

RECEIVED

JUL 05 2016

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

BOARD OF PROFESSIONAL CONDUCT

In re: Complaint Against
JOSEPH DUES REED
(Attorney Registration No. 0025938)
202 N. Harding Rd.
Columbus, Ohio 43209

RESPONDENT,

by

COLUMBUS BAR ASSOCIATION
175 South Third Street, Suite 1100
Columbus, Ohio 43215

RELATOR.

Case No. ~~16-028~~

FILED

JUL 29 2016

**COMPLAINT AND
CERTIFICATE**

BOARD OF PROFESSIONAL CONDUCT

(Rule V of the Supreme Court
Rules for the Government of the
Bar of Ohio)

Now comes Relator, Columbus Bar Association, and alleges that Joseph Dues Reed (Reg. #0025938), an Attorney at Law duly admitted to practice law in this state of Ohio, is guilty of the following misconduct:

BACKGROUND

1. Respondent, Joseph Dues Reed, was admitted to the practice of law in Ohio in 1983.
2. Respondent has been disciplined by the Supreme Court of Ohio on two previous occasions.
3. On February 9, 2000, respondent was suspended from the practice of law for six months with the entire suspension stayed, for engaging in conduct adversely reflecting on his fitness to practice law, neglecting an entrusted legal matter, failing to seek the lawful objectives of his client, and failing to carry out a

contract of employment. *Columbus Bar Assn. v. Reed* (2000), 88 Ohio St.3d 48, 723 N.E.2d 568.

4. On July 11, 2006, respondent was suspended for failing to comply with Gov.Bar R.X, continuing legal education. *In re Reed*, CLE-2005-25938, 07/11/2006 Case Announcements, 2006-Ohio-3546.
5. On August 1, 2006, respondent was reinstated to the practice of law. *In re Reed*, 110 Ohio St.3d 1432, 2006-Ohio-3902, 852 N.E.2d 182.
6. On December 10, 2015, respondent was again suspended for noncompliance with his continuing legal education requirements. *In re Reed*, 144 Ohio St.3d 1418, 1421, 2015-Ohio-5126, 41 N.E.3d 1256.
7. Respondent was served with the December 10, 2015 notice of suspension and sanction order on or before December 16, 2015.
8. Respondent has not been reinstated to the practice of law from the December 10, 2015 CLE suspension.
9. Respondent was disciplined a second time on March 8, 2016. Respondent was suspended from the practice of law for two years with the final 18 months stayed in favor of monitored probation upon reinstatement from the suspension. The court found that respondent failed to provide competent representation and failed to respond to a request for information by a disciplinary authority during an investigation. *Columbus Bar Assn. v. Reed*, Slip Opinion No. 2016-Ohio-834.
10. Respondent has not been reinstated to the practice of law from the March 8, 2016 disciplinary suspension.

COUNT ONE – MELITA BRIGGS

11. Beginning on or about August 14, 2015, respondent represented Melita Briggs in the matter known as *State v. Briggs*, Franklin County Court of Common Pleas, Case No. 15 CR 3433.
12. The aforementioned *Briggs* case originated with an indictment filed on July 15, 2015.
13. Briggs was indicted on four felony counts of aggravated vehicular homicide, two felony counts of aggravated vehicular assault, and one count of OMVI.
14. Respondent represented Briggs and appeared on her behalf at plea and pre-trial hearings in August and November 2015.
15. *State v. Briggs* was originally set for trial on November 18, 2015.
16. Respondent appeared in court on November 18, 2015 and signed an agreed entry of continuance.
17. The *State v. Briggs* trial was rescheduled for January 20, 2016.
18. Thereafter and notwithstanding the fact that he had been suspended from the practice of law on December 10, 2015, respondent did not withdraw from the *Briggs* case, nor did he notify his client or the court that he had been suspended.
19. On January 20, 2016 and after his license to practice law was suspended, respondent appeared in the Franklin County Court of Common Pleas (Hon. Richard A. Frye) on behalf of Melita A. Briggs.

