

BRIEF IN SUPPORT

I. STATEMENT OF THE CASE

Adam Stone (hereinafter “Stone”) was indicted in case number 24 CR 0661, on November 7, 2024, upon one count of Telecommunications Fraud, a felony of the third degree; one count of Identity Fraud, a felony of the fifth degree; one count of Impersonating a Peace Officer, a felony of the third degree; and one count of Theft, a felony of the fourth degree.

On July 14, 2025, Stone entered a change of plea from not guilty to guilty to one count of Telecommunications Fraud and an amended count of Impersonating an Officer, felonies of the third and fourth degree, respectively. The remaining counts of the indictment were dismissed. This is not a case where Stone profited from his conduct in this matter, as explained below; this case is different in that Stone did not profit from this crime nor did he conspire to enrich someone else. This crime, while abhorrent, was borne out of inexperience, fear, and mental health challenges.

a. Background Facts

Stone was admitted to the practice of law on November 9, 2009. He operated a rapidly growing law firm in central Ohio that focused primarily on criminal defense. As a result of serious mental health challenges, the realization that he was in deeply over his head, and his specific conduct in this case, Stone moved the Supreme Court to resign from the practice of law with discipline pending which was granted on January 18, 2023.

The criminal conduct in this case originates out of the relationship between the victims and Stone that predated his entry into the practice of law by more than a decade. Stone was high school

friends with the victims' son, who the victims believed had been murdered by their daughter-in-law.

The victims formed this belief, in part, on what they perceived as an improper, or failed, investigation conducted by the Bucyrus Police Department. The Franklin County Coroner had ruled that the cause of death was undetermined, rather than a homicide. The victims believed that law enforcement was not taking their son's death as seriously as they should and formed the belief that their son's wife was responsible for the murder. Ultimately, police informed the victims that they were no longer investigating the matter, which angered the victims, who zealously believed that their daughter-in-law was responsible for the death of their son. This caused the victims to seek out Stone.

Stone, at the request of the victims here, met with the victims in December 2016, where Stone agreed that he, and his firm, would represent them in a number of legal matters ranging in complexity from the simple to the highly complex. These included an investigation into the death of their son, a wrongful death case, two different probate cases, and a grandparents visitation matter. The true purpose of this representation was to ultimately investigate and secure an indictment against their daughter-in-law, whom the victims believed was the person responsible for the death of their son.

A more experienced, seasoned attorney would have recognized that a small firm with virtually no experience handling this type of investigation or litigation should decline and refer it to other counsel. Stone, failing to recognize the complexity of the case, took the matter on not out of greed or avarice, but because of his friendship with the victims' son.

The attorney-client relationship described above began in December 2016 and terminated on January 26, 2022. Stone, despite his inexcusable conduct that occurred later in the

representation, did provide valuable legal services that legitimately moved the victims' matter towards an ultimate conclusion in the matter – having the government decide whether or not charges should be filed against their daughter-in-law. (Exhibit A)

On June 23, 2017, the Crawford County Prosecutor wrote to Detective Keegan following the Prosecutor's review of the Bucyrus Police Department's investigation into the death of the victims' son. (Exhibit A) The Prosecutor itemizes all of the sources of evidence that he relied upon, that he reviewed, and who he spoke to regarding the matter. (Exhibit A) In addition to the Prosecutor's own review of the file, he also referred the matter to the Crawford County Sheriff's Department for a review of the file. (Exhibit A)

The Prosecutor makes direct reference to the wrongful death lawsuit filed by Stone, on behalf of the victims, that advances their theory that their daughter-in-law murdered their son. (Exhibit A, pg 3-4) Stone, according to the Prosecutor's filing, advanced the theory that:

6. The above-described accident was proximately caused by the intentional and reckless acts of the defendant, Leslie Baxter, in that the defendant intentionally or recklessly placed the aforementioned drugs (benzodiazepines) in the decedent's beverage without decedent's knowledge or consent. (Exhibit A)

The Prosecutor's letter also references that he spoke directly to the victims here and that they expressed their belief that Ms. Baxter murdered their son. (Exhibit A) Stone was hired for the ultimate purpose of advancing the victims' theory to the government and his efforts were effective in the matter being reviewed by at least two other organizational entities; the elected Crawford County Prosecutor Matthew Crall, and Sgt. Heydinger from the Crawford County Sheriff's Department. (Exhibit A)

The victims here were certainly aware of and satisfied with Stone's efforts in 2016 through 2018 to bring who they believed killed their son to the attention of authorities. They were also

aware of Prosecutor Crall's decision and that the wrongful death suit, while not successful, had at least generated the kind of attention that few people obtain. Stone's failure to honestly convey to the victims what had happened in the wrongful death lawsuit was inexcusable, unprofessional, and unethical but it was not *at that point* criminal.

The victims, who were fully aware that the Crawford County Prosecutor did not believe that there was sufficient evidence to indict their daughter-in-law, sought to move forward with the use of an expert in crime scene reconstruction. Truly, the victims' primary focus was not on the wrongful death lawsuit but was focused on the potential prosecution of their daughter-in-law, whom they believed had murdered their son. (Exhibit B – Agent report) An expert was then retained on February 27, 2018, to determine if he could recreate the scene of the death and conclude that a crime had occurred. (Exhibit B)

On April 30, 2018, the victims wrote to the expert that "Just want to reiterate that yes – we will be using this for civil case – but our main objective after winning this trial is to get Attorney General to pick up criminal case for murder. *This is what it is all about.*" (Emphasis Added) (Exhibit B) This is in no way an attempt by Stone, or his counsel, to denigrate in any fashion the victims in the case but is used by way of illustration to demonstrate that a more experienced attorney would have handled the matter differently.

By October 2018, according to the investigative report in this matter, the victims in this case directly provided the expert witness approximately \$32,500.00 in fees. These funds came directly through their own accounts and were paid directly to the expert, including a \$7,000.00 check in April 2018.

The relevance of this, as it relates to this matter, is that the wrongful death statute deadline with use of the savings clause was November 2, 2018.¹ The victims in this case spent approximately \$9,200.00 on legal fees, filing fees, and other associated costs following the November 2, 2018, statute date. This figure includes a \$7,500.00 check drawn on Stone's IOLTA that was sent to the expert with the victim's permission on December 10, 2020.²

Stone refunded all funds remaining in his IOLTA at the conclusion of representation, which was verified by the special master investigating this case to have been sent by means of a check in the amount of \$1,186.57 on October 31, 2022. The remaining \$500.00 was applied to filing fees associated with the missed statute deadline and the continued prosecution of the appeal from the same. In this matter, despite the fraud and scheme, Stone did not profit.

This case does not represent the standard telecommunications fraud or theft case in which a defendant seeks out a vulnerable victim and enacts a scheme to defraud or purloin valuable resources from an unknowing victim into their own pockets. Stone, while his conduct is inexcusable and abhorrent, did not accept the representation in this matter with the intent to cause harm to the victims.

This case, to be blunt, is the direct result of an attorney with only a few years of experience taking on a case because of a personal relationship that he should have refused, referred, or brought in outside counsel to manage. Stone should have admitted to the victims that he had missed the wrongful death filing statute, and should have conveyed to them that without that filing being properly and timely made there was no hope of that matter going forward.

¹ *Disciplinary Counsel v. Stone*, Amended Complaint, ¶ 22

² Stone sought, and received, permission from the victim to spend this money on December 10, 2020 as reflected in an email chain involving the expert, the victim, and Stone.

Stone felt an immense mental and psychological pressure to please his clients, whom he was acquainted with for many years. He could not, as ethically required, bring himself to disclose to his clients, that trusted him deeply and with whom he had developed a very close friendship with through the course of the representation, that he had missed a critical deadline. It may be lost on attorneys, or lay people, who have never represented a client in a case such as this, but it is incredibly hard for even an experienced attorney to deliver hard news. That is even more the case when there is a close personal relationship, and, while that does not excuse Stone's conduct, it is important to understand the proper context surrounding his behavior.

Stone's conduct became criminal when he knowingly enacted a deceptive scheme where that deception caused a detriment to befall the victims in this case. R.C. 2913.01(B), R.C. 2913.05(A). This criminal conduct caused an inexcusable emotional and mental toll on the victims and a financial loss of approximately \$8,000.00 between the expert fees and court costs.

Stone's disturbing behavior was a direct result of inability to convey to the victims that there was no evidence that their son was murdered by his wife and that the wrongful death savings statute had been hopelessly missed after November 2, 2018. At this point, Stone engaged in the very conduct prohibited by R.C. 2913.04 and, as a result, defrauded the victims into paying \$7,500.00 in expert fees that would be fruitless.

It is important to recognize that as disturbing, improper, and criminal as Stone's behavior was, the context behind this matter is far less serious than the standard case in which an attorney defrauds a client. Stone was not an experienced litigator deceptively stealing \$41,000.00 dollars from a client who he tricked into giving blank checks.³ At the point that Stone was retained to represent the victims he had just over six years of experience as an attorney and, again, to be blunt,

³ *State v. Christopher Burchinal*, 19 CR 08 0541, Delaware County

was in over his head on the matters that he took on here. He primarily took the case on, as the disciplinary investigation showed, because he knew the victim's son from high school. The immense pressure that he felt to take on the case was not based upon fraud but because he had a prior friendship with the victims' son, the same son who victims believed was murdered by their daughter-in-law.

