



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

Disciplinary Counsel)	CASE NO. 2024-024
65 East State Street, Suite 1510)	
Columbus, Ohio 43215-4215)	
)	
Relator,)	
)	
Hon. Leslie Ann Celebrezze)	<u>ANSWER OF RESPONDENT</u>
Attorney Registration No. 0071679)	<u>HON. LESLIE ANN CELEBREZZE</u>
Cuyahoga County Domestic Relations Court)	<u>TO RELATOR'S FIRST AMENDED COMPLAINT</u>
1 Lakeside Avenue)	
Cleveland, Ohio, 44113)	
)	
Respondent.)	

Now comes Respondent, the Hon. Leslie Anne Celebrezze, by and through her undersigned counsel, and for her Answer to Relator's First Amended Complaint states as follows:

1. Respondent admits the allegations contained in Paragraph 1 of Relator's First Amended Complaint.
2. Respondent admits the allegations contained in Paragraph 2 of Relator's First Amended Complaint.
3. Respondent admits the allegations contained in Paragraph 3 of Relator's First Amended Complaint.
4. Respondent admits the allegations contained in Paragraph 4 of Relator's First Amended Complaint.
5. Respondent admits the allegations contained in Paragraph 5 of Relator's First Amended Complaint.
6. Respondent admits the allegations contained in Paragraph 6 of Relator's First Amended Complaint.

7. Respondent admits the allegations contained in Paragraph 7 of Relator's First Amended Complaint.

Count I
The *Jardine* Matter

8. Respondent admits the allegations contained in Paragraph 8 of Relator's First Amended Complaint.

9. Respondent admits the allegations contained in Paragraph 9 of Relator's First Amended Complaint.

10. Respondent admits the allegations contained in Paragraph 10 of Relator's First Amended Complaint, including those contained in Footnote 1, and affirmatively states that Crystal Jardine ("Crystal") originally consulted with Joseph Stafford ("Stafford") before retaining Richard Rabb ("Rabb") as her counsel.

11. Respondent admits the allegations contained in Paragraph 11 of Relator's First Amended Complaint.

12. Respondent admits the allegations contained in Paragraph 12 of Relator's First Amended Complaint. Further answering, Respondent affirmatively states Nicholas Froning ("Froning"), as special ethics counsel for Crystal, rather than Rabb (her divorce lawyer), filed the *Motion to Disqualify* on the basis that Crystal consulted with, and paid a fee to, Stafford regarding her divorce and Stafford thereafter represented her husband, Jason Jardine ("Jason"). Further answering, Respondent affirmatively states that the staff attorney to Judge Tonya Jones ("Judge Jones") did not tender her resignation until May 12, 2022 and her last day of employment with the Cuyahoga County Domestic Relations Court was June 3, 2022, some sixteen months after the original *Motion to Disqualify* was filed. After Stafford hired Judge Jones's staff attorney, Froning filed a Supplemental Brief in Support of the *Motion to Disqualify* on June 24, 2022 which addressed this additional conflict.

13. Respondent admits the allegations contained in Paragraph 13 of Relator's First Amended Complaint.

14. Respondent admits the allegations contained in Paragraph 14 of Relator's First Amended Complaint.

15. Respondent admits the allegations contained in Paragraph 15 of Relator's First Amended Complaint.

16. Respondent admits the allegations contained in Paragraph 16 of Relator's First Amended Complaint.

17. Respondent admits the allegations contained in Paragraph 17 of Relator's First Amended Complaint

18. Respondent admits the allegations contained in Paragraph 18 of Relator's First Amended Complaint, and affirmatively states that Mark Dottore ("Dottore") filed the *Motion to Revise Appointment Order*, through his independent counsel under penalty of Civ.R. 11.

19. Respondent admits the allegations contained in Paragraph 19 of Relator's First Amended Complaint, and affirmatively states that Dottore filed the *Emergency Amended Motion to Revise Appointment Order*, through his independent counsel under penalty of Civ.R. 11.

20. Respondent admits the allegations contained in Paragraph 20 of Relator's First Amended Complaint, and affirmatively states that the original *Motion to Disqualify* remained pending, which was based upon the fact that Crystal had consulted with Stafford.