20. Judge Frye convened a hearing on the record in *State v. Briggs* on January 20, 2016.
21. Prior to the start of the hearing, respondent asked Judge Frye to “continue” the trial.
22. During the hearing, respondent falsely told Judge Frye that he had “completed all the [CLE] delinquencies and [reapplied] and anticipate being re-admitted by the end of the month or the beginning of February[.]”
23. As of January 20, 2016, respondent had not completed any continuing education hours toward his deficiency, nor had respondent applied to be reinstated to the practice of law.
24. Because of respondent’s suspension from the practice of law and his failure to advise his client of same so that she could hire other counsel or request a continuance in advance of the January 20, 2016 trial date, Briggs had to “waive” her right to a speedy trial.
25. When the January 20, 2016 hearing reconvened after a recess, Briggs learned from Judge Frye and for the first time, more than 30 days after the court’s order of suspension, that her lawyer, respondent, was currently suspended from the practice of law.
26. As set forth in Count One, respondent has violated the following Ohio Rules of Professional Conduct:
 - 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);

- 1.4(a)(3) (a lawyer shall keep the client reasonably informed about the status of the matter);
- 1.16(a)(1) (a lawyer shall withdraw from the representation of a client when the representation will result in violation of the Ohio Rules of Professional Conduct or other law);
- 1.16(d) (as part of the termination of representation, a lawyer shall take steps, to the extent reasonably practicable to protect s client’s interest, to include: giving due notice to the client, allowing reasonable time for employment of other counsel, delivering to the client all papers and property to which the client is entitled, and complying with applicable laws and rules);
- 3.3(a)(1) (a lawyer shall not knowingly make a false statement of fact to a tribunal);
- 5.5(a) (a lawyer shall not practice law in a jurisdiction in violation of the regulation of the legal professional in that jurisdiction);
- 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation);
- 8.4(d) (it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice); and,
- 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer’s fitness to practice law).

COUNT TWO – JASUAN ANDERSON AND FEYTIASA ANDERSON

27. On or about April 19, 2015, Feytiasa Anderson (“Feytiasa”) was looking for an attorney to represent her son, JaSuan Anderson (“JaSuan”), in criminal matters that were pending in Franklin County, Ohio.
28. Feytiasa had been referred to respondent as a possible attorney for JaSuan.
29. Respondent met with Feytiasa at his office on April 20, 2015.
30. During the April 20, 2015 meeting, respondent told Feytiasa that he would be able to get JaSuan’s bond “reduced” and claimed that JaSuan would “be home” the “next day.”
31. Feytiasa hired respondent to represent JaSuan on April 20, 2015.
32. Feytiasa and respondent signed a fee agreement.
33. Feytiasa paid respondent \$1,500 to represent JaSuan.
34. Pursuant to the fee agreement, respondent agreed to represent JaSuan in all of the cases that had been filed against him.
35. Shortly after he was hired, respondent appeared at a court hearing on JaSuan’s behalf.
36. JaSuan’s bond was not lowered at that hearing – it was increased.
37. Feytiasa repeatedly attempted to contact respondent to learn about her son’s case, his bond amount, and to learn what was going to happen next.
38. Respondent was nearly unresponsive to Feytiasa’s requests for information.
39. Respondent did not appear at any other court proceedings for JaSuan.

40. After receiving payment on April 20, 2015, respondent only minimally communicated with JaSuan and Feytiasa.
41. Because she was unable to communicate with respondent and unable to obtain JaSuan's file from respondent, Feytiasa hired a different attorney for JaSuan.
42. Respondent has not returned any of the fees paid by Feytiasa.
43. Feytiasa filed a grievance with relator's office against respondent on May 26, 2015.
44. On June 1, 2015, relator mailed its first letter of inquiry to respondent regarding Feytiasa's grievance.
45. Respondent did not respond to relator's first letter of inquiry.
46. On June 16, 2015, relator mailed, via certified mail, return receipt requested, a second letter of inquiry to respondent.
47. Per the USPS certified return receipt, respondent received the second letter of inquiry on June 18, 2015.
48. Respondent did not respond to relator's second letter of inquiry.
49. As set forth in Count Two, respondent has violated the following Ohio Rules of Professional Conduct:
 - 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);
 - 1.16(d) (as part of the termination of representation, a lawyer shall take steps, to the extent reasonably practicable to protect a client's interest, to include:

giving due notice to the client, allowing reasonable time for employment of other counsel, delivering to the client all papers and property to which the client is entitled, and complying with applicable laws and rules);