In 2019, Stone began informing the victims that he would attempt to convince the Ohio Attorney General's Office to prosecute their daughter-in-law for murdering their son.⁴ This is where Stone's actions began to transform the case from malpractice to unethical to criminal. Stone's decision to lead the victims to believe that the Attorney General was actively investigating the matter and that a warrant may issue soon was not a scheme to enrich himself, but it was still a deceptive scheme that resulted in the victims paying another \$7,500.00 to their expert. These actions culminated in January 2022 when he made the inexplicable and shocking decision to pretend to be an attorney working for the Attorney General's Office.

Stone's conscious decision to mislead the victims about the involvement of the Attorney General's Office finalized his criminal conduct in this matter, but it is important to note that this was not borne out of greed or avarice, but, rather, this was borne out of inexperience and fear. Rather than having the courage to tell the victims that there was no evidence to support charging their daughter-in-law, Stone concocted a series of lies and deceptions to mislead them. Stone was discharged on January 26, 2022.

The victims in this matter filed a grievance on February 2, 2022, with the Office of Disciplinary Counsel, who conducted an investigation and found probable cause that Stone violated the Rules of Professional Conduct. Stone recognized that his behavior violated the Rules

⁴ *Disciplinary Counsel v. Stone*, Amended Complaint, ¶ 52-53

of Professional Conduct, that he had caused harm, and that it was not appropriate for him to continue on as a licensed attorney in this state. He accepted full responsibility for his conduct and resigned from the practice of law long before an indictment was filed in this case.

b. Community Support

Stone, despite the criminal conduct that he readily accepts, has the support of a huge swath of the population, ranging from those he has helped, those he worked with, and other legal professionals. A letter in support from Robert Neff, Jr. exemplifies both the successes and struggles of who Stone is. (Exhibit C)

Attorney Neff, in his letter, provides a valuable insight into Stone not just from the perspective of someone who shared office space with him, who observed Stone's successes and struggles, but also as an attorney who, while practicing, served as a magistrate as well as on the Character and Fitness Committee. Attorney Neff points to the many struggles that Stone had both personally and medically as Stone tried to navigate the difficult world of criminal defense; especially in cases involving the death of another, the loss of a child, or child-related crimes. (Exhibit C) Attorney Neff points to how invested Stone became in handling cases and how difficult it was for Stone to turn down representation, especially in cases where he had a prior relationship with the potential client. (Exhibit C)

Stone is fortunate enough to have the support of his former employees who write that Stone cared deeply for his clients. (Exhibit D) Stone also took chances on employees who might not have had opportunities otherwise, such as Ms. Everly, who writes that she first interned with Stone and then was employed as a paralegal until he closed his practice. (Exhibit D)

Stone's former clients write of how dedicated he was to their matters, and how he showed genuine care and empathy in dealing with the matters they entrusted him with. (Exhibit E) One

example of this is Ms. Cottrel, who writes that Stone went above and beyond in helping her find financial resources to help care for her child, guiding her through a complex and frightening legal system, and, ultimately, helping her adopt her son with “*no financial gain to himself.*” (Exhibit E) Another former client, Ms. Markland, writes that Stone served as her attorney during the most difficult part of her life. (Exhibit F) She writes that Stone was there for her when she needed it the most. (Exhibit F) Another client, and someone who has known Stone since they were children, writes of the work Stone performed for him and how he is an asset to the community. (Exhibit G) The same client’s son writes as to how thankful he is that Stone fought so hard to help his father gain custody of him, rescuing him from what he perceived to be a life of hardship. (Exhibit F, G)

Stone is fortunate to have the support of other former clients and their family members, who all write in regarding his kindness, compassion, and generosity in dealing with their cases. (Exhibit H – Stuckman, Exhibit I – Posey)

Family support is also considered to be a reliable indicator of how successful a defendant will be in transitioning from criminal defendant to successful citizen. Here, Stone enjoys the wide support of his family members who are there to support him. (Exhibit J -- family support) This strong public and familia support, where he has disclosed his criminal behavior too, evidences that not only does he take his actions seriously because rather downplaying his behavior he admits it but that his family and community will stand by and support his as he attempts to earn redemption.

c. Continued Employment

Stone has not sat idly by since his resignation from the practice of law, his subsequent indictment, nor following his guilty plea. Stone has sought out and remained gainfully employed, earning the respect of his employers, who he made aware of his ongoing matter. (Exhibit K) Ms. Lanier, the Director of Academics, writes that Stone has been employed with Bridges since the

2023 school year and currently continues to work there. She finds him to be an exemplary employee who she considers an asset to the point that she hopes that he can continue working there after the conclusion of this matter. (Exhibit K)

II. LAW AND ARGUMENT

a. Statutory considerations support a term of community control.

This Honorable Court should impose a term of community control with a term of local incarceration. “The overriding purposes of felony sentencing are to protect the public from future crime by the offender and others and to punish the offender using the minimum sanctions that the court determines accomplish those purposes without imposing an unnecessary burden on the state or local government resources.” R.C. 2929.11(A).

“To achieve those purposes, the sentencing court shall consider the need for incapacitating the offender, deterring the offender and others from future crime, rehabilitating the offender, and making restitution to the victim of the offense, the public, or both.” *Id.* In imposing a sentence, the trial court must ensure that the sentence does not demean the seriousness of the offender’s conduct and is consistent with sentences imposed in similar cases. R.C. 2929.11(B).

The three “guiding principles” for formulating a sentence are generally referred to as reasonableness, proportionality, and consistency. *State v. Quine*, 9th Dist. Summit No. 20968, 2002-Ohio-6987; *State v. Gramlich*, 8th Dist. Cuyahoga No. 84172, 2005-Ohio-503; *State v. Georgakopoulos*, 8th Dist. Cuyahoga No. 81934, 2003-Ohio-4341. The Court must consistently consider the same principles and characteristics prior to sentencing. *State v. Ruby*, 9th Dist. Summit No. 23219, 2007-Ohio-244. In this regard, this Honorable Court must consider during the sentencing hearing whether the sentence received by the defendant was consistent with similar situated offenders. R.C. 2929.11.

- b. The R.C. 2929.12(B) and (C) factors demonstrate that while serious, the offense here is not more serious than other offenses of a similar nature.**

When considering the seriousness of the crime, the Court has discretion to determine the most effective way to comply with the purposes and principles of sentencing as well as consider any other factors that are relevant to achieving those purposes and principles. R.C. 2929.12(A). The Court must consider all of the 2929.12(B) factors, which indicate whether or not the offender's conduct was more serious than conduct normally constituting the offense. The Legislature requires that a sentencing court consider ten different factors to reach a conclusion on whether the offense is more serious than others.

In this case Stone does agree that under R.C. 2929.12(B)(2) this Court should consider that Stone caused economic harm to the victims, even if the victims were made whole from his misconduct prior to the filing of the indictment. Stone also agrees that under R.C. 2929.12(B)(6) this Court may consider that he used his position as a licensed practicing attorney to facilitate the offense. The remaining eight factors that this Court must consider under R.C. 2929.12(B) are inapplicable to Stone as he did not cause physical injury, did not exacerbate a mental health condition, and he was not a public official.

In mitigation, the legislature guides the trial courts to consider factors that indicate that the offender, the offense, and any other relevant factors, which indicate that the offender's conduct is less serious than conduct normally constituting the offense. R.C. 2929.12(C). Such considerations include whether there were substantial grounds to mitigate the offender's conduct although said grounds were not enough to constitute a defense. *Id.*

Stone did not seek out or solicit the victims in this case; rather, they approached him based in part on his reputation as a successful attorney and his past relationship with their son. Stone's conduct in this case is different than the cases analyzed below in that he did not go into the

relationship with the victims expecting to cause any harm to the victims or their finances. R.C. 2929.12(C)(3). Stone, objectively, took substantial legitimate steps towards achieving the victims' goal of having their daughter-in-law prosecuted for the death of their son. R.C. 2929.12(C)(4). Virtually every other form of fraud and theft from clients that undersigned counsel can find relate to attorneys who intentionally pilfered from their clients' trust accounts, who purloined fees from settlements, or who otherwise directly defrauded a client. Here, the complaint is not that Stone personally profited from his criminal conduct but, rather, he caused the victims to spend money they *might* not have otherwise spent.

In this case Stone put in legitimate, credible, work towards the victims' goal from the start of the attorney-client relationship. Stone reached some initial significant success in having the death of the victims' son evaluated by the Crawford County Prosecutor and a member of the Crawford County Sheriff's office, as those two groups directly reference his work in their review. This strongly suggests that the offenses Stone committed, while objectively disturbing to any member of the bar, are still less serious than the average case of fraud and theft – where greed and avarice run rampant.

In addition to the unique set of facts that surround this case, Stone has serious mental health challenges that he has actively sought treatment for that directly contributed to his inability to handle the underlying case. As referenced in Attorney Neff's letter of support, Stone became deeply disturbed by much of the material he observed, a challenge anyone working in the criminal justice system can appreciate. (Exhibit C) However, Stone responsibly sought treatment and counseling for these challenges rather than letting them continue to spiral. (Exhibit L- Wirebaugh letter)

Stone suffered from depression with suicidal ideations as a result of what he initially described as work-related stress and the subsequent loss of his father. Stone's treatment team diagnosed him with Major Depressive Disorder, Recurrent, and Severe (F33.2). He was also diagnosed with Post-Traumatic Stress Disorder, Chronic (F43.12). His treatment team recommended that he step away from the practice because of his inability to manage the intense psychological demands of the practice of law . (Exhibit L) Stone followed these recommendations and resigned with discipline pending, even though he would have likely avoided disbarment. Stone's acknowledgement that his conduct was deeply disturbing and his steps to take accountability for it evidence that, while he does not have a complete defense to this matter, this is less severe than similar cases.

c. Consideration of the factors present in R.C. 2929.12(D) & (E) evidence that Stone is not likely to commit crimes in the future.

