



Commission
on Continuing
Legal Education

2025
Annual Report

April 2026



Commission on Continuing Legal Education

2025 Annual Report

Sharon L. Kennedy
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Gina White Palmer
DEPUTY ADMINISTRATIVE DIRECTOR,
LEGAL SERVICES

Dear Chief Justice and Justices
of the Supreme Court of Ohio,

This Court has entrusted the Commission on Continuing Legal Education with the meaningful task of ensuring that Ohio's attorneys and judges maintain a level of competency deserving of the public's trust. Specifically, the Commission is charged with administering and regulating compliance with the Court's rules governing continuing legal education, the stated purpose of which is to maintain and improve the quality of legal and judicial services in Ohio. The Commission is comprised of individual members, mostly of the legal community, and is supported by the Court's Registration and Continuing Legal Education Section.

This 2025 Annual Report of the Commission on Continuing Legal Education includes a detailed review of the Commission's work under Rule X of the Supreme Court Rules for the Government of the Bar of Ohio and Rule IV of the Rules for the Government of the Judiciary of Ohio for calendar year 2025.

Respectfully submitted,



Michel Jendretzky, Esq.

Director, Attorney Services Division

Secretary to the Commission on Continuing Legal Education

Commission

Under the authority of the Supreme Court of Ohio, the Commission on Continuing Legal Education administers the continuing legal education rules of Gov.Bar R. X and Gov.Jud. R. IV.

The Commission includes 19 members appointed by the Court, including 12 attorneys licensed to practice law in Ohio, representing each appellate district; one dean or member of a law school faculty engaged in full-time legal education in an Ohio law school; five judges; and one non-attorney. Commission members are appointed by Supreme Court justices to three-year terms and are limited to two consecutive terms. Commissioners serve as volunteers and are not compensated, except for travel costs allowed to Court appointees.

Chairperson

The Commission elected member Judge J. Gregory Howard to serve as the Commission chairperson in 2025. Judge Howard serves the Butler County Court of Common Pleas, General Division.

Vice-Chairperson

The Commission elected member Judge Kevin Kelley to serve as vice-chairperson in 2025. Judge Kelley serves the Cuyahoga County Court of Common Pleas, General Division.

Director and Staff

Michel Jendretzky, Director of the Office of Attorney Services, serves as Secretary to the Commission. Pursuant to CLE Reg. 201, the action of the Secretary shall constitute the action of the Commission, unless and until the Commission determines otherwise. The Secretary takes initial action on all applications for accreditation and maintains CLE records of all attorneys, judges, and magistrates. Further, the Secretary is authorized to review and decide requests for exemption from the CLE requirements. Staff of the Registration and CLE Section, consisting of 10 full-time positions, assist with the Commission's work.

2025 CLE Commission Roster

Hon. Carly Edelstein

Tenth District Court of Appeals

Judge

Hon. J. Gregory Howard, Chair

Butler County Court of Common Pleas

Judge

Hon. Kevin J. Kelley, Vice-Chair

Cuyahoga County Court of Common Pleas

Judge

Hon. Eric Allen Marks

Lucas County Court of Common Pleas

Judge

Hon. Sheryl Munson

Franklin County Court of Common Pleas

Judge

Adrienne J. Roach

Keating Muething & Klekamp PLL

Attorney: First District

Magistrate Ebony Wreh

Dayton Municipal Court

Attorney: Second District

Anthony Will

Schultz Cox & Will

Attorney: Third District

James Sillery

Mollica Gall Sloan & Sillery Co. LPA

Attorney: Fourth District

Vacant

Attorney: Fifth District

Sharon Harwood

S. Harwood Law and Consulting LLC

Attorney: Sixth District

Patricia Wagner

Youngstown State University

Attorney: Seventh District

Razi Lane

Tucker Ellis LLP

Attorney: Eighth District

Karin Wiest

Wayne County Volunteer GAL Program

Attorney: Ninth District

Thomas Widman

Weltman Weinberg & Reis Co., LPA

Attorney: Tenth District

Jacqueline M. O'Donnell

City of Eastlake

Attorney: Eleventh District

Bennett A. Manning

Twelfth District Court of Appeals

Attorney: Twelfth District

Professor Colleen Garrity Settineri

The Ohio State University College of Law

Law School Faculty

Dr. Carri L. Brown

Fairfield County Auditor's Office

Non-Attorney Member

Office of Attorney Services Staff

Michel Jendretzky, Esq.

