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THE SUPREME COURT OF OHIO

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July 6, 2023

**PERSONAL AND CONFIDENTIAL
VIA ELECTRONIC MAIL ONLY:**

Ms. Mattie LaVora Perry
mlavoraperry@gmail.com
13405 Forest Hill Avenue
East Cleveland, Ohio 44112

**Re: Heather McCollough, Esq.
Our File No. C3-0784**

Dear Ms. Perry:

Heather McCollough responded to your allegations. We are providing you with a copy and an opportunity to submit additional information supporting your grievance. Because our authority is limited to investigating alleged violations of the Ohio Rules of Professional Conduct, please limit your reply to issues about ethics.

If you choose to reply to Heather McCollough's response, you must do so in writing. If we do not receive your reply by July 20, 2023, we will base our decision on the information received thus far.

Sincerely,

Donald M. Scheetz
Assistant Disciplinary Counsel

DMS/ks
Enclosure

As to reviewing her evidence, I reviewed the evidence that was necessary for charging. First, she sends these excessively wordy documents detailing everything Mr. Primous has allegedly done or said to her since 2016. I don't need to review all of that for charges in 2022. She had told me about it verbally.

She makes much of this gunfire issue. However, when asked, she stated that she did not see Mr. Primous fire the weapon. She stated that she knew it was him because he knew where her bedroom window was located. Unfortunately, gunfire is a routine occurrence in the city of East Cleveland. I deemed a phone recording of a gunshot with no witnesses to be insufficient for charges. But I didn't need it to charge him. I had her statements about the threats and her son as a witness. That was enough for the aggravated menacing charge. Additionally, I did hear the gunshot on her video. She posted a video on her Facebook page

telling everyone about this gunshot. This can still be viewed on YouTube and a link to that video is also on Facebook on the Democrats of East Cleveland page.

(See [youtube.com/watch?v=adizQ96AsY4](https://www.youtube.com/watch?v=adizQ96AsY4) and Exhibit 2). Please watch this video. I find it odd that she happened to be awake at 2:30am with her phone on record, just in time to hear the one gunshot. She never claimed that multiple rounds were fired, only the one.