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

Disciplinary Counsel

Relator,

v. Case No. 24-024

Hon. Leslie Ann Celebrezze
Attorney Registration No. 0071679

Respondent.

Relator's Post-Hearing Brief

Introduction

Inherent in the rules comprising the Code of Judicial Conduct "are the precepts that judges, individually and collectively, must respect and honor the judicial office as a public trust and strive to maintain and enhance confidence in the legal system." Jud.Cond.R. Preamble. In this regard, respondent failed miserably. Instead of enhancing the public's confidence in the integrity, impartiality, and independence of the judiciary, respondent, through manipulation and deceit, tarnished the reputation of the judiciary and undermined the public's confidence in the institution. For this, respondent must serve an actual suspension from the practice of law.

Respondent's Relationship with Mark Dottore

At the heart of this judicial disciplinary proceeding is respondent's relationship with Mark Dottore, a non-lawyer businessman who served as a court-appointed receiver in several of respondent's domestic relations cases. Respondent and Dottore were involved in a personal relationship that extended well beyond "close personal" friends, as respondent initially—and falsely—claimed. While judges are entitled to lead lives free from public intrusion, they must

disclose when their private interests might reasonably impair their professional obligations to serve as a fair and impartial jurist. Here, respondent was heavily involved in a personal and, at the very least, deeply emotional relationship with Dottore, who racked up hundreds of thousands of dollars in receiver fees from litigants who had no knowledge of the clandestine relationship and thus were left to question respondent's impartiality and the propriety of the fees. "Public trust is essential to the effective operation of the judicial system, and the conduct of one judge may have a significant adverse impact on the public perception of the entire judicial system. *Matter of Henderson*, 306 Kan. 62, 392 P.3d 56 (2017), citing *In re Robertson*, 280 Kan. 266, 272, 120 P.3d 790 (2005). Respondent's conduct in concealing her relationship with Dottore, coupled with her troubling penchant for dishonesty, strikes at the very heart of judicial integrity and transparency. She violated the public trust and must serve an actual suspension.

COUNT ONE

The *Jardine* Matter

In December 2020, Jason Jardine filed for divorce from his wife, Crystal Jardine, who was represented by Attorney Richard Rabb. (Stip. No. 9, 11.) The case was randomly assigned to Judge Tonya Jones, who, at Rabb's request, appointed Dottore as a receiver, but only after Judge Jones solicited respondent's opinion of Dottore. (Stip. No. 15, 16.) Judge Jones's initial appointment order limited the scope of Dottore's duties, which prompted Dottore to move to expand the order on May 26, 2022, and again on June 7, 2022. Before ruling on Dottore's motions, Judge Jones recused herself by Judgment Entry dated August 9, 2022, and sent the case to respondent for random reassignment as required under Sup.Ct.R. 36.019(A) and Cuyahoga C.P., Dom.Rel.Div., Loc.R. 2(B)(2). (Stip. No. 24, 25.) With five judges on the Domestic Relations Division of the Cuyahoga County Common Pleas Court, respondent had a one-in-four

chance of obtaining the *Jardine* case through random reassignment, after Judge Jones's recusal. Not satisfied with the odds, respondent circumvented the random case assignment system by asking Judge Jones to assign the *Jardine* matter directly to respondent, thus ensuring that respondent would preside over a case in which Dottore was serving as the receiver.

Rather than immediately disclosing her deep, emotional, and affectionate relationship with Dottore to the parties as required under Jud.Cond.R. 2.11, one of respondent's first decisions in the *Jardine* case was to grant Dottore's motion to expand the receivership—a move that ultimately resulted in respondent approving over $240,000 in fees to Dottore. (Stip. No. 53.)

In March 2023, Jardine took the extraordinary step of hiring a private investigator to conduct video surveillance on respondent and Dottore. (Stip. No. 33.) But for Jardine's curiosity and suspicion, the depth of respondent's relationship with Dottore would likely have gone undetected. Over the course of 18 days, the private investigator captured uncontroverted evidence of respondent's emotional attachment to and "feelings for" Dottore. During the surveillance period—i.e., March 14 through March 31, 2023, respondent was with Dottore at his home, office, or a restaurant on seven different days, all while respondent was presiding over Jardine's case. (Joint Ex. 85.)

As one example, on Friday, March 24, 2023, respondent drove from her home to Dottore's home, entered through the garage, and remained inside for two hours and 26 minutes. (Stip. No. 47; Joint Ex. 85; Joint Ex. 86(E).) In response to relator's Letter of Inquiry ("LOI"), respondent claimed that over the nearly two-and-a-half hours, she and Dottore "had coffee and talked." (Joint Ex. 67.) Talked about what? The *Jardine* case? Dottore's fees? It is no surprise that on the *same* day, respondent signed an entry approving Dottore's and his legal counsel's fees in the *Jardine* case. (Stip. No. 48.) Furthermore, Dottore billed Jardine on that same day for,

among other things, "phone call with the court regarding show cause hearing." (Joint Ex. 32, Bates 003.)

But nothing illustrates respondent's "feelings for" Dottore more than the brief but intimate encounter outside Delmonico's Steakhouse on March 22, 2023, which respondent later misrepresented to relator as a "single chaste momentary" kiss. (Joint Ex. 72, p. 3.) As the video and screenshot make clear, respondent intimately extended her hand to Dottore's chin, gently pulled him toward her, and kissed him on the lips. (Joint Ex. 86(D); Joint 86(H).)

Just as the video offers indisputable evidence of a relationship beyond that of "close personal" friends, the incredible volume of phone calls between respondent and Dottore underscores the depth of their "emotional attachment." In the 18-day span in which respondent and Dottore were under video surveillance, respondent's phone records show there were 153 phone calls between them totaling 894 minutes, or 14.9 hours. (Joint Ex. 89.) On 16 of the 18 days, respondent's first phone call of the day was to Dottore. And on 10 of the 18 days, the last call of the night was either to or from Dottore.[1]

In addition to respondent's clandestine relationship with Dottore, she was also caught socializing with Crystal Jardine's lawyer, Richard Rabb. On March 15, 2023, the private investigator captured respondent, Rabb, and Dottore socializing over drinks at the Capital Grill, thus creating—at the very least—an appearance of impropriety. (Stip. No. 37; Joint Ex. 85; Joint Ex. 86(G).) Imagine learning that the judge presiding over your contentious divorce case is having drinks with your spouse's attorney and the person you believe is destroying your business. The fact that respondent was blind to the impropriety of her actions casts serious doubt on her judgment. Adding insult to injury, Dottore billed Jardine for a March 15, 2023

[1] The first and last phone calls of the day to or from Dottore are listed in red in Joint Ex. 89. Due to an oversight, the first calls of the day on March 18 and March 22 are in black.

