Ms. Semaury with anxiety about possible retaliation she might face for showing Mr. Puente public court records.

60. Celebrezze texted her bailiff, ordering him to tell Ms. Semaury they would talk about the incident the next week.

61. Ms. Semaury was devastated that her boss and dear friend wouldn't even speak to her. She spent much of the rest of the day crying.

62. Celebrezze's magistrate Scott Kitson comforted her by observing that if she had refused to give Mr. Puente the file, the reporter probably would have written a negative story about how the court was denying him access to public records to which he was entitled.

Defendants punish Ms. Searny for complying with the Supreme Court of Ohio's Rules of Superintendence—and the First Amendment to the United States Constitution.

63. On May 1, 2023, Ms. Searny received an email from Defendant Sweeney scheduling a meeting among Defendant Sweeney, Ms. Searny, and Defendant Zak for May 3, 2023.

64. The email provided Ms. Searny with no notice about the meeting's purpose, but Ms. Searny assumed it was about Mr. Puente's request to view public records. She feared she would be fired.

65. Celebrezze ignored Ms. Searny all day. This had never happened before. They were close.

66. The next day, Ms. Searny noticed that not just Celebrezze but other court employees were ignoring or avoiding her. When Celebrezze was present, other staff would not speak with her and acted coldly.

67. This took a great emotional toll on Ms. Searny, and she continued to cry on and off.

68. Ms. Searny asked Celebrezze if she would be fired. Celebrezze shrugged and said nothing, leaving Ms. Searny in great distress.

69. Ms. Searny then asked if the judge would just talk to her. The judge didn't say a word and shook her head no.

70. Ms. Searny asked Defendants Sweeney and Zak if they could move up their scheduled meeting to May 2 because, as she explained to Zak, she hadn't slept in five days. But they denied her request, leaving her in emotional agony.

71. On the morning of May 3, 2023, Searny approached Defendant Zak's secretary and asked if Zak was available to talk or if their meeting, scheduled for that afternoon, could be moved up. Zak said Judge Celebrezze was headed to his office, so Ms. Searny tried to leave.

72. As she was leaving, Ms. Searny passed Celebrezze and asked if she could try to move the meeting up earlier.

73. Celebrezze just *ignored* her employee and confidant.

74. At 1:30 pm on May 3, 2023, Ms. Searny met with Defendants Sweeney and Zak.

75. Zak asked Ms. Searny to explain what happened when Mr. Puente came to her office.

76. Ms. Searny explained the day's events. She reiterated that the records were public and that, for 15 years, she had shared them with those who came to the judge's office and asked.

77. Defendant Zak gave Ms. Searny a "Written Counseling" for providing public court records to a reporter. In so doing, Zak, complicit with the other Defendants, created a false written document for Ms. Searny's personnel file alleging that she had shared confidential information when, as Defendants well knew, she had not done so, and he had no evidence that she had. The document, with the official seal of the Cuyahoga County Court of Common Pleas Domestic Relations Division on it, was entitled, "Written Counseling." Under "Description of Violation" it read:

On Friday, April 28, 2023, Georgeanna Searny gave a court file containing confidential information to Mr. Mark Puente without first notifying and receiving permission from either Judge Leslie Ann Celebrezze or Court Administrator Jim Zak. Without authority or permission to do so, Ms. Searny allowed Mr. Puente to remove the file from the court office and review its contents without supervision. Ms. Searny's actions violated Employee Handbook Sections 2.10, 2.11, and the Code of Ethics as outlined below:

78. The claim that Ms. Searny gave a court file containing confidential information to Mark Puente was a false statement. Ms. Searny had checked the file to ensure that nothing in it was confidential, under seal, or contained judicial notes.

79. Although the document claimed Ms. Searny had shared confidential information with Mr. Puente, it conspicuously failed to identify anything confidential in the file Ms. Searny had made available to Mr. Puente—much less explain how Defendants had arrived at such a bogus conclusion.

Relieved that she wasn't being fired and prepared to take her lumps for angering Celebrezze, Ms. Semaury did not ask.

80. The insinuation that Ms. Semaury would have first needed to notify and receive permission from Defendants Celebrezze or Zak was also false. As a matter of practice, that never happened when people showed up at chambers and asked for court records. And it was and had always been part of Ms. Semaury's job, as authorized by Celebrezze, to provide direct access to such documents to those asking for them. As judicial assistant, she was responsible for maintaining the files.

81. The statement that Mr. Puente was allowed to remove the file from the court office and review its contents without supervision was false, because he was in the court office and within 10 feet of her. He didn't go anywhere with the file and had the papers only for minutes.

82. The statement that Ms. Semaury's actions violated Employee Handbook Sections 2.10, 2.11, and the Code of Ethics was also false, as explained next.

83. Court Employee Handbook Section 2.10, quoted in the notice, states:

An employee must not exhibit or divulge the contents of any record to any person, including other employees, except in the conduct of the employee's work assignments and in accordance with Court policy and the Ohio Rules of Superintendence. An employee must not remove, or cause to be removed, copies of any record or report from any file from the office where it is kept, except in the performance of the employee's duties.

(Emphases added.)

84. Ms. Semaury was conducting her work assignments in accordance with Court policy and the Ohio Rules of Superintendence. She was performing her duties.

85. The "Written Counseling" Ms. Semaury received also quoted Employee Handbook Section 2.11, which states:

The production or release of any Court records or documents resulting from a public records request, including media requests, is governed by Rules 44-47 of the Ohio Rules of Superintendence for the Courts of Ohio. A request for production or inspection of any Court records or documents must be promptly presented to Court Administration. Any communication or follow-up regarding the request will be handled by Court Administration.

86. In Ms. Semaury's 15 years of experience working with Judge Celebrezze, the second and third sentences of this section were not followed or enforced. Celebrezze, like the other judges, had authorized, and indeed directed, in-chambers personnel like Ms. Semaury to make active case files open and available to the public consistent with Rules 44–47 of the Rules of Superintendence, generally providing direct access to court records, and knew that personnel had regularly done so. To the best of her knowledge, any purported requirement that every request from every law-firm runner, lawyer, journalist, or member of the public be routed to court administration was simply not followed. Staff had not been trained on such a policy. And as a practical matter, it was unworkable for every staff member of every DR Court chambers to route, through central administration, anyone who showed up seeking open case files.

87. Nor was there any DR Court policy or rule about redacting juvenile names and birth dates from court records before making them accessible. Ms. Semaury would do so in cases of domestic violence, which was not the type of case file she gave to Dottore.

88. Indeed, DR Court judges would often put juvenile names in their judgment entries, which were not confidential or withheld from the public.

89. Only when the request was from someone who Ms. Semaury, at the end of the interaction, learned happened to be a journalist—and one who was investigating Celebrezze's illicit amorous and business relationship with Dottore—did court officials contrive such discipline to retaliate against and intimidate Ms. Semaury.

90. Defendants' excuses for punishing Ms. Semaury were pretexts for retaliation and witness intimidation.

91. And even if Ms. Semaury had violated some written policy, that would not have justified her friend and boss—the administrative judge of the DR Court—ostracizing her and never speaking with her again. Celebrezze's burning fury was fueled by retaliatory animus and intimidatory intent.

92. Ms. Searny told Defendants Zak and Sweeney that, although she would sign the “Written Counseling” (to acknowledge receiving it), she had neither done anything wrong nor handled things any differently from the way she had over the previous 15 years. Still, Defendants did not relent. At the end of the May 3 meeting, Defendant Zak assured Ms. Searny that would be the end of the discipline.

93. After the meeting, Defendant Sweeney, complicit with the other Defendants, also created a false written document: her purported notes. The notes claimed, among other false statements, that Ms. Searny had said, “not sure if anything taken” and “not sure if any confidential information.” In truth and in fact, Ms. Searny had clearly and unambiguously told Defendant Sweeney and the others in the meeting that Mr. Puente had taken nothing other than the copies she made for him, and that Ms. Searny had personally inspected the file to ensure it contained no confidential information.

94. These falsified purported notes of the meeting also jumbled the chronology in which Ms. Searny had discussed topics with her blindsiding interlocutors. They thus could not have been and were not written contemporaneously in the meeting.

95. Upon returning to the office, Ms. Searny spoke to Judge Celebrezze and explained the stress the entire event had caused, including Ms. Searny’s losing several nights of sleep.

96. Ms. Searny felt that—judging by her demeanor—Celebrezze no longer wanted to continue their long friendship.

Despite weeks of silence, the retaliation and intimidation against Ms. Searny resumes as The Marshall Project’s article looms over Celebrezze.

97. The forthcoming Marshall Project article loomed large over Celebrezze’s life. Her anger and anxiety mounted because she knew what Mr. Puente was investigating and knew she was in trouble. She had already, misleadingly defended her conduct with Dottore to Mr. Puente for his forthcoming article (quotes discussed below).

98. On May 26, 2023—23 days after the written-counseling meeting—Defendant Seeton, the

deputy court administrator, summoned Ms. Searny to his office. Again, Ms. Searny was given no notice about the purpose.

99. When Ms. Searny went to Defendant Seeton's office, Defendant Ergun, the director of judicial operations was there as well. Defendants Seeton and Ergun slid a piece of paper to her and told her she was being demoted to the position of scheduler, a position she had last held 14 years earlier with the Cleveland Municipal Court. Ms. Searny was shocked because Defendant Zak had assured her that a written counseling would be the full extent of the disciplinary action against her for providing public records to a journalist. Now she was being punished a second time apparently for the same purported offense.

100. Ms. Searny pleaded to know why she was being demoted, but neither Defendant Seeton nor Defendant Ergun said a word. They just sat there and looked at her.

101. She asked again. They again said nothing, continuing to stare at her in silence.

102. Ms. Searny asked whether her pay would be affected, and Defendants Seeton and Ergun said they could not answer; they added that would be up to Celebrezze.

103. On June 1, 2023, Ms. Searny returned from a planned vacation and reported to her new position. She felt anxious and depressed about the demotion and struggled to adjust.

The Marshall Project publishes an exposé on Celebrezze, suggesting an affair with receiver Mark Dottore.