21. Respondent admits the allegations contained in Paragraph 21 of Relator's First Amended Complaint, and affirmatively states that both the Rules of Superintendence for the Courts and the Cuyahoga County Domestic Relations Court Local Rules of Practice speak for themselves.

22. Respondent admits the allegations contained in Paragraph 22 of Relator's First Amended Complaint.

23. Respondent denies as stated the allegations contained in Paragraph 23 of Relator's First Amended Complaint, and affirmatively states that she and Judge Jones spoke about reassignment of the *Jardine* case, including in Respondent's capacity as Administrative and Presiding Judge, as a result of the recusal by Judge Jones. Further answering, because Judge Diane Palos ("Judge Palos") also had a conflict and Judge Francine Goldberg ("Judge Goldberg") had previously recused herself from presiding over a domestic violence case involving the Jardines, only Respondent and Judge Colleen Ann Reali ("Judge Reali") were available to preside over the *Jardine* case (although Judge Reali had not been signing judgment entries in cases in which Stafford was counsel of record for a several year period).¹

24. Respondent admits the allegations contained in Paragraph 24 of Relator's First Amended Complaint.

25. Respondent admits the allegations contained in Paragraph 25 of Relator's First Amended Complaint, and affirmatively states that Dottore filed a *Supplemental Brief in Support of Motion to Amend Appointment Order*, through his independent counsel under penalty of Civ.R. 11.

26. Respondent admits the allegations contained in Paragraph 26 of Relator's First Amended Complaint.

27. Respondent admits the allegations contained in Paragraph 27 of Relator's First Amended Complaint.

28. Respondent admits the allegations contained in Paragraph 28 of Relator's First Amended Complaint, and affirmatively states that Jason did not object, through his counsel

¹ There are five judges on the Cuyahoga County Domestic Relations Court.

Stafford or otherwise, to the *Motion for Receiver's Fees* filed on Dottore's behalf by his independent counsel on August 26, 2022, and Respondent did not grant same until after the time period in which to object expired.

29. Respondent admits the allegations contained in Paragraph 29 of Relator's First Amended Complaint, and affirmatively states that Jason did not object, through his counsel Stafford or otherwise, to the requested fees, and Respondent did not grant same until after the time period in which to object expired.

30. Respondent admits that Jason and/or Stafford hired a private investigator routinely used by Stafford, but denies the remaining allegations contained in Paragraph 30 of Relator's First Amended Complaint. Further answering, Respondent affirmatively states that she is for want of knowledge as to why Jardine would have suspected an alleged improper relationship between Respondent and Dottore or what is meant by the amorphous term "improper relationship" as averred by Relator.

31. Respondent admits the allegations contained in Paragraph 31 of Relator's First Amended Complaint, and affirmatively states that she has not been provided with the entirety of the private investigator's materials and does not know for how long, or the full extent to which he followed her.²

32. Respondent admits the allegations contained in Paragraph 32 of Relator's First Amended Complaint.

33. Respondent admits the allegations contained in Paragraph 33 of Relator's First Amended Complaint.

² Assuming the private investigator followed Respondent for the entirety of the two weeks cited, he would have observed her daily routine, including going to work, driving her children, spending time with her husband, and attending events.

34. Respondent admits the allegations contained in Paragraph 34 of Plaintiff's Complaint, and affirmatively states that Respondent, Dottore, and Rabb did not speak about any case pending on Respondent's docket.

35. Respondent admits the allegations contained in Paragraph 35 of Plaintiff's Complaint.

36. Respondent admits the allegations contained in Paragraph 36 of Plaintiff's Complaint.

37. Respondent admits that on March 20, 2023, independent counsel for Dottore, under penalty of Civ.R. 11, filed a *Motion to Show Cause* against Jason in good faith as Jason failed to comply with appointment orders, but denies any implication in response to the allegations contained in Paragraph 37 of Relator's First Amended Complaint that Respondent influenced, or in any way prompted, such filings by Dottore's independent counsel who had their own ethical duties to the court. Further answering, Respondent affirmatively states that the *Motion to Show Cause* speaks for itself.

38. Respondent admits the allegations contained in Paragraph 38 of Relator's First Amended Complaint.

39. Respondent admits the allegations contained in Paragraph 39 of Relator's First Amended Complaint, and affirmatively states that the *Motion to Show Cause* speaks for itself.

