

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

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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 (LaECI), 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: Zaleski, Edward (440) 329-5560
Last First MI Phone No.
ADDRESS: The Justice Center, 7th 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?: n/a Yes n/a 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>;</u> | <u></u> |
| <u>Frank Letempio Jr., Esq. LETEMPIO 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 June 4th, 2012, the Honorable Judge - Edward Zaleski resided over the Suppression Hearing in State v. Jackson, Case No. 11CR083104, and the hearing did not conclude that day.

On or about August 14th, 2012, the Honorable Judge - Edward Zaleski requested the vehicle's rental agreement. When Zaleski was fully aware from viewing the audio & video of June 14th, 2011, that at no time through the entirety of the audio & video did Trooper Christopher Beyer every retrieved from me my license or the rental agreement, therefore the rental agreement was

not preserved or reserved for the initial record. And the Judge in making these statements on the record was judicial misconduct that raised to a judicial bias level, because is was not supported in/or the record, and the audio & video contradicts the Judge Zaleski's statements, and the perjured testimony entered by both Trooper Christopher Beyer and Michael Trauder, and the fact that Zaleski also confirmed that he witnessed the audio & video, referred to the specific time line of the audio & aideo in his decision, but altered the facts of th-at specific time line, by adding alleged facts that never existed. And when Judge Zaleski entered his decision, there appears in/on the record two different decisions: (1) Decision granting my motion to suppress, and another denying my motion to suppress, clearly the conduct of now retired Lorain County Common Pleas Court Judge - Edward Zaleski deprived me of any chance of a fair Suppression Hearing review and Trial. See Affidavit in Support of Clifton Jackson's Grievance Form; See also Exhibits "A", "D", "J - K", "N - O", and "AAR" attached to said Affidavit's Appendix of Exhibits; 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, Section 3(A)(C)&(D); Gov.Bar.R. 4, Sections 1 & 2; Gov.Jud. 1, Sections 1 & 2; See also Canon 1, 1.1, 1.2, and 1.3; Canon 2, 2.1, 2.2, 2.4(a)(b)&(c), 2.5(a), 2.6(a)&(b), 2.7, 2.9(A), 2.10(A)(B)&(C), 2.11(a)(1)(5)&(7)(b), 2.12(A); and Canon 3, 3.1(A)(C)&(D).

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 7th, 2016
Date