104. At 5 pm that same day, The Marshall Project published "A Judge, a Kiss, and \$450,000-plus in Court Work," an investigative report about accusations that Judge Celebrezze was in an illicit relationship with Mark Dottore, a man she often appointed receiver. Mark Puente, *A Judge, a Kiss, and \$450,000-plus in Court Work*, The Marshall Project, June 1, 2023, at <https://www.themarshallproject.org/2023/06/01/divorce-judge-kiss-court-work> (copy attached and incorporated as Ex. 1). See also <https://www.clevescene.com/news/a-judge-a-kiss-and-450000-plus-in-court-work-42091655> (simultaneous publishing of Puente's article in *Cleveland Scene*

Magazine); <https://www.news5cleveland.com/news/the-marshall-project/a-judge-a-kiss-and-450-000-plus-in-court-work> (June 2, 2023 republishing of Puente’s article on WEWS News 5’s website).

105. The article detailed a Supreme Court of Ohio filing questioning the relationship between Defendant Celebrezze and Dottore, who had been appointed receiver in a divorce case. One of the parties in that case, Jason Jardine, filed an affidavit of disqualification, trying to remove Celebrezze from presiding over the case.

106. Jardine hired a private investigator to investigate Celebrezze and Dottore’s relationship, according to the article.

107. The investigator caught Celebrezze and Dottore kissing on the lips outside of Delmonico’s Steakhouse in Independence on March 22, 2023. And The Marshall Project’s and *Cleveland Scene Magazine*’s websites published a video of the kiss. In the video, Celebrezze turned toward Dottore as he leaned in. She seized and cupped his face tenderly and kissed him on the lips:



“I’m Italian.” – Judge Leslie Ann Celebrezze, left; “She kisses everybody. I kiss everybody.” –Mark Dottore, right

108. The article reported: “Celebrezze and Dottore deny a romantic relationship. ‘I’m Italian,’ Celebrezze said in an emailed statement to The Marshall Project – Cleveland ..., “and I frequently kiss my family and friends on the lips when I greet them or say goodbye.””

109. The Marshall Project also quoted Dottore as saying, in response to the private investigator’s video: “She kisses everybody. I kiss everybody.”

110. Celebrezze’s and Dottore’s respective “I’m Italian” defense and “I kiss everybody” protests were lies calculated to cover up and perpetuate their amatory relationship even as Celebrezze presided over cases in which she funneled money to Dottore and his daughter.

111. The report about the private investigator’s steakhouse-kiss stakeout reminded Ms. Semary of Celebrezze’s admission that Dottore’s wife had caught Celebrezze and Dottore “making out” outside of Dottore’s office.

112. Even as they carry on their hanky-panky, according to the article, Celebrezze and Dottore maintain a business relationship in which she has funneled to him almost half-a-million dollars of work as a receiver for her cases. As of the article’s publication, Dottore and his daughter were listed as receivers in eight of Celebrezze’s cases. And, according to the article, Dottore served as Celebrezze’s campaign treasurer when she ran for her judgeship in 2008. Her campaign headquarters is even listed as Dottore’s business address.

113. According to the Marshall Project article, a private investigator said he followed Celebrezze at least seven times to Dottore’s office, home, and to restaurants. The judge and receiver met three to four times each week.

114. According to the article, Dottore claimed he met with Celebrezze at his home on Fridays to work on “court programs” and “special projects.” There appeared to be no explanation for what sorts of so-called “special projects” a court-appointed receiver and supposedly independent judge who appoints him to charge against litigants’ assets could or should possibly be working on.

115. Mr. Puente later reported that Celebrezze may be the only DR Court judge who regularly appoints receivers. Mark Puente, *Cuyahoga Judge May Be the Only One Using Receivers, Costing Divorcing Couples Thousands*, The Marshall Project, July 24, 2023, at <https://www.themarshallproject.org/2023/07/24/cuyahoga-judge-receivers-divorce> (copy attached and incorporated as Ex. 2).

116. Plaintiff alleges based on information and belief that Dottore has playfully slapped Celebrezze on the buttocks in front of others, calling her “his judge.” She has failed to disabuse him or others of the troublesome insinuation.

117. Victims of Celebrezze’s scheme to appoint Dottore unnecessarily to bleed litigants’ assets contemplated and pursued litigation in which Ms. Searny would or could have been a witness. *See, e.g.*, Mark Puente, *New Bias Complaints Continue to Target Top Cuyahoga County Judge*, The Marshall Project, June 15, 2023, at <https://www.themarshallproject.org/2023/06/15/ohio-divorce-judge-conflict-allegation> (copy attached and incorporated as Ex. 3); Mark Puente, *Judge Celebrezze Removed from Controversial Cuyahoga County Divorce Case*, The Marshall Project, Aug. 22, 2023, at <https://www.themarshallproject.org/2023/08/22/judge-celebrezze-removed-cuyahoga-divorce> (attached as Ex. 4).

After news of Celebrezze’s affair and unseemly business relationship breaks, the retaliation and intimidation against Ms. Searny escalates—leading to her constructive discharge.

118. On June 5, 2023, a few days after The Marshall Project’s article published, Ms. Searny received an email from Defendant Zak setting yet another meeting for June 7, two days later.

119. Ms. Searny emailed Zak back asking to postpone the meeting so she could have an attorney present.

120. Rather than reply, Zak tracked down Ms. Searny in a hallway and handed her an envelope. Inside was a letter informing Ms. Searny that her salary was cut by almost \$20,000 a year. (And therefore, the pension she would have otherwise received after future raises would also be cut.)

121. The letter dated June 7 falsely stated that she had been informed about the salary cut during the May 26, 2023 meeting with Defendants Seeton and Ergun. In truth and in fact, both had remained mum on why she was being demoted. And neither had been able to tell her if her salary would be cut, saying that was up to Defendant Celebrezze. Defendants deliberated back and forth over the content of this document, and Defendant Seeton specifically emailed Defendant Zak on June 6 that he and Ergun had not stated that Ms. Semařy would receive a salary reduction. But Zak, on Defendants' behalf, proceeded to make the false statement anyway.

122. Since her demotion and pay cut, Ms. Semařy continued to be *persona non grata* at the DR Court. People she considered friends no longer spoke to her and did not call to ask how she's been since the retaliation and intimidation started and she was demoted, with her pay (and thus her lifetime pension) slashed. Some people who would talk to her would suddenly stop if they saw Celebrezze nearby—they would say they couldn't have Celebrezze see them talking to her.

123. The retaliation, intimidation, and Defendants' conduct have been widely discussed among the DR Court judges and court personnel.

124. Other DR Court judges knew that Celebrezze was having an affair with Dottore. Celebrezze told at least one of them that she loved Dottore.

125. Celebrezze never disclosed her affair with Dottore to any of the parties or attorneys before her where she appointed or contemplated appointing Mark Dottore or his daughter as receivers. She knew that if she did, parties would object to her handing over their assets to someone with whom she was having an intimate relationship. They would be rightly concerned that she could not be objective in evaluating or approving Dottore invoices bleeding their assets.

126. On information and belief, Celebrezze never disallowed Dottore's billing on litigants' assets.

127. Defendants—including Celebrezze—knew that Ms. Semařy had information as a witness that would publicly expose Celebrezze's affair and relationship with Mark Dottore and cast doubt on

the objectivity and propriety of all Celebrezze's judicial acts of appointing him as a receiver and approving his and his daughter's fees and expenses. Defendants also knew the information Ms. Semaury had, if exposed, would raise questions and prompt investigations about what personal benefits Celebrezze may have received directly or indirectly from Dottore including and beyond the affair.

128. Defendants—including Celebrezze—knew that if Ms. Semaury was not silenced, not only was Celebrezze's judicial office, but her law license, too, at risk.

129. Ms. Semaury's witness status is confirmed by the fact that she has been interviewed about Celebrezze by the Federal Bureau of Investigation (FBI)'s Cleveland-based public-corruption squad.

130. Other government authorities would be interested in what Ms. Semaury knows about Celebrezze and Dottore's relationship and in what happened to Ms. Semaury as a result.

131. Consistent with her retaliation and intimidation of Ms. Semaury, and with her relationship with Dottore exposed and the object of scrutiny by litigants and their lawyers, Celebrezze schemed with Dottore and his longtime private attorney, Robert Glickman, to try to cover it up. For example, when a divorce attorney, on May 2, 2023, sent an email and letter asking for a meeting with the DR Court's *other* judges to discuss the threat to due process presented by Celebrezze's conduct with Dottore, one of those judges forwarded the communication to Celebrezze. Celebrezze that night then even revealed to Glickman internal, ostensibly privileged communications with her own counsel.

132. In any case, on information and belief, and inferring from the facts detailed above, any communications Celebrezze had with any attorney, including her own, were in furtherance of crimes and frauds, including, but not limited to those discussed in the claims section below—and therefore not privileged.

133. Based on information and belief, Plaintiff alleges that Dottore's lawyer Glickman created at least two documents on Dottore's behalf for Celebrezze to use to oppose Supreme Court of Ohio affidavits of disqualification arising from her conduct with Dottore.

134. Defendants having created intolerable working conditions for Ms. Semary, Ms. Semary had no choice but to resign. She submitted her resignation on or about August 14, 2023, with a last day of September 8, 2023.

CLAIM 1

CIVIL LIABILITY FOR CRIMINAL ACTS UNDER R.C. 2307.60 AND 2921.04(A) (INTIMIDATION OF ATTORNEY, VICTIM, OR WITNESS TO A CRIMINAL ACT) AND 18 U.S.C. § 1513(B)(2) (ATTEMPTED RETALIATION AGAINST A PERSON FOR ANY INFORMATION RELATING TO THE COMMISSION OF A FEDERAL OFFENSE), AND COMPLICITY UNDER R.C. 2923.03, CONSPIRACY UNDER 18 U.S.C. §§ 371 AND 1951, AND AIDING AND ABETTING AGAINST DEFENDANTS IN THEIR INDIVIDUAL CAPACITIES AGAINST DEFENDANTS IN THEIR PERSONAL CAPACITIES

135. Plaintiff incorporates all previous allegations.

136. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

137. Under the relevant part of R.C. 2921.04(A), "... no person shall knowingly attempt to intimidate a witness to a criminal or delinquent act by reason of the person being a witness to that act." (Cleaned up.)

