



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**MOTION TO...**  
**November 29, 2023 15:24**

By: ELIZABETH E. COLLINS 0091032

Confirmation Nbr. 3029162

GEORGEANNA M. SEMARY

CV 23 984974

vs.

**Judge:** ANDREW J. SANTOLI

LESLIE ANN CELEBREZZE, ET AL.

**Pages Filed:** 34

**IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO**

**GEORGEANNA M. SEMARY,  
Plaintiff,**

**v.**

**LESLIE ANN CELEBREZZE, et al.,  
Defendants.**

) **CASE NO. CV-23-984974**  
)  
)  
) **JUDGE: ANDREW J. SANTOLI**  
)  
)  
)  
)  
)  
)  
)

---

**THIRD-PARTIES MARK E. DOTTORE AND THE DOTTORE COMPANIES, LLC'S  
MOTION TO STRIKE PORTIONS OF THE SUBPOENA SERVICE RETURNS FILED  
BY PLAINTIFF FROM THE RECORD**

---

**I. INTRODUCTION**

Now come third-parties Mark E. Dottore and the Dottore Companies, LLC (the “Dottore parties”), by and through undersigned counsel, who hereby move this Court to strike portions of two Subpoena Service Returns filed by Plaintiff Georgeanna M. Semary (“Plaintiff”) on November 16, 2023. As will be explained further in this Motion, the Subpoena Service Return filings contain harassing information and requests that should not be made a part of the public record, particularly with respect to the Dottore parties who are not even parties in this litigation. Accordingly, for the reasons stated more fully below, the Dottore parties ask for an Order striking those portions of filings from the public record. A Proposed Order granting the relief the Dottore parties request is attached hereto and will be submitted contemporaneously herewith.

**II. BACKGROUND AND ARGUMENT**

On or about November 16, 2023, Plaintiff served a subpoena on each of the Dottore parties (the “Subpoenas”). This Motion does not address the scope of the materials requested in the Subpoenas, and the Dottore parties reserve all rights and remedies related to scope of the

Subpoenas, as they are undeniably objectionable and improper. This Motion simply addresses whether Request 1 in the Subpoenas should remain visible on the public docket in this case.

Particularly, Request 1 in each of the Subpoenas allegedly contains language derived from an alleged text message that Plaintiff believes was sent by Defendant Celebrezze to non-party Dottore 15 years ago. This “belief” is questionable and lacks foundation, to put it gently. The language in Request 1 from the Subpoenas should be stricken from the record in this case, as it is unnecessary to identify the specific information being subpoenaed, and is intended solely to harass, intimidate, or embarrass the Dottore parties and/or Defendant Celebrezze. The Dottore parties are not asking that the Subpoena Service Returns be stricken from the record entirely—simply that Request 1 be redacted where appropriate and that the Notice be submitted to the Clerk to replace the docket entry existing currently. The Dottore parties’ proposed redactions are attached as Exhibit 1 to the Proposed Order attached hereto.

Trial courts have “inherent power to manage their own dockets” and may strike filings that they deem improper. *See State ex rel. Charvat v. Frye*, 114 Ohio St. 3d 76, 2007-Ohio-2882, 868 N.E.2d 270, ¶ 23. Here, portions of Request 1 in Plaintiff’s Subpoena Service Returns are improper, serve no purpose other than to harass the Dottore parties and to taint the jury pool, and should therefore be stricken. A review of the Request shows that it could easily have identified a specific sender, recipient, and date for which text messages are being Subpoenaed rather than seek to smear unsubstantiated memories of an **alleged** text message **allegedly** sent **fifteen years ago** on the public record. Plaintiff’s decision to include language that Plaintiff **believes could have been sent** by text message **fifteen years ago** was Plaintiff’s counsel’s transparent attempt to taint the jury pool and get unsupported evidence into the public record any way he could. This attempt to harass a judge and a prominent local businessman is unacceptable.

A review of Plaintiff's counsel's website demonstrates that attorney Chandra seeks to use news publications and his public dissemination of alleged "facts," many of which may prove to be **untrue** in discovery, as a litigation tactic. This risks tainting the jury pool in this matter, prejudicing the Dottore parties, and prejudicing other parties and individuals involved. One need only peruse the 21-page PDF attached hereto as Exhibit A, which is a true and accurate copy of the following page attorney Chandra's law firm's website, <https://www.chandralaw.com/blog/suit-cuyahoga-domestic-relations-chief-judge-leslie-ann-celebrezze-retaliated-against-judicial-assistant-who-knew-too-much>, to see this tactic. This 21-page PDF concludes with "A call for information" on attorney Chandra's website, asking individuals to "contact us as soon as possible at [DrCourtMisConduct@ChandraLaw.com](mailto:DrCourtMisConduct@ChandraLaw.com)." This conduct should not be allowed, particularly when many allegations in Plaintiff's Complaint are currently the subject of a Motion to Dismiss.

### III. CONCLUSION

For the foregoing reasons, the Dottore parties respectfully ask that this Court issue an Order striking the improper portions of Request 1 from the two Subpoenas from the public record in this case. A Proposed Order with proposed redactions is attached hereto for the Court's convenience.

Respectfully submitted,

/s/ Elizabeth E Collins

Tim L. Collins (0033116)

Elizabeth E. Collins (0091032)

Thrasher, Dinsmore & Dolan, LPA

1282 West 58<sup>th</sup> Street

Cleveland, Ohio 44102

[tcollins@tddlaw.com](mailto:tcollins@tddlaw.com)

[ecollins@tddlaw.com](mailto:ecollins@tddlaw.com)

(216) 252-5431 | (216) 255-5450 (fax)

*Counsel for the Dottore parties*

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2023, the foregoing was filed by electronic filing and will be served on all parties of record by operation of the Court's ECF system.