"Conference with R. Rabb and C. Dottore[2] regarding Bank of America Documents…" (Joint Ex. 32, p. 2). The entry begs the question: Was the conference at the Capital Grill?

Count One: Rule Violations

I. Jud.Cond.R. 1.2

Under Jud.Cond.R. 1.2, "a judge shall act at all times in a manner that promotes public confidence in the independence, integrity, and impartiality of the judiciary, and shall avoid impropriety and the appearance of impropriety." Respondent's conduct while presiding over the *Jardine* case violated every aspect of Jud.Cond.R. 1.2. Her failure to disclose her intimate relationship with Dottore to unsuspecting litigants, while approving hundreds of thousands dollars in fees to Dottore, coupled with her indiscretion in socializing and having drinks with an opposing party's lawyer in a pending case, created an *appearance* of impropriety. "An appearance of bias can be just as damaging to public confidence as actual bias." *In re Disqualification of Murphy*, 2005-Ohio-7148, ¶ 6.

But respondent's misconduct in the *Jardine* case extended beyond the *appearance* of impropriety. Her manipulation of the random case assignment process and her failure to recuse herself constituted *actual* impropriety. "Actual improprieties include violations of law, court rules, or provisions of [the Code of Judicial Conduct.]" *Disciplinary Counsel v. Hoover*, 2024-Ohio-4608, ¶ 12, citing Jud.Cond.R. 1.2, Comment 5. Taken as a whole, respondent's conduct while presiding over the *Jardine* case eroded the public's confidence in the integrity and impartiality of the judiciary.

[2] C. Dottore is Dottore's daughter and employee, Camille Dottore.

II. Jud.Cond.R. 2.5

Under Jud.Cond.R. 2.5(A), "a judge shall perform all judicial and administrative duties competently and diligently and shall comply with guidelines set forth in the Rule of Superintendence for the Courts of Ohio." In relevant part, Sup.Ct.R. 36.019(A) states, "[f]ollowing the recusal of a judge in a multi-judge court or division, the administrative judge shall *randomly* assign the case among the remaining judges of the court or division who are able to hear the case." (Emphasis added.) Similarly, Loc.R. 2(B)(2) of the Cuyahoga County Court of Common Pleas, Domestic Relations Division, provides that "[w]hen 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." (Emphasis added.) In intentionally disregarding these rules, respondent ensured that she would preside over a case in which Dottore had been appointed receiver.

III. Jud.Cond.R. 2.11(A)

Under Jud.Cond.R. 2.11(A), "a judge shall disqualify herself in any proceeding in which the judge's impartiality might reasonably be questioned." Here, there were at least three overt acts for which one could reasonably question respondent's impartiality: (1) her intimate relationship with Dottore; (2) her socializing over drinks with Rabb, whose client's case was pending before respondent; and (3) her circumvention of the local court rules and the rules of superintendence to avoid the random reassignment of the *Jardine* case. In fact, Chief Justice Sharon Kennedy disqualified respondent for failing to randomly reassign the *Jardine* case, stating:

> The purpose of random assignment or reassignment of cases is not only to avoid judge-shopping and to distribute cases equitably among judges, *see* Sup.R. 36.011 commentary, but also to maintain public confidence in the judicial system by ensuring that cases are assigned impartially and not deliberately to a certain judge.

In re Disqualification of Celebrezze, 2023-Ohio-4383, ¶ 99. (Joint Ex. 35.)

Given the video evidence, it was entirely reasonable for Jardine to question whether respondent could be fair and impartial. But it is inconceivable that after being presented with video evidence of her relationship with Dottore, respondent refused to recuse herself from the *Jardine* case. In his grievance, Jardine reasonably wondered, "How am I supposed to be getting a fair process when the judge and the person who controls my business are in an inappropriate and sexual relationship?" (Joint Ex. 71.)

IV. Prof.Cond.R. 8.4(d)

Collectively, the aforementioned rule violations comprised a violation of Prof.Cond.R. 8.4(d), which states, "It is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice." In *Disciplinary Counsel v. Oldfield*, 2014-Ohio-2963, a judge failed to recuse herself from presiding over cases involving a public defender who had been arrested for OVI while in the judge's presence, and who was temporarily staying at the judge's home. *Id*. at ¶ 10. In finding that Judge Oldfield violated Jud.Cond.R. 1.2 and 2.11, the court noted, "We also find that these violations of the Code of Judicial Conduct comprise a violation of Prof.Cond.R. 8.4(d)." *Id.* at ¶ 16. As further evidence of the prejudicial impact of respondent's misconduct, the panel should consider that Jardine was forced to file an *Affidavit of Disqualification*, which stayed the contentious proceedings until the Chief Justice disqualified respondent, thus forcing the case to a third judge through no fault of Jardine. And it cannot be overlooked that respondent made several of the same misrepresentations in her July 2023 response to Jardine's *Affidavit of Disqualification* that she made to relator:

- "I have been happily married to Dr. Charles Zonfa for 25 years." (Joint Ex. 34, p. 3; Contrast with Stip. Nos. 127 to 131.)

- "I am not now nor have ever been represented by attorney Scott Rosenthal. I do not need a family law attorney. I am not contemplating divorce and, as far as I know, neither is my spouse." (Joint Ex. 34, p. 9; Contrast with Stip. Nos. 127 to 132.)

- "Mr. Glickman has never acted as my representative." (Joint Ex. 34, p. 6; Contrast with Stip. Nos. 81, 82, 83.)

- "I deny engaging in any action to manipulate the assignment of cases." (Joint Ex. 34, p. 7; Contrast with Stip. No. 26, 70, 143.)