138. Under the relevant part of R.C. 2921.04(B)(2), "No person, knowingly and... by unlawful threat of harm to any person or property or by unlawful threat to commit any offense or calumny against any person, shall attempt to influence, intimidate, or hinder... A witness to a criminal or delinquent act by reason of the person being a witness to that act." (Cleaned up.)

139. Violations of R.C. 2921.04(A) are criminal acts under R.C. 2921.04(D). Violations of R.C. 2921.04(B) are criminal acts, indeed felonious, under R.C. 2921.04(D).

140. Under R.C. 2901.22(B):

A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact.

141. Under R.C. 2921.04(E), “‘witness’ means any person who has or claims to have knowledge concerning a fact or facts concerning a criminal or delinquent act, whether or not criminal or delinquent child charges are actually filed.”

142. Under 18 U.S.C. § 1513(b)(2) (Retaliating against a witness, victim, or an informant), whoever knowingly damages the tangible property of another person, or threatens to do so, with intent to retaliate against any person *for any information relating to the commission or possible commission of a federal offense* has committed a federal crime.

143. Ms. Semaury was witness to multiple potential criminal acts by Defendant Celebrezze—and other Defendants, given those other Defendants’ serial complicit acts of intimidation, retaliation, falsification, and tampering with records on Celebrezze’s behalf.

144. Under R.C. 102.03(D), “No public official or employee shall use or authorize the use of the authority or influence of office or employment to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person’s duties.” Violation of this prohibition is a criminal act under R.C. 102.99.

145. Under R.C. 102.03(E), “No public official or employee shall solicit or accept anything of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person’s duties.” Violation of this is a criminal act under R.C. 102.99.

146. Under R.C. 2921.42(A)(1), “No public official shall knowingly... [a]uthorize, or employ the authority or influence of the public official's office to secure authorization of any public contract in which the public official, a member of the public official's family, or any of the public official's business associates has an interest.”

147. And under R.C. 2921.42(A)(4), “No public official shall knowingly... [h]ave an interest in the profits or benefits of a public contract entered into by or for the use of the political subdivision or governmental agency or instrumentality with which the public official is connected.” Violation of this statute is criminal.

148. Various federal public-corruption statutes also apply to Celebrezze’s conduct, including those prohibiting, bribery, extortion, gratuities, mail fraud, wire fraud, and depriving others (including public entities like the State of Ohio and Cuyahoga County) of their intangible right of honest services under 18 U.S.C. § 1346.

149. Under R.C. 2923.32(A)(1), the Ohio RICO statute, “No person employed by, or associated with, any enterprise shall conduct or participate in, directly or indirectly, the affairs of the enterprise through a pattern of corrupt activity....”

150. Ms. Smary is a witness who knows facts about criminal acts, including, but not limited to, Judge Celebrezze’s participating in the affairs of the DR Court through a pattern of corrupt activity, authorizing the using of the authority or influence of her office or employment to secure something of value or the promise or offer of something of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person’s duties—things of value including her affair with Dottore and any attendant financial benefits including expensive meals, etc.

151. Ms. Smary is also a potential witness who has information about state and federal offenses including Celebrezze’s soliciting and accepting something of value that is of such a character as to

manifest a substantial and improper influence upon her with respect to that her duties—the affair and any attendant financial benefits including expensive meals, etc.

152. And Ms. Semaury is a witness to Celebrezze, as a public official, knowingly authorizing or employing the authority or influence of her office to secure authorization of public contracts in which she and her business associates (Dottore) have interests. Ms. Semaury is also a witness to Celebrezze’s knowingly having an interest in the profits or benefits of a public contract entered into by or *for the use of* the DR Court—the contracts with Dottore’s businesses.

153. Ms. Semaury has been interviewed as a witness by the FBI about the conduct of Celebrezze and her co-Defendants.

154. R.C. 2923.03 criminalizes various forms of complicity, including conspiring with another to commit an offense, aiding and abetting another, and causing an otherwise innocent person to commit an offense. Title 18 U.S.C. § 2 criminalizes aiding and abetting. And 18 U.S.C. § 371 and 18 U.S.C. § 1951 criminalize certain conspiracies, including corruption conspiracies.

155. Defendants, working in concert, attempted to intimidate and hinder Ms. Semaury in her role as a witness to misconduct, criminal acts, and Celebrezze’s corruption, by engaging in these acts, among others:

- a. Celebrezze’s ceasing communication with Ms. Semaury and causing others to freeze Ms. Semaury out as well.
- b. Arranging for a reprimand of Ms. Semaury.
- c. Demoting Ms. Semaury.
- d. Causing Ms. Semaury’s pay (and thus her lifetime pension) to be slashed.
- e. Causing Ms. Semaury’s constructive discharge.

156. Defendants’ intimidation involved first threatening, and eventually causing, economic harm to Ms. Semaury.

157. Defendants knowingly damaged the tangible property of Ms. Searny—her income and pension benefits, and threatened to do so, with intent to retaliate against her for possessing information relating to the commission or possible commission of a federal offense.

158. As a direct and proximate result of these actions, Ms. Searny has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; emotional distress; loss of reputation; the loss of salary, wages, and benefits including pension; and other terms, privileges, and conditions of employment.

159. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 2

CIVIL LIABILITY FOR CRIMINAL ACTS UNDER R.C. 2307.60 FOR RETALIATION AGAINST A PUBLIC SERVANT AND WITNESS UNDER R.C. 2921.05 AND COMPLICITY AND AIDING AND ABETTING UNDER R.C. 2923.03 AGAINST DEFENDANTS IN THEIR PERSONAL CAPACITIES

160. Plaintiff incorporates all previous allegations.

161. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

162. Under the relevant part of R.C. 2921.05(A):

No person, purposely and by force or by unlawful threat of harm to any person or property, shall retaliate against a public servant, a party official, or an attorney or witness who was involved in a civil or criminal action or proceeding because the public servant, party official, attorney, or witness discharged the duties of the public servant, party official, attorney, or witness.

163. Violations of R.C. 2921.05(A) are criminal acts, indeed felonious under R.C. 2921.05(C).

164. R.C. 2901.22(A) defines purposely as, "A person acts purposely when it is the person's specific intention to cause a certain result, or, when the gist of the offense is a prohibition against

conduct of a certain nature, regardless of what the offender intends to accomplish thereby, it is the offender's specific intention to engage in conduct of that nature.”

165. R.C. 2923.03 criminalizes various forms of complicity, including conspiring with another to commit an offense, aiding and abetting another, and causing an otherwise innocent person to commit an offense. Title 18 U.S.C. § 2 criminalizes aiding and abetting. Various other federal statutes parallel the applicable state provisions.

166. Ms. Searny was discharging her duties as a public servant when she allowed journalist Mark Puente to view public court records. Making those records available is required not just by the Supreme Court of Ohio’s Rules of Superintendence but by the First Amendment to the United States Constitution, as applied to the states by the Fourteenth Amendment.

167. The campaign of retaliation orchestrated by Defendants was calculated to punish Ms. Searny for allowing a journalist to review court records, which ultimately resulted in the public exposure of Judge Celebrezze’s unethical affair with Mark Dottore, a receiver she consistently appointed in cases.

168. Defendants retaliated and attempted to retaliate against Ms. Searny because Ms. Searny performed the duties of her job as a public servant by allowing access to public court records to a journalist. That retaliation included, but was not limited to, ensuring Ms. Searny was turned into a pariah at work, reprimanded and demoted to a less-fulfilling position and slashing Ms. Searny’s pay by \$20,000 a year (and thus slashing her pension), a decision that, according to her colleagues at the court, was left up to Celebrezze.¹

¹ Threats of unlawful harm don’t have to be communicated directly from one person to another. *State v. Reyes*, 6th Dist. Wood No. WD-09-089, 2010-Ohio-4712, ¶ 10 (“This court held ‘where ‘the defendant was either aware that the threats would be communicated to the intended victim by the third party or could reasonably have expected the threats to be so conveyed, he is guilty of the type of unlawful threat of harm required by the retaliation statute.’”).

169. Defendants retaliated against Ms. Semaury because they intended to punish Ms. Semaury for doing her job because she gave public records to Mark Puente, who exposed an improper, unethical affair and relationship between Celebrezze and Mark Dottore. They also sought to silence, discredit, and intimidate Ms. Semaury in serving as a witness about that improper relationship.

170. Defendants' retaliation against Ms. Semaury constituted an unlawful threat of harm to her property because Celebrezze unlawfully threatened to take away—and ultimately managed to take away—substantial financial resources from Ms. Semaury because she had performed her job duties. Disciplinary action can lead to (and did lead to) demotion, loss of salary, and loss of benefits, including pension benefits because of Ms. Semaury's substantially lower salary. The retaliation also constituted a threat to Ms. Semaury's person as an unwarranted and unfair disciplinary action could cause immense mental harm.²

171. Defendants were complicit with one another in plotting and performing these actions.

172. As a direct and proximate result of Defendants' actions, Ms. Semaury has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; emotional distress; loss of reputation; the loss of salary, wages, and benefits including pension; other terms, privileges, and conditions of employment; and constructive discharge.

173. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

² The language about unlawful threats is identical in both R.C. 2921.05(A) and R.C. 2921.03(A), the retaliation and intimidation statutes respectively. *State v. Lambert*, 2d Dist. Montgomery No. 16667, 1998 WL 288957, *4 (Jun. 5, 1998). The Court should thus construe them in the same manner. *Id.* Courts have interpreted threats under R.C. 2921.03(A) to include financial harm as well as emotional and mental harm. *State v. Kinstle*, 2012-Ohio-5952, 985 N.E.2d 184, ¶ 35 (3d. Dist.).

CLAIM 3

INTIMIDATION UNDER R.C. 2921.03(A) AND (C) AND CIVIL LIABILITY FOR CRIMINAL ACTS UNDER R.C. 2307.60 (INCORPORATING R.C. 2921.03) AND COMPLICITY AND AIDING AND ABETTING UNDER R.C. 2923.03 AGAINST DEFENDANTS IN THEIR PERSONAL CAPACITIES

174. Plaintiff incorporates all previous allegations.

175. Under the relevant part of R.C. 2921.03(A):

No person, knowingly and by force, by unlawful threat of harm³ to any person or property, or by filing, recording, or otherwise using a materially false or fraudulent writing with malicious purpose, in bad faith, or in a wanton or reckless manner, shall attempt to influence, intimidate,⁴ or hinder a public servant, a party official, or an attorney or witness involved in a civil action or proceeding in the discharge of the person's the duties of the public servant, party official, attorney, or witness.