/s/ Elizabeth E. Collins

Elizabeth E. Collins (0091032)

*Counsel for the Dottore Parties*

## Suit: Cuyahoga Domestic Relations Chief Judge Leslie Ann Celebrezze retaliated against judicial assistant who "knew too much"

Tuesday, September 5, 2023

A lawsuit says that as Judge Celebrezze's career unraveled, she orchestrated the destruction of her judicial assistant's career to cover up an exposé of the judge's alleged affair with a court-appointed receiver.





*Leslie Ann Celebrezze with Georgeanna "Georgia" Sema, pals on the shooting range in 2020*

Cleveland, OH – Cuyahoga County Judge Leslie Ann Celebrezze engaged in unlawful retaliation, witness intimidation, and records tampering, among other civil-rights violations, against her long-time judicial assistant Georgeanna "Georgia" Sema to silence Sema and other potential witnesses about conflicts of interest from the judge's alleged extramarital affair, according to a civil lawsuit filed today.

The suit alleges that Celebrezze, administrative judge of the Cuyahoga County Court of Common Pleas Domestic Relations Division ("DR Court"), retaliated against her judicial assistant, Georgeanna "Georgia" Sema, and eventually forced her out of her job, because Sema was a witness to the married judge's alleged affair with Mark Dottore—a receiver, the suit contends, Celebrezze regularly

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

and unnecessarily appointed to cases.

A receiver is a supposed to be a disinterested person appointed by a court to protect or collect property that is the subject of claims or is otherwise being litigated. Court-appointed receivers take total control of parties' assets and have the authority to dispose of them. Receivers often charge lucrative fees for these services.

The suit also names other court employees—James Zak, Susan K. Sweeney, Justin Seeton, and Serpil Ergun—as defendants, accusing them of joining Celebrezze in her illegal retaliation against Semař after she provided public court records, as a required job responsibility, to a journalist who was investigating Celebrezze's and Dottore's relationship.

The journalist later exposed details of the alleged relationship in an article published by The Marshall Project on June 1, 2023,

The Marshall Project reported that Celebrezze has steered hundreds of thousands of dollars of work to Dottore and his daughter, and that Celebrezze may be the only judge of the domestic-relations court to appoint such receivers.

Semař's lawsuit alleges that after she gave the journalist the open, public court documents—which Ohio Supreme Court rules and the U.S. Constitution's First Amendment required her to provide—the retaliation from Judge Celebrezze and other court employees, working on her behalf, was swift, persistent, and devastating.

For 15 years, Semař had been a trusted judicial assistant to Judge Celebrezze, receiving perfect scores on performance evaluations, gushing praise from Celebrezze, and performance bonuses. The two women were also close friends and spent time together, even with their families, outside of work.

But, says Semař in her lawsuit, everything changed in April 2023, after she told Celebrezze that she had given the journalist access to the open court records.

Semař's complaint says that Celebrezze and other court staff engaged in a coordinated campaign of serial retaliation and intimidation against Semař that included professional humiliation and isolation, a demotion, a substantial pay cut that will slash Semař's lifetime pension, and Semař's constructive discharge—in other words, being forced out of her job.

"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. Semaury and send a chilling warning to all court employees to remain silent," Semaury's suit alleges. "A primary purpose of this campaign was to try to discredit, intimidate, and retaliate against Ms. Semaury as a witness and public servant, and to prevent corroborating details from emerging about Celebrezze's [alleged] extramarital and unethical dalliance with Dottore."

"Celebrezze knew Ms. Semaury knew too much about the affair. And she knew that, when Ms. Semaury was identified as a witness, Celebrezze's judicial—and possibly her legal—career would be over," the suit alleges.

The suit also alleges that 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 these things. Indeed, the suit says, some helped Celebrezze try to cover it all up. The suit further alleges that Celebrezze schemed with Dottore and his private attorney to try to cover it all up.

## “What happens in Miami stays in Miami!”

The suit alleges regarding Semaury's knowledge of an affair between Celebrezze and Dottore:

- As early as 2011, Celebrezze told Semaury that she liked Dottore romantically.
  - Before Dottore's divorce in 2018, Semaury once was working when Celebrezze entered the office crying. Semaury asked if she was okay, and Celebrezze told her that Dottore's then-wife had caught her "making out" with Dottore outside of his office. Celebrezze told Semaury that Dottore's wife was upset and called the pair names.
  - After Mark Dottore's divorce, Semaury would hear from her workstation in Celebrezze's chambers as the judge would call Dottore when he was dating someone new and scream at him over the phone.
  - Celebrezze would often invite Semaury for smoke breaks, where she would complain about Dottore's other girlfriends, exclaiming bitterly, "Fuck that bitch!" She would complain about how Dottore's girlfriends would call while she was with Dottore. Celebrezze reported how she got one woman to stop calling when Celebrezze was with Dottore by stopping location sharing on a
- Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

phone app.

- In about September 2021, Smary invited Celebrezze on a “girls’ trip” to Miami. Celebrezze said Dottore would try to join them for the weekend. On a smoking break, Celebrezze quipped to Smary about Dottore coming with her: “What happens in Miami stays in Miami!” But Celebrezze ultimately canceled because of a family medical emergency.
- In February 2022, Smary invited Celebrezze to her 50th birthday party on a Friday night. Dottore planned to attend the party to meet up with Celebrezze, but ultimately canceled, saying that having arrived back from travel, he was too tired to attend. In front of multiple witnesses, Celebrezze wept, upset that Dottore wasn't coming. Smary, trying to comfort her, told Celebrezze that Smary didn't trust Dottore and she could do better. This upset Celebrezze.
- For a judge who was supposed to be neutral and detached, 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!”
- Celebrezze told Smary 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—almost getting into a fight with him. She had been worried about getting red wine on her white coat.
- Celebrezze has an Instagram account entitled @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. Dottore, daily, would click on the “heart” button to express his love of these until The Marshall Project story broke about Celebrezze's relationship with Dottore. Celebrezze then turned the previously open account private, requiring requests for access.