- 1.16(e) (a lawyer who withdraws from employment shall refund promptly any part of a fee paid in advance that has not been earned);
- 8.1(b) (a lawyer shall not, in response to a demand for information from an admissions or disciplinary authority, fail to disclose a material fact or knowingly fail to respond);
- 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); and,
- 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer's fitness to practice law).

50. As set forth in Count Two herein, respondent has violated the Rules for the Government of the Bar of Ohio, to wit: Gov.Bar R.V(9)(G) (No attorney shall neglect or refuse to assist or testify in an investigation or hearing.)

COUNT THREE – JESSICA FOSTER AND CORINTHIA FOSTER

51. In July, 2015, Corinthia Foster (“Corinthia”) sought to hire an attorney to represent her sister, Jessica Foster (“Jessica”) in a serious criminal matter that was pending in Franklin County, Ohio.

52. Jessica had been charged with felonies including murder and aggravated robbery.

53. Jessica was referred to respondent by one of respondent's former clients.
54. On July 9, 2015, Corinthia hired respondent to represent Jessica.
55. Corinthia and respondent signed a fee agreement.
56. Corinthia paid respondent a total of \$3,660 in several installments.
57. After hiring respondent, Corinthia repeatedly attempted to contact respondent about Jessica's case.
58. Respondent was only responsive to calls or text messages if Corinthia offered to pay an additional installment toward respondent's fee.
59. Respondent appeared at Jessica's pre-trial hearings on August 3, 2015, October 19, 2015, and December 1, 2015.
60. At least three of the installment fee payments made by Corinthia were accepted by respondent after his license to practice law was suspended, to wit, a few days before Christmas 2015 and on January 6 and January 18, 2016.
61. At no time did respondent tell Corinthia or Jessica that his license to practice law had been suspended on December 10, 2015.
62. Without telling Jessica, Corinthia, or the court in advance, respondent did not appear at a hearing in Jessica's case that was scheduled for February 3, 2016.
63. To the best of Corinthia's knowledge, other than appearing at the pre-trial hearings and visiting Jessica briefly in jail, respondent did no other legal work for Jessica.

64. After respondent failed to appear at the February 2016 pre-trial hearing, the court appointed different counsel to represent Jessica.
65. Respondent has not returned any fees to Corinthia.
66. On February 1, 2016, Corinthia filed a grievance with relator's office against respondent.
67. On February 2, 2016, relator sent respondent a letter of inquiry regarding Corinthia's grievance.
68. Respondent has not answered relator's request for a response.
69. As set forth in Count Three, respondent has violated the following Ohio Rules of Professional Conduct:
 - 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);
 - 1.4(a)(2) (a lawyer shall consult with the client about the means by which the client's objectives are to be accomplished);
 - 1.4(a)(3) (a lawyer shall keep the client reasonably informed about the status of the matter);
 - 1.4(a)(4) (a lawyer shall comply as soon as practicable with reasonable requests for information from the client);
 - 1.4(b) (a lawyer shall explain a matter to the extent reasonable necessary to permit the client to make informed decisions regarding the representation);

- 1.16(a)(1) (a lawyer shall withdraw from the representation of a client when the representation will result in violation of the Ohio Rules of Professional Conduct or other law);
- 1.16(d) (as part of the termination of representation, a lawyer shall take steps, to the extent reasonably practicable to protect a client's interest, to include: giving due notice to the client, allowing reasonable time for employment of other counsel, delivering to the client all papers and property to which the client is entitled, and complying with applicable laws and rules);
- 1.16(e) (a lawyer who withdraws from employment shall refund promptly any part of a fee paid in advance that has not been earned);
- 5.5(a) (a lawyer shall not practice law in a jurisdiction in violation of the regulation of the legal professional in that jurisdiction);
- 8.1(b) (a lawyer shall not, in response to a demand for information from an admissions or disciplinary authority, fail to disclose a material fact or knowingly fail to respond);
- 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); and,
- 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer's fitness to practice law).