176. Under R.C. 2901.22(B):

A person acts knowingly, regardless of purpose, when the person is aware that the person's conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact.

177. R.C. 2921.03(C) establishes a civil cause of action for damages, including attorney fees and costs, for violations of R.C. 2921.03(A).

178. Likewise, under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action. Violations of R.C. 2921.03(A) are criminal acts, indeed felonious, under R.C. 2921.03(B).

179. Ms. Smary is a public servant who works for the DR Court. It is part of her duties as a public servant to provide public court records to the public upon request, which is exactly what she did here.

³ Harm can include non-physical harm, including financial harm and emotional or mental harm. *State v. Kinstle*, 985 N.E.2d 184, 194 (Ohio Ct. App. 2012).

⁴ A person does not actually have to be intimidated. There only needs to be an attempt to intimidate. *State v. Kinstle*, 2012-Ohio-5952, 985 N.E.2d 184, ¶ 38 (3d. Dist.).

180. Defendants engaged in an unlawful threat of harm to Ms. Semaury and her property interests in her job, salary, and benefits, by engaging in following acts of retaliation, among others, and by influencing, intimidating,⁵ and hindering her, a public servant and witness involved in a civil actions and proceedings (including actual and contemplated litigation and grievance proceedings over Celebrezze's conduct) in the discharge of her duties:

- a. Celebrezze's ceasing communication with Ms. Semaury and causing others to freeze Ms. Semaury out as well.
- b. Arranging for a reprimand of Ms. Semaury.
- c. Demoting Ms. Semaury.
- d. Causing Ms. Semaury's pay (and thus her lifetime pension) to be slashed.
- e. Causing Ms. Semaury's constructive discharge.

181. Defendants also filed, recorded, and otherwise used materially false or fraudulent writings with malicious purpose, in bad faith, and in a wanton or reckless manner in an attempt to influence, intimidate, and hinder public servants: courts in expected litigation, prosecutors, and disciplinary authorities—in the discharge of their duties, so that Ms. Semaury would not prevail in her efforts to seek justice.

182. These false and fraudulent statements include, but are not limited to, the Written Counseling document claiming that Ms. Semaury had made confidential information available to reporter Mark Puente, the notes falsely claiming that Ms. Semaury had admitted she didn't know if she had given Mr. Puente confidential information or had taken documents, and the false statement in the June 7, 2023 letter that Defendants had informed her about her salary cut on May 26, 2023, which, in truth and in fact, became a later act of retaliation and intimidation that Defendants imposed.

⁵ A person does not actually have to be intimidated. There only needs to be an attempt to intimidate. *State v. Kinstle*, 2012-Ohio-5952, 985 N.E.2d 184, ¶ 38 (3d. Dist.).

183. Defendants retaliated and attempted to retaliate against Ms. Searny because Ms. Searny performed the duties of her job as a public servant by allowing journalist Mark Puente to access public court records. That retaliation included, but was not limited to, ensuring Ms. Searny was reprimanded and demoted to a less-fulfilling position and slashing Ms. Searny's pay by \$20,000 a year (and thus her lifetime pension)—a decision that, according to her colleagues at the court, was left up to Celebrezze.⁶

184. Defendants retaliated against Ms. Searny because they intended to punish Ms. Searny for doing her job—by giving public records to Puente, who exposed an improper, unethical, romantic affair between Celebrezze and Mark Dottore from which Celebrezze benefited personally and financially, either indirectly (in the form of side benefits like expensive meals) or directly. They also sought to silence and discredit Ms. Searny from serving effectively as a witness about that improper relationship.

185. Defendants' retaliation against Ms. Searny constituted an unlawful threat of harm to her property because Celebrezze unlawfully threatened—and ultimately followed through on that threat—to take away substantial financial resources from Ms. Searny because she had performed her job duties. Disciplinary action can lead to (and did lead to) demotion, loss of salary, and loss of benefits including pension benefits because of Ms. Searny's substantially lower salary. The retaliation also constituted a threat to Ms. Searny's person as an unwarranted and unfair disciplinary action could cause immense mental harm.⁷

⁶ Threats of unlawful harm don't have to be communicated directly from one person to another. *State v. Reyes*, 6th Dist. Wood No. WD-09-089, 2010-Ohio-4712, ¶ 10 (“This court held ‘where ‘the defendant was either aware that the threats would be communicated to the intended victim by the third party or could reasonably have expected the threats to be so conveyed, he is guilty of the type of unlawful threat of harm required by the retaliation statute.’”).

⁷ The language concerning unlawful threats is identical in both R.C. 2921.05(A) and R.C. 2921.03(A), the retaliation and intimidation statutes respectively. *State v. Lambert*, 2d Dist. Montgomery No. 16667, 1998 WL 288957, *4 (Jun. 5, 1998). The Court should thus construe them in the same manner. *Id.* Courts have

186. R.C. 2923.03 criminalizes various forms of complicity, including conspiring with another to commit an offense, aiding and abetting another, and causing an otherwise innocent person to commit an offense. Title 18 U.S.C. § 2 criminalizes aiding and abetting. Various other federal statutes parallel the applicable state provisions.

187. Defendants were complicit with and aided and abetted one another in plotting and performing these actions.

188. As a direct and proximate result of Defendants' actions, Ms. Semary has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; emotional distress; loss of reputation; the loss of salary, wages, and benefits including pension; other terms, privileges, and conditions of employment; and constructive discharge.

189. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 4

CIVIL LIABILITY FOR CRIMINAL ACTS (TAMPERING WITH RECORDS) UNDER R.C. 2307.60 AND 2913.42(A)(1) AND (2) AND COMPLICITY AND AIDING AND ABETTING UNDER R.C. 2923.03 AGAINST DEFENDANTS IN THEIR PERSONAL CAPACITIES

190. Plaintiff incorporates all previous allegations.

191. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

interpreted threats under R.C. 2921.03(A) to include financial harm as well as emotional and mental harm. *State v. Kinstle*, 2012-Ohio-5952, 985 N.E.2d 184, ¶ 35 (3d. Dist.).

192. Under R.C. 2913.42(A)(1), “No person, knowing the person has no privilege to do so, and with purpose to defraud or knowing that the person is facilitating a fraud, shall ... [f]alsify⁸ ... any writing, computer software, data, or record” or, under R.C. 2913.42(A)(2) “[u]tter any writing or record, knowing it to have been tampered with as provided in division (A)(1) of this section.”

(Cleaned up.)

193. Violations of R.C. 2913.42(A)(1) and (2) are criminal acts, indeed are felonious, under R.C. 2913.42(B)(4), especially when the writing, data, computer software, or record is kept by or belongs to a local or state governmental entity like the DR Court.

194. Under R.C. 2901.22(B):

A person acts knowingly, regardless of purpose, when the person is aware that the person’s conduct will probably cause a certain result or will probably be of a certain nature. A person has knowledge of circumstances when the person is aware that such circumstances probably exist. When knowledge of the existence of a particular fact is an element of an offense, such knowledge is established if a person subjectively believes that there is a high probability of its existence and fails to make inquiry or acts with a conscious purpose to avoid learning the fact.

195. Defendants, with purpose to defraud or knowing that they were facilitating a fraud, falsified writings, data, and records and uttered writings and records, knowing them to have been tampered with, by creating false documentation that Ms. Semary had somehow done something wrong by making open court records available to reporter Mark Puente of The Marshall Project.

196. These falsified writings and records include, but are not limited to, the Written Counseling document claiming that Ms. Semary had made confidential information available to reporter Mark Puente, the notes falsely claiming that Ms. Semary had admitted she didn’t know if she had given Mr. Puente confidential information or had taken documents, and the false statement in the June 7,

⁸ Under R.C. 2913.42(A)(1), falsify has been defined as, “to state untruthfully or alter in order to deceive.” *State v. Mims*, 8th Dist. Cuyahoga No. 108726, 2020-Ohio-1616, ¶ 4.

2023 letter that Defendants had informed her about her salary cut on May 26, 2023, which, in truth and in fact, became a later act of retaliation and intimidation that Defendants imposed.

197. R.C. 2923.03 criminalizes various forms of complicity, including conspiring with another to commit an offense, aiding and abetting another, and causing an otherwise innocent person to commit an offense. Title 18 U.S.C. § 2 criminalizes aiding and abetting. Various other federal statutes parallel the applicable state provisions.

198. Defendants were complicit with one another in plotting and performing these actions.

199. As a direct and proximate result of Defendants' actions, including their gaslighting, Ms. Semary has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; emotional distress; loss of reputation; the loss of salary, wages, and benefits including pension; other terms, privileges, and conditions of employment; and constructive discharge.

200. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 5
CIVIL LIABILITY FOR CRIMINAL ACTS (FALSIFICATION) UNDER R.C. 2307.60 AND 2921.13(A)(2)
AND (3) AND COMPLICITY AND AIDING AND ABETTING UNDER R.C. 2923.03 AGAINST
DEFENDANTS IN THEIR PERSONAL CAPACITIES

201. Plaintiff incorporates all previous allegations.

202. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

203. Under the relevant parts of R.C. 2921.13(A)(2) and (3), "No person shall knowingly make a false statement, or knowingly swear or affirm the truth of a false statement previously made, when... (2) The statement is made with purpose to incriminate another" or "(3) The statement is made with purpose to mislead a public official in performing the public official's official function."

204. Defendants engaged and are continuing to engage in falsification by creating and causing to be made false oral and written statements that Ms. Semary had improperly revealed confidential information to reporter Mark Puente and that Ms. Semary had somehow violated the court's policies and procedures. They made and are making these statements with purpose to incriminate Ms. Semary and with purpose to mislead public officials in performing their official functions. These false, gaslighting statements include, but are not limited to, the Written Counseling document claiming that Ms. Semary had made confidential information available to reporter Mark Puente, the notes falsely claiming that Ms. Semary had admitted she didn't know if she had given Mr. Puente confidential information or had taken documents, and the false statement in the June 7, 2023 letter that Defendants had informed her about her salary cut on May 26, 2023, which, in truth and in fact, became a later act of retaliation and intimidation that Defendants imposed.