Director, Office of Attorney Services

Bradley Martinez, Esq.

Deputy Director, Office of Attorney Services

Kirstyn Moyers

Registration and CLE Manager

MacLaren Roemer

Attorney Services Counsel

Penny Marchal

Registration and CLE Coordinator

Shannon Scheid

Administrative Assistant, Office of Attorney Services

Denise Spencer

Senior Registration and CLE Specialist

Joshua Martin

Registration and CLE Specialist II

Loraine Stone

Registration and CLE Specialist I

Stacy Hebner

Registration and CLE Specialist I



In 2025, the Commission met quarterly to review and act on matters brought before it, including proposed rule amendments, appeals of decisions denying accreditation, and enforcement of continuing legal education requirements.

Amendments to Gov.Jud. R. IV

During 2025, the Supreme Court adopted amendments to the continuing legal education rules governing the Judiciary, requiring acting judges to register with the Commission prior to appointment, in addition to annually thereafter. The rule change also clarifies that the duty judge must ensure the acting judge has notice of and complies with the registration requirement. The change, effective January 1, 2026, helps to ensure the correct continuing legal education requirements are applied to acting judges.

Applications for Accreditation for CLE Activities

Pursuant to Gov.Bar R. X, Section 2 (B) (3), the Commission accredits continuing legal education programs and establishes procedures for accreditation. In 2025, the Commission received 29,627 applications for accreditation for continuing legal education activities. Of those applications, 29,415 (99%) were granted CLE accreditation; 153 were canceled or withdrawn; 43 were rejected as incomplete; and 16 were denied accreditation. None of the decisions to deny accreditation were appealed to the Commission, as permitted under Reg. 201.3.

A review of the activity formats for 2025 indicates the vast majority of CLE was offered through self-study activities, with 24,616 applications for self-study activities.

The remaining 5,011 applications included applications for traditional in-person CLE activities, 28 applications for pro bono CLE activities in which attorneys provided pro bono services and received one hour of CLE credit for every six hours of pro bono services provided in Ohio, and 61 applications from attorneys applying for CLE credit for publishing a book or article related to the practice of law.

Exemptions from CLE Requirements

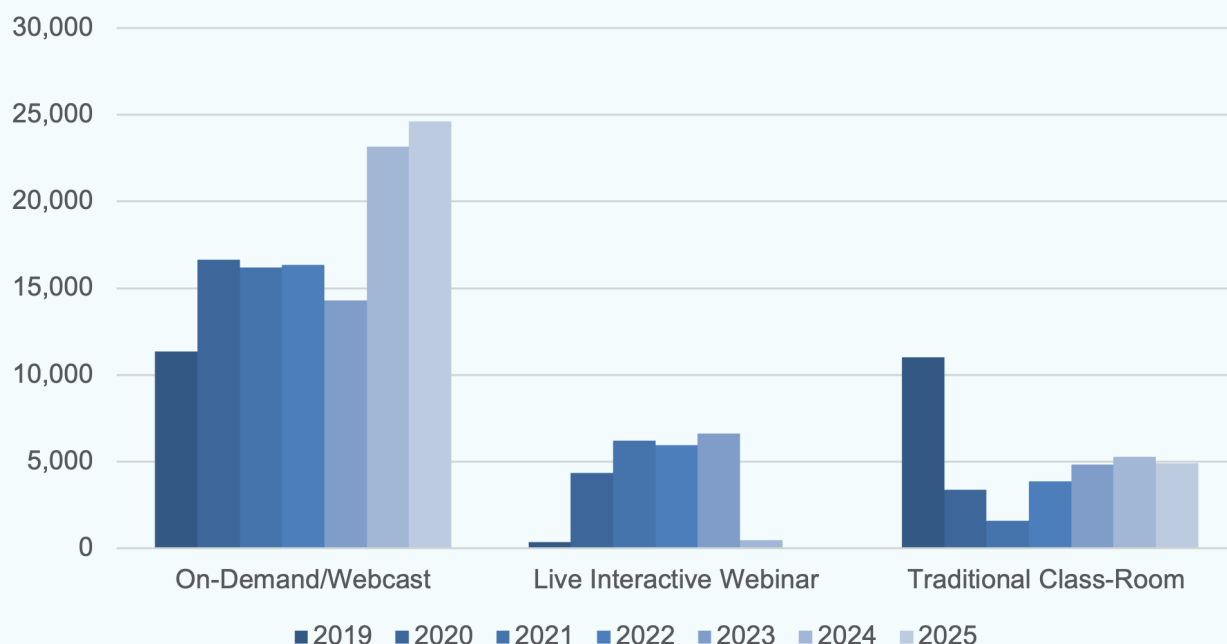
Pursuant to Gov.Bar R. X, Section 12, attorneys and judges may apply for an exemption from the CLE requirements if they are on full-time military duty or if they are unable to comply with CLE requirements due to illness or disability or special circumstances. Additionally, attorneys registered as inactive and federal judges and magistrates do not have Ohio CLE requirements.