COUNT TWO

The *Maron* Matter

In January 2023, just a few months after respondent had improperly assumed jurisdiction over the *Jardine* case, she approached Judge Colleen Reali's magistrate, Jason Parker, who had fallen ill, and offered to take the *Maron* case—a contentious divorce that Magistrate Parker had been presiding over. (Stip. No. 65.) A few days later, respondent approached Judge Reali with the same offer stating, "I've been getting some calls on the *Maron* case." (Stip. No. 67.) At respondent's suggestion, Judge Reali recused herself from the *Maron* case; however, rather than having the case assigned randomly, respondent directed the assignment commissioner to assign the *Maron* case directly to respondent in contravention of Sup.Ct.R. 36.019(A) and Cuyahoga C.P., Dom.Rel.Div., Loc.R. 2(B)(2). (Stip. No. 70.). This time, however, rather than instructing Judge Reali to issue an Entry Nunc Pro Tunc like she did in the *Jardine* case, respondent signed an auto-generated entry that falsely stated the case had been randomly assigned to her via electronic judge roll.

> To preclude any propriety or the appearance of a conflict of interest on the part of the assigned Judge, **COLLEEN ANN REALI** voluntarily removes herself from the above captioned case. This case is hereby reassigned to Judge **LESLIE ANN CELEBREZZE** (via electronic judge roll) to resolve all pending and future issues.

(Joint Ex. 36; Joint Ex. 40.) One month later, while the parties took a break during trial to discuss settlement, respondent asked the parties' lawyers to consider Dottore as a mediator; however, she dropped the idea after the parties objected to Dottore. (Stip. No. 73.)[3] Respondent's plug for Dottore forces one to question respondent's true motive in assuming jurisdiction over the *Maron* case.

Then, in April 2023, Attorney Robert Glickman entered his notice of appearance on behalf of Ari Maron, despite having provided legal advice and counsel to respondent in 2022 and 2023. In fact, on May 5, 2023—the day after respondent submitted her response to Jardine's grievance about respondent's inappropriate relationship with Dottore—Glickman sent legal research to respondent regarding whether conversations between a judge and a court-appointed receiver qualify as ex parte communications. (See Joint Ex. 90, Bates 021.) Coincidence? No. In fact, in her response to relator's Notice of Intent to File, respondent cited the case that Glickman sent to her on May 5, 2023. (See Joint Ex. 72, p. 3, FN 5.)

On August 18, 2023, Chief Justice Kennedy disqualified respondent from presiding over the *Jardine* matter; consequently, respondent recused herself from the *Maron* case, since she had circumvented the rules regarding random reassignment in the *Maron* case, too. (Stip. No. 76.)

The *Abedrabbo* Matter

Having succeeded in obtaining the *Maron* case from Judge Reali, respondent set her sights on another one of Judge Reali's contentious divorce cases—*Abedrabbo v. Abedrabbo*. This time, instead of angling to get Dottore appointed, respondent tried to muscle Judge Reali off the case in an apparent assist to—guess who? Her lawyer—Glickman. It should come as no

[3] In response to the LOI, respondent misrepresented that Attorney Larry Zukerman had suggested Dottore. (Joint Ex. 69, p. 3.)

surprise that Glickman has represented Dottore in the past and that the two share a wine locker at Morton's restaurant. (Joint Ex. 34, p. 5, 6.)

On September 12, 2022, Glickman had entered a notice of appearance on behalf of Abdelrahman Abedrabbo during four days of trial because Abdelrahman's lawyer, Scott Rosenthal, was ill. (Stip. No. 79, 80.) Two months later, on November 10, 2022, Glickman filed a *Writ of Mandamus* against Judge Reali in the *Abedrabbo* case. (Stip. No. 84; Joint Ex. 60.) On January 25, 2023, the Supreme Court of Ohio issued a decision granting an *Alternative Writ of Mandamus* ordering Judge Reali to comply with a briefing schedule for the presentation of the evidence in the *Abedrabbo* divorce case. (Joint Ex. 64.) Despite having no involvement in the *Abedrabbo* case, respondent contacted Glickman ex parte to discuss the *Writ* he filed against Judge Reali. In response, Glickman sent a copy of the *Alternative Writ* to respondent via email. (Stip. No. 87; Joint Ex. 50.) On January 30, 2023, respondent called Judge Reali and asked her to transfer the *Abedrabbo* case to respondent, claiming that because the Supreme Court was going to hear the *Writ*, Judge Reali would look bad if she stayed on the case. (Stip. No. 89.) When Judge Reali refused, respondent said words to the effect of, "A little birdie told me that the *Abedrabbo Writ* will be heard, and the *Writ* will go away if you give me the case" and that "Dottore is close to the new Chief Justice. He has her ear. Kennedy loves Dottore." (Stip. No. 91.) Judge Reali understood that respondent was suggesting that if Judge Reali agreed to transfer the *Abedrabbo* case to respondent, Glickman would dismiss the *Writ* against Reali. (Stip. No. 93.) At this point, it should come as no surprise to the panel that on the same day respondent was insinuating that Dottore had an in with the Chief Justice, respondent and Dottore spoke on the phone 13 times, totaling 81 minutes. (Joint Ex. 89.)

When it became clear that Judge Reali was not going to succumb to respondent's overtures, an associate in Glickman's firm filed a public records request seeking all of Judge Reali's cases in which Attorney Joseph Stafford, who was opposing counsel in the *Abedrabbo* case, was attorney of record. (Stip. No. 97.) When Judges Jones, Reali, and Goldberg contacted respondent to discuss a response to the public records request, respondent replied, "It's escalating. They're going to read all our emails." (Stip. No. 99.) Respondent then directed court staff to provide a response to the public records request without any input from Judge Reali. (Stip. No. 101.) In the meantime, Judge Reali had scheduled the *Abedrabbo* case for trial beginning on February 6, 2023. On February 1, 2023, Rosenthal filed a *Motion to Continue* the February 6, 2023 trial. The following day, February 2, 2023, during the judges' monthly meeting, respondent told Judge Reali that she must continue the *Abedrabbo* case. (Stip. No. 104.) When the other judges asked why, respondent *falsely* claimed that Glickman had filed a *Motion to Continue* the *Abedrabbo* case on the court's administrative docket. (Stip. No. 106.) Respondent told Judge Reali that if she did not continue the case, respondent would grant the continuance. (Stip. No. 108.) Of course, Glickman never filed a *Motion to Continue*, and there was no administrative docket in the domestic relations court. (Stip. No. 111.)

