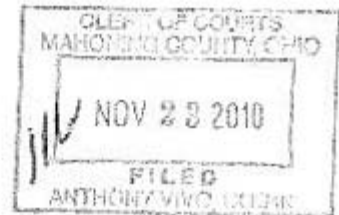


IN THE COURT OF COMMON PLEAS
GENERAL DIVISION
MAHONING COUNTY, OHIO



THE STATE OF OHIO

JUDGE William H. Wolff, Jr.

VS.

JOHN REARDON

CASE NO. 2010 CR 00800 E

BILL OF PARTICULARS FOR JOHN REARDON

The State of Ohio, through its undersigned attorneys, hereby submits its Bill of Particulars with respect to Defendant Reardon and counts 5, 15, 22, 31, 32, 51, 63, 66 and 68 in the indictment relating to him.

**PURPOSES AND REQUIREMENTS
OF AN INDICTMENT AND A BILL OF PARTICULARS**

Ohio law is clear relative to the purpose and requirements of both an Indictment and of a Bill of Particulars:

"Crim.R. 7(B) explains the structure and sufficiency requirements of an indictment: "The statement may be made in ordinary and concise language without technical averments or allegations not essential to be proved. The statement may be in the words of the applicable section of the statute, provided the words of that statute charge an offense, or in words sufficient to give the defendant notice of all the elements of the offense with which the defendant is charged. (Emphasis Added) State v. Horner, Ohio Supreme Court Slip Opinion No. 2010-Ohio-3830, decided August 27, 2010.

Additionally, an indictment is sufficient if it uses the exact language of the statute, quotes the statutory section, and specifies when the defendant committed the

acts. That was done here. See, Rule 7 of the Ohio Rules of Criminal Procedure. See also, R.C. §2941.05.

An indictment is not--in the State of Ohio--required to state the particular facts upon which the indictment was based¹. Insofar as the statutory elements of a crime are presented in an indictment, it is sufficient under Ohio law. Defendants can obtain the factual bases from a bill of particulars and the State's prosecutorial file pursuant to open file discovery mandates and the recently revised Ohio Criminal Rule 16. See, Ohio v. Sessler, 2007 Ohio 4931, 2007 Ohio App. LEXIS 4631 (2007).

Moreover, a criminal rule Bill of Particulars is not the equivalent of a response to a civil rule request for interrogatories:

*"A motion for a bill of particulars seeking to obtain a detailed statement of the particular means by which the state claims the defendant committed an alleged offense and a motion for discovery and inspection of the state's evidence were properly overruled. **The disclosure by the state of evidence is not a proper function of a bill of particulars**, and no problem of constitutional dimensions is raised by limiting the scope of discovery within the discretion of the trial court. "State v. Wilson, 29 Ohio St. 2d 203, 208 N.E.2d 915 (1972).*

The Ohio Supreme Court has stated the Ohio rule relative to Bills of Particular and said that the purpose of giving a Bill of Particulars is "to elucidate or particularize the conduct of the accused"..."**but not to provide the accused with specifications of evidence or to serve as a substitute for discovery.**"

¹ Ohio Case law and Crim. Rule 7 generally track the original Ohio Revised Code statute (prior to the implementation of the Ohio Rules of Criminal Procedure), at §2941.05 therein, "Statement charging an offense" which provides that:

*"In an indictment or information charging an offense, each count shall contain, and is sufficient if it contains in substance, a statement that the accused has committed some public offense therein specified. Such statement may be made in ordinary and concise language without any technical averments or any allegations not essential to be proved. **It may be in the words of the section of the Revised Code describing the offense or declaring the matter charged to be a public offense, or in any words sufficient to give the accused notice of the offense of which he is charged.**" (emphasis added).*

(emphasis added) See, State v. Lawrinson, 49 Ohio St. 3d 238 at 239 (1990), citing State v. Sellards 17 Ohio St. 3d 169, 17 OBR 410, 478 N.E. 2d 781 (1985). See, also State v. Wilson, supra. State v. Robinson, 2005 Ohio 6286, 2005 Ohio App. LEXIS 5631 (Ohio Ct. App., Lake County Nov. 25, 2005).

