

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

In re:

Complaint against

Case No. 2023-025

Calvin Sylvester Tregre

24-0493

Respondent

Disciplinary Counsel

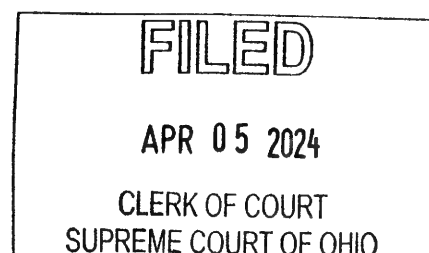
Relator

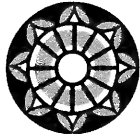
CERTIFICATE

I hereby certify that the filing of the original file, expenses, transcript, exhibits, and the Findings of Fact, Conclusions of Law, and Recommendation of the Board constitute the complete record in this cause, and that the same is true and accurate to the best of my knowledge.

Richard A. Dove

Director





Ohio Board of Professional Conduct

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D. ALLAN ASBURY

SENIOR COUNSEL

KRISTI R. McANAU

COUNSEL

Case Name:	Disciplinary Counsel v. Calvin Sylvester Tregre
Board Number:	2023-025
Original File:	1 ✓
Deposition:	n/a
Deposition Exhibits:	n/a
Transcript of Hearing:	February 15, 2024 ✓
Transcript Exhibits:	See attached. White binder ✓



Ohio Board of Professional Conduct

Disciplinary Counsel v. Calvin Sylvester Tregre
Board Number 2023-025

<u>ITEM NUMBER</u>	<u>DESCRIPTION</u>	<u>DATE FILED</u>
1 ✓	Certified Complaint, waiver Notice of Filing and Memo-served on Relator and Respondent,	9/6/2023
2 ✓	Service email	9/6/2023
3 ✓	Clerk Service Letter	9/25/2023
4 ✓	Certification from Clerk	Dated 9/25/2023
5 ✓	Service email	9/25/2023
6 ✓	Motion for extension of time	9/25/2023
7 ✓	Entry	9/26/2023
8 ✓	Respondent's answer	10/10/2023
9 ✓	Entry	10/10/2023
10 ✓	Order	10/11/2023
11 ✓	Order	10/17/2023
12 ✓	Notice of Formal hearing	10/17/2023
13 ✓	Service email	10/17/2023
14 ✓	Notice of Appearance	12/5/2023
15 ✓	Entry	1/16/2024

16 ✓	Order	1/18/2024
17 ✓	Relator's motion for leave to present remote witness testimony	1/30/2024
18 ✓	Order	1/30/2024
19 ✓	Stipulations (exhibits in brown folder)	2/6/2024
20 ✓	Relator's witness list	2/6/2024

Kathy May 4.5.24
Deputy Clerk Name and Date

I N D E X

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3	WITNESSES		PAGE
4	Calvin S. Tregre, Jr.		
5	Cross-examination by Ms. Hall		23
6	Examination by Member Herf		81
7	Examination by Chair Cook		83
8	Further cross-examination by Ms. Hall		95
9	Calvin S. Tregre, Jr.		
10	Direct testimony		101
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12	EXHIBITS	MARKED	RECEIVED
13	Stipulations -	--	80
14	✓ Stipulated Exhibit 1 -	--	80
15	Respondent's Supreme Court		
16	Attorney Registration		
17	✓ Stipulated Exhibit 2 -	--	80
18	First Financial Bank,		
19	IOLTA Origination,		
20	Account No. 4878		
21	✓ Stipulated Exhibit 3 -	--	80
22	Bennett Contingency		
23	Fee Agreement		
24	✓ Stipulated Exhibit 4 -	--	80
25	Chatman Grievance (07/23/2021)		

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3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 5 -	--	80
5	In re: Estate of Sarah E.		
6	Green, Hamilton P.C. 2020003085		
7	(Probate Court Case File)		
8	(Bates Labeled) and		
9	In re: Estate of Sarah E.		
10	Green, Hamilton P.C. 2020003085		
11	(Probate Court Case File)		
12	✓ Stipulated Exhibit 6 -	--	80
13	Bennett Letter to UC Drake		
14	(08/19/2020)		
15	✓ Stipulated Exhibit 7 -	--	80
16	Revised Code 2115.02		
17	✓ Stipulated Exhibit 8 -	--	80
18	Revised Code 2109.301		
19	✓ Stipulated Exhibit 9 -	--	80
20	Local Rule 71.1 - Hamilton		
21	County Probate Court		
22	✓ Stipulated Exhibit 10 -	--	80
23	Chatman-Bennett Text Messages		
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3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 11 -	--	80
5	Bennett Letter to Fountains -		
6	Atrium (01/29/2021)		
7	✓ Stipulated Exhibit 12 -	--	80
8	Respondent Letter to Bennett		
9	Re: Termination (05/10/2021)		
10	✓ Stipulated Exhibit 13 -	--	80
11	Bossie-Holliday e-mail		
12	(07/22/2019)		
13	✓ Stipulated Exhibit 14 -	--	80
14	The Tregre Firm, LLC		
15	Certificate		
16	✓ Stipulated Exhibit 15 -	--	80
17	Holliday e-mail (06/04/2020)		
18	✓ Stipulated Exhibit 16 -	--	80
19	Revised Code 2125.02		
20	✓ Stipulated Exhibit 17 -	--	80
21	Holliday Grievance (02/21/2022)		
22	✓ Stipulated Exhibit 18 -	--	80
23	Landrum Contingency		
24	Fee Agreement		
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1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 19 -	--	80
5	Landrum Text Messages		
6	✓ Stipulated Exhibit 20 -	--	80
7	Landrum - Notice of		
8	Potential Legal Claim		
9	(11/11/2021)		
10	✓ Stipulated Exhibit 21 -	--	80
11	Landrum Certified		
12	Letter (07/18/2022)		
13	✓ Stipulated Exhibit 22 -	--	80
14	Landrum Certified		
15	Letter (08/10/2022)		
16	✓ Stipulated Exhibit 23 -	--	80
17	Landrum Certified Letter		
18	(08/10/2022) USPS Tracking		
19	✓ Stipulated Exhibit 24 -	--	80
20	Landrum Grievance (09/08/2022)		
21	✓ Stipulated Exhibit 25 -	--	80
22	Hudgel Fee Agreement		
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1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 26 -	--	80
5	First Financial Bank IOLTA		
6	4878, Wagstaff & Cartmell Check		
7	Deposit (10/12/2021) (Redacted)		
8	✓ Stipulated Exhibit 27 -	--	80
9	Hudgel - Wagstaff & Cartmell,		
10	LLP Check No. 59627 (Redacted)		
11	✓ Stipulated Exhibit 28 -	--	80
12	First Financial Bank IOLTA		
13	4878, October 2021 (Redacted)		
14	✓ Stipulated Exhibit 29 -	--	80
15	Local Rule 24 - Warren County		
16	Probate Court		
17	✓ Stipulated Exhibit 30 -	--	80
18	In re: Estate of Percy P.		
19	Peckhem, Jr., Warren P.C.		
20	No. 20211717 (Probate Court		
21	Case File) (Bates Labeled) and		
22	In re: Estate of Percy P.		
23	Peckhem, Jr., Warren P.C.		
24	No. 20211717 (Probate Court		
25	Case File)		