On February 6, 2023, Judge Reali denied Rosenthal's *Motion to Continue* the *Abedrabbo* case; however, Glickman filed an *Affidavit of Disqualification* against Judge Reali, which stayed the *Abedrabbo* case. (Stip. No. 116, 117.) On or about February 17, 2023, respondent contacted Glickman ex parte and requested a copy of the *Supplemental Affidavit* claiming, falsely, that Judge Reali had refused to provide her a copy. (Stip. No. 119.) Glickman sent a copy of a *Supplemental Affidavit* to his *Affidavit of Disqualification* against Judge Reali to respondent—ex parte—to her personal email address. (Stip. No. 118.)

On March 15, 2023, Judge Reali recused herself from the *Abedrabbo* case and it was randomly reassigned to Judge Diane Palos. Incredibly, respondent made another attempt to get the *Abedrabbo* case when she approached Judge Palos's bailiff and told her that Judge Palos could transfer the case to respondent. (Stip. No. 122.) Judge Palos declined. (Stip. No. 123.)

Count Two: Rule Violations

I. Jud.Cond.R. 1.2

Like her conduct in *Jardine*, respondent's conduct in *Maron* and *Abedrabbo* violated every aspect of Jud.Cond.R. 1.2. Regarding *actual* improprieties, respondent manipulated the random reassignment process, and signed an entry falsely stating that the *Maron* case had been randomly assigned to respondent. In *Abedrabbo*, she implied that Dottore had influence over the Chief Justice, when, in fact, the Chief Justice has no personal or professional relationship with Dottore. (Stip. No. 91, FN 5.) In this regard, her false and reckless statements imply a corrupt judiciary where decisions are made not on the merits, but on who one knows in positions of power. It is this type of insidious conduct that erodes the public's faith in the judiciary. Finally, she misrepresented to her fellow judges that Glickman had filed a *Motion to Continue* on a nonexistent docket, thus sowing an atmosphere of distrust amongst her fellow judges. Regarding the *appearances* of impropriety, respondent's pursuit of contentious divorce cases forces one to question her motives. Clearly, in *Maron*, she angled to get Dottore appointed as a mediator. And in *Abedrabbo*, respondent gave the appearance of assisting her personal lawyer, Glickman, in getting Judge Reali off the case. Taken together, respondent failed miserably in promoting the public's confidence in the independence, integrity, and impartiality of the judiciary.

II. Jud.Cond.R. 2.5

Just like she did in *Jardine*, respondent violated Jud.Cond.R. 2.5 by intentionally disregarding Sup.Ct.R. 36.019(A) and Cuyahoga C.P., Dom.Rel.Div., Loc.R. 2(B)(2), to ensure the *Maron* case ended up on her docket. Only this time, she went one step further and issued a false journal entry claiming the case arrived by random reassignment.

III. Jud.Cond.R. 2.9(A)

Under Jud.Cond.R. 2.9(A), "a judge shall not initiate, receive, permit, or consider ex parte communications." An ex parte communication is a "communication, concerning a pending or impending matter, between counsel or an unrepresented party and the court when opposing counsel or an unrepresented party is not present *or any other communication made to the judge outside the presence of the parties or their lawyers.*" (Emphasis added.) Jud.Cond.R. Terminology. Here, although respondent was not the judge presiding over the *Abedrabbo* case, her communications with Glickman, who was representing Abdelrahman and actively pursuing Judge Reali's removal from the case, ran afoul of Jud.Cond.R. 2.9(A). In *Disciplinary Counsel v. Marshall*, 2019-Ohio-670, a common pleas court judge violated Jud.Cond.R. 2.9(A) when he contacted the juvenile court magistrate who was presiding over his daughter's traffic case. *Id*. at ¶ 23, 26.

IV. Jud.Cond.R. 2.11(A)

Respondent's conscious decision to circumvent Sup.Ct.R. 36.019(A) and Cuyahoga C.P., Dom.Rel.Div., Loc.R. 2(B)(2) to ensure that she obtained the *Maron* case required her disqualification, just as it did in *Jardine*. In disqualifying respondent from the *Jardine* case, Chief Justice Kennedy noted that "Judicial assignments 'must be free from the appearance of impropriety'." *Celebrezze*, at ¶ 104, citing *In re Disqualification of Kiger*, 156 Ohio St.3d 1232,

2019-Ohio-851, 125 N.E.3d 960, at ¶ 8, quoting *Brickman & Sons, Inc. v. Natl. City Bank*, 106 Ohio St.3d 30, 2005-Ohio-3559, 830 N.E.2d 1151, ¶ 21. Here, in addition to the actual impropriety in circumventing the rules, respondent's subsequent attempt to appoint Dottore creates an appearance of impropriety and forces the panel to question the genuineness of respondent's alleged concern for Magistrate Parker's health.

V. Prof.Cond.R. 8.4(c)

Under Prof.Cond.R.8.4(c), "It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation." Here, respondent stipulated to two acts of dishonesty: (1) the signing of the false journal entry in *Maron*; and (2) in *Abedrabbo*, mispresenting to her fellow judges that Glickman had filed a *Motion to Continue* on an administrative docket that did not exist. (Stip. No. 70, 111.) In addition, respondent lied to Glickman when she requested a copy of his *Affidavit of Disqualification* against Judge Reali, claiming that Judge Reali had refused to provide her with a copy. However, respondent had never asked Judge Reali for a copy. (Stip. No. 120.)

Respondent's signing of a false journal entry directly implicates her integrity and trustworthiness and lessens the public's confidence in the integrity and impartiality of the judiciary. In *Disciplinary Counsel v. Medley*, 2004-Ohio-6402, Judge William Medley issued a journal entry in a collections matter stating that the debtor "had appeared in open court" and requested an opportunity to answer. *Id.* at ¶ 24. In reality, Judge Medley had spoken to the debtor ex parte in his chambers. *Id.* In finding that Judge Medley's journal entry violated DR-1-102(A)(4), the predecessor to Prof.Cond.R. 8.4(c), the court stated, "This entry conveyed the false impression that [the debtor's] request had been made in a formal court proceeding." *Id.*

The same rationale applies in the instant case. The *Maron* entry conveys to the public—and the parties—that the case was randomly assigned when respondent had manipulated the assignment to ensure it came to her. It is axiomatic that "a court speaks only through its journal…" *State v. Gary*, 117 Ohio App.3d 286, 288 (8th Dist. 1996), citing *State ex rel. Hansen v. Reed* (1992), 63 Ohio St.3d 597, 599, 589 N.E.2d 1324, 1326; *State v. Smelcer* (1993), 89 Ohio App.3d 115, 127, 623 N.E.2d 1219, 1227. Accordingly, to instill public confidence in the integrity of the judicial system, entries must reflect what actually transpired.