Finally, the sentencing court shall consider all factors to determine whether or not the offender is likely to commit future crimes. R.C. 2929.12(D) – (E). In this case, Stone's behavior, when viewed in light of these factors, demonstrates that he is not likely to reoffend. Most of the subsections in R.C. 2929.12(D) are inapplicable to Stone. Most of the subsections in R.C. 2929.12(E) apply to Stone. R.C. 2929.12(E) lists factors that tend to indicate an offender is not likely to commit future crimes. Pursuant to this section, this Court shall consider that: Stone had not been adjudicated a delinquent child, he had led a law-abiding life for a significant number of years, the offense was committed under circumstances not likely to recur, and he has shown genuine remorse.

Stone is truly remorseful for his conduct and accepts full responsibility for his actions. He recognizes that the choices he made led him down a path that he does not want to continue on.

Stone acknowledges that it was his own decision, and he regrets compromising his character and values. Stone is embarrassed, ashamed, and disgusted by his actions.

d. Similar offenses, and their resulting sentences, as compared to the facts of this case.

In determining the appropriate sanction in this matter, and to ensure that similar defendants do not receive disparate sentences, this Court should consider other cases of similar import. One such case is *State v. Christopher Burchinal*, 19 CR 08 0541 in which Burchinal stole over \$41,000.00 dollars from a client he had declared, by the court, to be incompetent. *Disciplinary Counsel v. Burchinal*, 2021-Ohio-774.

Burchinal completed his schemes by having his client issue blank checks to himself, and then immediately used those funds for personal use. Burchinal stole a total of \$43,000.00 from a vulnerable client in a matter of just four months. Burchinal was convicted of theft, a felony of the fourth degree, and was sentenced to a term of community control, a suspended nine-month prison sentence, and a ten-day period of incarceration. The trial court allowed Burchinal to divide the ten-day local incarceration into two, five-day sentences.

In *State v. Dennis Adams*, CR 2023-05-0725 Attorney Adams was convicted of stealing tens of thousands of dollars directly out of client settlement funds. *Disciplinary Counsel v. Adams*, 2024-Ohio-559. Adams ignored disciplinary counsel, attempted to deceive investigators into his conduct, and was ultimately convicted of felony theft. *Id.* The trial court sentenced Adams to five years of community control, suspended a twelve-month prison sentence, 500 hours of community service, and ordered him to immediately repay restitution.

In *United States v. Charles Runser*, 3:15-cr-00395, Attorney Rusner was sentenced to twenty-two months in federal prison following his theft of over more than \$800,000.00 from multiple different clients over a four-year period of time. He also falsified his records to attempt

to avoid his schemes being detected. In *State v. Kingsbury*, CR-19-636132 in Cuyahoga County, Attorney Kingsbury was convicted of stealing over \$750,000.00 from various clients. As a result of her theft, she was sentenced to four years in prison.

In the matter before this Court, Stone, unlike the other attorneys whose cases have been mentioned, did perform actual legal services for the victims in this case. Stone did file, as he promised, a wrongful death suit, and that suit raised enough concern that two other agencies did a review of the work performed by the investigating police department. This Court should not consider or allow the argument that the entire relationship was fraudulent as it was in the other cases cited above. Here, Stone did get in over his head and he absolutely did fraudulently deceive the victims after the case became hopeless, but fraud near the end of the representation should not be imputed to the entire case.

The importance of this is that while Stone's conduct here was deplorable, there is a stark difference between the typical theft of funds from client accounts where no work is being performed, or in cases where a lawyer is abusing a disabled person for loans, and a case where a young attorney gets in over his head and then lies to cover it up. Stone should have had the courage, the integrity, and the decency to tell the victims the truth; they very well may have still elected to pay for the expert services, but they deserved the right to make that choice.

It is counsel's understanding from discussions with the State that full restitution has been made to the victims in this matter.

III. CONCLUSION

A term of community control is appropriate for Stone based not only on his own personal conduct but on a review of similar cases committed by other defendants who received sentences of local incarceration for far more diabolical and depraved acts. If this Court feels that

incarceration is necessary, this Court should consider a local incarceration that allows Stone to still demonstrate through community control that he is redeemable.

Community control does not demean the seriousness of the offense, and it would permit Stone to maintain his mental health course of treatment, to remain gainfully employed in the community, and to demonstrate that he is capable of redemption. This matter has been before the Supreme Court of Ohio, through its disciplinary arm, and the State of Ohio through prosecution for over three years. In that time, Stone has demonstrated that he has not only shown genuine remorse, but that he has taken accountability for his behavior. Moreover, he has not committed additional crimes, and no other complaints of his misconduct have been received. This was a horrible yet isolated instance that Stone has taken active steps to ensure will never happen again.

In considering all of the factors provided in R.C. 2929.12, Stone has a significant number of mitigating factors that support a term of probation and avoidance of incarceration. Further, all the factors provided in R.C. 2929.12(E) tend to indicate that Stone will not reoffend in the future.

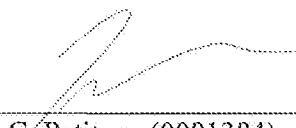
As stated above, Stone has complied with all of the terms of his bail and release while this matter has been pending; this indicates that he is capable and willing to follow any rules that this Court imposes.

By sentencing Stone to a lengthy term of community control with the threat of a severe a prison sentence, this Court achieves two things: First, this allows Stone to demonstrate to this Court that he can rehabilitate himself; second, it allows this Court to impose a sentence upon him that punishes him but also ensures that he has the opportunity to rehabilitate. This Court has the opportunity to craft a just punishment that protects the public, punishes Stone, and offers him a path to redemption.

Stone is no longer an attorney, and he can never be one again. Stone is aware that he could have fought and avoided disbarment in this case; however, he accepted responsibility and surrendered his license. There is no possibility that the circumstances present in this case can ever occur again.

WHEREFORE, Defendant moves this Honorable Court to issue an order sentencing Defendant to a period of community control.

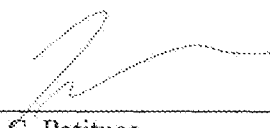
Respectfully submitted,

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CERTIFICATE OF SERVICE

A true copy of the foregoing was served this 19th day of August 2025, via the court's electronic filing system and by email:

Delaware County Prosecutor
Prosecutor Melissa Schiffel

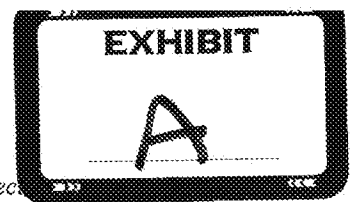
By: 

Joseph C. Patituce

Attorney for Defendant



MATTHEW E. CRALL
CRAWFORD COUNTY PROSECUTING ATTORNEY



Assistant Prosec
Assistant Prosecutor Ryan M. Hovler
Assistant Prosecutor Robert J. Kidd

June 23, 2017

Detective Tracy Keegan
Bucyrus Police Department
500 South Sandusky Avenue
Bucyrus, OH 44820

Re: Review of the Baxter Death Investigation

Detective Keegan:

Please be advised that I have completed my review of the Bucyrus Police Department's investigation into the death of Brandon Baxter who was declared brain dead on August 9, 2016 and later taken off life support. Based upon the evidence and the facts that can be proven, no criminal charges will be forthcoming.

It is my opinion that the investigation was completed competently by your department. Unfortunately, the facts of every case do not always make sense and some facts cannot be proven. Compiling the inability to explain what cannot be proven when a loved one dies, is particularly difficult to understand especially for the family of the deceased.

In the course of reviewing this case for criminal charges I have reviewed the following information:

1. Bucyrus Police Report 3-16-002044
 - a. Report by Officer S. Cramer
 - b. Report by Officer Pennington
 - c. Report by Officer Hulsmeyer
 - d. Dispatch Narratives by Russell and Calder
 - e. Investigation Notes by Detective Keegan
 - f. Investigation Notes by Detective Seif
2. Photographs taken on August 8, 2016
3. Photographs taken October 18, 2016 during reenactment
4. Bureau of Criminal Investigation (BCI) Report 16-111895 – DNA test

112 E. Mansfield Street -- Suite 305
Bucyrus, OH 44820
419-562-9782
Fax: 419-562-9533
matte@crawford-co.org

5. Franklin County Coroner Report -- dated 9/20/2016 (Dr. Somerset)
6. Amended Franklin County Coroner Report -- dated 11/04/2016 (Dr. Gerston)
7. Bucyrus Community Hospital Medical Records (Avita)
8. Grant Hospital Medical Records (OhioHealth)
9. Ohio Automated Rx Reporting System Reports for Leslie and Brandon Baxter
10. Statement given by Leslie Baxter at BPD 8/25/16
11. Statement given by Michelle Cross at BPD 8/25/16
12. Statement given by Jason Candel at BPD 12/21/16
13. Statement given by Brian Reeves at BPD 1/10/17
14. Statement given by Chris Hall at BPD 1/15/17
15. Phone call information from Leslie Baxter's Phone from 8/8/16
16. Cruiser videos from Officers Pennington and Cramer
17. Body camera audio from Officer Hulsmeyer from 8/8/16
18. 9-1-1 call

As part of my review of the case I spoke with Retired Crawford County Coroner Dr. Michael Johnson who was coroner at the time of this incident. He felt that while it was unusual to have no furrow marks at the time of the autopsy it was not impossible.

I also spoke with Franklin County Assistant Coroner Dr. Gerston who reviewed the original autopsy performed by Dr. Somerset who is no longer with the Franklin County Coroner's Office. He is the forensic pathologist who changed the cause of death from "Near hanging" as stated by Dr. Somerset to "Undetermined" in the amended report. The manner of death was undetermined in both reports. In my conversation with Dr. Gerston, he reiterated that he did not believe based upon Dr. Somerset not observing furrow marks that this case was a suicide by hanging.