1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 31 -	--	80
5	Local Rule 22 - Warren County		
6	Probate Court		
7	✓ Stipulated Exhibit 32 -	--	80
8	Hudgel Post Lien Indemnification		
9	Agreement (12/07/2022)		
10	✓ Stipulated Exhibit 33 -	--	80
11	Hudgel e-mails (12/07/2022 -		
12	02/06/2023)		
13	✓ Stipulated Exhibit 34 -	--	80
14	Hudgel e-mails (09/24/2021;		
15	12/07/2022 - 02/11/2023)		
16	✓ Stipulated Exhibit 35 -	--	80
17	Hudgel Successor Counsel		
18	Letter (02/23/2023)		
19	✓ Stipulated Exhibit 36 -	--	80
20	Hudgel Successor Counsel		
21	Certified Mail Receipt		
22	✓ Stipulated Exhibit 37 -	--	80
23	Hudgel Grievance (03/06/2023)		
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1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 38 -	--	80
5	Hudgel Successor Counsel		
6	Invoice		
7	✓ Stipulated Exhibit 39 -	--	80
8	Landingham Fee Agreement		
9	✓ Stipulated Exhibit 40 -	--	80
10	Landingham Receipt		
11	✓ Stipulated Exhibit 41 -	--	80
12	First Financial Bank IOLTA		
13	4878 April and May 2022		
14	(Redacted)		
15	✓ Stipulated Exhibit 42 -	--	80
16	Landingham Grievance		
17	✓ Stipulated Exhibit 43 -	--	80
18	10/05/2021 Chatman-Bennett LOI		
19	✓ Stipulated Exhibit 44 -	--	80
20	10/19/2021 e-mails Relator		
21	and Respondent		
22	✓ Stipulated Exhibit 45 -	--	80
23	11/02/2021 e-mails Relator		
24	and Respondent		
25			

1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 46 -	--	80
5	11/17/2021 Chatman-Bennett		
6	LOI (Second Inquiry)		
7	✓ Stipulated Exhibit 47 -	--	80
8	01/20/2022 Chatman-Bennett		
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10	✓ Stipulated Exhibit 48 -	--	80
11	01/20/2022 Subpoena Duces		
12	Tecum - Remote Deposition		
13	✓ Stipulated Exhibit 49 -	--	80
14	02/09/2022 Subpoena Duces		
15	Tecum - Remote Deposition		
16	✓ Stipulated Exhibit 50 -	--	80
17	03/03/2022 Remote		
18	Deposition Link		
19	✓ Stipulated Exhibit 51 -	--	80
20	03/09/2022 Letter Relator		
21	to Respondent		
22	✓ Stipulated Exhibit 52 -	--	80
23	05/04/2022 Subpoena		
24	Duces Tecum		
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1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 53 -	--	80
5	06/06/2022 e-mail Respondent		
6	to Relator - Extension Request		
7	✓ Stipulated Exhibit 54 -	--	80
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14	08/09/2022 Letter Granting		
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22	11/03/2022 Subpoena		
23	Duces Tecum		
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1	I N D E X (continued)		
2	-- --		
3	EXHIBITS	MARKED	RECEIVED
4	✓ Stipulated Exhibit 60 -	--	80
5	02/24/2023 Subpoena		
6	Duces Tecum		
7	✓ Stipulated Exhibit 61 -	--	80
8	03/31/2023 e-mails Re:		
9	Meeting at Cincinnati		
10	Bar Association		
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12	03/31/2023 Letter to		
13	Respondent		
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15	07/05/2023 Landingham LOI		
16	✓ Stipulated Exhibit 64 -	--	80
17	Respondent Hearing Subpoena		
18	✓ Stipulated Exhibit 65 -	--	80
19	Bossie Joint Contingent		
20	Fee Agreement		
21	✓ Stipulated Exhibit 66 -	--	80
22	Bossie Medical Record		
23	Requests		
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