70. As set forth in Count Three herein, respondent has violated the Rules for the Government of the Bar of Ohio, to wit: Gov. Bar R.V(9)(G) (No attorney shall neglect or refuse to assist or testify in an investigation or hearing.)

COUNT FOUR – DUANE HILL AND MELINDA MARSHALL

71. On October 12, 2015, respondent filed a notice of appearance on behalf of Duane Hill (“Duane”) in *State v. Hill*, Franklin County Court of Common Pleas, Case No. 15 CR 4144.
72. According to the grievance that Duane filed against respondent, Duane hired respondent to represent him on November 8, 2015.
73. Melinda Marshall (“Melinda”) is Duane’s girlfriend.
74. Respondent informed Melinda it would cost \$2,500 for him to represent Duane.
75. Duane signed a fee agreement with respondent.
76. Respondent did not provide a copy of the fee agreement to Melinda or Duane.
77. Melinda paid respondent a total of \$2,000 in several installments.
78. When Duane first hired respondent, respondent made many promises about how he would handle Duane’s case.
79. Respondent told Melinda that he had “a witness” who would be helpful in Duane’s defense.
80. Respondent never told Melinda the name of the witness, and she believes that the witness was never mentioned to the prosecutor.
81. Respondent stated he would contact the mother of Duane’s child and ask her to complete an affidavit.

82. Respondent never drafted, completed, or participated in executing an affidavit for the mother.
83. To the best of Melinda's knowledge, respondent visited Duane at the jail a total of three times.
84. Respondent appeared at Duane's hearing on December 9, 2015.
85. After Melinda hired respondent, she tried on numerous occasions to ask him questions about Duane's case.
86. The only times respondent would respond to Melinda's messages was when Melinda offered to pay him additional money.
87. At no time did respondent tell Melinda that his license to practice law was suspended as of December 10, 2015.
88. To the best of Melinda's knowledge, respondent never told Duane that his license to practice law had been suspended.
89. One of the installment fee payments made by Melinda was accepted by respondent after his license to practice law was suspended, to wit, on December 14, 2015.
90. The last communication Melinda had with respondent was on December 22, 2015, when respondent told her again that he would send a statement to the mother of Duane's child.
91. Respondent never returned any of the money Melinda paid him for attorney fees.

92. Duane's successor attorney, Mark Hunt, has been unable to communicate with or obtain files from respondent.
93. Melinda and Duane both filed grievances with relator's office against respondent.
94. On January 12, 2016, relator mailed its first letter of inquiry to respondent regarding Melinda's grievance.
95. Respondent did not respond to relator's first letter of inquiry.
96. On January 26, 2016, relator mailed, via certified mail, return receipt requested, a second letter of inquiry to respondent.
97. Per USPS, respondent received the second letter of inquiry on January 27, 2016.
98. Respondent did not respond to relator's second letter of inquiry.
99. On January 14, 2016, Duane filed a grievance with relator's office against respondent.
100. On January 19, 2016, relator mailed its first letter of inquiry to respondent regarding Duane's grievance.
101. Respondent did not respond to relator's first letter of inquiry.
102. On February 1, 2016, relator mailed, via certified mail, return receipt requested, a second letter of inquiry to respondent.
103. Per USPS, respondent received the second letter of inquiry on February 3, 2016.
104. Respondent did not respond to the second letter of inquiry.
105. As set forth in Count Four, respondent has violated the following Ohio Rules of Professional Conduct:

