

BEFORE THE BOARD OF PROFESSIONAL CONDUCT OF THE SUPREME COURT OF OHIO

Disciplinary Counsel 65 East State Street, Suite 1510 Columbus, Ohio 43215-4215

Relator,

v.

Case No. 2024-012

Ryan Richard Black, Esq. Attorney Registration No. 0097679 88 South Market Street Logan, Ohio 43138

Respondent.

ANSWER OF RESPONDENT

First Defense

- 1. Admits all statements and allegations in paragraphs 1 through 4 of Relator's Complaint.
- 2. States that some of the allegations in Relator's Complaint are the subject of a federal civil lawsuit against Respondent and Hocking County, Ohio, further states that at times relevant to the allegations in Relator's Complaint, Respondent suffered from a mental health disorder and an alcohol use disorder (for which Respondent is seeking ongoing treatment), which contributed to cause any conduct for which Respondent is responsible, and denies all statements and allegations in paragraphs 5 through 16 of Relator's Complaint.
- 3. Admits that Respondent and Russell-Ramos mutually engaged in informal communication with one another, admits that that Respondent's text messages speak for themselves, and denies all other statements and allegations in paragraphs 17 through 50 of Relator's Complaint.

- 4. Admits all statements and allegations in paragraphs 51 and 52 of Relator's Complaint.
- 5. States that the allegations involving K.V. are the subject of a federal civil lawsuit against Respondent and Hocking County, Ohio, that K.V. was a victim advocate who resigned her position and admits all other statements and allegations in paragraph 53 of Relator's Complaint.
- 6. Admits all statements and allegations in paragraph 54 through 58 of Relator's Complaint.
- 7. Admits that Respondent's text messages speak for themselves, and denies all other statements and allegations in paragraphs 59 through 138 of Relator's Complaint.
- 8. Admits that in January of 2023, Investigator Martin led the investigation of Moritz, and for want of knowledge, denies all other statements and allegations in paragraphs 139 through 145 of Relator's Complaint.
- 9. Denies all statements and allegations in paragraphs 146 through 164 of Relator's Complaint.
- 10. Admits that Dicken took office as a Commissioner on January 2, 2023 (and that Respondent was attorney for the board of county commissioners), and denies all other statements and allegations in paragraphs 165 through 174 of Relator's Complaint.
- 11. Admits that Stout is the Hocking County IT Director, and for want of knowledge denies all other statements and allegations in paragraphs 175 through 178 of Relator's Complaint.
- 12. Admits that Respondent's text messages speak for themselves, and denies all of the statements and allegations in paragraphs 179 through 183 of Relator's Complaint.
- 13. Denies all statements and allegations in paragraph 184 Relator's Complaint.
- 14. Denies all statements and allegations not specifically admitted herein.

Second Defense

15. States that at times relevant to the allegations in the Complaint, Respondent suffered from a mental health disorder and an alcohol use disorder (for which Respondent is seeking ongoing treatment), which contributed to cause any conduct for which Respondent is responsible.

Wherefore, Respondent having answered Relator's Complaint requests that he be afforded a hearing to present evidence in defense of Relator's allegations and mitigation.

Respectfully submitted,

/s/ Alvin E. Mathews, Jr.

Alvin E. Mathews, Jr. (0038660) UB GREENSFELDER LLP 65 E. State Street, Suite 1100 Columbus, Ohio 43215 Telephone: (614) 229-0000

Email: amathews@ubglaw.com

Counsel for Respondent

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day April, 2024, a copy of the foregoing was served by electronic mail upon the following:

Ryan N. Sander Ryan.sander@odc.ohio.gov

Joseph M. Caligiuri Joseph.caligiuri@odc.ohio.gov

Karen H. Osmond Karen.osmond@odc.ohio.gov

/s/ Alvin E. Mathews, Jr.

Alvin E. Mathews, Jr. (0038660)