Even federal authorities, in interpreting the Federal Rules of Criminal Procedure, are in accord with Ohio's interpretation of its own criminal rules. Under federal law, the general purpose of a bill of particulars is to inform a defendant of the charges against him with sufficient precision to: (1) enable him to prepare his defense, (2) obviate surprise at trial, and (3) enable him to plead his acquittal or conviction in the case as a bar to subsequent prosecution for the same offense. United States v. Davis, 582 F.2d 947, 951 (5th Cir. 1978), cert. denied, 441 U.S. 962 (1979).

Federal case law interpreting Rule 7 of the Federal Rules of Criminal Procedure states that a bill of particulars should not be expanded into a device to circumvent the restrictions on pretrial discovery of specific evidence contained in Fed. R. Crim. P. 16. Cooper v. United States, 282 F.2d 527, 532 (9th Cir. 1960). See also Davis, 582 F.2d at 951 ("generalized discovery is not a permissible goal of a bill of particulars"). Where the indictment itself and the bill of particulars supplied by the government provide the defendant with adequate information with which to conduct his defense, requests for additional particulars should be denied. Harlow v. United States, 301 F.2d 361, 367-68 (5th Cir.), cert. denied, 371 U.S. 814 (1962).

Federal courts have taken into account other sources of information provided by the government, including discovery materials. United States v. Long, 706 F.2d 1044, 1054 (9th Cir. 1983) (broad discovery can serve as a substitute for the "trial preparation" function of a bill of particulars). See, e.g., United States v. Feola, 651 F.

Supp. 1068, 1133 (S.D.N.Y. 1987) (court considered whether the information requested had been provided elsewhere, including through discovery).

Under the federal interpretation of its rules, an indictment is sufficient if it “contains the elements of the offense charged and fairly informs a defendant of the charges against which he must defend, and second, whether it enables him to plead an acquittal or conviction in bar of future prosecutions for the same offense.” United States v. Middleton, 246 F.3d 825, 841-42, quoting United States v. Monus, 128 F.3d 376, 388 (6th Cir. 1997).

The government is under no obligation to “preview its case or expose its legal theory”, nor does the government have to disclose the “precise manner in which the crime charged in the indictment is alleged to have been committed.” United States v. Shoher, 555 F. Supp 346, 349 (1983), quoting United States v. Andrews, 381 F.2d 377, 377-78 (1967).

Pursuant to Rule 16 of the Ohio Rules of Criminal Procedure, the defendants in Mahoning County Common Pleas case numbers 2010 CR 00800, *et al*, have received, to date, in excess of 56,000 thousand pages of documents (a significant number of which came from the defendants themselves pursuant to grand jury subpoenas issued during the course and scope of an extensive grand jury investigation which was curtailed by the finite ending date specified by the Mahoning County general division judges, all of whom have recused themselves in these companion cases).

COUNT 5 ENGAGING IN A PATTERN OF CORRUPT ACTIVITY

The State of Ohio incorporates statements made with respect to the other counts contained herein and further submits that the Defendant has been charged in the indictment with a violation of R.C. §2923.32(A)(1), Engaging in a Pattern of

Corrupt Activity. The Enterprise, as that term is defined in §2923.31(C) of the Revised Code, is as specified in the indictment and the Pattern of Corrupt Activity, as that term is defined in §2923.31 of the Revised Code, is as specified in the indictment

During the period set forth in the indictment, the Defendant's role in the Enterprise included meetings and conversations with one or more members of the Enterprise during the time period specified in the indictment with a goal to block the move from the Cafaro-controlled Garland site to the Oakhill site. Those efforts included acts of Conspiracy, Perjury, Bribery and violations of Ohio ethics laws.