205. R.C. 2923.03 criminalizes various forms of complicity, including conspiring with another to commit an offense, aiding and abetting another, and causing an otherwise innocent person to commit an offense. Title 18 U.S.C. § 2 criminalizes aiding and abetting. Various other federal statutes parallel the applicable state provisions.

206. Defendants were complicit with one another in plotting and performing these actions.

207. As a direct and proximate result of Defendants' actions, including Defendants' gaslighting, Ms. Semary has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; the loss of salary, wages, and benefits including pension; other terms, privileges, and conditions of employment; and constructive discharge.

CLAIM 6
CIVIL LIABILITY FOR CRIMINAL ACTS UNDER R.C. 2307.60 AND 2921.44(E) (DERELICTION OF DUTY) AND COMPLICITY AND AIDING AND ABETTING UNDER R.C. 2923.03 AGAINST DEFENDANTS IN THEIR PERSONAL CAPACITIES

208. Plaintiff incorporates all previous allegations.

209. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

210. Under R.C. 2921.44(E), “No public servant shall recklessly fail to perform a duty expressly imposed by law with respect to the public servant’s office, or recklessly do any act expressly forbidden by law with respect to the public servant’s office.”

211. Violations of R.C. 2921.44(A) are criminal acts under R.C. 2921.44(F).

212. As detailed above in the previous causes of action and the immediately following one, which are incorporated, Defendants, acting in complicity with one another, recklessly did acts expressly forbidden by law with respect to their offices.

213. As a direct and proximate result of these actions, Ms. Semaury has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; emotional distress; loss of reputation; the loss of salary, wages, and benefits including pension; and other terms, privileges, and conditions of employment.

214. Defendants’ acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 7
CIVIL LIABILITY FOR CRIMINAL ACTS UNDER R.C. 2307.60 AND 2921.45(A)
(INTERFERENCE WITH CIVIL AND STATUTORY RIGHTS) AND COMPLICITY AND AIDING
AND ABETTING UNDER R.C. 2923.03 AGAINST DEFENDANTS IN THEIR PERSONAL
CAPACITIES

215. Plaintiff incorporates all previous allegations.

216. Under R.C. 2307.60, anyone injured in person or property by a criminal act may recover full damages in a civil action.

217. Under R.C. 2921.45(A), “No public servant, under color of the public servant's office, employment, or authority, shall knowingly deprive, or conspire or attempt to deprive any person of a constitutional or statutory right.” Violations of R.C. 2921.45(A) are criminal acts under R.C. 2921.45(B).

218. As detailed above in the previous causes of action, the named Defendants violated Ms. Semary’s civil, and state and federal statutory rights.

219. As a direct and proximate result of these actions, including Defendants’ gaslighting, Ms. Semary has suffered and will continue to suffer economic and non-economic damages for which the named Defendants are liable, including, but not limited to, pain and suffering; the loss of salary, wages, and benefits including pension; and other terms, privileges, and conditions of employment.

220. Defendants’ acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

CLAIM 8
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

221. Plaintiff incorporates the above allegations.

222. In conducting themselves as they did, Defendants intended to cause emotional distress and knew that their conduct would cause severe emotional distress to Ms. Semary.

223. Defendants engaged in extreme and outrageous conduct by, among other things:

- a. Celebrezze’s ceasing communication with Ms. Semary and causing others to freeze Ms. Semary out as well, turning her into a pariah.
- b. Arranging for a reprimand of Ms. Semary.
- c. Demoting Ms. Semary.
- d. Causing Ms. Semary’s pay (and thus her lifetime pension) to be slashed.

e. Causing Ms. Semaury's constructive discharge.

224. The named Defendants' extreme and outrageous conduct continued over weeks as they sought to destroy her career and deprive her of salary and pension benefits to which she would have otherwise been entitled.

225. The named Defendants' behavior went beyond all possible bounds of decency and was such that it could be considered intolerable in civilized society.

226. Defendants' acts were malicious, in bad faith, performed in a wanton and reckless manner, willful, egregious, and worthy of substantial sanction to punish and deter them and others from engaging in this type of unlawful conduct.

227. As a direct and proximate result of their extreme and outrageous conduct, Plaintiff has suffered and will continue to suffer mental anguish of so serious a nature that no reasonable person could be expected to endure it and for which Defendants are liable. Plaintiff is entitled to recover damages for the intentional infliction of emotional distress under Ohio common law, as well as attorney fees and costs, and seeks punitive or exemplary damages based on the named Defendants' ill-willed, malicious, and wanton conduct.

PRAYER FOR RELIEF

For the reasons stated above, Plaintiff Georgeanna Semaury respectfully requests the following relief from the Court:

1. Declare that Defendants' acts and conduct constitute violations of Ohio law;
2. Enjoin Defendants from further retaliating and intimidating against Plaintiff Semaury and from further implementing any previous acts of retaliation and intimidation;
3. Enjoin Defendants from maintaining in her personnel file falsified and fraudulent documents and instruments of retaliation and intimidation, including, but not limited to, her purported "Written Counseling" and records of her demotion and salary cut;

4. Enter judgment in Plaintiff's favor on all claims for relief;
5. Award Plaintiff full compensatory damages, economic and non-economic, including, but not limited to, damages for pain and suffering, mental anguish, emotional distress, humiliation, loss of reputation, and inconvenience that she has suffered and is reasonably certain to suffer again;
6. Award Plaintiff punitive damages as appropriate for all intentional and malicious violations of state law;
7. Award prejudgment and post-judgment interest at the highest lawful rate;
8. Award Plaintiff her reasonable attorney fees (including expert fees) and all other costs of this suit;
9. Award all other relief in law or equity to which Plaintiff is entitled and that the Court deems equitable, just, or proper.

JURY DEMAND

Plaintiff Georgeanna Semaury demands a trial by jury on all issues within this complaint.

Dated: September 5, 2023

Respectfully submitted,

/s/ Subodh Chandra

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Attorneys for Plaintiff Georgeanna Semaury

A Judge, a Kiss, and \$450,000-plus in Court Work

An Ohio divorce court judge is barred from a case, pending a conflict hearing.



06.01.2023

By MARK PUENTE

An Ohio Supreme Court filing has prompted questions about the personal relationship between a judge and a contractor for whom she has approved hundreds of thousands of dollars for work he does in her courtroom.

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PLAINTIFF'S
EXHIBIT

1

Administrative Judge Leslie Ann Celebrezze of the Cuyahoga County Domestic Relations Court has known Mark Dottore most of her life. Dottore has served as a receiver on cases in her courtroom on numerous occasions. He even served as campaign treasurer when she ran successfully for her judgeship in 2008. Her campaign headquarters is listed under his business address.

This article was published in partnership with the Cleveland Scene. Government watchdogs suggest the relationship raises questions about transparency in Celebrezze's courtroom and whether she rules without bias in cases involving Dottore and his company.

Ohio Supreme Court Chief Justice Sharon Kennedy temporarily removed Celebrezze on May 18 from a divorce case involving Strongsville businessman Jason Jardine, after Jardine's attorney filed an affidavit of disqualification. The affidavit forbids Celebrezze from presiding over the case until Kennedy rules on the affidavit. Celebrezze, who did not respond to The Marshall Project - Cleveland's request for comment after the affidavit was filed, has until June 8 to respond to the order.

Kennedy's order came as The Marshall Project - Cleveland had been investigating the relationship between Celebrezze and Dottore.

Leslie Ann Celebrezze, administrative judge
of the Cuyahoga County Domestic Relations
Court. GUS CHAN FOR THE MARSHALL PROJECT

In complex divorce cases, judges appoint receivers to act as neutral parties to take possession and control of all marital property, including real estate cash, equipment, deposit accounts and businesses. Receivers have the sole authority to operate and manage the businesses and assets in their discretion throughout the litigation. After taking an oath and posting a \$100 bond, they take over.

According to the affidavit of disqualification, Jardine hired a private investigator because he was suspicious of the relationship. The investigator filmed the pair kissing on the lips outside

Delmonico's Steakhouse in Independence on March 22 and Celebrezze leaving Dottore's house during business hours on several Fridays.

Celebrezze and Dottore deny a romantic relationship.

"I'm Italian," Celebrezze said in an emailed statement to The Marshall Project - Cleveland before the high court issued its order, "and I frequently kiss my family and friends on the lips when I greet them or say goodbye."

Dottore's company has collected nearly \$450,000 in payments since 2017, with additional fees pending since invoices have not been submitted in some cases, Cuyahoga County court records show. Dottore charges between \$100 and 400 per hour, depending on the task.

Celebrezze and a court spokeswoman did not provide the name of other individuals appointed to be a receiver in her courtroom. A statement from the spokeswoman said the record system does not flag cases in which a receiver is appointed. A public search of the system shows Dottore and his daughter, Camille, are currently listed as receivers in eight divorce cases in Celebrezze's courtroom, records show.

The judge appointed Dottore or his daughter to be the receiver in six of the eight cases, according to Cuyahoga County court records.

Leslie Ann Celebrezze,
administrative judge of the
Cuyahoga County Domestic Relations
Court, and receiver Mark Dottore
leave Delmonico's Steakhouse on
March 22. Although Celebrezze and
Dottore kiss, each said they are
only longtime friends. Unknown to
both, a private investigator was
following Celebrezze to document
her relationship with Dottore. VIDEO
COURTESY OF MIKE LEWIS OF LEWIS
INVESTIGATIONS

Judge Tonya Jones handled the Jardine divorce case from December 2020 until she recused herself over a conflict in August 2022. She reassigned it to Celebrezze, court records show. Jones appointed Dottore as receiver. She approved one request for Dottore's fees; Celebrezze has approved nine other requests, court records show.

Dottore said he has known Celebrezze since she was 7. Dottore was also appointed as a receiver on several cases where Celebrezze's father, James Celebrezze, was the presiding judge.

"She kisses everybody," Dottore told The Marshall Project - Cleveland when asked about the private investigator's video. "I kiss everybody."

Brendan Sheehan, the presiding judge of the Cuyahoga County Common Pleas Court, declined to comment about the friendship.