I discussed with Dr. Gerston the timing of the death. Specifically, Mr. Baxter was not declared brain dead for 24 hours and was kept alive to allow for organ donation for nearly three more days prior to the autopsy. My question to him was whether furrow marks could have healed during this time. While he agreed that was possible, Dr. Gerston, based upon his experience, felt this situation contained too many unknown variables and therefore changed the cause of death to undetermined. Whether the cause of death was "near hanging" or "undetermined" does not provide the necessary evidence to support a homicide conviction.

I also requested that the Crawford County Sheriff's Office perform a review of the case file. This analysis was completed by Sgt. Detective Chris Heydinger who has nearly thirty years of experience with the Office and has the most relevant experience of any officer in this area. He has performed case reviews for other Sheriffs throughout the State of Ohio. He did not find errors with the investigation completed by the Bucyrus Police Department and relied upon the photographs and the position of the furrow observed at the Emergency Room to determine that pressure would have been applied to the front of the throat area. That finding is consistent with a suicidal hanging where the person dies because of loss of oxygen to the brain with a light amount of pressure. That is consistent with the position of Mr. Baxter in relationship to the floor and the pole used.

I spoke with forensic scientist Sara DeVine who conducted the DNA analysis on the coaxial cable for the Bureau of Criminal Investigation (BCI). She cautioned that the likely issue with the cable was that since it was in the home as reported, any DNA found would be of little probative value. The DNA could have already been on the cable prior to its use. I discussed whether re-testing would provide further information and we decided that it likely would not as any subsequent tests would have the same issues as the first test. The swabbing of the cable was done in the area of the knot not the area where Mr. Baxter's neck would have come in contact (the top of the loop versus the bottom of the loop).

One unique factor in this case is the recording from the time of the 9-1-1 call until Leslie and Michelle leave for the hospital. The officers did not find their reactions and their actions to be anything other than consistent with what the two women related happened. When compared with the telephone call made, the investigation shows a decent timetable. The Police also verified when the deceased left work to begin the timeline.

Another factor that I considered was the toxicology reports from the autopsy, the screens administered at Bucyrus Community Hospital, as well as the toxicology reports from Grant Hospital. Those screens show the presence of alcohol, suboxone, and marijuana. When comparing to the medication on the deceased OARRS report, one would have expected to see the presence of an opiate as he was prescribed Oxycodone. From my research, a person can overdose on Suboxone and alcohol. However, none of the levels alerted any of the medical personnel to such an issue.

Lastly, I spoke with Daniel and Melinda Straker, the step-father and mother of Brandon Baxter. The Strakers contend that Leslie Baxter murdered their son. Upon review of Court documents, the Strakers have filed a wrongful death suit wherein they alleged the following:

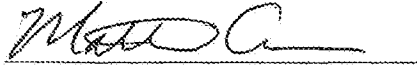
6. The above-described accident was proximately caused by the intentional and reckless acts of the defendant, Leslie Baxter, in that the defendant intentionally or recklessly placed the aforementioned drugs (benzodiazepines) in the decedent's beverage without decedent's knowledge or consent.
7. ...
8. As a proximate result of the above described wrongful act of defendant, decedent suffered severe multiple injuries to his person, which caused decedent's death on August 9, 2016.

The lawsuit says under number 7 that the decedent was not aware that his beverage had been contaminated.

The investigation, the allegation contained in the wrongful death suit, nor my conversation with the Strakers provided sufficient evidence that Leslie Baxter did what the Strakers accuse her of doing.

Therefore, it is my opinion as the duly elected County Prosecutor, that no charge can be proven beyond a reasonable doubt. As a result, no criminal charges will be filed in this matter unless additional evidence comes to light.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Crall', written over a horizontal line.

Matthew E. Crall, Esq.
County Prosecutor

cc: Patrick Murphy, Attorney for Leslie Baxter
Adam Stone, Attorney for Dan and Melinda Straker
Sgt. Detective Chris Heydinger

Mindy explained after talking with Dr. Gerston, they questioned Brandon's death, and the Bucyrus PD would not meet with them to discuss Brandon's case. They hired Stone to help them navigate Brandon's death and the investigation. Mindy advised that when they first met with Stone, Stone said they would pursue a wrongful death suit against Brandon's former wife, Leslee Baxter (Leslee), and prove that Leslee murdered Brandon. Stone told the Strakers that after they were able to prove that Leslee murdered Brandon, he could then give the case to the Ohio Attorney General's Office (AGO) and BCI, and the AGO would pursue murder charges against Leslee. The Strakers said that Adam told them he was friends in school with their deceased son, Brandon, and Mindy said that they were not friends.

Mindy advised that the initial agreement with Stone was that Stone would receive 33 and 1/3 percent of anything that they received in compensation for the wrongful death suit, and the Strakers had to pay for all court costs, filing fees, and expert witness costs. Stone also recommended that the Strakers open a trust account within Stone's office in the name of Brandon, and Dan believed there was between \$12,000.00 and \$14,000.00 deposited in the trust account in Brandon's name. The Strakers said based on their calculations, there should still be \$1,466.00 unaccounted for in the trust account. The Strakers advised that they bank with Chase Bank, and some of the copies they previously provided were obtained through Chase's online banking portal.

Mindy said that the total amount given to Stone between the trust and expert witnesses was \$50,698.25. Mindy advised that they spent \$32,500.00 on Evidence Room, Scott Roder (Roder), for forensic crime scene recreation. Mindy said that she paid Roder out of pocket and the remaining \$7,500.00 came out of Brandon's trust after Stone said that OAG Prosecutor Maggie Tomaro allegedly told Stone that they needed additional information done by Roder for the criminal case against Leslee. The Strakers said that numerous times they were waiting on work product from Roder, and Roder would tell the Strakers that Roder had sent the work product to Stone. The Strakers said that Stone would later find the work product Roder had sent Stone in Stone's emails.

Mindy advised in regard to Evidence Room, and owner Scott Roder (Roder), initially she sought out Roder when Stone said they needed expert witnesses in their case. The Strakers said they only asked that everyone involved in the case or their wrongful death suit would follow the evidence, and to them it seemed that Roder was following the evidence.

The Strakers said Roder eventually recommended that he bring in Medical Examiner Daniel Spitz (Spitz), and that Roder had used Spitz several times successfully in the past. The Strakers said they spoke with Spitz, and Spitz was surprised that he was hearing from them and not Stone. Spitz told the Strakers that he would follow the evidence and make a determination. The Strakers said they had a hearing scheduled that Stone said Roder and Spitz were supposed to be present for; however, they did not show.

The Strakers said in regard to the wrongful death suit, the case was dismissed and they were told by the Crawford County Common Pleas Court that the Strakers had to be the fiduciaries of Brandon's estate in order to bring a wrongful death suit against Leslee. Mindy advised that they then filed in Crawford County Probate Court to be the fiduciaries of Brandon's estate. Mindy stated their case went on for some time, during which; the sitting judge, Eckstein, passed away. Pat Murphy, who was Leslee's former attorney, was appointed judge of probate

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court, and a visiting judge was appointed to the probate case.

The Strakers said in one of the hearings in probate court, Stone leaned over to them, showed them his phone with text messages, and told them that the AGO was picking up the murder investigation of Leslee in Brandon's death. Neither Dan nor Mindy were able to see the messages, and said they only recognized that Stone's phone was an iPhone. The Strakers said that Stone told them this after Stone had dealings with the AGO in a separate investigation, and they believed that this was in 2018. Dan said in the probate court hearings the judge would often say that the Strakers could come into the hearings, but Stone would tell them that they needed to wait outside of the courtroom.

The Strakers said in 2018, Stone started communicating more by text, and when they wanted answers for things with the case, Stone would typically divert the conversation to the kids and/or issues he was dealing with in his life.

The Strakers said around the time they felt they were getting nowhere with the wrongful death suit, Mindy told Stone they were going to contact the AGO in regard to the case, and that was when Stone introduced that he had been in contact with AGO Prosecutor Tomaro and that the AGO was going to take the criminal case against Leslee. Dan and Mindy said as the text messages between them and Stone show, Stone had them believing that the AGO had taken the case to a Cuyahoga County Grand Jury, and Leslee had been indicted for murder. Following the indictment for murder, Stone had the Strakers conducting surveillance on Leslee, and believing that the Ohio State Patrol and BCI were trying to find Leslee to place her under arrest for murder. Stone told the Strakers that BCI SA Hamberg was working Leslee's case, and, according to Stone, SA Hamberg was too busy with other cases to pursue Leslee, all obviously untrue. The Strakers said they were aware of a previous investigation by BCI that Stone was involved with, where SA Hamberg and AGO Prosecutor Tomaro were investigating Stone and two females that had connections with Stone, and the Strakers believed it was likely that Stone set the two females up.

The Strakers stated at one point, Stone's father passed away, records show January 16, 2022, and the Strakers went to Stone's house to check on him and Stone hugged Dan so hard that Stone left blood on Dan's shirt from a bloody nose. The Strakers explained that they went to Stone's father's funeral, and as they exited the funeral home, Stone yelled to them, "Don't worry, we're gonna get her", referring to Leslee.

Dan Straker said he believes that Prosecutor Crall has something over Stone and that may be a reason that Stone did not handle Brandon's case as he should have. The Strakers said they have no evidence of that, but that is what they believe.

SA Emahiser asked the Strakers if Stone had ever given them an accounting of the monies in the trust and they advised that Stone did not, and Stone did bill them out of the trust which he was not supposed to.

