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, Iorain, 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 #A652-163

PATA SCIENCE OF THE STATE OF TH

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

## 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

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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 <u>may</u> 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,	C	lifton,	Α	
Last		First	MI	Phone No.
PERMANENT ADDRESS: Lake Erie Correct Street	ctional Institu	tion (LaECI),	501 Thompson	Road, P.O. Box 8000
Conneaut,	Ashtabula,		Ohio	44030
City	County		State	Zip Code
[	ABOUT WHOM A			
NAME: Mancino, Jr.	I	Paul,	Α.	(216)621-1742
Last		First	MI	Phone No.
ADDRESS: 75 Public Squa Street	re, Suite 101	16		
Cleveland,	Cuyahoga,		Ohio	44113-2098
City	County		State	Zip Code
Have you filed this grievance with an If yes, provide name of that agency a Did you receive a response?: n/a  Did this attorney represent you?	and date of filing: Yes <u>n/a</u> N	n/a o IF YES, F	PLEASE ATTACI	date:n/a H A COPY

Date the attorney was hired: May 1st, 2014	Does s/he still represent you?: Yes X_ No
Did you pay the attorney a fee/retainer? X Yes	No If yes, how much?: \$5,000.00 - \$7,000.00
Did you sign a written fee agreement/contract?x	Yes No IF YES, PLEASE ATTACH A COPY
Has the attorney sued you for fees? Yes	No
Have you brought civil or criminal court action against	t this attorney or judge? Yes No
If yes, provide name of court and case number n/a	
Result of court action: n/a	
	representing you, if different than attorney about whom you are
Does this grievance involve a case that is still pending be	pefore a court? X Yes No
<del>-</del>	Appellate District, Case No. 14CA010555, App.R.26(B)
What action or resolution are you seeking from this office	
List the name, address, and daytime telephone number of in support of your grievance.	of persons who can provide information, IF NECESSARY,
NAME ADDRE	ESS PHONE NO.
Amber Pawlak,	
Frank Letempio Jr., Esq. LETEMPIO P.C. LAW	
FACTS OF	F THE GRIEVANCE
Briefly explain the facts of your grievance in chronol committed by this legal professional. Attach <u>COPIE</u> documents that support your grievance.	ological order, including dates and a description of the conduct ES (DO NOT SEND ORIGINALS) of any correspondence and

On or about May 1st, 2014, after being retained by Clifton Jackson (through his family) with \$5,000.00 to \$7,000.00 dollars, attorney Paul A. Mancino, Jr. was ineffective in failing to communicate with a paying client; also in failing to address and properly challenge and litigate Fourth Amendment infringements occurring on June 14th, 2011, which resulted in a Fruit of the Poisonous Tree Doctrine violation that rendered all of the evidence so illegally seized inadmissible. And in waiving the viewing of the audio & video [which was the only way

to prove the violation occurred], deprived me of my only defense against such evidence which
should have been thoroughly addressed at the trial court level; and the fact that the audio
& Video totally contradicts the perjured testimony given by Troopers Christopher Beyer and
Michael Trader before the Grand Jury, at both the Suppression Hearing and Trial. The audio
and video also contradicts Judge Edward Zaleski's decision based on things that were not a-
part of the record, when he attempted to justify denying my request to suppress the illegal-
ly obtained evidence of June 14th, 2011. And to further display his unprofessional conduct
and incompetency, appellate counsel Paul A. Mancino, Jr. failed to address the issue of Ja-
ck W. Bradley's ineffectiveness at the trial court level concerning my Fourth Amendment vi-
olation under the fruit of the poisonous tree doctrine. See Affidavit in Support of Clift-
on Jackson's Grievance Form; See also Exhibits "A", "AAL - AAO", and "AAQ - AAAB" attached
to said Affidavit's Appendix of Exhibits. The conduct of attorney Paul A. Mancino, Jr., de-
prived me of my right to effective assistance of counsel, and violated Ohio Rules of Profes-
sional 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; 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 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.R. 1, Sectio-
ns 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.
Clipton a. Charles Date Date