In 2025, the Commission received 98 requests for exemptions. Of this total, the Commission granted 25 for illness or disability, 58 for full-time military duty, and 11 for special circumstances. Four requests were withdrawn, rejected, or denied.

Late Compliance and Sanctions

Gov.Bar R. X, Section 18(A), provides that an attorney or judge who fails to timely comply with the applicable requirements of Gov.Bar R. X or Gov.Jud. R. IV, but does so

CLE Delivery Formats



within 90 days of the December 31 deadline, shall be assessed a late fee in accordance with CLE Regulation 503.

In 2025, the Commission reviewed CLE compliance for 19,935 attorneys and judges (last names beginning with A-L) who were required to comply with CLE requirements for the 2023-2024 compliance period ending December 31, 2024. More than 94% (18,860) were in compliance.

The Commission issued Notices of Apparent Non-Compliance to the 1,075 attorneys and judges who appeared non-compliant. The notice instructed them that, to avoid sanction and suspension from the practice of law, any CLE deficiencies must be cured within 90 days of the reporting deadline and a late fee ranging from \$75 to \$300, depending on the severity of non-compliance, must be paid.

A total of 288 attorneys and judges (27%) provided evidence of having timely completed the CLE requirements during the 2023-2024 compliance period or changed their attorney registration status so that the CLE requirements did not apply. A total of 700 attorneys and judges (65%) submitted

a request for late compliance, providing evidence that they cured the deficiencies by the late compliance deadlines. Of those who received a Notice of Apparent Non-Compliance, 87 (8%) did not cure the CLE deficiencies by the late compliance deadlines and were subject to sanction or suspension from the practice of law.

On October 24, 2025, the Commission imposed monetary sanctions against 87 attorneys for non-compliance with the continuing legal education requirements for the 2023-2024 compliance period. Additionally, the Commission suspended 4 attorneys from the practice of law for failure to comply with Gov.Bar R. X. Of the 4 attorneys who were suspended, 2 were new attorneys who had failed to comply with the New Lawyers Training requirements of Gov. Bar R. X(14).



CLE Funds Collected

Pursuant to Reg. 901 (Schedule of Fees for Sponsors and Attorneys), the Commission collects application fees for sponsors applying for CLE accreditation and late fees for the late submission of attorney credits. Sponsors are assessed a \$25 fee for applying for accreditation for CLE activities for 2.0 hours or less and \$50 per application for more than 2.0 hours. Further, sponsors are assessed a \$100 fee for failure to submit the application timely. Attorneys are assessed a \$25 fee for failure to timely report credits or applying for accreditation more than 60 days after attending an out-of-state CLE activity. Pursuant to Reg. 503, attorneys and judges may be subject to late compliance fees or monetary sanctions for failure to comply with the CLE requirements based upon the number of hours deficient, ranging from \$75 to \$300.

In 2025, the Commission collected a total of \$466,340 for sponsor and attorney fees:

Sponsor Fees	\$245,900
Sponsor Late Fees	\$86,400
Attorney Late Compliance and Sanction Fees	\$125,765
Attorney Late Application and Credit Fees	\$8,275

2025 At-a-Glance

- On October 24, 2025, monetary sanctions were imposed against 87 attorneys, and 4 attorneys were suspended from the practice of law for failure to comply with the CLE requirements. Of the 4 attorneys who were suspended, 2 were new attorneys who had failed to comply with the New Lawyers Training requirements.
- The Commission collected a total of \$466,340 in sponsor applications fees and attorney late compliance fees and sanctions.

Conclusion

The Commission furthers the Supreme Court's Constitutional duty to regulate the practice of law in Ohio by ensuring the bench and bar take the required CLE programs to remain educated and up to date on matters pertaining to the practice of law. The Commission continues to conduct a review of the rules and regulations to ensure its policies are fair and efficient.



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