Catherine Turcer, executive director of Common Cause Ohio, a nonpartisan advocacy group dedicated to improving transparency and accountability in government, called the friendship problematic because the judge has a duty to be transparent.

“This comes down to perception,” Turcer said. “Most people don’t have the ability to suss out when something is wrong. That is why we need as much transparency as possible.”

Cassandra Robertson, the director at the Center for Professional Ethics at Case Western Reserve University School of Law, said Celebrezze and Dottore’s friendship looks troublesome because judges need to appear impartial.

“It’s so important for the public to have faith in the judiciary,” Robertson said.

Celebrezze Succeeded Father on Bench

Celebrezze took office in 2009 after voters elected her to replace her father, who had served nearly two decades on the Domestic Relations Court and two years on the Ohio Supreme Court.

She made headlines that same year after the Ohio Supreme Court ordered her removal from a divorce case involving Marc Strauss, a wealthy real estate developer. Dottore was also the receiver in the case and cited as a reason to disqualify Celebrezze, The Plain Dealer reported in May 2009.

Celebrezze’s father originally appointed Dottore to that case and 10 others during the last six months of 2008, netting Dottore \$340,000 in fees. Yet “the judge gave no work to any other receivers during the same period, records show, despite an Ohio Supreme Court rule that such appointments be rotated equitably,” the Plain Dealer reported.

In a video from a private investigator, Judge Leslie Ann Celebrezze leaves receiver Mark Dottore's Cleveland office on Canal Road after spending about 20 minutes inside. VIDEO COURTESY OF MIKE LEWIS OF LEWIS INVESTIGATIONS

Attorney Jaye Schlachet, who represented Strauss in the divorce case, accused Celebrezze of bias not only because she could unduly make rulings based on what her father had previously ruled, but also because Dottore was her friend and campaign treasurer. Schlachet asked Ohio's top court to remove Celebrezze from the case.

Then-Ohio Supreme Court Chief Justice Thomas Moyer agreed on the first part and noted his concerns about the second. He cited a provision of the Ohio Code of Judicial Conduct that requires judges to remove themselves from cases in which a close relative also has acted as a judge because of the potential for bias, according to the ruling.

Moyer also had concerns that Celebrezze would "continue to engage in the questionable use of Dottore's services initiated" by her father. Celebrezze later removed herself from 88 cases that started with her father, The Plain Dealer reported.

In videos from a private investigator, Judge Leslie Ann Celebrezze leaves receiver Mark Dottore's home the afternoon of March 24 and the morning of March 31. Celebrezze and Dottore both said they work on special projects at the house. VIDEO COURTESY OF MIKE LEWIS OF LEWIS INVESTIGATIONS

Dinner, a Kiss, Private Home Visits

Jardine, the businessman who hired the private investigator after becoming suspicious of the friendly interactions between Celebrezze and Dottore, said he wanted to understand their relationship better.

Mike Lewis, of Lewis Investigations, said he followed Celebrezze on at least seven occasions to Dottore's office, home, and to restaurants, according to the affidavit of disqualification. The judge and receiver met three to four times each week.

On March 14, Celebrezze exited the Huntington Parking Garage on Lakeside Avenue in downtown Cleveland in her SUV at 3:15 p.m. and arrived minutes later at Dottore Companies on Canal Road in Cleveland. She left 35 minutes later.

On March 15, Celebrezze met Dottore at the Capital Grill in Lyndhurst. They were joined by attorney Richard Rabb, who represents Jardine's wife, Crystal, in the divorce case, court records show.

Between March 14 and March 21, Celebrezze visited Dottore's office on three occasions during business hours, according to the affidavit of disqualification.

On March 22, Celebrezze and Dottore dined at Delmonico's Steakhouse in Independence.

The video shot by Lewis shows Celebrezze and Dottore leaving. She stops, turns around and grabs his chin. "Dottore leaned toward Celebrezze, and Celebrezze and Dottore kissed each other on the lips," according to the affidavit of disqualification.

On consecutive Fridays, March 24 and March 31, Celebrezze left her home and visited Dottore's house in Lyndhurst. She parked her SUV in the driveway and entered through the large garage door, according to the affidavit of disqualification. She stayed nearly three hours on March 24 and an hour on March 31.

Celebrezze's statement cited Ohio Judicial Conduct rules, which allow judges to work with staff and court officials outside the courtroom as long as the judges avoid receiving information that is not part of the official record.

"Having the ability to work remotely during the pandemic, I manage my docket both remotely and in person, as do my colleagues," she said. "As a judge, the hours I work are not limited to the court's hours of operation."

Dottore said they work on court programs from his house.

"I work from home on Fridays," Dottore said on the telephone. "We work on special projects."

\$400 Per Hour Fees For Various Receiver Tasks

The Marshall Project - Cleveland examined thousands of court documents in cases assigned to Dottore to find out how much his firm had collected. The court does not keep totals because parties embroiled in litigation make the payments independently to the receiver.

An invoice in one ongoing divorce case shows Dottore's firm charged \$14,776 for fees in March 2023 for nearly 53 hours. These hours represent work from Dottore, three relatives — Charlie

Dottore, Tom Dottore and CB Dottore — and another employee. Records show that Dottore charged \$400 per hour for almost 29 hours; his relatives and an employee charged between \$125 and \$325 per hour.

For this case, Dottore stated that he reviewed emails and business documents, held phone calls with lawyers and examined expenses from the couple's businesses, among other things.

An invoice from an older case showed that Dottore charged \$40,265 for fees in August 2018 for 137 hours. Those hours represent work from Dottore, three relatives and another employee. Dottore charged \$325 per hour for 64 hours. Others charged between \$250 to \$325 per hour, records show.

For this billing period, Dottore stated that he held phone calls to discuss a yacht sale, send emails, and discuss selling multiple vehicles, among other things.

Celebrezze said in the email statement that she doesn't disclose her relationship with Dottore in court.

"No, nor am I required to," she said. "My long-standing professional and personal relationship with Mr. Dottore has no impact on the cases in front of me."

Robert Glickman, Dottore's attorney, also said his client does not disclose the relationship in court.

"The attorneys on the case know of Mr. Dottore's friendship with Judge Celebrezze and other judges," Glickman said in a statement. "However, Mr. Dottore routinely discusses his experience with the court, in Judge Celebrezze's room and others, in settlement communications with litigants or when answering litigants' questions."

Robertson, of the Case Western Reserve University School of Law, said when judges control appointments, as with Celebrezze appointing Dottore as a receiver, they should be an arms-length transaction — professional and fully disclosed.

Dottore's fees and work have come under scrutiny before.

In 2005, Cleveland Scene, a local news site, detailed disputes about how Dottore bills parties in cases. Cuyahoga County Common Pleas Court Judge Nancy M. Russo raised questions then about Dottore's practices.

"I would never appoint him again," Russo told Cleveland Scene in 2005.

Dottore said the nature of his work created enemies.

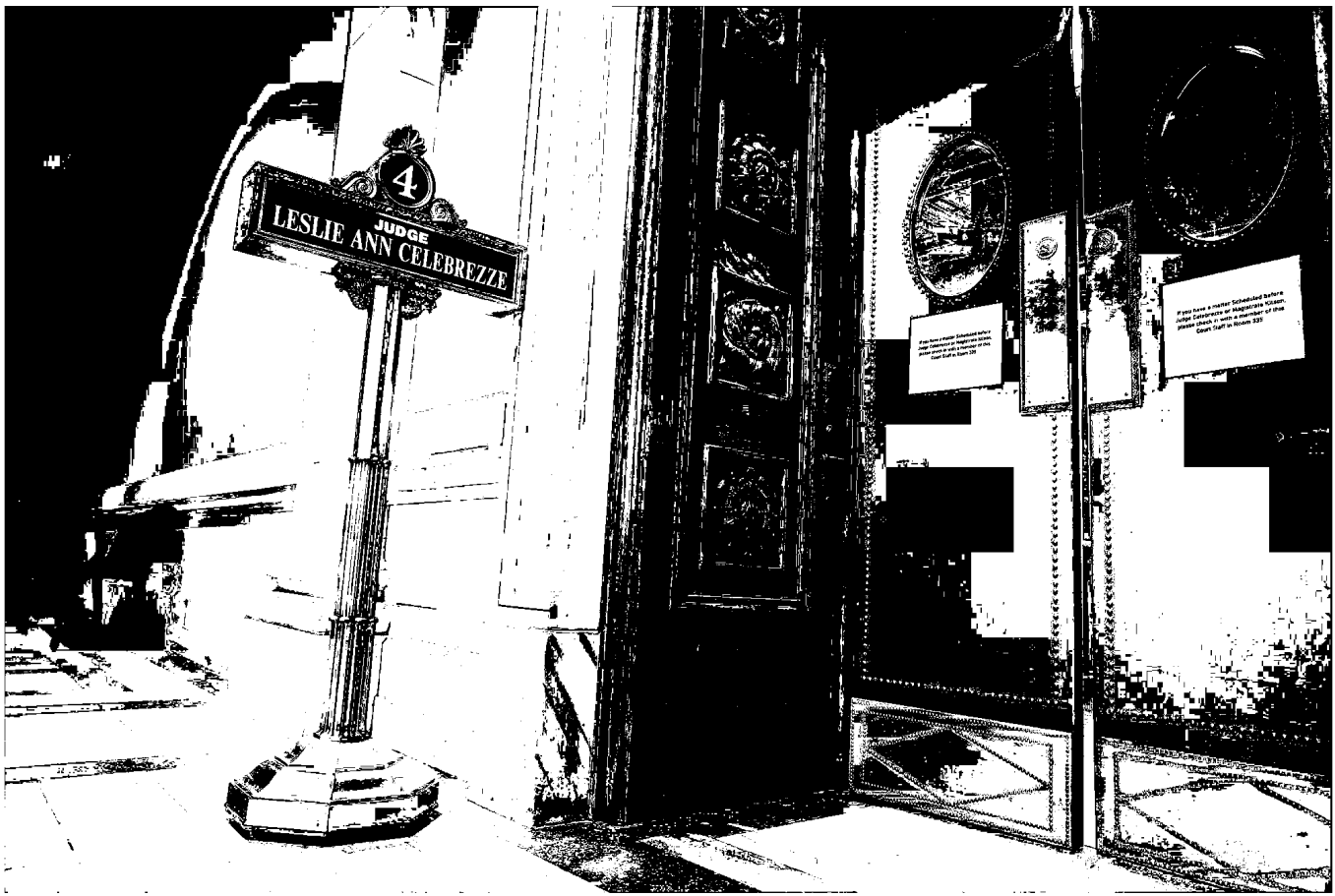
“If I took all the money out of your pocket and did it every day for a year, how happy would you be with me?” he told Cleveland Scene in 2005. “A receiver's gotta have the negotiating skills of King Solomon, the mind of a forensic accountant, and definitely the skin of a rhinoceros. Nobody likes you.” ■■■

07.24.2023

 CLEVELAND

Cuyahoga Judge May Be the Only One Using Receivers, Costing Divorcing Couples Thousands

More ethics questions circle Leslie Celebrezze, as fellow judges say they never use receivers. Meanwhile, she gave her friend nearly \$500,000 in work.