40. Respondent admits the allegations contained in Paragraph 40 of Relator's First Amended Complaint, and affirmatively states that Respondent was at the crowded bar with several individuals, including Dottore.

41. Respondent admits the allegations contained in Paragraph 41 of Relator's First Amended Complaint, and affirmatively states that Respondent was at the crowded bar with several individuals, including Dottore.

42. Respondent admits the allegations contained in Paragraph 42 of Relator's First Amended Complaint, but denies any implication that the kiss in a crowded public parking lot was romantic in nature.

43. Respondent admits the allegations contained in Paragraph 43 of Relator's First Amended Complaint.

44. Respondent admits the allegations contained in Paragraph 44 of Relator's First Amended Complaint.

45. Respondent denies the allegations contained in Paragraph 45 of Relator's First Amended Complaint, and affirmatively states that she approved payment of Dottore's and his legal counsel's fees on April 3, 2023 (not March 24, 2023 as alleged). Further answering, Respondent affirmatively states that Jason, through his counsel Stafford or otherwise, did not object to the request for approval of Dottore's and his legal counsel's fees, and Respondent did not grant same until after the time period in which to object expired.

46. Respondent admits the allegations contained in Paragraph 46 of Relator's First Amended Complaint.

47. Respondent admits the allegations contained in Paragraph 47 of Relator's First Amended Complaint.

48. Respondent admits the allegations contained in Paragraph 48 of Relator's First Amended Complaint.

49. Respondent admits the allegations contained in Paragraph 49 of Relator's First Amended Complaint.

50. Respondent admits the allegations contained in Paragraph 50 of Relator's First Amended Complaint, and affirmatively states that Jason did not object, through his counsel

Stafford or otherwise, to Dottore’s receiver fees or the fees to Dottore’s legal counsel and the orders granting same were not entered until after the time to object had expired.

51. Respondent denies the allegations contained in Paragraph 51 of Relator’s First Amended Complaint, affirmatively states that the attorneys in the *Jardine* matter, including Stafford, knew of Respondent’s friendship with Dottore and there was nothing more to disclose about the amorphous “nature of her relationship” with either Dottore or Rabb.

52. In response to the allegations contained in Paragraph 52 of Relator’s First Amended Complaint, Respondent:

- Admits that she violated Jud.Cond.R. 1.2³;
- Admits that she violated Jud.Cond.R. 2.5;

³ Respondent fully acknowledges Chief Justice Kennedy granted *Jardine*’s *Affidavit of Disqualification*, but in so doing specifically held that “[t]he granting of *Jardine*’s original affidavit of disqualification is not based on evidence that Judge Celebrezze lacks impartiality or is biased or prejudiced; rather, the affidavit of disqualification is granted on the narrow ground of avoiding the appearance of impropriety.” *In re Disqualification of Celebrezze*, 2023-Ohio-4383, ¶ 106. As a result, Respondent admits that she violated Jud.Cond.R. 1.2. However, the Chief Justice did not conclude that Respondent’s social connections with Dottore or Rabb evidenced prejudice or bias. Respondent fully accepts the Chief Justice’s ruling and the reasoning underlying it, but respectfully submits that Respondent reasonably concluded that her social connections with Dottore and/or Rabb did not call into question her impartiality and thus did not require proactive recusal under Jud.Cond.R. 2.11(A). *See In re Disqualification of Bressler*, 81 Ohio St.3d 1215, 688 N.E.2d 517, 518 (1997) (holding that “the mere existence of a friendship between a judge and an attorney or between a judge and a party will not disqualify the judge from cases involving that attorney or party,” and declining “to establish a rule that mandates the judge’s disqualification based on the existence of the friendship”); *In re Disqualification of Heiser*, 2021-Ohio-628, ¶ 9 (“In today’s legal culture, friendships among judges, lawyers, and former colleagues are common, and a judge need not cut himself or herself off from the rest of the legal community. The reasonable person would conclude that the oaths and obligations of a judge are not so meaningless as to be overcome merely by friendship with a party’s counsel.”) (internal citations and quotations omitted). Judges are often disqualified in order to avoid the appearance of impropriety, bias, or favoritism without subsequently facing disciplinary action for failing to have recused themselves. *See, e.g., In re Disqualification of Beathard*, 2021-Ohio-2725; *In re Disqualification of Saffold*, 2021-Ohio-114; *In re Disqualification of Swenski*, 2020-Ohio-4615; *In re Disqualification of Saffold*, 2020-Ohio-1530. Respondent further notes that with regard to recusal considerations, Dottore in his capacity as receiver was not an adversarial party in the *Jardine* case but rather served as an arm of the court. *See In re Disqualification of McGee*, 2009-Ohio-7203, ¶ 5 (finding that “a court-appointed receiver is not an adversarial party; rather, a receiver is appointed for the specific purpose of preserving the value of the assets at issue in the litigation,” and that “[a] court-appointed receiver therefore qualifies as court personnel whose functions are to aid the judge in carrying out the judge’s adjudicative responsibilities”) (citations and quotations omitted).