The interests and goals of the Enterprise were all focused upon the unsuccessful attempt of Anthony Cafaro and the Cafaro-related entities in their efforts to keep the Mahoning County Department of Job and Family Services physically located at the Garland site owned by a Cafaro-controlled entity, Ohio Valley Mall Company, an Ohio limited partnership and to keep that failed attempt from becoming public. The attempt included a lawsuit captioned *State of Ohio ex rel Ohio Valley Mall Company v. Mahoning County Commissioners, et al.* (Mahoning County Case No. 06CV3032). The mission was to allow the Cafaro-controlled entity to continue to collect rent as it had for more than a decade under a month-to-month lease arrangement following the expiration of the term of a written lease dated March 19, 1987, reaping hundreds of thousands of dollars a year in rent from Mahoning County.

Those efforts went beyond that of permissible political speech or social discourse or legitimate taxpayer interests when members of the Enterprise began to commit acts ultimately constituting criminal offenses including those offenses defined as Corrupt Activity under the Ohio Revised Code. The Defendant's role in his

association with members of the Enterprise included acts of Conspiracy, Perjury, Bribery and violations of Ohio Ethics Laws.

COUNT 15 CONSPIRACY

The State of Ohio incorporates statements made with respect to the other counts contained herein and submits that during the period set forth in the indictment and with the purpose to commit or to promote or facilitate the commission of the crime of engaging in a pattern of corrupt activity, the Defendant did, with another person or persons associated with the Enterprise, plan or aid in planning the commission of the offense of Engaging In A Pattern Of Corrupt Activity. A substantial overt act or acts in furtherance of the conspiracy include clandestine meetings with one or more of the persons with whom said Defendant has conspired; commission and/or complicity in the commission of one or more offense(s) of Perjury, Bribery, violations of ethics laws, the receipt of or complicity in the receipt of monies with respect to any one or more of the crimes set forth in the body of this Indictment including the receipt of or complicity in the receipt of free legal services, all in connection with an effort to block the proposed relocation of Mahoning County offices to a premises commonly referred to as "Oak Hill", in violation of Section 2923.01(A)(1) of the Revised Code, a Felony of the Third Degree

COUNT 22 CONSPIRACY

The State of Ohio incorporates statements made with respect to the other counts contained herein and further submits that during the period set forth in the indictment and with the purpose to commit or to promote or facilitate the commission of the crime of engaging in a pattern of corrupt activity, the Defendant did agree with another person or persons associated with the Enterprise that one or

more of them will engage in conduct that facilitates the commission of the crime of engaging in a pattern of corrupt activity. A substantial overt act or acts in furtherance of the conspiracy done by the Defendant or a person with whom said Defendant conspired, subsequent to said Defendant's entrance into the conspiracy include clandestine meetings with one or more of the persons with whom said defendant has conspired, commission and/or complicity in the commission of one or more offense(s) of Perjury, Bribery, violations of ethics laws and the receipt of or complicity in the receipt of monies with respect to any one or more of the crimes set forth in the body of this Indictment including the receipt of or complicity in the receipt of free legal services, all in connection with an effort to block the proposed relocation of Mahoning County offices to a premises commonly referred to as "Oak Hill"

COUNT 31 PERJURY

The State of Ohio incorporates statements made with respect to the other counts contained herein and further submits that on Saturday, June 16, 2007, Defendant Reardon testified as a witness in a deposition with respect to the taxpayer suit referenced above, captioned *State of Ohio ex rel Ohio Valley Mall Company v. Mahoning County Commissioners, et al.*, 2006CV30352, which was filed by an entity controlled by or at the direction of Anthony M. Cafaro Sr. (See *STATE016801*). The legal action was engineered to stop the purchase of Oakhill by Mahoning County and to prevent the move of the Department of Job Services from the Garland site owned by Ohio Valley Mall Company. Defendant Reardon, at the time of his deposition, was the Treasurer of Mahoning County. He was a party in *State of Ohio ex rel Ohio Valley Mall Company v. Mahoning County Commissioners, et al.*, 2006CV3032 but was substituted by operation of law with the current Mahoning County Treasurer Lisa

Antonini when he resigned in 2007. Defendant Reardon testified as both a prior party and a witness subpoenaed by the Mahoning County Board of Commissioners, a named Defendant in *State of Ohio ex rel Ohio Valley Mall Company v. Mahoning County Commissioners, et al.*, 2006CV3032. The Defendant, at the time, was the Treasurer for Mahoning County. He was a named party defendant in the taxpayer's lawsuit. During that deposition testimony of defendant Reardon, on pages 14, the Defendant knowingly made false statements under oath about items material to the lawsuit.