- 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);
- 1.16(a)(1) (a lawyer shall withdraw from the representation of a client when the representation will result in violation of the Ohio Rules of Professional Conduct or other law);
- 1.16(d) (as part of the termination of representation, a lawyer shall take steps, to the extent reasonably practicable to protect a client's interest, to include: giving due notice to the client, allowing reasonable time for employment of other counsel, delivering to the client all papers and property to which the client is entitled, and complying with applicable laws and rules);
- 1.16(e) (a lawyer who withdraws from employment shall refund promptly any part of a fee paid in advance that has not been earned);
- 5.5(a) (a lawyer shall not practice law in a jurisdiction in violation of the regulation of the legal professional in that jurisdiction);
- 8.1(b) (a lawyer shall not, in response to a demand for information from an admissions or disciplinary authority, fail to disclose a material fact or knowingly fail to respond);
- 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); and,
- 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer's fitness to practice law).

106. As set forth in Count Four herein, respondent has violated the Rules for the Government of the Bar of Ohio, to wit: Gov. Bar R.V(9)(G) (No attorney shall neglect or refuse to assist or testify in an investigation or hearing.)

COUNT FIVE – LUISA GUZMAN AND OSCAR COLLADO

107. In January 2016, Luisa Guzman (“Luisa”) wanted to hire an attorney to represent her boyfriend, Oscar Collado (“Oscar”), in a criminal matter that was pending in Franklin County, Ohio.
108. Luisa was referred to respondent by a friend.
109. On January 11, 2016, Luisa hired respondent to represent Oscar.
110. At no time did respondent tell Luisa that his license to practice law had been suspended on December 10, 2015.
111. Beginning on or about January 11, 2016, Luisa paid respondent a total of \$7,500 in several installments to represent Oscar.
112. Luisa obtained a loan in order to pay respondent’s fees.
113. Shortly after he was “hired” by Luisa, respondent attempted to obtain a Power of Attorney from Oscar in order to enable Luisa to conduct business for Oscar.
114. After respondent gave Luisa the alleged Power of Attorney, Luisa discovered that it had not been properly executed and was invalid.
115. Luisa attempted to contact respondent on numerous occasions.

116. Respondent only responded to messages from Luisa if and when she was setting up a time for her to pay him more money.
117. Respondent promised to file various motions on Oscar's behalf, to get Oscar out of jail, and to "fix it" so the "FBI and the DEA would not bother him anymore."
118. Respondent was scheduled to appear in court for Oscar on February 2, 2016, but sent Luisa a text message shortly before the hearing claiming that his "daughter was sick."
119. During a mid-February text message exchange, respondent promised to give Luisa a refund.
120. Respondent has not returned any fees to Luisa.
121. As set forth in Count Five, respondent has violated the following Ohio Rules of Professional Conduct:
 - 1.1 (a lawyer shall provide competent representation to a client);
 - 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);
 - 1.16(a)(1) (a lawyer shall withdraw from the representation of a client when the representation will result in violation of the Ohio Rules of Professional Conduct or other law);
 - 1.16(e) (a lawyer who withdraws from employment shall refund promptly any part of a fee paid in advance that has not been earned);

- 5.5(a) (a lawyer shall not practice law in a jurisdiction in violation of the regulation of the legal professional in that jurisdiction);
- 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); and,
- 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer's fitness to practice law).

COUNT SIX – JEFFREY S. HOCHRADEL

122. Approximately five years ago, Jeffrey S. Hochradel (“Jeffrey”) hired respondent to represent his son Michael Hochradel (“Michael”) in a criminal matter that was pending in Licking County, Ohio.
123. Michael was 18 years old at the time Jeffrey first hired respondent.
124. After Michael’s case was completed, respondent told Jeffrey that if Michael did everything he was supposed to do, the Hochradels could hire respondent to ask the court to have Michael’s criminal record expunged.
125. In October 2015, Jeffrey contacted respondent and asked him to file for an expungement for Michael.
126. On October 18, 2015, Jeffrey and his wife, Teresa, met with respondent.
127. During that meeting, respondent told them he was working on a murder case in Chillicothe, Ohio and he could start working on Michael’s expungement on or about October 27, 2015.