> [t]he "rules and orders of the court" clearly provide for a case to be randomly reassigned in the event of disqualification. The random assignment of cases, and the random reassignment in the event of disqualification, has the obvious, commonsensical and beneficial purpose of maintaining the public's confidence in the integrity of the judiciary. This purpose is defeated when cases or motions are assigned, or reassigned, to judges who are handpicked to decide the particular case or motion in question. A system of random assignment is purely objective and is not open to the criticism that business is being assigned to particular judges in accordance with any particular agenda.

In re Disqualification of Celebrezze, 2023-Ohio-4383, ¶ 99, citing *Grutter v. Bollinger*, 16 F.Supp.2d 797, 802 (E.D.Mich.1998).

In the *Abedrabbo* case, respondent's irrational response to Glickman's public records request, coupled with the lies she told to her fellow judges, exposed the lengths she was willing to go to assist Glickman at the expense of the opposing party and to deflect the spotlight from her own transgressions.

VI. Prof.Cond.R. 8.4(d)

"We have interpreted the phrase 'conduct that is prejudicial to the administration of justice,' when disciplining a judge, to be "conduct that would appear to an objective observer to be unjudicial and prejudicial to the public esteem for the judicial office." *Disciplinary Counsel v. Gaul*, 2010-Ohio-4831, ¶ 68. Here, respondent's

manipulation of the assignment process, her signing of a false journal entry in *Maron*, her relentless pursuit of the *Abedrabbo* case, and her false statements to her fellow judges erodes public esteem for the judicial office.

COUNT THREE

False Statements During the Disciplinary Process

When Jason Jardine filed his grievance against respondent, he alleged an improper and sexual relationship between respondent and Dottore, and provided the private investigator's report and video, which relator provided to respondent. In her May 4, 2023 response,[4] respondent misrepresented the true extent of her relationship with Dottore, claiming they were simply "close personal" friends and dismissing the kiss outside Delmonico's as the product of their Italian heritage: "As for the kiss, both the Judge and Mr. Dottore are Italian and have a habit of kissing all family and close friends. The video demonstrates that the was not a romantic kiss." (Joint Ex. 67, p. 3.) She also misrepresented that she "is happily married to Dr. Charles Zonfa..." *Id.*

But we now know those statements were blatantly false. At the time respondent submitted her response, May 4, 2023, she was in love with Dottore. Their relationship had extended well beyond a "close personal" friendship, and the kiss was the product of her "feelings for" Dottore. And contrary to her assertions in her response, her marriage was crumbling. (Stip. No. 127-129.) In addition to respondent's own admission that she made false statements of material fact during the disciplinary investigation (Stip. No. 133), there was ample evidence corroborating the true extent of the relationship between respondent and Dottore.

[4] Respondent made similar representations in her responses to the Maron, Abedrabbo, Rennell, and Anonymous grievances, along with her answer to the Notice of Intent to File, and her response to the *Affidavit of Disqualification*. See Joint Exs. 34; 68; 69; 70; 72.

As late as January 2023, respondent had told her fellow judges that she was "in love" with Dottore and that she had consulted with two lawyers (Joseph Stafford and Scott Rosenthal) about getting a divorce from her husband. (Stip. No. 130, 131.) Furthermore, the video footage from the private investigator illustrated the shocking frequency, duration, and location of their meetings. Finally, the volume, timing, and duration of the phone calls between respondent and Dottore established beyond any doubt that respondent had developed a deep emotional attachment to and romantic feelings for Dottore. From August 12, 2022, to August 18, 2023, respondent and Dottore exchanged 3,304 phone calls totaling 18,479 minutes, or 307.9 hours. On average, they called each other 8.89 times *per day*. On three separate occasions during the one-year period, there were 28 phone calls between respondent and Dottore in a single day. As the chart indicates, there were numerous times when respondent's first and last call of the day was to or from Dottore. (Joint Ex. 89.)[5]

Respondent's misrepresentations to relator were not innocuous inaccuracies. Rather, they were material falsehoods intentionally designed to derail relator's investigation, prevent further inquiry into the relationship, and avoid discipline. In her response to the Jardine LOI, respondent, through counsel, stated:

> Jason and his counsel, Joe Stafford, are losing in court due to their own misdeeds. They are on a mission to destroy the Judge and the Receiver in hopes of finding a way into a court that doesn't demand ethical behavior. This investigation should be closed and Joe Stafford should be referred to CGC for investigation.

(Joint Ex. 67, p. 5.)

[5] Calls in red represent the first and/or last call of the day between respondent and Dottore.

Count Three: Rule Violation

I. Prof.Cond.R. 8.1(a)

In mispresenting the true extent of her relationship with Dottore to relator, respondent violated Prof.Cond.R. 8.1(a) [In connection with a disciplinary matter, a lawyer shall not knowingly make a false state of material fact]. While relator appreciates respondent's last-minute candor, the panel should not overlook the fact that respondent misled relator for almost two years—i.e., from her May 4, 2023 response to Jardine's grievance, through March 2025, when she stipulated to submitting false statements of material fact during the disciplinary process. Along the way, respondent made similar misrepresentations in responses to other LOIs (Joint Ex. 68, Joint Ex. 69, her response to the *Affidavit of Disqualification* (Joint Ex. 34) in *Jardine*, and her response to relator's Notice of Intent to File (Joint Ex. 72.)