Q: "Do you know any attorneys from Squires, Sanders & Dempsey?"

A: "Not to my knowledge"

Q: "What about the firm of Taft, Stettinius & Hollister?"

A: "No." (See *STATE 0168140*).

The intentionally false statements were made to conceal the existence of the defendant's contact and co-ordination with law firms being paid by or working on behalf of one or more other members of the Enterprise. The denied knowledge of existence of the law firms was done to conceal defendant Reardon's contact as a defendant in the civil taxpayer's lawsuit through his coordinated efforts with the plaintiff of the same taxpayer lawsuit and other members of the Enterprise. The false statements aided the Plaintiff in its unsuccessful efforts to block Mahoning County's move to Oakhill from the Garland site.

In fact, Defendant Reardon and his deputy treasurer, Lisa Antonini had a telephone conference call with attorneys from Squires, Sanders & Dempsey on August 16, 2006 regarding the legality of 'internal notes' relative to Mahoning County. The conversation took place at the urging of defendant Anthony M. Cafaro, Sr. (See

STATE 006553-006554). At such time Lisa Antonini was the Chief Deputy Treasurer of Mahoning County. Additionally, Lisa Antonini faxed information to Squires, Sanders & Dempsey in preparation for that conference call. (See *STATE 006791-006813*). Copies of the faxed information went to Anthony M. Cafaro, Sr. of the notes taken by attorneys in the telephone conference that took place with the attorneys and Defendant Reardon and Lisa Antonini. (See *STATE 009479-009480*). A memorandum on the internal debt was prepared relative to this issue. (See *STATE 009479*).

On July 19, 2006, defendant Reardon along with Enterprise co-defendants John McNally and Michael Sciortino had a telephone conference with attorney Bruce Waterhouse from Taft, Stettinius & Hollister to discuss facts for the defendant's objection in bankruptcy court to the sale of the Oak Hill building to Mahoning County. (See *STATE 003163*). An e-mail from one Ulmer & Burne attorney to another Ulmer & Burne attorney documents that they meet with attorneys from Taft, Stettinius & Hollister on July 20, 2006 ; the Ulmer & Burne attorneys wrote that they believed their visit was helpful to the Taft, Stettinius & Hollister attorneys. The Ulmer & Burne attorney documented in the e-mail that Taft, Stettinius & Hollister attorney Bruce Waterhouse has given them "permission to speak with both the Treasurer and Auditor" (See *STATE 002264*); which would be referring to defendant Treasurer Reardon and Enterprise defendant Sciortino. On July 26, 2006 defendant Reardon along with Enterprise co-defendants John McNally and Michael Sciortino filed a Pro Se motion in bankruptcy court objecting to the sale of the Oak Hill property (See *STATE 32232-32253*). One day earlier, there is a draft copy, dated July 25, 2006, of the bankruptcy objection reflecting two (2) attorneys from Taft,

Stettinius & Hollister as the attorneys of record for defendant Reardon along with Enterprise co-defendants John McNally and Michael Sciortino (See STATE 003402-003415) which supports defendant Reardon was represented by a law firm he later denied under oath having known. On July 24, 2006, per the request of Taft, Stettinius & Hollister lawyer Bruce Waterhouse, an e-mail copy of the bankruptcy objections of defendant Reardon along with Enterprise co-defendants McNally and Sciortino was sent to two (2) attorneys with the law firm of Ulmer & Burne (See STATE 003401-003415) who were representing Enterprise co-defendants Ohio Valley Mall and Anthony Cafaro Sr.