At that time, the interview was concluded, and SA Emahiser advised the Strakers if they had any additional information, other than the files they had provided AGO Section Chief Kinsler, to contact SA Emahiser. SA Emahiser also advised the Strakers that there will likely be additional follow up contact regarding the case.

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Attachments:

Attachment # 01: Straker 8.12.2022

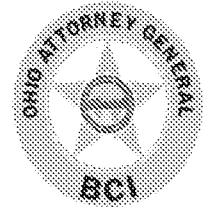
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Ohio Attorney General's Office
Bureau of Criminal Investigation
Investigative Report

2022-1374

Fraud – Melinda M Straker, Daniel A Straker (V)



Investigative Activity: Cell Phone Analysis and Review

Involves: Melinda M Straker (V)

Date of Activity: 08/12/2022

Author: SA Tyler J. Price, #165

Narrative:

On August 12, 2022, Special Agent (SA) Tyler Price responded along with SA Ryan Emahiser to the Straker residence at 236 Summerbrook Place, Delaware, OH. SA Emahiser requested assistance with extracting text messages from the phones of Dan and Melinda Straker. Mr. and Mrs. Straker provided consent for the extraction of their cell phones.

Due to the phones not extracting successfully on scene, the phones were picked up on August 23, 2022 and taken to the Bureau of Criminal Investigation Cyber Lab to utilize advanced extraction techniques.

References:

Mobile Phone – Apple iPhone 12 Pro (S/N F17FPGLA0D83)

Mobile Phone – Apple iPhone 12 Pro Max (S/N G0NFMD840D42)

Analysis:

–Apple iPhone 12 Pro (S/N F17FPGLA0D83)

On August 12, 2022, The Apple iPhone 12 Pro was placed into Airplane mode and connected to a forensic computer running the Cellebrite UFED4PC forensic software. A logical extraction was attempted, in an effort to extract the text message content. The extraction would not complete. An advanced logical extraction was attempted and also failed.

After attempting extractions with UFED4PC, an extraction was attempted with using the Axiom Process forensic software. A file system extraction was obtained from the device. The image would not open through Axiom Examine to determine if the desired content was acquired.

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On August 23, 2022, the Axiom image was successfully loaded into Cellebrite Physical Analyzer for data parsing and analysis. The data was found to contain text message content.

A PDF report was generated containing the text message content requested by SA Emahiser.

–Apple iPhone 12 Pro Max (S/N G0NFMDB40D42)

On August 12, 2022, The Apple iPhone 12 Pro Max was placed into Airplane mode and connected to a forensic computer running the Cellebrite UFED4PC forensic software. A logical and advanced logical extraction were attempted, but not successful.

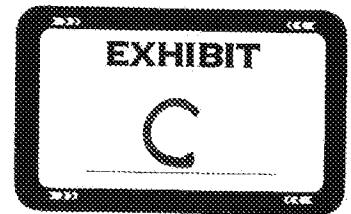
On August 23, 2022, The device was connected to a forensic box running the Graykey forensic software. A Full filesystem extraction was obtained from the device. The extraction files were then loaded into Cellebrite Physical Analyzer for data parsing and analysis.

A PDF report was generated containing the text message content requested by SA Emahiser.

Conclusion:

Data was extracted from the devices, rendered into a human readable format, and provided to SA Emahiser for review. A copy of the extraction files and reports will be retained in the Bureau of Criminal Investigation Cyber Crimes Unit case file.

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ROBERT CLARK NEFF, JR.
126 W. RENSSELAER ST.
BUCYRUS, OHIO 44820

July 31, 2025

Re: Adam Charles Stone

To whom it may concern:

I am a retired Ohio lawyer. Prior to my retirement, I practiced law in Cincinnati, Ohio and, thereafter, in Bucyrus, Ohio. I served as the Law Director for the City of Bucyrus, and, following that, as a magistrate under Judge Russell B. Wiseman in the Crawford County Court of Common Pleas. I also served in various capacities with the Crawford County Bar Association, including service on its Character and Fitness Committee for the Practice of Law. Although I have relocated from Crawford County in retirement, I maintain a secondary residence in Bucyrus, the address of which is reflected on this letterhead.

Adam Stone interned in my office while he was still a law student at the University of Dayton and, after graduation prior to his admission to the Ohio Bar. After his admission to the bar, I worked with Adam in the Ohio State Bar Association's mentorship program and shared office space with him for several years. As a result of my personal investment in Adam as a young lawyer, his downfall causes me personal, as well as professional anguish. I realize that any disappointment I feel may be less than that of those more directly affected by his actions. Nevertheless, it serves as context for my comments. The convenient approach for me now would be to condemn Adam publicly and refuse to offer any words of support. However, because Adam has always dealt with me honorably, and because I believe that, his current circumstances notwithstanding, Adam has offered much in the past and has much to offer in the future, both to his family and community, I cannot in good conscience abandon him with scorn or, more conveniently, without comment.

Preliminarily, I note that I claim no particularized knowledge of the charges against Adam and the behavior that led to these proceedings. In that sense, I do not seek to speak in his defense or to justify or excuse his actions. Rather, my focus is to provide perspective on the person I know and the context in which these matters occurred.

When Adam shared office space with me, I witnessed him struggle with persistent and debilitating back pain and spasms. These were characterized at times with sudden and painful

losses of basic mobility. On more than one occasion, I and others in the office assisted in getting Adam to a vehicle so that he could be taken either to obtain medical attention or taken home to rest, often for days at a time, before he was able to return to work. While I am not privy to all the details of the medical treatment Adam received, I know that he was under continuing medical care for this condition for a period of years before he eventually received what appears to be lasting relief. As I understand it, the surgical procedures that eventually provided lasting relief were delayed because of the relatively young age of onset for Adam's symptoms and the need for refinement of emerging surgical procedures before the risk/benefit calculation was medically sound.

As Adam's health improved, his law practice grew, especially in the area of criminal defense. Adam is the only attorney I know personally who has taken a murder case to trial and secured a not guilty jury verdict. But his successes came at a price. Adam struggled with what appeared to be the secondary or vicarious trauma from dealing with the factual details of the serious felony cases he handled. Adam mentioned a particular case to me on more than one occasion where the extremely graphic photographic evidence of a child victim haunted him long after the case concluded. As he was professionally obligated to do, Adam used the disturbing nature of the evidence to his client's advantage in negotiating a plea bargain. My fear is that he felt he sacrificed a part of his humanity in fulfilling his professional obligation. More than once, Adam expressed a desire to refocus his practice away from criminal defense. However, he also expressed frustration that he was always drawn back into his criminal defense practice by prior success and referrals and requests for representation from former clients and/or their families, and he found it impossible to decline representation.

During the time I shared office space with Adam, I knew him to be a compassionate person who, despite his own struggles, went out of his way to assist others in their time of need. I saw Adam hire a former client who had lost his job and his livelihood in ignominiously spectacular fashion and who was essentially unemployable. Adam hired that person as a legal assistant and provided employment through the completion of a paralegal certificate program. In short, Adam gave that person a second chance. I saw Adam hire another individual as an investigator who had lost a local governmental post for what appeared to be political reasons. That person also was given a second chance by Adam and is now working for a different local governmental entity in Ohio. I saw Adam hire another person who had graduated from law school in California and was returning home to north central Ohio to take the Ohio Bar. Adam hired him as a law clerk. That clerk had local regional ties, having grown up in the area, but experienced difficulties in his youth that resulted in no one else in the legal community giving him a chance. Adam hired him and, thereafter, the Character and Fitness Committee required certain actions to be taken which delayed the taking of the bar for a year. Adam continued his employment, giving him a second chance. That individual is currently a practicing lawyer in Ohio, and has contributed significantly to his community, coaching high school athletes and mentoring them through speakership programs and collecting professional clothing donations for them to wear to job interviews. I saw Adam hire another person as a law clerk pending the receipt of bar results. This person experienced persistent difficulty with passing the bar exam despite being very

successful in a prestigious East coast law school. Adam provided a chance, a second and a third chance for this individual who eventually passed the Ohio Bar with management of apparent test anxiety and is a highly regarded practicing attorney in Ohio today. These four individuals landed on their feet, so to speak, and are working and contributing to their communities today, thanks in large part to the bridges provided to them by Adam.

Adam has also suffered significant traumatic family issues involving some of the most influential people in his life during the time relevant to these matters. His grandfather, with whom he was quite close, developed dementia and lived with Adam's parents in a home addition that Adam's father built for his in-laws until care requirements exceeded the ability of his family to provide in-home care. Adam lived close to his parents and therefore dealt with the challenges of a loved one's dementia on a regular, if not daily, basis. As the saying goes, "If you know, you know." Thereafter, his grandfather resided in an assisted living facility until it closed at an advanced stage of his illness, resulting in a very difficult transition to a new and unfamiliar facility.

Approximately six weeks after Adam's grandfather died, Adam's father died suddenly from a heart attack at home in his sleep. It became incumbent on Adam, as the family member located closest, to respond immediately to his mother's call and to bear witness to the aftermath of his father's death and to assume responsibility for the removal of his body from the family home. Adam called me that morning to tell me they found his father dead. At the time, I was struck by how calm and matter of fact Adam was in such extremely difficult circumstances. I have come to believe that this was just another instance of Adam being very adept at masking his difficulties from others instead of coping effectively with them.