COUNT FOUR

The *Rennell* Matter

In May 2022, Judge Tonya Jones and her magistrate, Sharon Echols, recused themselves from a contentious divorce case, *Rennell v. Rennell*, which was scheduled for trial in July 2022. (Stip. No. 137, 138.) Judge Jones sent the case to respondent in her capacity as the Administrative Judge, at which time respondent—again—circumvented Sup.Ct.R. 36.019(A) and Cuyahoga C.P., Dom.Rel.Div., Loc.R. 2(B)(2), and assigned the case directly to herself. (Stip. No. 143.) Two months later, respondent appointed Dottore as the receiver in the *Rennell* case (Stip. No. 145); however, she failed to advise the parties of her relationship with Dottore. (Stip. No. 151.) As stated previously, Chief Justice Kennedy disqualified respondent from the *Jardine* case on August 18, 2023, for creating an appearance of impropriety in sidestepping the random case assignment process. On that same day, respondent recused herself from the *Maron*

case because she had obtained that case in the same manner as the *Jardine* case. Despite knowing that her acquisition of the *Rennell* case created the same appearance of impropriety as it did in *Jardine* and *Maron*, respondent never recused herself from the *Rennell* case. One can assume that respondent elected to retain *Rennell* because she had appointed Dottore to the case.

Count Four: Rule Violations

Respondent stipulated that she committed the same four rule violations while presiding over the *Rennell* matter as she did in the *Jardine* matter in Count One: Jud.Cond.R. 1.2, Jud.Cond.R. 2.5, Jud.Cond.R. 2.11(A), and Prof.Cond.R. 8.4(d).

Aggravation Evidence

In aggravation, the parties stipulated to the following factors:

- A pattern of misconduct

Here, respondent manipulated the random case assignment process to ensure that three different cases—*Jardine*, *Maron*, and *Rennell*—were assigned to her docket. In a fourth case—*Abedrabbo*—respondent pressured Judge Reali, albeit unsuccessfully, to transfer the case directly to her docket. Furthermore, in each of the aforementioned cases, respondent failed to disclose her relationships with Dottore, Rabb, and Glickman to the litigants or their lawyers, thus creating an appearance of impropriety.

- Multiple Offenses

Respondent stipulated to 15 rule violations spanning four counts of misconduct.

- Submission of false statements during the disciplinary process.

Respondent stipulated that she knowingly made a false statement of material fact during the disciplinary investigation regarding her relationship with Dottore, which we now know extended well beyond a "close personal" friendship.

Mitigation Evidence

In mitigation, the parties stipulated that respondent has no previous discipline and positive character evidence. (Stip. No. 158.) In addition, the parties stipulated that respondent displayed a cooperative attitude toward the proceedings as evidenced by her stipulation to all material facts and each of the 15 rule violations.

A note about motive. Because respondent advised relator that she intended to invoke her Fifth Amendment right against self-incrimination and did so at the disciplinary hearing, relator was precluded from exploring her motive during discovery and at the hearing. In *Disciplinary Counsel v Heiland*, 2008-Ohio-91, an attorney invoked his right against self-incrimination during his disciplinary hearing, then claimed the Board was precluded from finding a failure to cooperate based on the invocation of the privilege. *Id.* at ¶ 26. In rejecting Heiland's argument, the court noted that because Heiland was found to have violated seven other rule violations, he was not sanctioned solely for invoking his Fifth Amendment privilege. *Id.* at ¶ 30. Here, relator is not suggesting that respondent's invocation of the privilege constitutes a rule violation; however, because a disciplinary proceeding is neither criminal nor civil (*Id.* at ¶ 32), the panel should consider respondent's invocation of the privilege when it considers motive.

Recommended Sanction

"The primary purposes of judicial discipline are to protect the public, guarantee the evenhanded administration of justice, and maintain and enhance public confidence in the integrity of the judiciary." *Disciplinary Counsel v. O'Neill*, 2004-Ohio-4704, ¶ 33. There is no question that respondent's manipulation of the random case assignment process, her failure to disclose her relationship with Dottore and others, and her dishonesty toward her fellow judges and the disciplinary process have eroded the public's confidence in our judiciary. "A judge who

misrepresents the truth tarnishes the dignity and honor of his or her office" because "[t]ruth and honesty lie at the heart of the judicial system, and judges who conduct themselves in an untruthful manner contradict this most basic ideal." *Id.* at ¶ 27, citing *In re Inquiry Concerning McCormick* (Iowa 2002), 639 N.W.2d 12, 16.

The harm respondent has caused to the reputation of the judiciary cannot be overstated, nor can it be easily erased. As such, relator urges the panel to impose an actual suspension as a first step in restoring the public's faith in our system of justice. "Sanctions serve as a deterrent to similar violations by judicial officers in the future, they notify the public of the self-regulating nature of the legal profession, and they build confidence in the legitimacy and integrity of the judiciary." *Ohio State Bar Assn. v. Winkler*, 2024-Ohio-3141, citing *Disciplinary Counsel v. Horton*, 2019-Ohio-4139, ¶ 60.

While there is no case directly on point, cases in which judges have failed to disclose inappropriate relationships while performing their judicial duties, along with cases in which judges have engaged in dishonest conduct, prove instructive.

On one end of the spectrum are cases in which judges failed to recuse themselves due to inappropriate relationships that impacted their impartiality and created the appearance of impropriety but involved no dishonesty. For example, in *Disciplinary Counsel v. Medley*, 2001-Ohio-1592, the court issued a public reprimand after finding that Judge William Medley escorted a defendant, who had previously appeared in his courtroom, from the police station and drove her home after she had been arrested and booked for OVI. Just before the case was to proceed to trial, the defendant's attorney and the prosecutor learned of Judge Medley's involvement; therefore, they negotiated a plea believing that Judge Medley's involvement required his recusal. Instead, Judge Medley accepted the plea and sentenced the defendant. *Id.* at ¶ 5.

In finding that Judge Medley violated Canon 2 [A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary]; Canon 3(E)(1) [A judge shall disqualify herself in a proceeding in which the judge's impartiality might reasonably be questioned]; and Canon 4 [A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary], the court stated, "The sight or thought of a judge providing a ride home to a person who has just been detained for breaking the law surely gives the impression of bias on the judge's part when it comes time to hear that case. This act also gives an impression of impropriety, in violation of Canon 4 by making it appear that Grate would be subject to special treatment." *Id.* at ¶ 10.