COUNT 32 PERJURY

The State of Ohio incorporates statements made with respect to the other counts contained herein and further submits that in that same Saturday, June 16, 2007 deposition under oath, Defendant Rcardon testified further and again knowingly made a false statements under oath about items material to the lawsuit. The false statements again aided the Plaintiff in *State of Ohio ex rel Ohio Valley Mall Company v. Mahoning County Commissioners, et al.*, 2006CV3032 in its unsuccessful efforts to block Mahoning County's move to Oakhill from Garland site.

Q: "You reached the conclusion that Mahoning was in default on five of these notes in this memorandum.?"

"A" "Yes"

"Q" "Did you reach that conclusion with the assistance of any other people?"

A "Yes"

Q: "Who?"

A: "The people in the County Treasurer's office."

Q: Other than your subordinates in the County Treasurer's office?"

A; "No"

(See STATE 016859).

In fact, defendant Reardon attended the August 30, 2006 meeting with attorneys from Calfee, Halter & Griswold. (See STATE 033096). The subject of that meeting was the alleged "default" of Mahoning County on the 'internal notes'. (See STATE 033096). At another time, during the (civil taxpayer) trial, he also later verified a meeting with an attorney from Calfee, Halter & Griswold in trial testimony but did not respond because an attorney for Ohio Valley Mall objected based upon the grounds of privilege and the trial judge did not allow the responsive testimony. (See STATE 021281-021284). Additionally, defendant Reardon had a telephone conference with Squires, Sanders & Dempsey attorneys on August 16, 2006 relative to the 'internal notes' issue. (See STATE 006553-006554).

On December 20, 2006 a payment was made from a checking account bearing the captioned letterhead of "The Cafaro Company" payable to Squire, Sanders & Dempsey in the amount of \$49,055.43 (See STATE 000964). The total amount paid included an invoice from Squire, Sanders & Dempsey in the amount of \$23,001.23 (See STATE 000998-001001). An internal Cafaro Company accounts payable invoice explanation and contracted service report provided an explanation for the \$23,001.23 from Squire, Sanders & Dempsey as: "Research and memorandum regarding County Treasurer's right to refuse to sign cks or invest in internal County debt" (See STATE 000997). The general ledger accounting records support that the legal fees were charged to the Garland Plaza, an affiliated entity of the Cafaro Company.

On June 15, 2007, just two (2) days before defendant Reardon's deposition, Reardon appears in hand written notes to have had a conversation with the writer of the notes (the hand writing of which is consistent with that to be known as Anthony Cafaro Sr.) The notes include the statement: "Lisa assures him – she is not buying any more debt oblig" (See STATE 000280) which is believed to mean that current Mahoning County Treasurer, Lisa Antonini has assured Reardon that she is not buying any more internal debt obligations of Mahoning County and that this information was relayed by defendant Reardon to Enterprise defendant Anthony Cafaro Sr.

COUNT 51 BRIBERY

The State of Ohio incorporates statements made with respect to the other counts contained herein and further submits that on or about the dates set forth in the indictment, and in conjunction with his deposition and trial testimony, the Defendant, before or after he was elected, appointed, qualified, employed, summoned, or sworn as a public servant or party official, knowingly solicited or accepted for himself or another person any valuable thing or valuable benefit to corrupt or improperly him or another public servant or party official with respect to the discharge of his or the other public servant's or party official's duty.

The defendant Reardon's actions with one or more members of the Enterprise resulted in the Reardon receiving the benefits of legal representation and research paid for by other members of the Enterprise. During the dates set forth in the indictment, there were 15 checks bearing the captioned letterhead of "The Cafaro Company" payable to law firm of Squire, Sanders & Dempsey in the amount of \$482,499.81 with the underlying general ledger accounting entry charging the legal

fees to the Garland Plaza, an affiliated entity of the Cafaro Company. (See STATE 00945-00951, 00956-01013, 01032-01073, and 0190-01151). There were also 15 checks bearing the captioned letterhead of "The Cafaro Company" payable to law firm of Ulmer & Burne in the amount of \$876,139.29 with the underlying general ledger accounting entry charging the legal fees to the Garland Plaza, an affiliated entity of the Cafaro Company. (See STATE 00381-00391, 00417-00439, 00481-00511, 00521-00535, 00538-00554, 00557-00567, 00594-00613, 00616-00635, and 01329-01370).

