

FILED
IN COMMON PLEAS COURT

2017 AUG -8 AM 9:56

DENISE M. KAMINSKI
CLERK OF COURTS
GEAUGA COUNTY

IN THE COURT OF COMMON PLEAS
GEAUGA COUNTY, OHIO

IN RE:) CASE NO. 17 MISC 301
)
Application of Prosecuting) JUDGE FORREST W. BURT
Attorney and Geauga County)
Board of Commissioners for) APPLICATION FOR
Appointment of Legal Counsel) APPOINTMENT OF COUNSEL
)
)

Now comes James R. Flaiz, Geauga County Prosecuting Attorney, and the Geauga County Board of Commissioners, and hereby apply, pursuant to Ohio Revised Code 305.14(A), for an order authorizing the Geauga County Department of Job and Family Services employees, Paul Reiman and Katherine Wiles, to employ legal counsel to represent the employees in a contempt of court action initiated by Geauga County Juvenile Court Judge Timothy J. Grendell.

For cause, the undersigned directs the Court's attention to the attached Memorandum in Support.

Respectfully submitted,



JAMES R. FLAIZ (#0075242)
GEAUGA COUNTY PROSECUTOR
231 Main Street, 3rd Floor
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MEMORANDUM IN SUPPORT

On August 2, 2017, the Geauga County Prosecutor's Office received from the Geauga County Juvenile Court a Summons and Order to Show Cause issued to the Assistant Director of the Geauga County Department of Job and Family Services, Paul Reiman¹, and Geauga County Department of Job and Family Services child support worker, Katherine Wiles (attached hereto as Exhibits 1 and 2). The Summons and Order to Show Cause was apparently issued sua sponte by the court. It is under the case of *In Re: Susie Miller v. John Miller*, Geauga County Juvenile Court Case No. 16SU000411 which is a child support establishment matter.

The Geauga County Prosecutor is legal counsel for the Geauga County Department of Job and Family Services. Unfortunately, it appears that the assistant prosecutor who is assigned to represent the child support enforcement division could be called as a witness in these proceedings. Additionally, any alleged conduct regarding this matter by Mr. Reiman or Ms. Wiles would have been done in the course and scope of their employment with the Geauga County Department of Job and Family Services. Therefore, the appointment of outside counsel pursuant to R.C. 305.14(A) is necessary in this case.

WHEREFORE, based on the foregoing, Geauga County Board of Commissioners and the Geauga County Prosecuting Attorney hereby request this Honorable Court appoint legal counsel for the Geauga County Department of Job and Family Services employees, Paul Reiman and Katherine Wiles, with respect to the contempt proceedings initiated by the Geauga County Juvenile Court Judge.

Respectfully submitted,


JAMES R. FLANZ (# 0075242)
GEAUGA COUNTY PROSECUTOR
231 Main Street, 3rd Floor
Chardon, OH 44024
(440) 279-2100

¹ Incorrectly spelled "Reinman" in the court's order.

FILED
IN COMMON PLEAS COURT

IN THE COURT OF COMMON PLEAS
JUVENILE DIVISION
GEAUGA COUNTY, OHIO

2017 AUG - 2
PREPARED BY
GEOGRAPHIC

IN THE MATTER OF
SUSIE MILLER et al
Plaintiff
JOHN MILLER
Defendant

: CASE NO.: 16 SU 000411
:
: I.D. NO.: 35596
:
: JUDGE TIMOTHY J. GRENDALL
:
: **SUMMONS AND ORDER**
: **(General Order)**

TO: **PAUL REINMAN**

YOU ARE HEREBY SUMMONED AND ORDERED to appear in Judge Timothy J. Grendell's courtroom on **AUGUST 14, 2017 at 12:00PM** to show cause why you should not be held in Contempt of Court for failure to comply with the Court's order filed on July 26, 2017

You are notified as follows:

- (1) If you fail to appear a warrant for your arrest may be issued.
- (2) You have a right to counsel or, if indigent, a right to court appointed counsel; but you must apply for court appointed counsel within three (3) business days after receipt of this summons:
- (3) At the time of hearing, the Court may refuse to grant a continuance to enable you to obtain counsel if you fail to make a good faith effort to retain counsel or a public defender before the hearing.
- (4) At the time of the hearing the court may grant limited driving privileges pursuant to your request, if your driver's license was suspended based on a notice as from a child support agency that you are in default or noncompliance under a child support order and if you request is accompanied by a recent noncertified copy of a driver's abstract from the Registrar of Motor Vehicles and a copy of your proof of financial responsibility.
- (5) If you are found guilty in this case, you may be punished as follows:
 - (a) For a first offense, a jail sentence of thirty (30) days and/or a fine of up to Two Hundred Fifty Dollars (\$250.00).
 - (b) For a second offense, a jail sentence of sixty (60) days and/or a fine of up to Five Hundred Dollars (\$500.00).
 - (c) For a third offense, a jail sentence of ninety (90)

GENORDER_J



IN THE COURT OF COMMON PLEAS
JUVENILE DIVISION
GEAUGA COUNTY, OHIO

FILED
IN COMMON PLEAS COURT

2017 AUG - 2

PROBATION
DIVISION
GEAUGA COUNTY, OHIO

IN THE MATTER OF
SUSIE MILLER et al
Plaintiff
- JUVENILE
SUSIE
JOHN MILLER
Defendant

: CASE NO.: 16 SU 000411
:
: I.D. NO.: 35596
:
: JUDGE TIMOTHY J. GRENDALL
:
: **SUMMONS AND ORDER**
: **(General Order)**

TO: **KATHERINE WILES**

YOU ARE HEREBY SUMMONED AND ORDERED to appear in Judge Timothy J. Grendell's courtroom on **AUGUST 14, 2017 at 12:00PM** to show cause why you should not be held in Contempt of Court for failure to comply with the Court's order filed on July 26, 2017

You are notified as follows:

- (1) If you fail to appear a warrant for your arrest may be issued.
- (2) You have a right to counsel or, if indigent, a right to court appointed counsel; but you must apply for court appointed counsel within three (3) business days after receipt of this summons.
- (3) At the time of hearing, the Court may refuse to grant a continuance to enable you to obtain counsel if you fail to make a good faith effort to retain counsel or a public defender before the hearing.
- (4) At the time of the hearing the court may grant limited driving privileges pursuant to your request, if your driver's license was suspended based on a notice as from a child support agency that you are in default or noncompliance under a child support order and if you request is accompanied by a recent noncertified copy of a driver's abstract from the Registrar of Motor Vehicles and a copy of your proof of financial responsibility.
- (5) If you are found guilty in this case, you may be punished as follows:
 - (a) For a first offense, a jail sentence of thirty (30) days and/or a fine of up to Two Hundred Fifty Dollars (\$250.00).
 - (b) For a second offense, a jail sentence of sixty (60) days and/or a fine of up to Five Hundred Dollars (\$500.00).
 - (c) For a third offense, a jail sentence of ninety (90)

GENORDER_J