By MARK PUENTE

Three Cuyahoga County domestic relations judges say they've never seen the need to appoint receivers in divorce cases, a move fellow Judge Leslie Celebrezze has done repeatedly for a family friend while costing couples nearly \$500,000 in fees.

Two of those three judges also declined to answer questions about whether Celebrezze ever asked them to recuse themselves from a case, which would allow her to assume control as administrative judge and make the lucrative appointments. It's a practice Celebrezze has denied doing, according to a spokesperson.

The responses to questions from The Marshall Project - Cleveland come as Celebrezze is under scrutiny from the Ohio Supreme Court for approving nearly half a million dollars in receivership work to her longtime friend, Mark Dottore.

The volume of work Celebrezze gave to Dottore raises questions over whether the judge usurped case assignment policy to steer cases to her friend.

In complex divorce cases, judges can appoint receivers to act as neutral parties to take control of all

marital property, including real estate, cash and businesses. Receivers have the sole authority to manage the businesses and assets at their discretion throughout the litigation.

The five judges in Domestic Relations Court handle thousands of new cases each year, but three of those judges — Diane Palos, Francine Goldberg and Colleen Ann Reali — each told The Marshall Project - Cleveland that they have never seen the need to appoint a receiver. The three judges have served the court from eight years to more than 30 years.

“Under the facts of the cases I have heard, I never had the need to appoint a receiver,” wrote Palos, who joined the court as a magistrate in 1986 and became a judge in 2009.

Celebrezze declined to comment through a spokesperson.

It’s unclear if Celebrezze has appointed any other receiver since 2009. In May, she and a court spokeswoman did not provide the name of other individuals appointed to be a receiver in her courtroom. A statement from the spokeswoman said the record system does not flag cases in which a receiver is appointed. How Celebrezze came to appoint Dottore while other judges fail to see a need in their caseload is also raising questions.

The Marshall Project - Cleveland asked each judge if Celebrezze ever requested them to step down from a case so she could preside over the divorce. Goldberg said no.

However, Palos and Reali each said they could not comment, citing an Ohio judicial rule that says “a judge shall not make any public statement that might reasonably be expected to affect the outcome or impair the fairness of a matter pending or impending in any court.”

Through a spokesperson, Celebrezze said she has never asked a judge to recuse themselves from any case so she could preside over it.

Judge Tonya Jones initially handled the divorce case of Strongsville businessman Jason Jardine from December 2020 until she recused herself over a conflict in Aug. 9, 2022. She stepped aside because “her former staff attorney left employment with the court and accepted employment with” Jardine’s attorney, court spokesperson Susan Sweeney wrote in an email.

The court’s rules state: “When it is necessary for a case already assigned to a judge to be reassigned due to a recusal, the administrative judge will reassign a judge, at random, and record the reassignment on the docket.”

Jones’ initial recusal didn’t list which judge would handle the case, court records show. But three days later, she vacated it and filed a second one, writing that it was “further ordered that this matter

be reassigned to Administrative Judge Leslie Ann Celebrezze.”

The case went directly to Celebrezze.

Jones approved one request for Dottore’s fees; Celebrezze has approved nine other requests, court records show.

The Marshall Project - Cleveland also asked Jones if she ever appointed a receiver to any other case beside the Jardine divorce case.

“The determination as to whether to appoint a receiver is based on the facts of the case,” Jones wrote, adding that Celebrezze never asked her to remove herself from a case.

On May 18, Ohio Supreme Court Chief Justice Sharon Kennedy temporarily removed Celebrezze from a divorce case after Jardine filed numerous complaints accusing Celebrezze of approving hundreds of thousands of dollars in payments to Dottore to work as a receiver in the case. Dottore is paid directly by the Jardines.

Kennedy’s order came as The Marshall Project - Cleveland had been investigating the relationship between Celebrezze and Dottore.

Celebrezze was given time to respond to numerous allegations listed in affidavits of disqualification filed by Jardine. Jardine says Dottore charged thousands of dollars for days when Jardine claims the receiver and the judge met at his home, eateries and his office, according to the affidavit of disqualification filed by Jardine’s lawyer.

Celebrezze filed responses to the allegations but asked Kennedy to keep them sealed from the public. Jardine objected. Kennedy has yet to rule.

Government watchdogs suggest Celebrezze and Dottore’s relationship raises questions about transparency in Celebrezze’s courtroom and whether she rules without bias in cases involving Dottore and his company.

Court records show Dottore’s company has earned nearly half a million dollars since 2017 from complex divorce cases in Celebrezze’s courtroom. He charges between \$100-\$400 per hour, depending on the task.

In addition to serving as a receiver on cases in Celebrezze’s courtroom, Dottore served as campaign treasurer when she ran for her judgeship in 2008. Her campaign headquarters is listed under his business address. Dottore’s daughter, Camille, is also listed as a receiver on cases in Celebrezze’s

courtroom, records show.

Celebrezze's deputy campaign treasurer, Cheri Tate, has also worked on Jardine's case as an administrative manager for Dottore's company.

Celebrezze took office in 2009 after voters elected her to replace her father, James Celebrezze, who had served nearly two decades on the Domestic Relations Court and two years on the Ohio Supreme Court.

She made headlines that same year after the Ohio Supreme Court ordered her removal from a divorce case involving Marc Strauss, a wealthy real estate developer. Dottore was also the receiver in the case and was cited as a reason to disqualify Celebrezze, The Plain Dealer reported in May 2009.

Celebrezze's father originally appointed Dottore to that case and several others in 2008, netting Dottore \$340,000 in fees. Yet "the judge gave no work to any other receivers during the same period, records show, despite an Ohio Supreme Court rule that such appointments be rotated equitably," the Plain Dealer reported.

Dottore, who is not an attorney, has been working as a receiver for years in courts across northeast Ohio. His bio on the company website says he "is the most trusted, experienced, and successful court appointed receiver, mediator, and crisis management specialist in the Midwest." ■■■

New Bias Complaints Continue to Target Top Cuyahoga County Judge

Already temporarily removed from a divorce case, Judge Leslie Ann Celebrezze is slated to answer new allegations by June 22.



06.15.2023

By MARK PUENTE

The controversy around Judge Leslie Ann Celebrezze of the Cuyahoga County Domestic Relations Court has grown amid additional complaints of potential biases lodged with the Ohio Supreme Court.

New affidavits of disqualification filed by a Strongsville businessman say Celebrezze approved

~~Electronically Filed 06/15/2023 16:09:05 CV 23-98497-1 Doc 1 by the Plaintiff~~ ~~06/15/2023 16:09:05 CV 23-98497-1 Doc 1 by the Plaintiff~~ campaign treasurer, Cheri

Tate, in the businessman's divorce case. Tate works as an administrative manager for court-appointed receiver Mark Dottore, whose longtime friendship with the judge is under increased scrutiny.

Businessman Jason Jardine also complained about billing practices in his divorce case to the Ohio Supreme Court. Jardine says Dottore charged thousands of dollars for days when Jardine claims the receiver and the judge met at his home, eateries and his office, according to the affidavit of disqualification filed by Jardine's lawyer.

This article was published in partnership with News 5 Cleveland, the Cleveland Scene and Ideastream. Dottore's company has earned nearly a half a million dollars since 2017 from complex divorce cases in Celebrezze's courtroom, court records show. Chief Justice Sharon Kennedy gave Celebrezze until June 8 to respond to Jardine's initial complaints. Kennedy extended the deadline to June 22 for Celebrezze to respond to all the allegations. Celebrezze may file a request for extension of time to respond to the affidavit.

Kennedy temporarily removed Celebrezze from the divorce case on May 18 after Jardine raised questions about the friendship between Celebrezze and Dottore.

Celebrezze is prohibited from commenting, according to an email from a court spokesperson. Through an attorney, Dottore and Tate also declined to comment.

Catherine Turcer, executive director of Common Cause Ohio, a nonpartisan advocacy group dedicated to improving transparency and accountability in government, said Ohioans need impartial courts — absent of hidden conflicts.

"We need transparency where it's meaningful and accessible," Turcer said. "At the end of the day, we want justice that is fair. Judges need to be thoughtful for how appearances look. That's a problem."

Administrative Judge Leslie Ann
Celebrezze's courtroom is in The
Old Courthouse on Lakeside Avenue.
GUS CHAN FOR THE MARSHALL PROJECT

Kennedy's first order came as The Marshall Project - Cleveland had been investigating the longtime friendship between Celebrezze and Dottore.

The Marshall Project - Cleveland reported June 1 that government watchdogs suggest the pair's friendship raises questions about transparency in Celebrezze's courtroom and whether she rules without bias in cases involving Dottore and his company.

An affidavit of disqualification filed June 6 with the Ohio Supreme Court states Tate has been Celebrezze's deputy campaign treasurer since 2009 and has also worked for Dottore for over 15 years. Tate serves as a liaison to the court while overseeing Dottore's accounting, taxes and billing.

Dottore served as campaign treasurer when Celebrezze ran successfully for her judgeship in 2008. Her campaign headquarters is listed under Dottore's business address.

Celebrezze's husband, Charles Zonfa, serves as the judge's campaign treasurer, but has not "executed any of the finance reports" filed with the Cuyahoga County Board of Elections, according to the affidavit of disqualification.