Adam was (and is) devastated by the loss of both these important male role models. His grandfather was an autoworker and was very active in his church, his family, and in union matters. Adam's father, Chuck Stone, (for whom Adam Charles Stone is named in part) grew up under exceedingly difficult circumstances, of which I am personally aware as a contemporary of Adam's parents. Chuck's mother suffered from significant mental illness which destroyed his family household and resulted in Chuck spending a significant portion of his childhood in the Crawford County Children's Home and another portion of it living in a transient hotel in Bucyrus. Despite the challenges of his youth, Adam's father had the good fortune to be taken under the wing of one of his teachers/coaches in junior high school. Through his commendable efforts, and guided by his coach, Chuck went to college, played on an ACC championship football team and emerged as a positive, nurturing father and teacher, teaching for over twenty years at Tri-Rivers Joint Vocational Center in Marion, OH and thereafter in Marion City Schools prior to his untimely death. Having been assisted through his challenges by others, Chuck became a caretaker by nature, coaching student athletes, spearheading athletic booster efforts and assisting personally with students in need. Chuck's generosity of spirit is recognized in Stoney's Kindness Fund, a memorial social impact fund in his name with The Community Foundation for Crawford County. See <https://www.cfcrawford.org>.

Adam's behavior in the aftermath of his legal career is significant. When the allegations of misconduct came to light, he surrendered his law license, citing mental health concerns. While some may have viewed those mental health concerns as a convenient excuse, I have come to believe differently. The truly bizarre behavior which Adam is accused of, and to which he admits through his guilty plea, is so incongruous with the person I have known for years, it can only make sense to me in the context of mental illness. Adam began working with a mental health professional, and to the best of my belief, continues to do so. He is also emulating his father and namesake by teaching at Bridges Preparatory Academy, a charter school in Tiffin, Ohio. In this sense, he is furthering a family tradition in education in the State of Ohio. In addition to his father's teaching career, Adam's mother, Sandy Stone, served on the Bucyrus City Schools Board of Education for twenty years. Adam continues this family tradition and is making positive contributions to the lives of his students and his north central Ohio community, in essence helping students who may be experiencing challenges like his father did by assisting them like his father did. Additionally, Adam is very active in the parenting of his three sons and is making positive contributions in their young lives as well. In short, he has rebuilt his life in a positive way under circumstances, be they of his own making, that would crush many people.

An appropriate sentence is, of course, in the discretion of the court. While I would not presume to fashion a sentence based on my narrow perspective, I offer a few observations for the court's consideration. Adam's surrendering of his law license means that there is zero likelihood that he will repeat his misdeeds and, therefore, incarceration is not necessary to protect the public from any similar misconduct. Furthermore, Adam's guilty plea is a demonstration of his acknowledgment of responsibility for his actions. Incarceration is not necessary to provoke self-reflection to realize what Adam has already acknowledged and admitted. Further, incarceration will almost certainly interrupt ongoing mental health services Adam is receiving which have enabled him to rebuild his life. Interruption of these mental health services will undoubtedly work to his detriment as well as to the detriment of his family. Incarceration will also necessarily interfere with his parenting of his young children as well as his teaching of the students at Bridges Preparatory Academy. If rehabilitation is substantially complete, and it appears to be, incarceration will not serve that end.

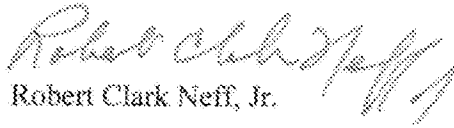
I have no knowledge of any economic damages suffered by the victims of Adam's misconduct. If the victims have not been made whole, I believe full restitution would clearly be in order.

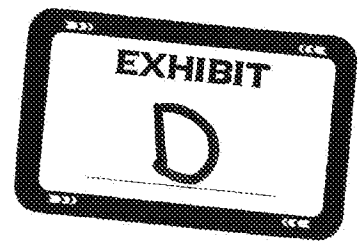
Finally, there is a question whether Adam should be dealt with to serve as an example to others. In this sense, we often deal more harshly with those closest to us, professionally or personally. Further, such considerations are sometimes based upon an imagination of what we would have done in Adam's circumstances. Such matters are fraught with uncertainty and presumption. We cannot know what Adam experienced or how he experienced it. While we would like to believe we would have taken it all in stride, until we are dealt the hand, we cannot be certain of how we would play it. Adam has, in my opinion, set himself forth as a good example, a bad example, and again, as a good example, in that order. He already serves as a cautionary tale, given the

publicity this case has received, the loss of his career, and in large part, the loss of reputation. I know of no one who would not avoid his path, even if it does not include incarceration.

This case is littered with the tragedies of families destroyed over at least two generations on both sides of the equation. To prevent that from happening yet again to a third generation, I would respectfully suggest that Adam be extended what he so readily extended to others: another chance. Not because he deserves it; none of us does. But rather, because the grace of another chance allowed offers the best opportunity going forward for positive change in these difficult circumstances.

Respectfully submitted,


Robert Clark Neff, Jr.



August 6, 2025

To Whom it May Concern:

I met Adam Stone through a mutual acquaintance who I knew through the Paralegal program at North Central State College. She introduced us knowing that he needed office help, and I needed to find somewhere to do an internship, and then possibly even employment, after graduation. He allowed me to do my internship from September through December of 2013 and then I was hired to work as a full-time Paralegal in his office beginning in December of 2013. I was employed by Adam from December of 2013 until he resigned as an attorney in October 2022.

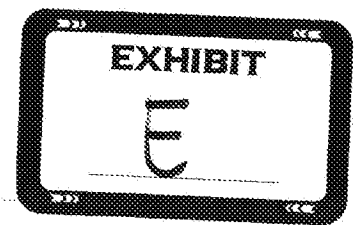
I sent out all the letters of withdraw to clients, as well as Motions to Withdraw to all the Courts. I believe it took me at a minimum two (2) weeks to complete all the letters and Motions due to the number of clients that he had at the time of his resignation.

He was, for the most part, a good boss and he did care about his employee's well-being. He did his best to make an enjoyable and, when possible, even fun work environment. I truly appreciate the opportunities that he gave me. After years of staying home with my children, and going back to school later in life, many people would not care to hire someone with such a gap in employment history.

I know Adam spent a great deal of time with charitable organizations early on in his career and was doing valuable work with those organizations. I do believe that if he was given the opportunity to repeat some of that vital work, he would do so and could, once again, make an important difference in the lives of people that need it.

Best wishes,

Bobbi Everly



Letter for Adam Stone

From Carrie Cottrell <c.cottrell@cleaningbycarrie.com>

Date Thu 7/10/2025 1:51 PM

To jpatituce@patitucelaw.com <jpatituce@patitucelaw.com>

Cc Dean@behmandhenry.com <Dean@behmandhenry.com>; senior@patitucelaw.com
<senior@patitucelaw.com>

To Whom It May Concern,

My name is Carrie Cottrell, and I am writing this letter on behalf of my friend, Adam, to share how his kindness, integrity, and dedication profoundly impacted my family's life during one of the most difficult seasons we've ever faced.

On November 11, 2014, my son Grayson was born. Just one week later, on November 18th, we received a call from Crawford County asking if we would take Grayson into our home. His birth mother—my sister—was being investigated for neglect and other issues tied to her struggle with addiction. From that moment forward, our world changed.

As Grayson entered the system, a guardian ad litem was assigned to oversee the case and facilitate supervised visits between us, Grayson, and his birth parents, with the goal of eventual reunification. During this process, Adam was an essential support. He did everything within his power to help guide us toward the best possible outcome—not just for Grayson, but for everyone involved.

As it became clear that Grayson's biological parents were not following the court's plan of action, Adam continued to stand by us. He helped my husband and me find financial resources, connected us with the right people, and walked us through each step of a complex legal system that we had never imagined being part of. After more than a year of uncertainty, we decided to pursue adoption so that Grayson could have the stability and security every child deserves. Adam and his legal team supported us through the entire adoption process—with no financial gain to himself.

Adam went above and beyond for our family, simply because he believed it was the right thing to do. To this day, I consider him not just a trusted advisor, but a friend and part of our extended family.

I can't speak to the circumstances that have led to him needing this letter, but I can say with absolute certainty that the Adam I know is a man of compassion, integrity, and deep commitment to doing what's right—even when it's not easy. His actions changed a little boy's life forever, and I will always be grateful.

Sincerely,
Carrie Cottrell

--

Carrie J. Cottrell, Owner

419.989.1678

cleaningbycarrie.com



To Whom It May Concern,

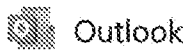
I am writing this letter in support of Adam Stone, who served as my attorney during the most difficult time of my life. More than just legal guidance, Adam offered me a sense of clarity and dignity when I felt like I was losing both. His words reminded me that I am not defined by my lowest moments, nor by the harsh judgments of others. His compassion and steady presence helped me rebuild my confidence and stay grounded. I will always be grateful for his belief in me when I needed it most.

He has made a positive difference in my life and the lives of many others, and that should not be overlooked. What he said to me then still holds true now: we are not our worst moments. I believe that applies to him too—and I believe he deserves the chance to show that.

Thank you for your time and consideration.