128. Respondent told Jeffrey that he would need to pay him \$550 for his fee and filing costs.
129. Jeffrey paid respondent \$550 on October 18, 2015 to represent Michael and to file for his expungement.
130. After two weeks with no communication from respondent, Jeffrey began calling and texting him.
131. Respondent did not respond to any of Jeffrey's requests for information.
132. At no time did respondent tell Jeffrey that his license to practice law was suspended as of December 10, 2015.
133. To the best of Jeffrey's knowledge, respondent never did any legal work for Michael after receiving the \$550 payment.
134. Respondent has not returned any fees to Jeffrey.
135. Jeffrey filed a grievance with relator's office against respondent on December 23, 2015.
136. On January 20, 2016, relator mailed its first letter of inquiry to respondent regarding Jeffrey's grievance.
137. Respondent did not respond to relator's first letter of inquiry.
138. On February 1, 2016, relator mailed, via certified mail, return receipt requested, a second letter of inquiry.
139. Relator did not receive proof from USPS that the letter had been delivered; however, the letter was not returned to relator's office.

140. Respondent did not respond to relator's second letter of inquiry.
141. As set forth in Count Six, respondent has violated the following Ohio Rules of Professional Conduct:
- 1.3 (a lawyer shall act with reasonable diligence and promptness in representing a client);
 - 1.16(e) (a lawyer who withdraws from employment shall refund promptly any part of a fee paid in advance that has not been earned);
 - 8.1(b) (a lawyer shall not, in response to a demand for information from an admissions or disciplinary authority, fail to disclose a material fact or knowingly fail to respond);
 - 8.4(c) (it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation); and,
 - 8.4(h) (it is professional misconduct for a lawyer to engage in any other conduct that adversely reflects on the lawyer's fitness to practice law).
142. As set forth in Count Six herein, respondent has violated the Rules for the Government of the Bar of Ohio, to wit: Gov. Bar R.V(9)(G) (No attorney shall neglect or refuse to assist or testify in an investigation or hearing.)

RESTITUTION

143. Relator believes that respondent owes some or all of the following amounts as restitution:

- Feytiasa Anderson - \$1,500;
- Corinthia Foster - \$3,660;
- Melinda Marshall - \$2,000;
- Luisa Guzman - \$7,500;
- Jeffrey S. Hochradel - \$550; and,
- Melita Briggs – despite relator’s best efforts, relator was unable to determine the amount Melita paid respondent for his legal services.

WHEREFORE, relator submits that respondent, Joseph D. Reed, should be found in violation of these Rules of Professional Conduct and be sanctioned appropriately.

Respectfully submitted,

Jeffrey C. Rogers (by LB 0040142)

Jeffrey C. Rogers (0069399)
Franklin County Prosecuting Attorney
373 E. High Street, 14th Floor
Columbus, Ohio 43215
(614) 525-6339
jrogers1@franklincountyohio.gov (e-mail)

Lori J. Brown

Lori J. Brown (0040142)
Columbus Bar Association
175 South Third Street, Suite 1100
Columbus, Ohio 43215
(614) 340-2053 / (614) 221-4850 (fax)
lori@cbalaw.org (e-mail)

A. Alysha Clous (by LB 0040142)

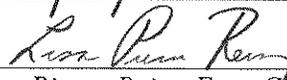
A. Alysha Clous (0070627)
Columbus Bar Association
175 South Third Street, Suite 1100
Columbus, Ohio 43215
(614) 340-2034 / (614) 221-4850 (fax)
alysha@cbalaw.org (e-mail)

CO-COUNSEL FOR RELATOR

CERTIFICATE

The undersigned Chairperson of the Certified Grievance Committee of the Columbus Bar Association hereby certifies that Jeffrey C. Rogers, Esq., Lori J. Brown, Esq., and A. Alysha Clous, Esq., are duly authorized to represent Relator in the premises and have accepted the responsibility of prosecuting the complaint to its conclusion. After investigation, Relator believes reasonable cause exists to warrant a hearing on such complaint.

Dated: 6/22/16

Signed: 
Lisa Pierce Reisz, Esq., Chairperson
Certified Grievance Committee,
Columbus Bar Association