Here, the sight of respondent entering Dottore's residence and place of business, and dining with Dottore and Rabb, created an appearance of bias, just as it did in *Medley*. Moreover, respondent's misconduct dwarfs Judge Medley's. Unlike Judge Medley, respondent manipulated the rules of superintendence and the local court rules to circumvent the random case assignment process in three separate matters, failed to disclose her long-standing relationship with Dottore, lied to relator about the relationship, and lied to her fellow judges about Glickman's role in the *Abedrabbo* matter. Accordingly, respondent deserves a greater sanction than the one meted out in *Medley*.

Similarly, in *Disciplinary Counsel v. Oldfield*, 2014-Ohio-2963, Judge Joy Oldfield left a social event around 1:00 a.m. with Catherine Loya, a public defender who was assigned to her courtroom. On the way to the judge's home, they parked in a parking lot to talk and smoke. An officer approached the car and noticed an odor of alcohol, and asked Loya to perform field sobriety tests; however, she refused. Accordingly, Loya was placed under arrest for OVI. That

evening, and for the next two nights, Loya stayed at Judge Oldfield's home and Judge Oldfield drove Loya to and from court each day. Over the course of 11 days, Judge Oldfield presided over 53 cases in which Loya appeared as counsel of record, until Loya was assigned to a different courtroom. Even though Judge Oldfield had "obtained the permission" of the municipal prosecutor and the public defender, the court found that Judge Oldfield violated Jud.Cond.R. 1.2, 2.11(A), and Prof.Cond.R. 8.4(d).

> Here, the board properly found that Judge Oldfield's impartiality from February 6, 2012, to February 17, 2012, when Loya was assigned to a different courtroom, could have reasonably been questioned. The board observed that her failure to recuse herself created the appearance of impropriety because she argued against Loya's arrest at the scene, because she took Loya into her home for three days and transported her to and from work in her own courtroom, and because she was a potential witness in Loya's criminal case, among other reasons. These facts also support the board's conclusion that Judge Oldfield violated Prof.Cond.R. 8.4(d).

Id. at ¶ 19.

Finding just one aggravating factor—i.e., a pattern of misconduct, the *Oldfield* Court imposed a public reprimand. Here, respondent presents with three aggravating factors, including the submission of false statements during the disciplinary process. Unlike the judge in *Oldfield*, respondent never disclosed her relationship with Dottore, forcing Jardine and Rennell to file *Affidavits of Disqualification*, which respondent challenged by repeating many of the same false statements that she provided in response to relator's inquiries. Compared to the misconduct in *Oldfield*, respondent's conduct was more sinister, greater in volume and length, more prejudicial to the administration of justice, and dishonest; accordingly, a harsher sanction is warranted.

The Supreme Court of Louisiana issued a public censure against a judge who appointed his girlfriend, a certified nurse, over a three-year period to review and summarize medical records in 19 cases, and authorized the payment of $13,860.50 in fees, and $2,321.78 in expenses associated with her attendance at a course to obtain an additional certification. *In re Granier*, 906

So.2d 417 (La. 2005). In issuing the public censure, the court noted that Judge Granier's girlfriend was qualified to do the work, that Judge Granier terminated her employment when the matter was first raised, and that it was "abundantly clear" the judge was "remorseful for any appearance of impropriety that occurred..." *Id.* at 420. Clearly, Judge Granier's conduct paled in comparison to respondent's.

In *Disciplinary Counsel v. Hale*, 2014-Ohio-5053, Judge Harland Hale dismissed his personal attorney's traffic ticket, then created a false journal entry to conceal his actions, stating the dismissal was at the prosecutor's request. *Id.* at ¶ 26. Four months later, upon inquiry from the media, the prosecutor discovered what had transpired, which prompted Judge Hale to engage in two improper ex parte communications and draft another false entry. *Id.* at ¶ 15. Ultimately, Judge Hale vacated the original dismissal and recused himself. Before his disciplinary hearing, Judge Hale resigned from the bench; however, during the hearing, he falsely testified that he had not practiced law since his resignation. *Id.* at ¶ 16. In issuing a six-month actual suspension, the court noted, "We, likewise, acknowledge that false testimony from a member of the Ohio bar is unacceptable under any circumstances—but that it is particularly perverse when it occurs in the course of a disciplinary proceeding." *Id*. at ¶ 39.

Like the judge in *Hale*, respondent engaged in several deceptive practices to cover her tracks. First, in *Jardine*, when Judge Jones recused herself and sent the case to respondent for random reassignment, respondent prevailed upon Judge Jones to issue a Nunc Pro Tunc to circumvent the random reassignment process, making it appear as if it was Judge Jones's idea to assign the case to respondent Second, in *Maron*, respondent directed the assignment commissioner to sidestep the random reassignment process, then signed a false journal entry claiming the case had been randomly assigned to her. Third, in *Abedrabbo*, respondent lied to her

fellow judges while advocating for a continuance on behalf of Glickman and his client. Fourth, and perhaps most disturbing, when questioned about her relationship with Dottore, respondent lied to relator in an attempt to squelch any further inquiry into the relationship and to avoid discipline. Moreover, whereas Judge Hale's misconduct emanated from a single incident, respondent's spanned four different cases and a lengthy disciplinary investigation.

In *Disciplinary Counsel v. Burge*, 2019-Ohio-3205, the court imposed a one-year suspension with six months stayed upon Judge James Burge after finding, among other misconduct including misdemeanor convictions, that he had presided over and assigned cases to lawyers who rented space in a building in which Judge Burge held an ownership interest. *Id*. at ¶ 15. Like respondent, Judge Burge did not recuse himself from any of the cases nor did he disclose the financial arrangements to the prosecutors involved in the assigned cases. *Id.* A major distinguishing factor in *Burge* is that he, like Judge Hale, resigned from the bench, so his conduct was unlikely to reoccur. *Id.* at ¶ 32. Here, we have no such assurances.

In *Disciplinary Counsel v. O'Neill*, 2004-Ohio-4704, the court imposed a two-year suspension with one year stayed upon a judge who, among other things, exhibited a pattern of misrepresentation in her interactions with judges and others. *Id.* at ¶ 23. In two such matters, Judge O'Neill misrepresented to her fellow judges actions that had occurred or not occurred during court proceedings. *Id.* "By misrepresenting events that occurred in court proceedings and in the court itself, respondent failed to treat other judges, litigants, attorneys, and court personnel with courtesy, respect, and honesty and thus undermined public confidence in the integrity of the judicial system." *Id.* at ¶ 27. The court also found that Judge O'Neill submitted false statements during the disciplinary process.