- Denies that she violated Jud.Cond.R. 2.11(A); and
- Admits that she violated Jud.Cond.R. 8.4(d).

Count II
The *Maron* Matter

53. Respondent admits the allegations contained in Paragraph 53 of Relator's First Amended Complaint.

54. Respondent admits the allegations contained in Paragraph 54 of Relator's First Amended Complaint.

55. Respondent admits the allegations contained in Paragraph 55 of Relator's First Amended Complaint.

56. Respondent admits the allegations contained in Paragraph 56 of Relator's First Amended Complaint.

57. Respondent denies as stated the allegations contained in Paragraph 57 of Relator's First Amended Complaint, and affirmatively states that Judge Colleen Reali ("Judge Reali") did not sign entries on rulings in cases in which Stafford was counsel of record and relied on her magistrates and/or other judges to sign such entries.

58. Respondent admits the allegations contained in Paragraph 58 of Relator's First Amended Complaint.

59. Respondent admits the allegations contained in Paragraph 59 of Relator's First Amended Complaint, and affirmatively states that the case docket and filings speak for themselves.

60. Respondent admits the allegations contained in Paragraph 60 of Relator's First Amended Complaint, and affirmatively states that there were over 150 unrulled upon motions.

61. Respondent admits that she did offer to preside over the *Maron* case to reduce Judge Reali's caseload due to her magistrate's situation, but denies as stated the remaining allegations contained in Paragraph 61 of Relator's First Amended Complaint.

62. Respondent admits the allegations contained in Paragraph 62 of Relator's First Amended Complaint.

63. Respondent admits the allegations contained in Paragraph 63 of Relator's First Amended Complaint, and affirmatively states that both the Rules of Superintendence for the Courts and the Cuyahoga County Domestic Relations Court Local Rules of Practice speak for themselves.

64. Respondent admits the allegations contained in Paragraph 64 of Relator's First Amended Complaint, and affirmatively states that the statement "via electronic judge roll" in the associated entry was inaccurate.

65. Respondent admits the allegations contained in Paragraph 65 of Relator's First Amended Complaint.

66. Respondent admits the allegations contained in Paragraph 66 of Relator's First Amended Complaint.

67. Respondent admits the allegations contained in Paragraph 67 of Relator's First Amended Complaint.

68. Respondent admits that Stafford objected to the appointment of Dottore as a mediator, but denies the remaining allegations contained in Paragraph 68 of Relator's First Amended Complaint, and affirmatively states that Respondent did not have Dottore serve as the mediator as a result of Stafford's objection.

69. Respondent admits the allegations contained in Paragraph 69 of Relator's First Amended Complaint.

70. Respondent admits the allegations contained in Paragraph 70 of Relator's First Amended Complaint, including the statements contained in Footnote 2.

The *Abdrabbo* Matter

71. Respondent admits the allegations contained in Paragraph 71 of Relator's First Amended Complaint.

72. Respondent admits the allegations contained in Paragraph 72 of Relator's First Amended Complaint.

73. Respondent admits the allegations contained in Paragraph 73 of Relator's First Amended Complaint, including the allegations contained in Footnote 3, and affirmatively states that Scott Rosenthal ("Rosenthal") was sole counsel for Abdelrahman Abdrabbo ("Abdelrahman"), entering a *Notice of Appearance* on September 22, 2021 until September 12, 2022, when Robert Glickman ("Glickman") entered a *Notice of Appearance as Additional Counsel* due to the fact that Rosenthal was ill.

