

TO: OFFICE OF DISCIPLINARY COUNSEL  
THE SUPREME COURT OF OHIO  
Scott J. Drexel, Disciplinary Counsel  
250 Civic Center Drive, Suite 325  
Columbus, Ohio 43215-7411  
(614)461-0256  
1-800-589-5256  
(614)461-7205 FAX

April 6, 2016

FROM: Clifton A. Jackson #A652-163  
Lake Erie Correctional Inst.  
501 Thompson Road  
P.O. Box 8000  
Coneaut, Ohio 44030 [Certified Mail #70142120000321667776]

RE: State of Ohio vs. Clifton A. Jackson, Lorain County Case No.  
11CR083104; Court of Appeals Case No. 14CA010555:

ATTN: Counsel Drexel,

Enclosed, please locate the following grievance forms on my complaints of ethical misconduct against attorneys and judges as named and listed below:

1. Dennis P. Will, Lorain County Prosecutor, The Justice Center, 3rd Flr. 225 Court Street, Elyria, Ohio 44035 - (440)329-5389.
2. Mary Slanczka, Lorain County Assistant Prosecutor, The Justice Center, 3rd Flr. 225 Court Street, Elyria, Ohio 44035 - (440)329-5552.
3. Jennifer M. Riedthaler, Lorain County Assistant Prosecutor, The Justice Center, 3rd Flr. 225 Court Street, Elyria, Ohio 44035 - (440)329-5575.
4. Peter J. Gauthier, Lorain County Assistant Prosecutor, The Justice Center, 3rd Flr. 225 Court Street, Elyria, Ohio 44035 - (440)329-5389.
5. Laura Ann Dezort, Lorain County Assistant Prosecutor, The Justice Center, 3rd Flr. 225 Court Street, Elyria, Ohio 44035 - (440)329-5389.
6. Jack W. Bradley, Attorney At Law, 520 Broadway, 3rd Floor, Lorain, Ohio 44052 - (440)244-1811.
7. Mark A. Aufdenkampe, Attorney At Law [Court Appointed], 33399 Walker Road, Suite A, Avon Lake, Ohio 44012 - (440)653-5275.
8. Paul A. Griffin, Attorney At Law [Court Appointed on Appeal], 6000 Broadway, 2nd Floor, Lorain, Ohio 44052 - (440)245-5565.
9. Paul A. Mancino, Jr., Attorney At Law, 75 Public Square, Suite 1016, Cleveland, Ohio 44113-2098 - (216)621-1742.
10. Edward Zaleski, Judge [Retired], The Justice Center, 7th Floor, 225 Court Street, Elyria, Ohio 44035 - (440)329-5560.

11. John R. Miraldi, Judge Common Pleas Court, Lorain County, The Justice Center, 7th Floor, 225 Court Street, Elyria, Ohio 44035 - (440)329-5560.

Also attached, please locate Clifton A. Jackson's Affidavit, Appendix of Exhibits which are numbered Roman numeral (1-63), and the (supported documents, DVD & CD) Appendix pages, which are 1-665.

As you'll notice, although the Affidavit is in support of my App.R. 26(B) Motion filed. If you pay immediate attention to the headers of the Affidavit and Exhibit pages, its clearly stated the Affidavit is in support of the App.R. 26(B) Motion, not limited too.

The Affidavit etc., attached is consistant to one truth, and the not limited too also includes these Grievance Forms against the above-listed attorneys and judges for ethical misconduct.

Thank you for your understanding in advance.

Respectfully submitted,

Clifton A. Jackson

Clifton A. Jackson #A652-163



Deborah Silvasy  
Notary Public, State of Ohio  
Recorded in Ashtabula County  
My Commission Expires  
March 26, 2019

OFFICE OF DISCIPLINARY COUNSEL  
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INSTRUCTIONS

The Office of Disciplinary Counsel investigates allegations of ethical misconduct against attorneys and judges. Disciplinary Counsel also investigates grievances regarding the unauthorized practice of law. Please understand that this office has no jurisdiction over and will not become involved in the legal merits of any case. The attorney disciplinary process will not affect or change court decisions made in your case. In addition, Disciplinary Counsel may not give you legal advice.

This form will assist you in filing your grievance. After you **have legibly completed the form and signed and dated the form**, please return it in the envelope provided. You may attach additional sheets of paper, if necessary, in order to complete the "Facts of the Grievance" portion of the form. If you wish to file a grievance against more than one attorney or judge, please use one form per attorney or judge. You may make additional copies of the form. You may enclose all forms in one envelope.

If you include documentation with your grievance, send **copies only**. **PLEASE DO NOT SEND ORIGINALS.**

The Rules of the Supreme Court of Ohio require that investigations be confidential. You are requested to keep confidential the fact that you are filing this grievance. Only the attorney/judge against whom you are filing your grievance may waive confidentiality. In filing a grievance against your attorney, you are waiving your attorney-client privilege.

The attorney/judge against whom you are filing your grievance will receive notice of your grievance. Those individuals are also entitled to receive a copy of your grievance and **may** be asked to respond to your allegations. Your grievance may result in your attorney withdrawing from your case. Disciplinary Counsel cannot prevent an attorney from withdrawing from representation.

Once received, it may take up to ninety (90) days for us to review and respond to your grievance. However, you will be contacted by mail within that time period to advise you whether your grievance will be investigated or dismissed. You may or may not be contacted by mail or telephone to provide additional information. This office will respond to inquiries **only** from the person(s) who complete(s) the form (is/are named as Grievant(s) under the "Your Name" portion of the form).