Since Aug. 25, 2022, Tate has billed for nearly 144 hours at \$125 per hour, totaling nearly \$18,000, according to the affidavit of disqualification. Her tasks included issuing checks for Jardine's businesses and reconciling deposits and accounts, records show.

For the April 2023 billing period, a Dottore Companies invoice showed Tate billed nearly 15 hours for \$1,800, according to the affidavit of disqualification. The March 2023 billing period showed Tate billed for 21 hours, totaling \$2,625.

The Marshall Project - Cleveland examined thousands of court documents in cases assigned to Dottore to find out how much his firm had collected. The court does not keep totals because parties embroiled in litigation make the payments independently to the receiver.

In complex and often contentious divorce cases, judges appoint receivers to act as neutral parties to take possession and control of all marital property, including real estate, cash, equipment, deposit accounts and businesses.

Receivers have the sole authority to operate and manage the businesses and assets in their discretion throughout the litigation. After taking an oath and posting a \$100 bond, they take over. Some receivers, such as Dottore, are not licensed attorneys.

Celebrezze has known Dottore most of her life. He has served as a receiver on cases in her courtroom on numerous occasions. He even served as campaign treasurer when she ran

successfully for her judgeship in 2008. Her campaign headquarters is listed under Dottore's business address.

Dottore's company has collected nearly \$450,000 in payments since 2017, with additional fees pending since invoices have not been submitted in some cases, Cuyahoga County court records show. He charges between \$100 and 400 per hour, depending on the task.

Celebrezze and Dottore said last month that they do not disclose their friendship in court.

Jardine hired a private investigator after he became suspicious of the friendly interaction between Celebrezze and Dottore. A private investigator said he followed Celebrezze on at least seven occasions to Dottore's office, home, and to restaurants, according to the affidavit of disqualification. The judge and receiver met three to four times each week.

The investigator filmed the pair sharing a kiss on the lips outside Delmonico's Steakhouse in Independence on March 22 and Celebrezze leaving Dottore's house during business hours on several Fridays.

Jardine raised questions about the way Dottore Companies billed when Dottore met with Celebrezze at his home or at restaurants. The allegations include one occasion where the pair dined and drank with attorney Richard Rabb, who represents Jardine's wife, Crystal, in the divorce case.

On seven occasions when Celebrezze and Dottore met privately, the receiver billed a total of \$3,880 for performing various services, according to the affidavit of disqualification.

On March 15, Celebrezze met Dottore and Rabb at the Capital Grill in Lyndhurst. Dottore billed \$680 for that day. The invoice noted Dottore had a conference with his brother and Rabb regarding bank documents, among other things.

"It's not a coincidence that Mark E. Dottore, Richard A. Rabb and Judge Celebrezze were observed dining and drinking together on the same date that Dottore billed for a conference on my case," Jardine wrote in the affidavit of disqualification. ■■■

08.22.2023

||| CLEVELAND

Judge Celebrezze Removed From Controversial Cuyahoga County Divorce Case

Chief Justice Sharon Kennedy found judge violated court rules when taking a case involving her longtime friend



By MARK PUENTE

The Marshall Project is a nonprofit newsroom covering the U.S. criminal justice system. [Sign up for our newsletters](#) to receive all of our stories and analysis.

Cuyahoga County Domestic Relations Judge Leslie Ann Celebrezze violated court rules when she steered a contentious but lucrative divorce case involving a longtime friend to her own docket, the Ohio Supreme Court has ruled.

The ruling bars Celebrezze from overseeing the case, in which she has faced numerous bias allegations from attorneys for Jason Jardine, a Strongsville businessman who is getting divorced. The allegations raised questions about the friendship between Celebrezze and receiver Mark Dottore.

Dottore is the judge's lifelong family friend, who has been paid more than \$500,000 in fees since 2017 for working as a court-appointed receiver in divorce cases in Celebrezze's courtroom.

Ohio Supreme Court Chief Justice Sharon Kennedy's decision permanently removes Celebrezze from the divorce case of Jardine. It does not yet affect Dottore's assignment as receiver.

This article was published in partnership with [News 5 Cleveland](#) and the [Cleveland Scene](#).

Kennedy didn't consider Jardine's bias allegations. Instead, the judge found the point moot because Celebrezze violated court policy when she unilaterally moved Jardine's case to her docket after another judge recused herself.

Kennedy disqualified Celebrezze to avoid an appearance of impropriety, the ruling states.

"Judge Celebrezze was not randomly assigned to Jardine's case. The failure to randomly assign the case was in violation of the local rules," Kennedy wrote in her ruling released Friday.

"Therefore, to allay any concerns about the integrity of the underlying case, and to ensure to the parties and the public the unquestioned neutrality of an impartial judge, Judge Celebrezze is disqualified."

Celebrezze declined to comment. The Jardine case, according to the court's online docket, has been reassigned to Judge Diane Palos, who joined the court in 2009.

In a written response to the allegations seeking her removal, Celebrezze said that it was her practice to reassign complex and contentious cases to herself. Kennedy balked at the claim.

"Each judge of that court is presumed competent to handle any assigned case, even complex and contentious matters," Kennedy wrote.

"Regardless of Judge Celebrezze's intention, the purpose of randomly reassigning cases after one judge recuses is defeated when the administrative judge handpicks a case to keep for herself."

Kennedy also ruled that Judge Tonya Jones violated local rules when she recused herself from Jardine's case in August 2022 and reassigned the case to Celebrezze.

Jones stepped aside because "her former staff attorney left employment with the court and accepted employment with" Jardine's attorney, the court previously said.

"Judge Jones was without authority to issue an order recusing from the case and reassigning the matter to Judge Celebrezze," Kennedy wrote.

Jones also declined to comment.

Meanwhile, the controversy around Celebrezze and Dottore has widened.

Georgeanna Semaury, Celebrezze's judicial assistant since 2009, contends she was transferred out of the judge's office in April and forced to take a \$20,000 pay cut after she allowed The Marshall Project - Cleveland to review public records involving Dottore or his company, court records show.

Semaury provided a reporter with copies of billing invoices from Dottore's firm contained in the public file.

After the demotion and pay cut, Semaury retained the Chandra Law Firm, which specializes in civil rights cases. In anticipation of a lawsuit, Chandra Law attorneys earlier this month requested copies of court policies, emails, pay records and other documents to better understand why Semaury was demoted after The Marshall Project - Cleveland published a story about Celebrezze.

"This should also include any documents that reflect why Ms. Semaury's job was changed on or about the day that The Marshall Project published an article about Judge Celebrezze," attorney Subodh Chandra wrote in a request to the court

"If Ms. Semaury did something wrong that merited adverse actions against her, we expect to receive the records that document that."

Earlier this summer, The Marshall Project - Cleveland reported that the volume of work Celebrezze gave to Dottore raises questions over whether the judge usurped case assignment policy to drive lucrative cases to her friend.

The Marshall Project - Cleveland noted that the court's rules state: "When it is necessary for a case already assigned to a judge to be reassigned due to a recusal, the administrative judge will reassign a judge, at random, and record the reassignment on the docket."

Additionally, three of the court's other judges each told The Marshall Project - Cleveland that they have never seen the need to appoint receivers in divorce cases.

In complex divorce cases, judges can appoint receivers — often charging couples thousands of dollars — to act as neutral parties to control marital property, including real estate, cash and businesses. Receivers have the sole authority to manage the businesses and assets at their discretion throughout the litigation.

Kennedy temporarily removed Celebrezze from the Jardine divorce case on May 18 after Jardine's attorneys filed an affidavit of disqualification to remove her from the case.

Celebrezze has known Mark Dottore most of her life. Dottore has served as a receiver on cases in her courtroom, as well as many other area judges, on numerous occasions. He also served as campaign treasurer when she ran successfully for her judgeship in 2008. Her campaign headquarters is listed under his business address.

Government watchdogs have suggested that the close relationship raises questions about transparency in Celebrezze's courtroom and whether she rules without bias in cases involving Dottore and his company.

Kennedy's ruling marks at least the second time since 2009 that Celebrezze has been removed from a divorce case in which Dottore was assigned as receiver.

Celebrezze made headlines that year after the Ohio Supreme Court ordered her removal from a divorce case involving Marc Strauss, a wealthy real estate developer. Dottore was also the receiver in the case and cited as a reason to disqualify Celebrezze, The Plain Dealer reported in May 2009.



Common Pleas Court of Cuyahoga County, Ohio

DESIGNATION FORM TO BE USED TO INDICATE THE CLASSIFICATION OF THE CAUSE

Georgeanna Sernary

Case Number: _____

Plaintiff

Date: September 5, 2023

Vs.

Leslie Ann Celebrezze, et al.

Defendant

Has this case been previously filed and dismissed? Yes No

Case #: _____ Judge: _____

Is this case related to any new cases now pending or previously filed? Yes No

Case #: _____ Judge: _____

CIVIL CLASSIFICATIONS: Place an (X) In ONE Classification Only.

Professional Torts:

- 1311 Medical Malpractice
1315 Dental Malpractice
1316 Optometric Malpractice
1317 Chiropractic Malpractice
1312 Legal Malpractice
1313 Other Malpractice

Product Liability:

- 1330 Product Liability

Other Torts:

- 1310 Motor Vehicle Accident
1314 Consumer Action
1350 Misc. Tort

Workers Compensation:

- 1550 Workers Compensation
1531 Workers Comp. Asbestos

Foreclosures:

- Utilize Separate Foreclosure Designation Form

Commercial Docket:

- 1386 Commercial Docket
1387 Commercial Docket with Foreclosure

Administrative Appeals:

- 1540 Employment Services
1551 Other

Other Civil:

- 1500 Replevin/Attachment
1382 Business Contract
1384 Real Estate Contract
1388 Consumer Debt
1390 Cognovit
1391 Other Contracts
1490 Foreign Judgment
1491 Stalking Civil Protection Order
1501 Misc. Other
1502 Petition to Contest Adam Walsh Act
1503 Certificate of Qualification for Employment

Amount of Controversy:

- None Stated
Less than \$25,000
Prayer Amount _____

Parties have previously attempted one of the following prior to filing:

- Arbitration
Early Neutral Evaluation
Mediation
None

I certify that to the best of my knowledge the within case is not related to any now pending or previously filed, except as noted above.

The Chandra Law Firm ILC

Subodh Chandra

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