Sincerely,

Kiersten Markland



Fwd: Adam Stone

From Darlene Ballard <dballard112@gmail.com>
Date Tue 7/29/2025 2:27 PM
To senior@patitucelaw.com <senior@patitucelaw.com>

----- Forwarded message -----

From: **Darlene Ballard** <dballard112@gmail.com>
Date: Tue, Jul 29, 2025 at 2:26 PM
Subject: Fwd: Adam Stone
To: <Dean@behmanhenry.com>

----- Forwarded message -----

From: **Darlene Ballard** <dballard112@gmail.com>
Date: Tue, Jul 29, 2025 at 2:24 PM
Subject: Adam Stone
To: jpatituce@patitucelaw.com <jpatituce@patitucelaw.com>

Your Honor, I am writing this to let you the character of Adam Stone. I have known him personally for many years and he has always been an upstanding young man. He has been my attorney for a legal situation and he spent hours to travel to represent me and never charged me for his travel. He diligently fought for me in this matter and had the case dismissed. I don't know too many attorneys that would travel 5 hrs round trip on several occasions and only sought the cost of the legal process. I am not quite sure of what all is involved in his situation, but I do know he would never intentionally deceive or mislead anyone, especially one he is representing. He would never deliberately cause any harm and would work to achieve the best outcome. I hope you take this letter in consideration in this matter. Sincerely, Darlene Ballard



July 6, 2025

To Whom It May Concern,

My name is Jennifer Ard, and I am both a former client and long-time acquaintance of Adam Stone. I have known Adam since 2019, when I was introduced to him through my husband, who had been both a friend and client of his prior to our marriage.

Although Adam was a Criminal Defense Attorney by profession, he went above and beyond by assisting my husband with a complex and emotionally challenging divorce case despite it falling outside his usual scope of practice. At the time, my husband was in an unsafe and abusive situation involving both physical and emotional harm, not only to himself but also to his children. Adam chose to help when he didn't have to, purely out of kindness and a genuine desire to help someone in need.

Thanks to Adam's dedication and compassion, my husband was granted custody of his children. As a result, they now live in a safe, nurturing, and loving environment free from the trauma they once endured. It is not an exaggeration to say that Adam's efforts profoundly changed our lives. Our children now have a real chance to experience a healthy, joyful childhood, and for that, we will always be grateful.

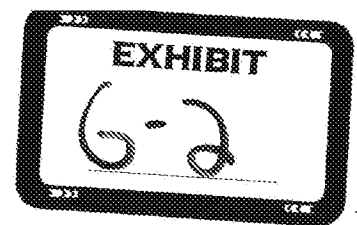
Adam is a man of integrity and compassion who has consistently demonstrated a willingness to help others. While I am not familiar with the full details of the accusations he may be facing, I do believe in recognizing the humanity in each of us. We all make mistakes, but those mistakes should not define an individual for a lifetime, especially someone who has shown such selflessness and care for others.

Adam is not only a valued friend but also a devoted husband and father. Removing him from his family would impose immense emotional harm, not only to him but to his wife and children as well. They need him—as do those of us whose lives he has touched with his support and generosity. Even after stepping away from his legal career, Adam has continued to assist our family in meaningful ways, reflecting the strength of his character and the depth of his heart.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Ard". The signature is written in a cursive, flowing style.

Jennifer Ard



To whom it may concern...

I hope this message finds you well. I'm writing to extend my deepest and most sincere thanks for the incredible work you did on behalf of my father all those years ago. I've carried this gratitude in my heart for a long time, and I felt it was finally time I expressed it to you directly.

Your dedication, expertise, and unwavering determination in the courtroom did more than just win a custody case. You changed the entire trajectory of my life. Because of your tireless efforts, my siblings and I were given the chance to live in a safe, stable, and loving home, far from the chaos and pain we had previously known. Your work protected us from what could have easily been a life of hardship and emotional turmoil in the hands of someone unfit to care for us. You gave us hope. You gave us a future.

Slowly but surely, the life you helped create for us allowed me to begin finding a sense of normalcy in what had once been a world full of chaos. The healing didn't happen all at once, but your dedication laid the foundation for it, and for that, I will always be thankful.

February 18th, 2018 is a date I will never forget. It is the day my dad officially got custody, and the day everything changed for the better. I often think about how different things could have been if you hadn't stood firmly in our corner. That thought is both terrifying and humbling.

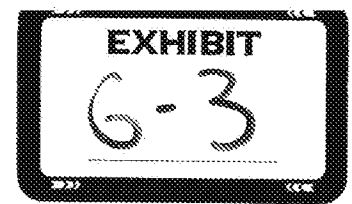
Thank you, Mr. Stone, for fighting for us when it mattered most. Thank you for believing in our case and for giving my dad the voice he needed in a system that often feels impossible to navigate. Your work didn't just serve justice. It saved lives, including mine.

You are truly a remarkable person, and I will never forget what you did for our family. From the bottom of my heart, thank you.

With endless gratitude,
Micah Ard

Micah Ard

7/6/2025



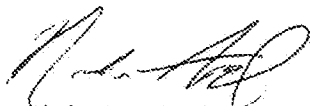
To Whom it may concern,

My name is Nicholas Ard, and I have known Adam Stone since we were young children. Adam was also my attorney until he resigned his law license, he always treated not only me, but my children with respect, compassion, and dignity. He was always honest with me, and always informed me of not only good outcomes, but also possible bad outcomes of issues. My children think the world of Adam, and till this day thank and love him for helping get them away from an abusive mother. Inside Mr. Stone has a good heart, and has always shown good intentions in every endeavor he embarked on. He has went above and beyond for not only my family, but I've seen him do the same for many others. Adam and his family also try to pass along positive things in the community, as in Stoney's kindness fund, which recognizes kids that show positive kind attitudes in Bucyrus City Schools, along with many other things he has done within the community in the past. I don't know much about what Adam is accused of doing, as I stay away from local media and Facebook, because the narrative is not always told in its entirety. Adam is also a very loving and caring father which I have witnessed on multiple occasions. Sending a good father to jail only affects the children in ways people may never understand. Adam is not a bad man, nor is he a person that would never purposely cause harm to anyone. Adam comes from a family of morals, and kindness, which many of us can see he has inherited from his strong family bond. Unfortunately sometimes people just have it out for certain people, and will do whatever they can to tarnish someone's name and who they are. It's like what I teach my children, everyone has a story. I can't imagine the things Adam has had to see, deal with, or the people he had to represent when he was a defense lawyer. Mental health is a huge thing in today's society, which is way overlooked. I'm not the one to judge if Adam did or did not do what he is accused of, but I'm positive his story played a part into whatever happened. Someone's thought process, who they are can change in the snap of a finger over something they had to go through or witness. Trauma can be caused by so many issues in life, I'm sure Adam has seen plenty of things one should never see, nor have to see someone go through. Putting a person that has always followed the law, has a good heart, and a loving family man in jail, would not only affect him, but would affect his family, his children in ways that you could never imagine. Which would only start up the vicious cycle we see today with many children. In closing, I know Adam is a good man, and everyone makes mistakes in life. That does not mean they are different, or going to become an habitual law breaker. There are other ways to punish first time offenders, if found guilty. Taking away someone from a tight loving family, only causes more issues down the road. Young children should never have to grow up without their loving father being around.

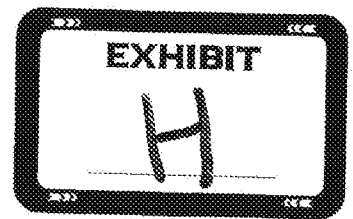
Keeping Adam out of jail, and finding an alternate solution would benefit most importantly his family. Adam is a good man, and given the chance to be who he needs to be for his family, I can say that I don't see Adam ever being involved with the law again.

I'll say it one more time, everyone has a story and maybe it's time that Adam's story has been heard.

Thanks for your time,

A handwritten signature in black ink, appearing to read 'Nicholas Ard', written in a cursive style.

Nicholas Ard



Sherry Stuckman
4233 State Route 96
Bucyrus, Ohio 44820
Stuckman.sherry14@gmail.com
419-569-0896

July 18, 2025

Re: Character Reference for Adam Stone

To Whom it may concern,

I am writing this letter regarding Adam Stone, who is currently before you in court. I have known Adam all his life. He has consistently demonstrated responsibility, and a genuine concern for the welfare of others. Adam has always acted with kindness and respect toward everyone he encounters.

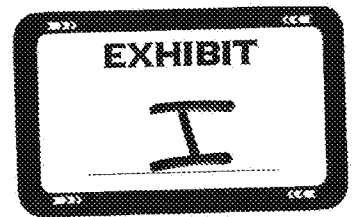
When I needed Adam, for legal assistance for my daughter, during a challenging time, he was able to resolve the matter involving her underage situation in a way that gave me peace of mind. From the moment we first consulted with him, it was clear that he genuinely cared about her well-being and the outcome of her case. His calm, yet assertive approach provided us with a sense of reassurance and clarity throughout the entire process. He took the time to explain the legal procedures, kept us updated regularly, and made sure we fully understood our options.

Most importantly, his efforts directly contributed to the positive resolution of the matter, which has allowed my daughter to move forward without the burden of a permanent legal record. I will be forever grateful for how he handled everything with such care, and I am confident that his intervention made a significant difference in her future.

I understand that Adam is facing a legal situation, but I hope that the Court will consider the positive contributions he has made to society. I am confident that Adam is not defined by this incident alone and that he will continue to make positive strides in the future.

Thank you for your time and for considering this letter as part of the proceedings. I am available for any further clarification should you require additional information.

Sincerely,
Sherry Stuckman



Friday, July 11, 2025

To Whom It May Concern:

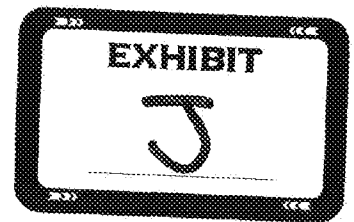
This letter is in regards to Adam Stone. I am writing to speak to the character that I have personally witnessed in Mr. Stone.

My name is Courtney Posey. My husband was Michael Posey. He is now deceased. Between 2012 and 2014, Mr. Stone represented my husband as his public defender. This was not our first experience with a public defender. I would like to make several notable points about Mr. Stone during that period because he was intelligent, knowledgeable, aggressive at the right times and not aggressive at the appropriate times. More than that, Mr. Stone treated my husband and myself with respect: he treated us like human beings. He recognized the flaws and concerns that were there, but also treated us as though we were intelligent human beings, able to be taught, deserving of a second chance and able to change course. He encouraged us to do so without making us feel small.