## Smary complies with the First Amendment.

The suit alleges regarding Smary's performance of her constitutional obligations:

- 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 lucrative appointments of Dottore and his daughter as receivers. The court's clerks gave those files to Puente, and did not

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

inspect them before handing them over for his review.

- Some of what Puente was seeking was in Celebrezze's chambers. The clerks sent Puente upstairs to review that information. So Mr. Puente went to then-judicial-assistant Semary's office.
- Semary, 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. With Celebrezze's full knowledge and consent, she had done so during her 15 years of service to court, usually in response to requests for lawyers or law-firm court runners.
- This is the same protocol staff in other DR Court chambers follow.
- Puente provided Semary with at least one case number. She pulled the relevant file and checked the contents to ensure the judge's personal notes were not in it and that nothing was marked confidential. Her review was standard protocol when someone requested a case to review. She handed only open court records to Puente. Celebrezze had never objected to this approach.
- Puente asked Semary to make a copies of court filings related to Dottore—which she did, just as she would have done for anyone else.
- As he left, Puente handed her his business card and said he was working on several of Judge Celebrezze's cases. He asked Semary to give the judge a message to have her call him. Semary took his card, and after he left took a photo of it and texted the photo to 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" [*s/c*].
- Celebrezze didn't respond.

## Court officials immediately raise alarm bells about Semary's interaction with a reporter.

The suit further alleges:

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

- But within minutes of Semary's text to Celebrezze, court administrator Defendant James Zak called and interrogated Semary. He demanded to know why Semary had allowed Puente to review the files.
- Zak seemed perturbed that Semary allowed Puente to obtain copies of the Dottore-related court filings, which were public court records. Semary told him that she wasn't concerned when Puente asked to see the records because they were public.
- Semary repeatedly texted and even called Judge Celebrezze, who failed to respond. This was highly unusual.

10:27



68

Leslie &gt;



Friday 1:11 PM

**Mark Puente**

STAFF WRITER

MPUENTE@THEMARSHALLPROJECT.ORG

727-580-2360

@markpuente

Based in Cleveland, OH

THE MARSHALL PROJECT C/O STUDIO CITYS  
156 WEST 56TH STREET, 3RD FLOOR  
NEW YORK, NY 10019  
themarshallproject.org

This guy stopped by the office  
asked if you can give him a call  
it's about several of your cases  
he said

I'm sorry I didn't know who he  
was he made it seem like he  
was a runner for an attorney

/2023

3, 10

2023-11-29 14:00:00

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



Message

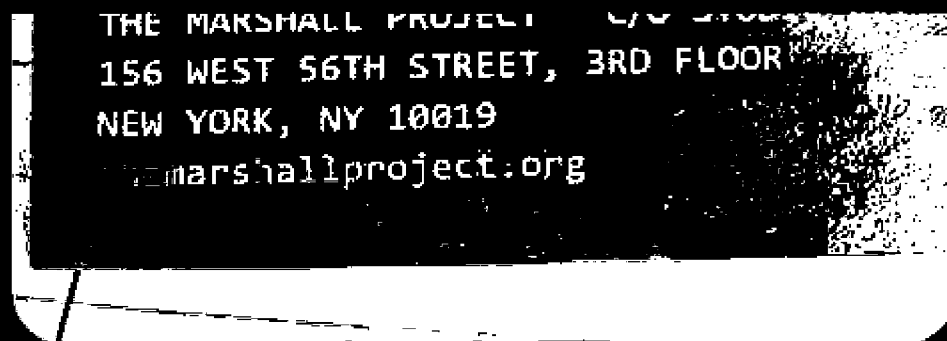




10:27



Leslie &gt;



This guy stopped by the office  
asked if you can give him a call  
it's about several of your cases  
he 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

/2023

working on several cases

MW

Please call me I'm sick over this  
and scared now I didn't know  
Leslie and I figured if the clerks  
sent him up it was ok please  
call me

Read Friday



Cash



*Screenshots of Sema's April 28, 2023 unanswered texts to Celebrezze.*

- Devastated that her boss and dear friend wouldn't speak to her, Sema spent much of the rest of the day crying.
- Sema was comforted by Celebrezze's Magistrate Judge Scott Kitson, who told her—accurately—that if she had refused to give 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 allegedly punish Sema for being a witness, and complying with the First Amendment to the Constitution and the Supreme Court of Ohio's rules.**

The suit further alleges:

- On May 1, 2023, Sema received an email from Defendant Susan K. Sweeney scheduling a meeting among Defendant Sweeney, Sema, and Defendant Zak for May 3, 2023. The email provided Sema with no notice about the meeting's purpose, but Sema assumed it was about Puente's request to view public records. She feared she would be fired.
- Celebrezze ignored Sema all day on May 1. This had never happened before. They were close.
- The next day, Sema noticed not just Celebrezze but other court employees ignoring or avoiding her. When Celebrezze was present, other staff wouldn't speak with her and acted coldly.
- This devastated Sema, and she continued to cry on and off.
- Sema asked Celebrezze if she would be fired. Celebrezze shrugged and said nothing, leaving Sema in great distress.

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

- Semaury then asked if the judge would just talk to her. The judge didn't say a word and shook her head no.
- During the May 3 meeting, Defendant Zak asked Semaury to explain what happened when Puente came to her office. Semaury explained the day's events. She reiterated that the records were public, and for 15 years, she has shared those types of records with the public.
- Defendant Zak gave Semaury a "Written Counseling" document for providing public court records to a reporter. Although the document claimed Semaury had shared confidential information with Puente, it conspicuously failed to specify anything confidential in the file Semaury had provided to Puente, much less how Zak had arrived at such a bogus conclusion. Zak promised Semaury the written counseling was the end of the matter.
- After the May 3, 2023 meeting, Defendant Susan K. Sweeney, complicit with the other Defendants, also created a false written document, purported notes. The notes claimed, among other false statements, that Semaury had said, "not sure if anything taken" and "not sure if any confidential information." In truth and in fact, Semaury had clearly and unambiguously told Defendant Sweeney and the others in the meeting that Puente had taken nothing other than the copies she made for him and that Semaury had personally inspected the file to ensure there was no confidential information in it.
- These falsified purported notes of the meeting also jumbled the chronology in which Semaury had discussed topics with her blindsiding interlocutors. They couldn't have been written contemporaneously during the meeting.