The Grievance Process

A grievance sent to the Disciplinary Counsel of the Supreme Court of Ohio or to a local bar association's certified grievance committee will be reviewed to determine whether the grievance alleges a violation of the Ohio Rules of Professional Conduct and/or Code of Judicial Conduct. If there is evidence that supports the allegation of a violation, the grievance will be investigated. Following the investigation, if substantial, credible evidence is found that a violation has occurred, a formal complaint may be filed with the Board of Professional Conduct of The Supreme Court of Ohio. A three-member panel of the Board will review the complaint and determine whether probable cause exists to certify it. If the complaint is certified by the Board, a hearing may be held before a different three-member panel of the Board. The panel considers the evidence and makes a recommendation to the full members of the Board. The full Board then makes a recommendation to the Supreme Court of Ohio. The Court has final say on whether to discipline an attorney or judge and what sanction should be administered. A grievance is confidential until the Board certifies it as a formal complaint. A grievance or complaint can be dismissed at any point in the process.

Grievance Form

YOUR NAME: Jackson, Clifton A.  
Last First MI Phone No.

PERMANENT ADDRESS: Lake Erie Correctional Institution, 501 Thompson Road, P.O. Box 8000  
Street

Conneaut, Ashtabula Ohio 44030  
City County State Zip Code

**ABOUT WHOM ARE YOU COMPLAINING ?**

(Please circle) (ATTORNEY) or JUDGE

NAME: Will, Dennis P. (440) 329-5389  
Last First MI Phone No.

ADDRESS: The Justice Center, 3rd Floor, 225 Court Street  
Street

Elyria, Lorain, Ohio 44035  
City County State Zip Code

Have you filed this grievance with any other agency or bar association?  Yes  No

If yes, provide name of that agency and date of filing: n/a date: n/a

Did you receive a response?:  Yes  No IF YES, PLEASE ATTACH A COPY

Did this attorney represent you?  Yes  No Type of case: n/a

Date the attorney was hired:  n/a  Does s/he still represent you?:  n/a  Yes  n/a  No  
Did you pay the attorney a fee/retainer?  n/a  Yes  n/a  No If yes, how much?:  n/a   
Did you sign a written fee agreement/contract?  n/a  Yes  n/a  No IF YES, PLEASE ATTACH A COPY  
Has the attorney sued you for fees?  n/a  Yes  n/a  No  
Have you brought civil or criminal court action against this attorney or judge?   Yes  x  No  
If yes, provide name of court and case number  n/a   
Result of court action:  n/a

Name and contact information for attorney currently representing you, if different than attorney about whom you are complaining:  
 Pro Se

Does this grievance involve a case that is still pending before a court?  x  Yes   No  
If yes, provide name of court and case number:  Ninth Appellate District, Case No. 14CA010555, App.R.26(B)   
What action or resolution are you seeking from this office?  Sanctions

**WITNESSES:**

List the name, address, and daytime telephone number of persons who can provide information, IF NECESSARY, in support of your grievance.

<u>NAME</u>	<u>ADDRESS</u>	<u>PHONE NO.</u>
<u>Amber Pawlak,</u>	<u>Buffalo, New York</u>	<u></u>
<u>Frank Letempio Jr., Esq, LETEMPPIO P.C. LAW GROUP,</u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>

**FACTS OF THE GRIEVANCE**

Briefly explain the facts of your grievance in chronological order, including dates and a description of the conduct committed by this legal professional. Attach COPIES (DO NOT SEND ORIGINALS) of any correspondence and documents that support your grievance.

On or about August of 2011, even though Lorain County Prosecutor "Dennis P. Will" knew or should have known that the testimony being provided by Troopers "Christopher Beyer" and "Michael Trader" before the Grand Jury, was in fact false/perjured testimony as to the event which occurred on June 14th, 2011. That the evidence was illegally obtained in violation of the Fourth Amendment [Fruit of the Poisonous Tree Doctrine], said Prosecutor still obtained an indictment which was assigned Case No. 11CR083104, when the Grand Jury was misled. Said Prosecutor also directly or indirectly withheld evidence favorable to

my defense "Brady Material" not limited to a recording of Trooper Michael Trader's body mic and his cruiser's audio & Video of June 14th, 2011. See Affidavit in Support of Clifton Jackson's Grievance Form; See also Exhibits "A", "C" and "D" attached to said Affidavit's Appendix of Exhibits. The conduct of the Lorain County Prosecutor Dennis P. Will, deprived me of my right to a fair trial, and violated Ohio Rules of Professional Conduct [Prof.Cond. R.], Prof.Cond.R. 1.1; 1.2(a)(c)(d)&(e); 1.3; 1.4(a)(1)(2)(3)(4)(5), (B) & (C); 2.1; 3.4(a)(b)(d)&(e); 3.8(a)(b)(c)&(d); 4.1(A)&(B); 5.1(C)(1)&(2); 8.3(A)&(B); 8.4(a)(b)(c)(d)(e)(f)(g)&(h); Ohio Supreme Court Rules for the Government of the Bar [Gov.Bar.R.], Gov.Bar.R. 1, Section 1(d)&(f); Gov.Bar.R. 3, Sections 3(A), (B)(1)&(2), (C)&(D); Gov.Bar.R. 4, Sections 1 & 2; and Gov.Jud.R. 1, Sections 1 & 2.

The Rules of the Supreme Court of Ohio require that investigations be confidential. Please keep confidential the fact that you are submitting this grievance. The party you are filing your grievance against will receive notice of your grievance and may receive a copy of your grievance and be asked to respond to your allegations.

Clifton A. Jackson  
Signature

April 7<sup>th</sup>, 2016  
Date