Mr. Stone was an asset and an inspiration during those troubled times. If you have any questions or concerns, please feel free to contact me.

Regards,

Courtney Posey, LCDC II, SWT
1094 Lavina Avenue
Bucyrus, Ohio 44820
419.834.4893
courtneysuehildebrand@gmail.com



From: "sandy stone" via Senior Staff
To: joathura@nathurclaw.com; Senior@nathurclaw.com; dean@behmandhenry.com
Subject: Adam Stone
Date: Tuesday, August 12, 2025 10:06:47 PM

My name is Sandra Stone and I respectfully submit the following for your consideration in support of my son, Adam C Stone.

Your Honor, no mother wants to see her child face the types of challenges my son has faced in the past several years.

The first, and the most prevalent, is the challenge he has been faced with in this case. I will not make excuses for the decisions Adam made to lead us here, but I believe that he has shown a strong character throughout the judicial process in this case. He said, on the record, that he makes no excuses for those charges which he pled guilty for. I am proud of him for standing tall and taking accountability for himself.

The second challenge has been loss. The loss of his grandfather, my dad, and the unexpected loss of his father. These two men showed my son what it truly meant to be a man, including shaping his character to admit when he's made less than favorable choices, learn from those choices, move forward and become a better man. He's also experienced the loss of his profession when he voluntarily retired his law license. While this was a choice he made, he did so because of the immense tension of the criminal cases he tried and the resulting mental health challenges that stemmed from representing clients in some of the most disgusting cases.

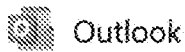
However, the loss he dealt with when 2 of his 3 boys were kept from him was devastating. Not only for him but also the boys (ages 9 and 5) who love their dad very much. His children are young, 9, 6 and 5, and they need their dad in their lives during the most formative years of their lives. Adam is a wonderful dad who deeply loves his boys, wants to help them learn about the world around them and the importance of family.

I'm not surprised that he is now teaching at risk students. I believe his passion has always been in helping kids. When he began practicing law, he was appointed as guardian ad litem in many cases. He loved that work. Only problem, you couldn't make a living on that alone.

In closing, my sincere hope Your Honor is that you will see that My son is a good man who, while he made a poor decision, should not be defined by that decision.

Thank you for your time in reading this letter.

Respectfully,
Sandra Stone



Character letter for Adam Stone

From samantha stone <samanthacox1745@gmail.com>

Date Mon 8/11/2025 9:10 PM

To jpatituce@patitucelaw.com <jpatituce@patitucelaw.com>; Senior Staff <senior@patitucelaw.com>; dean@behmanandhenry.com <dean@behmanandhenry.com>

Samantha Stone

955 West Beal Ave

Bucyrus, Ohio

44820

August 11, 2025

To The Honorable Judge Schuck,

Your Honor,

First, I want to sincerely thank you for taking the time to read this letter, and for your careful consideration of this case in its entirety.

I am a mother and I can not imagine the pain of losing a child that the Strakers must feel. I can not fully explain my husband's actions and I will not excuse any of his actions but I am sincerely sorry for their hurt. I do hope that concluding this will give them some form of closure and will help them in their process.

When I first met Adam, he was a practicing criminal defense attorney, and I was a staff accountant and office manager for a busy domestic relations attorney. Adam stood out immediately — he was charming, articulate, and had a natural ability to command attention in a courtroom. He had a unique gift for connecting with clients from all walks of life, no matter the charges they faced. I watched him spend countless hours fielding phone calls and emails — often late at night — and making frequent visits to jails to ensure his clients felt heard and supported.

From the outside, Adam appeared to be a successful attorney with a thriving practice and deep knowledge of criminal law. He was also incredibly generous with his time and energy, often helping others without hesitation.

However, once I saw things from the inside, I began to understand the personal cost of that generosity. Adam is a kindhearted man — sometimes to a fault. He found it incredibly difficult to say no, even when he should have. In my opinion, that inability led him to take on more than he could handle, and when things started to spiral, he made extremely poor choices to remedy the situation with decent — unfortunately, only making matters worse.

The man I married in 2022 and the man I am married to today in 2025 are very different people. When we first met, Adam was confident to the point of arrogance, often needing to be the most important person in the room. Today, he is humble, grounded, and fully devoted to our family. He consistently puts our needs above his own and has grown tremendously in character and maturity. I genuinely believe that much of this transformation came from stepping away from the legal profession and confronting his mistakes.

I also want to convey the toll this situation has taken — not just on Adam, but on our entire family. Since surrendering his license and the beginning of these criminal proceedings, we've faced public humiliation. Our personal information, including one of our children's Social Security numbers were printed in the local paper. Our home and car have been vandalized multiple times. Adam has lost access to two of his three sons — his oldest was withheld from him for 10 months, and we haven't seen his youngest since November 2024. We've been financially devastated and were recently forced to file for bankruptcy in early 2025. The legal fees alone have been overwhelming.

I'm not writing this letter to excuse Adam's actions. He made mistakes — serious ones — and he has taken accountability. He surrendered his law license on his own and sought out mental health support voluntarily. He is not the same man who made those mistakes.

Your Honor, I respectfully ask that you consider a sentence that does not include incarceration. I truly believe prison would not serve a meaningful purpose in Adam's case. He is an asset to the public and his community, not a threat. His risk of reoffending is non-existent as he has made it clear that he has no desire to enter the legal field again. Sentencing Adam to prison would severely affect his ability to pay restitution to the victims, an act that he has made clear he is more than willing to perform. If Adam is sent to prison, our children will be unnecessarily punished. Because they desperately need their father in their lives. Adam has already paid a heavy price emotionally, publicly, professionally, and financially. Those punishments will continue for many years.

Thank you again for your time, consideration, and compassion.

Sincerely,

Samantha Marie Stone

Dear Judge Schuck,

My name is Miranda Stone, I am Adam Stone's niece. I am getting ready to start my sophomore year at Ashland university while majoring in accounting after transferring in from Duke University.

Throughout my life Adam has been one of my most influential role models. He has never hesitated to step up when I needed him, no matter what the circumstances might've been. From helping me through my parents divorce and my grandfather's sudden passing, to giving me pep talks during sporting events, Adam has never failed to show up for me when I needed him most.

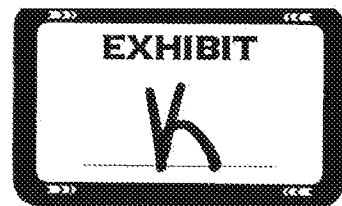
I understand that Adam is facing serious consequences for his actions. While I cannot excuse the choices that he has made, I can attest that he has always taken responsibility for his decisions and shows a sincere willingness to make things right.

I respectfully ask that you take into consideration the positive impact that he continually has on my life and the lives of those around him when considering his case. He is more than the poor choices that he has made and I truly believe that he has learned from this experience and has the character and determination to move forward in a positive direction.

Thank you Judge Schuck for your time and consideration.

Respectfully,

Miranda Stone



August 1, 2025

To Whom It May Concern,

I am writing this letter to provide support for Adam Stone. I have known Mr. Stone from the 2023-24 school year. I was the principal, and he applied for a substitute position at Bridges. Upon his hire, he was the model employee, displayed a great work ethic and adapted to whatever situation was thrown at him. His demeanor and attitude have always been professional, positive and student centered.

This past year of 2024-25, I was in a new role. Mr. Stone and I talked more frequently. I had the opportunity to see him more as he interacted with both students and staff. Again, I cannot say enough about his professionalism but also his humanity and desire to make a difference. For example, collaborating with staff on developing critical thinking skills in students, assisting students with problem solving and helping them see their potential, and finally, engaging each student with care and concern. All these qualities along with self-reflection have shown growth and a passion to be effective in the lives of our students.

It would be extremely beneficial to everyone if Mr. Stone is able to continue at Bridges.

Thank you for your time.

Sincerely,

Amy Lanier

Director of Academics

amylanier8@gmail.com

Affinity HealthWorks LLC

October 14, 2022

RE: Adam C Stone (DOB 9/8/1983)

To whom it may concern:

Adam Stone was self-referred for depression with suicidal ideation in response to work-related stress, as well as the loss of his father earlier this year. He completed a mental health assessment on May 27, 2022 and was subsequently diagnosed with Major Depressive Disorder, Recurrent episode, Severe (F33.2) and Post-Traumatic Stress Disorder, Chronic (F43.12).

He has participated in supportive counseling on the following dates: 6/8/22, 6/20/22, 6/30/22, 7/14/22, 8/10/22, 8/24/22, and 9/14/22. Treatment goals include elevating and stabilizing his mood, improving his understanding of trauma and its impact, and learning effective coping strategies to mitigate his symptoms. One such strategy is to reduce exposure to identifiable triggers and to disconnect from situations that leave him feeling overwhelmed and depressed.

Because his career exposes him to deeply disturbing content/images and intense psychological demands, this letter is written in support of his decision to discontinue the practice of law until he is better equipped to manage the emotional aspects that are inherent to the profession.

It is my opinion that Adam's work-related stress has had a tremendously detrimental impact on his mental health. Although he may be quite skillful at his trade, it is advisable for him to step back at this time to prevent further decompensation and to permit him to focus more on self-care and recovery.

Sincerely,



Barbara A Wirebaugh, LISW-S, MSW
Mental Health Therapist / Clinical Social Worker
1.0010227-SUPV (OH)