Despite weeks of silence, the alleged retaliation and intimidation resumes as The Marshall Project nears its publication date.

And the suit alleges:

- On May 26, 2023—23 days after the written-counseling meeting—Defendant Seeton, the deputy court administrator, called Semaury to his office. She was again given no notice about the purpose.

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

- When she went to Defendant Seeton's office, Defendant Ergun, the director of judicial operations was there as well. 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. Semaury was shocked because Defendant Zak had assured her that the 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 for the same purported offense.
- Semaury 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.
- She asked again. They again said nothing, just staring at her.
- Semaury asked whether her pay would be affected, and Seeton and Ergun said they could not answer; they added that would be up to Celebrezze.

## The Marshall Project publishes an exposé about Celebrezze, intimating an alleged affair with receiver Mark Dottore.

The suit also alleges:

- 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>. 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).
- 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.

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23-984974 / Confirmation Nbr. 3029162 / CLAMW

- Jardine hired a private investigator to investigate Celebrezze and Dottore's relationship, according to the article.
- The investigator caught Celebrezze and Dottore kissing on the lips outside of Delmonico's Steakhouse in Independence on March 22, 2023 and a [video of the kiss](#) was published to The Marshall Project's and *Cleveland Scene Magazine's* websites. 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; "She kisses everybody. I kiss everybody." –Mark Dottore (stillshot from surveillance video published in [Marshall Project report](#))*

The [suit](#) goes on to allege:

- 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."

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

- The Marshall Project also quoted Dottore as saying, in response to the private investigator's video: "She kisses everybody. I kiss everybody."
- 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.
- The report about the private investigator's steakhouse-kiss stakeout reminded Semary of Celebrezze's admission that Dottore's wife had caught Celebrezze and Dottore making out outside of Dottore's office.
- 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 publication of The Marshall Project's article, 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 and her campaign headquarters is listed as Dottore's business address.
- According to the 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.
- According to the article, Dottore claimed he met with Celebrezze at his home on Fridays to work on "court programs" and "special projects" although there appeared to be no explanation for what sorts of "special projects" a court-appointed receiver and supposedly independent judge who appoints him could or should possibly be working on.
- 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>.
- 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.

- Victims of Celebrezze's scheme to appoint Dottore unnecessarily to bleed litigants' assets contemplated and pursued litigation in which Semary 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>; 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>.

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

The suit further alleges:

- On June 5, 2023, a few days after The Marshall Project's article published, Semary received an email from Defendant Zak setting yet another meeting for June 7, two days later.
- Semary emailed Zak back asking to postpone the meeting so she could have an attorney present.
- Rather than reply, Zak tracked down Semary in a hallway and handed her an envelope. Inside was a letter informing her that her salary was cut **by almost \$20,000 a year**. (Thus also slashing the pension she would have otherwise received after future raises.)
- The letter falsely stated that she had been told about the salary cut during the May 26, 2023 meeting with Seeton and Ergun. In truth and in fact, both had remained mum on why she was being demoted. And neither had been able tell her if her salary would be cut, saying that was up to Celebrezze.
- Since her demotion and pay cut, Semary continued to be *persona non grata* at the DR Court. People she considered friends no longer spoke to her and didn't 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

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

Celebrezze nearby and say they couldn't have Celebrezze see them talking to her.

- The retaliation, intimidation, and Defendants' conduct have been widely discussed among the DR Court judges and court personnel.
- Other DR Court judges knew that Celebrezze was having an affair with Dottore. Celebrezze told at least one of them that she loved Dottore.
- Celebrezze never disclosed her affair with Dottore to any of the parties or attorneys before her where she appointed or contemplated appointing Dottore or his daughter as receivers. She knew that if she did, they would object to her handing over their assets to someone with whom the judge was having a romantic relationship and that she could not be objective in evaluating or approving the Dottores' bills.
- On information and belief, Celebrezze never disallowed Dottore's bills on litigants' assets.
- Defendants—including Celebrezze—knew that Semaury had information as a witness that would publicly expose Celebrezze's affair and relationship with Dottore and cast doubt on the objectivity and propriety of all Celebrezze's judicial decisions to appoint Mark Dottore as a receiver on cases and approving his and his daughter's fees and expenses. Defendants knew Semaury's information would raise questions and prompt investigations about what personal benefits she may have received.
- Defendants—including Celebrezze—knew that if Semaury wasn't silenced, not only was Celebrezze's judicial office, but her law license, too, at risk.
- One measure of Semaury's status as a witness is that she has been interviewed about Celebrezze by the Federal Bureau of Investigation (FBI)'s Cleveland-based public-corruption squad.
- Other government authorities would also be interested in what Semaury knows about Celebrezze and Dottore's relationship and in what happened to Semaury as a result.
- Consistent with her retaliation and intimidation of 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 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 the process presented by Celebrezze's conduct with Dottore,

one of those judges forwarded the communication to Celebrezze. Celebrezze that night then even revealed to Dottore's attorney internal privileged communications with her own counsel.

- Dottore's lawyer 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.
- Defendants having created intolerable working conditions for Sema, she had no choice but to resign. She submitted her resignation on or about August 14, 2023, with her last day September 8, 2023.

Subodh Chandra, Sema's lead counsel said, "Allegations of misuse of public office, including witness intimidation and retaliation, are distressing to those who care about public service. While Georgia Sema mourns the loss of her career and friendship, she knows she must hold Celebrezze and her enablers accountable. We will champion her cause with devotion because our mission is not just to seek justice for Ms. Sema, but to clean up the court."