Although Judge O'Neill engaged in far more misconduct than respondent, the *O'Neill* Court held:

> Because the depth and scope of the charges in this case are so unusual, the fashioning of an appropriate sanction for this misconduct is not an easy task; however, respondent's pervasive conduct of misrepresentation in violation of DR 1-102(A)(4) by itself warrants an actual suspension from the practice of law for an appropriate period of time.

Id. at ¶ 52.

The same rationale applies here. Swirling beneath respondent's misconduct is a disturbing willingness to distort the truth to ensure her objectives. For instance, in *Jardine*, respondent misrepresented her relationship with Dottore, even after receiving the private investigator's video evidence of their clandestine encounters. In *Maron*, she signed a false journal entry to hide the fact that she circumvented the rules. In *Abedrabbo*, she fabricated a story in an apparent attempt to help Glickman get the case continued. And for almost two years, she misled relator regarding her relationship with Dottore. In a profession grounded in truth and integrity, there is no place for a dishonest judge.

The Michigan Supreme Court suspended a judge for 12 months[6] after finding that she failed to disclose a romantic relationship with an attorney who she appointed to several cases, then lied about the relationship when confronted by police. *In re Chrzanowski*, 465 Mich. 468, 636 N.W.2d 758 (2001). In or around January 1998, Judge Chrzanowski began a romantic relationship with Michael Fletcher, a local defense attorney. During their relationship, which lasted until August 15, 1999, Judge Chrzanowski appointed Fletcher to 56 cases—55 of which resulted in Fletcher's clients accepting guilty pleas without a prosecutor present. In those cases, Judge Chrzanowski approved $16,000 in fees to Fletcher. In addition to the 56 cases, Fletcher

[6] The court granted Judge Chrzanowski six months credit for time served under an interim suspension.

appeared before the judge on one retained matter, which she dismissed. At no time did Judge Chrzanowski disclose her relationship with Fletcher to the parties. *Id.* at 470, 636 N.W.2d 758, 761. On August 16, 1999, Fletcher shot and killed his wife. Shortly after committing the murder, Fletcher called Judge Chrzanowski and left her a voicemail message. Fletcher and Judge Chrzanowski talked later that day, at which time Fletcher told Judge Chrzanowski "something horrible had happened." The following day, a coworker told Judge Chrzanowski that Fletcher's wife had died by suicide. On August 17, 1999, police officers interviewed respondent at her home. When asked if she had been engaged in an intimate relationship with Fletcher, Judge Chrzanowski admitted to the relationship; however, when questioned about the length of their relationship and whether she had spoken to Fletcher following the incident, Judge Chrzanowski misrepresented that the relationship began in February 1999 and ended in March 1999, and that she had not spoken to Fletcher. Two days later, during a second interview, Judge Chrzanowski admitted to officers that her relationship began in August 1998 and continued sporadically until August 15, 1999. She also admitted that she had spoken to Fletcher following his wife's death.

There are many similarities between Judge Chrzanowski's misconduct and respondent's. First, both failed to disclose their relationships to relevant parties. Second, both failed to recuse themselves from cases in which their impartiality might reasonably be questioned. Third, both approved fees without disclosing the nature of their relationship with the beneficiary of those fees. Fourth, while there was no evidence of actual harm from the appointments, their actions created an appearance of impropriety. Fifth, when confronted, albeit under different circumstances, both misrepresented the scope of their relationships. And sixth, both eventually admitted to their dishonesty.

There are a few distinguishing factors, too. Judge Chrzanowski approved $16,000 in fees, while respondent approved over $240,000 in fees to Dottore in *Jardine* alone. In the case at bar, respondent's misconduct was limited to four cases, as opposed to 56 in *Chrzanowski*. Moreover, while both were dishonest in downplaying the nature and scope of their relationships, Judge Chrzanowski corrected her misstatements within a few days, whereas respondent kept the charade going for almost two years.

As stated previously, there is no case quite like respondent's. But based on the cases cited herein, the appropriate sanction for respondent's misconduct is a one-year suspension with six months stayed on condition that respondent commit no further misconduct.

Conclusion

Thirty years ago, our court stated that an attorney who engages in a course of conduct that violates an ethical rule involving dishonesty, fraud, deceit, or misrepresentation will be actually suspended from the practice of law for a period of time. *Mahoning County Bar Assn. v. Macala*, 2024-Ohio-3158, citing *Disciplinary Counsel v. Fowerbaugh*, 74 Ohio St.3d at 191, 1995-Ohio-261, 658 N.E.2d 237 at ¶ 6. Recently, the *Macala* Court clarified that *Fowerbaugh* is a presumptive sanction that can be tempered in two instances: when the misconduct involves an isolated incident of dishonesty, or there is "an abundance of mitigating evidence" to justify a more lenient sanction. *Id. at* ¶ 24, 25. Here, neither exception applies. Respondent engaged in a pervasive and damaging pattern of dishonesty, and her mitigating factors carry little weight, especially in light of the aggravating factors. Moreover, "Judges are held to higher standards of integrity and ethical conduct than attorneys and other persons not invested with the public trust." *Burge,* supra, 2019-Ohio-3205, ¶ 35 (Kennedy, J. dissenting), citing *O'Neill,* supra, 103 Ohio St.3d 204, 2004-Ohio-4704, 815 N.E.2d 285, ¶ 57, quoting Shaman, Lubet & Alfini, *Judicial*

Conduct and Ethics, Section 1.01, at 1 (3d Ed.2000). Without question, respondent must serve an actual suspension. We cannot expect the public to trust the judiciary if we do not sufficiently sanction members of the judiciary who violate the public trust. Accordingly, relator urges the panel to recommend a one-year suspension with six months stayed on condition that respondent commit no further misconduct.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Relator's Post-Hearing Brief was served on respondent's counsel, Monica A. Sansalone and Matthew T. Norman, by electronic mail at msansalone@gallaghersharp.com and mnorman@gallaghersharp.com, on this 2nd day of May 2025.

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