74. Respondent admits that she has sought legal advice from Glickman on employment and other matters on various occasions, but denies as stated the remaining allegations contained in Paragraph 74 of Relator's First Amended Complaint.

75. Respondent admits the allegations contained in Paragraph 75 of Relator's First Amended Complaint, and affirmatively states that Judge Reali had not signed orders on cases in which Stafford was counsel of record, including the *Abdrabbo* case.

76. Respondent admits the allegations contained in Paragraph 76 of Relator's First Amended Complaint.

77. Respondent admits the allegations contained in Paragraph 77 of Relator's First Amended Complaint.

78. Respondent denies the allegations contained in Paragraph 78 of Relator's First Amended Complaint, and affirmatively states that Glickman and Respondent spoke about the *Affidavit of Disqualification* and he sent her a copy of the *Affidavit* – not the *Writ* as averred.

79. Respondent admits the allegations contained in Paragraph 79 of Relator's First Amended Complaint.

80. Respondent admits she spoke with Judge Reali about the *Abedrabbo* matter, but Respondent denies as stated the remaining allegations contained in Paragraph 80 of Relator's First Amended Complaint.

81. Respondent denies as stated the allegations contained in Paragraph 81 of Relator's First Amended Complaint, and affirmatively states that she does not recall the statements averred.

82. Respondent denies the allegations contained in Paragraph 82 of Relator's First Amended Complaint, and affirmatively states the Supreme Court of Ohio had previously granted an *Alternative Writ of Mandamus* filed against Judge Reali in the *Abedrabbo* case on January 25, 2023. Further answering, Respondent affirmatively states that Glickman made a public records request on January 27, 2023 for cases pending on the docket of Judge Reali in which Stafford was counsel of record and then filed an *Affidavit of Disqualification* of Judge Reali in which Glickman alleged that the records "showed that Judge Reali makes it a practice to not directly preside over Mr. Stafford's cases, going so far as to have other judges sign her orders. This practice raises the appearance of impropriety."

83. Respondent admits that she spoke with Judge Reali about the *Abedrabbo* matter, but Respondent denies as stated the remaining allegations contained in Paragraph 83 of Relator's First Amended Complaint.

84. Respondent denies the allegations contained in Paragraph 84 of Relator's First Amended Complaint, and affirmatively states that the *Writ* had been previously granted by the Supreme Court of Ohio on January 25, 2023.

85. Respondent admits that she spoke with Judge Reali about the *Abedrabbo* matter, but Respondent denies as stated the remaining allegations contained in Paragraph 85 of Relator's First Amended Complaint.

86. Respondent admits the allegations contained in Paragraph 86 of Relator's First Amended Complaint.

87. Respondent admits the allegations contained in Paragraph 87 of Relator's First Amended Complaint.

88. Respondent admits that Glickman made a public records request, but denies the remaining allegations contained in Paragraph 88 of Relator's First Amended Complaint, and affirmatively states that Glickman made the public records request on January 27, 2023, not January 30, 2023 as averred.

89. Respondent admits a conference call occurred, but Respondent denies as stated the remaining allegations contained in Paragraph 89 of Relator's First Amended Complaint.

90. Respondent denies as stated the allegations contained in Paragraph 90 of Relator's First Amended Complaint, and affirmatively states that Judge Reali did review the list of cases.

91. Respondent denies as stated the allegations contained in Paragraph 91 of Relator's First Amended Complaint.

92. Respondent admits the allegations contained in Paragraph 92 of Relator's First Amended Complaint.

93. Respondent admits the allegations contained in Paragraph 93 of Relator's First Amended Complaint.

94. Respondent admits the allegations contained in Paragraph 94 of Relator's First Amended Complaint, and affirmatively states that Respondent's statement was based on the Rules

of Superintendence as the lawyers in the *Abedrabbo* case were previously engaged in other trials which conflicted with the trial dates in *Abedrabbo*.