## A call for information.

Chandra continued, "**We urge anyone with information about the misconduct alleged in this complaint to contact us as soon as possible at [DRCourtMisconduct@ChandraLaw.com](mailto:DRCourtMisconduct@ChandraLaw.com) or through the secure [contact form](#) on our website.** Ms. Sema needs your help. And the public needs your help."

The case is captioned *Georgeanna M. Sema v. Leslie Ann Celebrezze, et al.*, Cuyahoga County Court of Common Pleas Case No. CV-23984974. The complaint asserts claims under Ohio Revised Code § 2307.60 (civil liability for criminal acts) for witness and public-employee intimidation and retaliation, interference with civil and statutory rights, dereliction of duty, falsification, and tampering with records; along with a claim for intentional infliction of emotional distress.

The complaint, which goes into greater detail, can be found [here](#).

The case is currently assigned to Cuyahoga County Common Pleas Court Judge Andrew J. Santoli, but the appointment of a visiting judge may be expected because a judge of the Common Pleas Court has been sued.

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

The Supreme Court of Ohio's Chief Justice has already disqualified Celebrezze from continuing as a judge on the case for which the party hired a private investigator resulting in the first Marshall Project story.

**Chandra Law is experienced obtaining justice for victims of employment retaliation. We also secure constitutional rights.**

**And the firm helped pioneer work in holding individuals and companies accountable for civil liability for criminal acts, securing the two leading Supreme Court of Ohio decisions favorable to crime victims on the topic.**

**If you think that your rights have been violated, you may contact us to discuss your options.**

At Chandra Law, your case is our cause.®

#### **RELATED PRACTICE AREAS**

Constitutional Law   Employment Retaliation   First Amendment   Government Ethics, Misconduct, Fraud, & Abuse

Constructive Discharge

#### **TAGS**

Serpil-Ergun   Mark-Dottore   Susan-K.-Sweeney   Justin-Seeton   James-Zak   Leslie-Ann-Celebrezze

R.C.-2307.60   Intimidation   Employment-Retaliation   Civil-Rights   Retaliation   Civil-Liability-For-Criminal-Acts

R.C.-2921.03   Civil-Damages-For-Criminal-Acts   R.C.-2921.45

**The Chandra Law Firm LLC is solely responsible for the content of this website.  
©2023 The Chandra Law Firm LLC.**

Electronically Filed 11/29/2023 15:24 / MOTION / CV 23 984974 / Confirmation Nbr. 3029162 / CLAMW

**IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO**

<b>GEORGEANNA M. SEMARY,</b>	)	<b>CASE NO. CV-23-984974</b>
<b>Plaintiff,</b>	)	
	)	
	)	<b>JUDGE: ANDREW J. SANTOLI</b>
<b>v.</b>	)	
	)	
	)	<b>ORDER GRANTING MOTION TO</b>
<b>LESLIE ANN CELEBREZZE, et al.,</b>	)	<b>STRIKE PORTIONS OF PLAINTIFF'S</b>
<b>Defendants.</b>	)	<b>SUBPOENA SERVICE RETURNS</b>
	)	

This matter came on for consideration upon the motion of third-parties Mark E. Dottore and the Dottore Companies, LLC asking this Court to strike portions of two Subpoena Service Returns filed by Plaintiff Georgeanna M. Semaury ("Plaintiff") on November 16, 2023 in this matter.

Upon due consideration thereof, the Court finds that the Motion is well taken.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the portions of Request 1 redacted on Exhibit 1 hereto are hereby STRICKEN from the record in this case.

The Clerk of Court is hereby ORDERED to STRIKE the two November 16, 2023 Subpoena Service Returns filed by Plaintiff from the public docket in this case. Plaintiff has leave re-file the redacted versions attached hereto as Exhibit 1 on the public record.

IT IS SO ORDERED.

\_\_\_\_\_  
JUDGE ANDREW J. SANTOLI

## IN THE COURT OF COMMON PLEAS

## SUBPOENA CIVIL RULE 45

THE STATE OF OHIO

SS.

Cuyahoga County

Georgeanna M. Semary,

Plaintiff/Petitioner

No. CV-23-984974

vs.

Leslie Ann Celebrezze, et al.,

Defendant/Respondent

Judge Andrew J. Santoli

To

Dottore Companies LLC  
2344 Canal Road,  
Cleveland, OH 44113

☐ YOU ARE COMMANDED to appear in the Court of Common Pleas to testify as witness on behalf of the (PLAINTIFF/DEFENDANT) in the above entitled case and not depart the Court without leave. Fail not under penalty of the law. Your appearance is required on the \_\_\_\_\_ of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M. in Courtroom No. \_\_\_\_\_ of the:

Justice Center-Court Tower  
1200 Ontario Street  
Cleveland, Ohio 44113☐Courthouse Square  
310 W. Lakeside Avenue  
Cleveland, Ohio 44113☐Cuyahoga County Courthouse  
One Lakeside Avenue  
Cleveland, Ohio 44113☐

☐ YOU ARE COMMANDED to appear at the place, date and time specified below to testify at the taking of deposition in the above case.

PLACE OF DEPOSITION

DATE

TIME

☒ YOU ARE COMMANDED to produce and permit inspection, copying, testing or sampling of the following documents or objects at the place, date and time specified below (list documents or objects):  
Please see the attached list of requested materials, which may be produced electronically.

The Chandra Law Firm LLC, 1265 W. 6th St., Suite 400, Cleveland, OH 44113

12/1/2023

4:30 pm

PLACE

DATE

TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below. Inspection is an option for electronically stored data. Please call to make arrangements.

PREMISES

DATE

TIME

To insure taxation of their fees, witnesses must report each attendance to the Clerk of Court of Common Pleas on the first floor of the Justice Center-Courts Tower.