COUNT 63 CONFLICT OF INTEREST

The State of Ohio incorporates herein statements made above with respect to the above Counts and further submits that defendant Reardon unlawfully, for the period set forth at this count of the indictment, while a public official or employee, did use or authorize the use of the authority or influence of office or employment to secure anything of value or the promise or offer of anything of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person's duties, a misdemeanor of the first degree pursuant to §102.09 of the Ohio Revised Code, in violation of §102.03(D) of the Ohio Revised Code. Defendant Reardon, while Mahoning County Treasurer, accepted a substantial thing of value, being free legal services and/or fees from another person as outlined above in this Bill of Particulars. At the time he received these payments, the source of these payments was doing or seeking to do business with, regulated by, or otherwise interested in matters before Mahoning County. Specifically, the source of these payments was seeking to maintain and renegotiate a lease with Mahoning

County at property located in Garland Plaza where the County was paying to the source in excess of \$400,000 per year as rent.

COUNT 66 CONFLICT OF INTEREST

The State of Ohio incorporates herein statements made above with respect to the above Counts and further submits that Defendant Reardon, unlawfully during the period set forth at this count of the indictment did, being a public official or employee, solicit or accept anything of value that is of such a character as to manifest a substantial and improper influence upon the public official or employee with respect to that person's duties, a misdemeanor of the first degree pursuant to §102.99 of the Ohio Revised Code, in violation of §102.03(E) of the Ohio Revised Code. Defendant Reardon, while Mahoning County Treasurer, accepted a substantial thing of value, being free legal services and/or fees from another person as outlined above in this Bill of Particulars. At the time he received these payments, the source of these payments was doing or seeking to do business with, regulated by, or otherwise interested in matters before Mahoning County. Specifically, the source of these payments was seeking to maintain and renegotiate a lease with Mahoning County at property located in Garland Plaza where the County was paying to the source in excess of \$400,000 per year as rent.

COUNT 68 FILING FALSE STATEMENTS

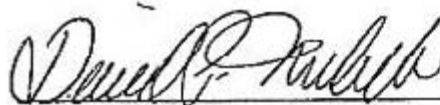
The State of Ohio incorporates herein statements made above with respect to the above Counts and further submits that Defendant Reardon, unlawfully during the period set forth at this count of the indictment did knowingly file a false statement that is required to be filed under §102.02 of the Ohio Revised Code, a misdemeanor of the first degree pursuant to §102.99 of the Ohio Revised Code, in violation of

§102.02(D) of the Ohio Revised Code, contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio. Defendant Reardon knowingly failed to disclose the source of the value of the benefits received in the form of free legal services and/or fees described above as a gift in excess of \$75 and/or income and/or debt in excess of \$1,000, as required by R.C. Section 102.02(A)(2) and/or (A)(5) and/or (A)(7).

CONCLUSION

Defendant Reardon has been placed on notice of the crime for which he is charged pursuant to a proper indictment; he has been provided with this Bill of Particulars and he will have access to extensive information in this case through voluminous discovery to be afforded him under Ohio Criminal Rule 16. Said information is sufficient to fully apprise him of the charges pending against him and to enable him to prepare for trial. To the extent evidentiary details in excess of such needs are sought, such is beyond the proper scope of a bill of particulars.

Respectfully submitted,



Dennis P. Will 0038129

Paul Nick 0046516

Anthony Cillo 0062497

David P. Muhek 0024395

Special Prosecuting Attorneys

CERTIFICATE OF SERVICE

A true copy of the forgoing Bill of Particulars has been served via electronic mail this 22nd day of November, 2010 upon Defendant Reardon in care of his attorney at the address appearing on the attached distribution list and served upon counsel for defendants charged by way of the same common indictment and filed with the court, all via their respective addresses appearing on said distribution list and through the same method of delivery.


Special Prosecuting Attorney

State of Ohio vs Anthony Cafaro, Sr., et al.
Case No. 10 CR 0800, et seq.

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