95. Respondent admits the allegations contained in Paragraph 95 of Relator's First Amended Complaint.

96. Respondent admits that there is no "administrative docket," but denies as stated the remaining allegations contained in Paragraph 96 of Relator's First Amended Complaint, and affirmatively states that as the Administrative and Presiding Judge she had authority to handle administrative matters.

97. Respondent denies as stated the allegations contained in Paragraph 97 of Relator's First Amended Complaint.

98. Respondent admits the allegations contained in Paragraph 98 of Relator's First Amended Complaint, and affirmatively states that she in her capacity as Administrative and Presiding Judge could continue the case.

99. Respondent admits the allegations contained in Paragraph 99 of Relator's First Amended Complaint.

100. Respondent admits the allegations contained in Paragraph 100 of Relator's First Amended Complaint.

101. Respondent admits there is no "administrative docket," but denies as stated the remaining allegations contained in Paragraph 101 of Relator's First Amended Complaint.

102. Respondent admits the allegations contained in Paragraph 102 of Relator's First Amended Complaint.

103. Respondent denies as stated the allegations contained in Paragraph 103 of Relator's First Amended Complaint, and affirmatively states that the public docket in the *Abedrabbo* case shows the entry granting the *Motion to Withdraw* earlier in time than the filing of Glickman's

Motion to Withdraw on February 3, 2023. Further answering, Respondent affirmatively states that pursuant to a *Supplemental Affidavit of Disqualification* of Judge Reali filed by Glickman on February 17, 2023, her entry granting his *Motion to Withdraw* was not imaged on the docket until February 6, 2023 (which was after Glickman had filed an *Affidavit of Disqualification* of Judge Reali).

104. Respondent admits the allegations contained in Paragraph 104 of Relator's First Amended Complaint.

105. Respondent admits the allegations contained in Paragraph 105 of Relator's First Amended Complaint.

106. Respondent admits the allegations contained in Paragraph 106 of Relator's First Amended Complaint.

107. Respondent admits the allegations contained in Paragraph 107 of Relator's First Amended Complaint.

108. Respondent admits the allegations contained in Paragraph 108 of Relator's First Amended Complaint, and affirmatively states that the comment was not a directive, and she did not intend it as such.

109. Respondent admits that the *Abedrabbo* case remained on the docket of Judge Palso, but denies as stated the allegations contained in Paragraph 109 of Relator's First Amended Complaint.

110. In response to the allegations contained in Paragraph 110 of Relator's First Amended Complaint, Respondent:

- Admits that she violated Jud.Cond.R. 1.2⁴;
- Admits that she violated Jud.Cond.R. 2.5;
- Denies that she violated Jud.Cond.R. 2.9(A);
- Denies that she violated Jud.Cond.R. 2.11(A);
- Denies that she violated Jud.Cond.R. 8.4(c); and
- Admits that she violated Jud.Cond.R. 8.4(d).

Count III
False Statement During the Disciplinary Process

111. Respondent admits that *Jardine* filed a grievance against her alleging bias, but denies that she had or has inappropriate or undisclosed “relationships” with Dottore, Rabb, or Glickman.

112. Respondent admits the allegations contained in Paragraph 112 of Relator’s First Amended Complaint.

113. Respondent admits that she disclosed to her fellow judges that that she loves Dottore, but denies as stated the remaining allegations contained in Paragraph 113 of Relator’s First Amended Complaint. Further answering, Respondent affirmatively states that her statements about Dottore were not meant in a romantic manner or are evidence of an inappropriate relationship between she and Dottore.

114. Respondent denies the allegations contained in Paragraph 114 of Relator’s First Amended Complaint, and affirmatively states that she did not make a false statement of material fact in connection with a disciplinary matter.

⁴ As stated above, Respondent fully acknowledges Chief Justice Kennedy granted *Jardine*’s *Affidavit of Disqualification* on the limited basis of an appearance of impropriety relative to how the case was reassigned. That decision is equally applicable to the *Maron* case which is why Respondent recused herself from it on the same day that she received the order from the Supreme Court of Ohio in *Jardine*.

Respectfully submitted,

/s/Monica A. Sansalone

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Attorney for Respondent

Hon. Leslie Ann Celebrezze

CERTIFICATE OF SERVICE

A copy of the foregoing *Answer* was sent via email only on this 30th day of October, 2024

to:

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