Section 2335.06 of the Ohio Revised Code provides that witnesses are entitled to receive \$12.00 for each full day's attendance and \$6.00 for each half day's attendance, plus ten cents per mile traveled to and from his place of residence outside of the City of Cleveland proper. Such fees are taxed as costs.

Subodh Chandra (0069233)The Chandra Law Building, 1265 W 6th St Suite 400, Cleveland, OH 44113

ATTORNEY NAME

ADDRESS

Georgeanna M. Semary11/16/2023

SIGNATURE

REPRESENTING

DATE

Cuyahoga County, Clerk of Courts  
Clerk

Electronically Filed 11/16/2023 19:45 / SERVICE / CV 23-984974 / Confirmation Nbr. 3020167 / CLTXP  
Electronically Filed 11/29/2023 15:24 / MOTION / CV 23-984974 / Confirmation Nbr. 3029162 / CLAMW

EXHIBIT 1

THE STATE OF OHIO

ss.

Cuyahoga County

Affidavit of Service of Subpoena by Sheriff or Officer, Attorney or Private Person

On the 16 day of November, 2023.  
I served this Subpoena on the within named:  
Dottore Companies LLC

as follows:

Attorney Timothy Collins agreed to accept service of the subpoena via email.

SHERIFF'S FEES

Service on \_\_\_\_\_ \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy Sheriff/Attorney  
\_\_\_\_\_ Copy \_\_\_\_\_  
\_\_\_\_\_ Miles Travel \_\_\_\_\_ Subscribed and sworn to before me, a  
\_\_\_\_\_ Return \_\_\_\_\_  
\$ \_\_\_\_\_ This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_  
Witness entitled to \_\_\_\_\_ miles

RULE 45. RULES OF CIVIL PROCEDURE, PARTS C & D

(C) Protection of persons subject to subpoenas. (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. (2)(a) A person commanded to produce under divisions (A)(1)(b), (iii), (iv), (v), or (vi) of this rule need not appear in person at the place of production or inspection unless commanded to attend and give testimony at a deposition, hearing, or trial. (b) Subject to division

(D)(2) of this rule, a person commanded to produce under divisions (A)(1)(b), (iii), (iv), (v), or (vi) of this rule may, within fourteen days after service of the subpoena or before the time specified for compliance if such time is less than fourteen days after service, serve upon the party or attorney designated in the subpoena written objections to production. If objection is made, the party serving the subpoena shall not be entitled to production except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena, upon notice to the person commanded to produce, may move at any time for an order to compel the production. An order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the production commanded. (3) On timely motion, the court from which the subpoena was issued shall quash or modify the subpoena, or order appearance or production only under specified conditions, if the subpoena does any of the following: (a) Fails to allow reasonable time to comply; (b) Requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; (c) Requires disclosure of a fact known or opinion held by an expert not retained or specially employed by any party in anticipation of litigation or preparation for trial as described by Civ.R. 26(B)(5), if the fact or opinion does not describe specific events or occurrences in dispute and results from study by that expert that was not made at the request of any party; (d) Subjects a person to undue burden.

(4) Before filing a motion pursuant to division (C)(3)(d) of this rule, a person resisting discovery under this rule shall attempt to resolve any claim of undue burden through discussions with the issuing attorney. A motion filed pursuant to division (C)(3)(d) of this rule shall be supported by an affidavit of the subpoenaed person or a certificate of that person's attorney of the efforts made to resolve any claim of undue burden. (5) If a motion is made under division (C)(3)(c) or (C)(3)(d) of this rule, the court shall quash or modify the subpoena unless the party in whose behalf the subpoena is issued shows

a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated.

(D) Duties in responding to subpoena. (1) A person responding to a subpoena to produce documents shall, at the person's option, produce them as they are kept in the usual course of business or organized and labeled to correspond with the categories in the subpoena. A person producing documents or electronically stored information pursuant to a subpoena for them shall permit their inspection and copying by all parties present at the time and place set in the subpoena for inspection and copying. (2) If a request does not specify the form or forms for producing electronically stored information, a person responding to a subpoena may produce the information in a form or forms in which the information is ordinarily maintained if that form is reasonably useable, or in any form that is reasonably useable. Unless ordered by the court or agreed to by the person subpoenaed, a person responding to a subpoena need not produce the same electronically stored information in more than one form. (3) A person need not provide discovery of electronically stored information when the production imposes undue burden or expense. On motion to compel discovery or for a protective order, the person from whom electronically stored information is sought must show that the information is not reasonably accessible because of undue burden or expense. If a showing of undue burden or expense is made, the court may nonetheless order production of electronically stored information if the requesting party shows good cause. The court shall consider the factors in Civ. R. 26(B)(4) when determining if good cause exists. In ordering production of electronically stored information, the court may specify the format, extent, timing, allocation of expenses and other conditions for the discovery of the electronically stored information. (4) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim. (5) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a receiving party must promptly return, sequester, or destroy the specified information and any copies within the party's possession, custody or control. A party may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim of privilege or of protection as trial-preparation material. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

Revised As Of 10/2018

**Attachment to Amended Subpoenas to Mark Dottore and Dottore Companies**

1. All communications between Mark Dottore and Leslie Ann Celebrezze since January 1, 2007, in any form, including, but not limited to, text message, Apple iMessage, email, voicemail, audio or videorecorded messages, or by private social-media or instant messaging service, including, but not limited to, Facebook Messenger, Instagram private message, Signal, Whisper, Telegram, WhatsApp, Snapchat, Viber, file-sharing websites, or any other such communications service. This would include any communications about *Georgeanna "Georgia" Searny, Mark Puente, the Marshall Project's investigation or reporting*, or how to respond to that reporting. And this should also include any communications of a sexual or romantic nature, including, but not limited to, the text on or about August 6, 2008 at about 7:30 am, in which Celebrezze texted Dottore:

[REDACTED]

And it should include any photographs communicated via message, iCloud, Instagram, Facebook Messenger, or any other means.

This request would also include any communications that include third parties like Robert Glickman or anyone at his office. These are not privileged because Celebrezze has previously testified that Glickman has never been her lawyer.

**Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please provide responsive records in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

2. Communications *about* Leslie Ann Celebrezze since January 1, 2007 to any third person. This would include, but not be limited to, communications with Camille Dottore and Lisa Moran (when she was no longer your wife) on the subject of Celebrezze, directly or indirectly.

**Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please produce these in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

3. Communications *about* Georgeanne "Georgia" Searny since January 1, 2007 to or with any third person other than Celebrezze. This would include, but not be limited to, communications with Camille Dottore and Lisa Moran (when she was no longer your wife) on the subject. **Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please produce these in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

4. Cellphone records back to January 1, 2007 showing dates and times of calls and text communications to and from Leslie Ann Celebrezze and geographical location data. You

**Attachment to Amended Subpoenas to Mark Dottore and Dottore Companies**

may redact all other call or text recipients.

5. Records of any expenses dating back to January 1, 2007 (including, but not limited to, credit-card receipts) at the LaQuinta Inn in Independence, Ohio, or any other hotel in Independence, Ohio, and the alleged purpose, including, but not limited to both business and personal purposes, of the expense.
6. Records of any expenses paid for Leslie Ann Celebrezze since January 1, 2007, including, but not limited to, receipts for gifts, meals for which Dottore or Dottore Company paid, travel, and hotel expenses.

**Again, please use the app iMazing to export responsive text, including SMS and iMessage messages in both visual and spreadsheet formats. We can do this for you.**

**YOU MUST PRESERVE ALL INFORMATION, INCLUDING ELECTRONIC DATA, RELATED TO LESLIE ANN CELEBREZZE OR GEORGEANNA "GEORGIA" SEMARY BECAUSE YOU ARE NOT ONLY A WITNESS BUT A POTENTIAL DEFENDANT IN CIVIL LITIGATION.**

## IN THE COURT OF COMMON PLEAS

## SUBPOENA CIVIL RULE 45

THE STATE OF OHIO

ss.

Cuyahoga County

Georgeanna M. Semary,

Plaintiff/Petitioner

No. CV-23-984974

vs.

Leslie Ann Celebrezze, et al.,

Defendant/Respondent

Judge Andrew J. Santoli

To

Mark E. Dottore1775 Richmond Road,  
Cleveland, OH 44124

YOU ARE COMMANDED to appear in the Court of Common Pleas to testify as witness on behalf of the (PLAINTIFF/DEFENDANT) in the above entitled case and not depart the Court without leave. Fail not under penalty of the law. Your appearance is required on the \_\_\_\_\_ of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M. in Courtroom No. \_\_\_\_\_ of the:

Justice Center-Court Tower  
1200 Ontario Street  
Cleveland, Ohio 44113



Courthouse Square  
310 W. Lakeside Avenue  
Cleveland, Ohio 44113



Cuyahoga County Courthouse  
One Lakeside Avenue  
Cleveland, Ohio 44113



YOU ARE COMMANDED to appear at the place, date and time specified below to testify at the taking of deposition in the above case.

PLACE OF DEPOSITION

DATE

TIME



YOU ARE COMMANDED to produce and permit inspection, copying, testing or sampling of the following documents or objects at the place, date and time specified below (list documents or objects):  
Please see the attached list of requested materials.

The Chandra Law Firm LLC, 1265 W. 8th St., Suite 400, Cleveland, OH 44113 (CALL 440-313-3487)

12/1/20234:30 PM

PLACE

DATE

TIME



YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.  
Inspection is an alternative for electronically stored data. Please call to make arrangements for inspection.

PREMISES

DATE

TIME

To insure taxation of their fees, witnesses must report each attendance to the Clerk of Court of Common Pleas on the first floor of the Justice Center-Courts Tower.

Section 2335.06 of the Ohio Revised Code provides that witnesses are entitled to receive \$12.00 for each full day's attendance and \$6.00 for each half day's attendance, plus ten cents per mile traveled to and from his place of residence outside of the City of Cleveland proper. Such fees are taxed as costs.

Subodh Chandra (0069233)The Chandra Law Building, 1265 W 6th St Suite 400, Cleveland, OH 44113

ATTORNEY NAME

ADDRESS

Georgeanna M. Semary11/16/2023

SIGNATURE

REPRESENTING

DATE

Cuyahoga County, Clerk of Courts

Clerk

THE STATE OF OHIO

SS.

Cuyahoga County

Affidavit of Service of Subpoena by Sheriff or Officer, Attorney or Private Person

On the 16 day of November, 2023.

I served this Subpoena on the within named:

Mark E. Dottore

as follows:

Attorney Timothy Collins agreed to accept service of the subpoena via email.

SHERIFF'S FEES

Service on \_\_\_\_\_ \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy Sheriff/Attorney  
\_\_\_\_\_ Copy \_\_\_\_\_  
\_\_\_\_\_ Miles Travel \_\_\_\_\_ Subscribed and sworn to before me, a  
\_\_\_\_\_ Return \_\_\_\_\_  
\$ \_\_\_\_\_ This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_  
Witness entitled to \_\_\_\_\_ miles

RULE 45. RULES OF CIVIL PROCEDURE, PARTS C & D

(C) Protection of persons subject to subpoenas. (1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. (2)(a) A person commanded to produce under divisions (A)(1)(b), (iii), (iv), (v), or (vi) of this rule need not appear in person at the place of production or inspection unless commanded to attend and give testimony at a deposition, hearing, or trial. (b) Subject to division

(D)(2) of this rule, a person commanded to produce under divisions (A)(1)(b), (iii), (iv), (v), or (vi) of this rule may, within fourteen days after service of the subpoena or before the time specified for compliance if such time is less than fourteen days after service, serve upon the party or attorney designated in the subpoena written objections to production. If objection is made, the party serving the subpoena shall not be entitled to production except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena, upon notice to the person commanded to produce, may move at any time for an order to compel the production. An order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the production commanded. (3) On timely motion, the court from which the subpoena was issued shall quash or modify the subpoena, or order appearance or production only under specified conditions, if the subpoena does any of the following: (a) Fails to allow reasonable time to comply; (b) Requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; (c) Requires disclosure of a fact known or opinion held by an expert not retained or specially employed by any party in anticipation of litigation or preparation for trial as described by Civ.R. 26(B)(5), if the fact or opinion does not describe specific events or occurrences in dispute and results from study by that expert that was not made at the request of any party; (d) Subjects a person to undue burden.

(4) Before filing a motion pursuant to division (C)(3)(d) of this rule, a person resisting discovery under this rule shall attempt to resolve any claim of undue burden through discussions with the issuing attorney. A motion filed pursuant to division (C)(3)(d) of this rule shall be supported by an affidavit of the subpoenaed person or a certificate of that person's attorney of the efforts made to resolve any claim of undue burden. (5) If a motion is made under division (C)(3)(c) or (C)(3)(d) of this rule, the court shall quash or modify the subpoena unless the party in whose behalf the subpoena is issued shows

a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated.

(D) Duties in responding to subpoena. (1) A person responding to a subpoena to produce documents shall, at the person's option, produce them as they are kept in the usual course of business or organized and labeled to correspond with the categories in the subpoena. A person producing documents or electronically stored information pursuant to a subpoena for them shall permit their inspection and copying by all parties present at the time and place set in the subpoena for inspection and copying. (2) If a request does not specify the form or forms for producing electronically stored information, a person responding to a subpoena may produce the information in a form or forms in which the information is ordinarily maintained if that form is reasonably useable, or in any form that is reasonably useable. Unless ordered by the court or agreed to by the person subpoenaed, a person responding to a subpoena need not produce the same electronically stored information in more than one form. (3) A person need not provide discovery of electronically stored information when the production imposes undue burden or expense. On motion to compel discovery or for a protective order, the person from whom electronically stored information is sought must show that the information is not reasonably accessible because of undue burden or expense. If a showing of undue burden or expense is made, the court may nonetheless order production of electronically stored information if the requesting party shows good cause. The court shall consider the factors in Civ. R. 26(B)(4) when determining if good cause exists. In ordering production of electronically stored information, the court may specify the format, extent, timing, allocation of expenses and other conditions for the discovery of the electronically stored information. (4) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim. (5) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a receiving party must promptly return, sequester, or destroy the specified information and any copies within the party's possession, custody or control. A party may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim of privilege or of protection as trial-preparation material. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

Revised As Of 10/2018

**Attachment to Amended Subpoenas to Mark Dottore and Dottore Companies**

1. All communications between Mark Dottore and Leslie Ann Celebrezze since January 1, 2007, in any form, including, but not limited to, text message, Apple iMessage, email, voicemail, audio or videorecorded messages, or by private social-media or instant messaging service, including, but not limited to, Facebook Messenger, Instagram private message, Signal, Whisper, Telegram, WhatsApp, Snapchat, Viber, file-sharing websites, or any other such communications service. This would include any communications about *Georgeanna "Georgia" Serny, Mark Puente, the Marshall Project's investigation or reporting*, or how to respond to that reporting. And this should also include any communications of a sexual or romantic nature, including, but not limited to, the text on or about August 6, 2008 at about 7:30 am, in which Celebrezze texted Dottore:



And it should include any photographs communicated via message, iCloud, Instagram, Facebook Messenger, or any other means.

This request would also include any communications that include third parties like Robert Glickman or anyone at his office. These are not privileged because Celebrezze has previously testified that Glickman has never been her lawyer.

**Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please provide responsive records in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

2. Communications *about* Leslie Ann Celebrezze since January 1, 2007 to any third person. This would include, but not be limited to, communications with Camille Dottore and Lisa Moran (when she was no longer your wife) on the subject of Celebrezze, directly or indirectly.

**Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please produce these in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

3. Communications *about* Georgeanne "Georgia" Serny since January 1, 2007 to or with any third person other than Celebrezze. This would include, but not be limited to, communications with Camille Dottore and Lisa Moran (when she was no longer your wife) on the subject. **Please use the app iMazing to export responsive text, including SMS and iMessage messages. We can do this for you. Please produce these in native format. If you have deleted any such messages, produce native electronic data establishing which communications are deleted. We can also make arrangements for an electronically stored information (ESI) expert to collect such data.**

4. Cellphone records back to January 1, 2007 showing dates and times of calls and text communications to and from Leslie Ann Celebrezze and geographical location data. You

**Attachment to Amended Subpoenas to Mark Dottore and Dottore Companies**

may redact all other call or text recipients.

5. Records of any expenses dating back to January 1, 2007 (including, but not limited to, credit-card receipts) at the LaQuinta Inn in Independence, Ohio, or any other hotel in Independence, Ohio, and the alleged purpose, including, but not limited to both business and personal purposes, of the expense.
6. Records of any expenses paid for Leslie Ann Celebrezze since January 1, 2007, including, but not limited to, receipts for gifts, meals for which Dottore or Dottore Company paid, travel, and hotel expenses.

**Again, please use the app iMazing to export responsive text, including SMS and iMessage messages in both visual and spreadsheet formats. We can do this for you.**

**YOU MUST PRESERVE ALL INFORMATION, INCLUDING ELECTRONIC DATA, RELATED TO LESLIE ANN CELEBREZZE OR GEORGEANNA "GEORGIA" SEMARY BECAUSE YOU ARE NOT ONLY A WITNESS BUT A POTENTIAL DEFENDANT IN CIVIL LITIGATION.**