## IN THE SUPREME COURT OF OHIO

In re:

Complaint against

Case No. 2025-019

**David Paul Greulich** 

Respondent

**Disciplinary Counsel** 

Relator

# **CERTIFICATION OF DEFAULT**

David Paul Greulich, Jr. (0067366) 1370 Ontario Street, #1800 Cleveland, OH 44113 davidgreulich@me.com Joseph M. Caligiuri (0074786) 65 E. State St. Suite 1510 Columbus, OH 43215 joseph.caligiuri@odc.ohio.gov

Elizabeth T. Smith (0012075) Ohio Board of Professional Conduct 65 South Front Street, 5<sup>th</sup> Floor Columbus, Ohio 43215 (614) 387-9370 elizabeth.smith@bpc.ohio.gov IN THE SUPREME COURT OF OHIO

In re:

Complaint against

**CERTIFICATION OF DEFAULT** 

**David Paul Greulich** 

Gov. Bar R. V, Section 14

Respondent

**Disciplinary Counsel** 

Relator

Pursuant to Rule V, Section 14, of the Supreme Court Rules for the Government of the Bar of Ohio, I hereby certify that the respondent in the above-captioned matter has failed to file an answer to the formal complaint certified to the Ohio Board of Professional Conduct on September 26, 2025.

Attached to this certification is an affidavit setting forth the attempts to serve the complaint on the respondent and copies of documents referenced in the affidavit.

Elizabeth T. Smith

Director Board of Professional Conduct

# STATE OF OHIO COUNTY OF FRANKLIN

### **AFFIDAVIT**

I, Elizabeth T. Smith, having been duly sworn according to the laws of Ohio, hereby depose and say:

- 1. I am the Director of the Board of Professional Conduct of the Supreme Court of Ohio ("Board"). Pursuant to Rule V of the Supreme Court Rules for the Government of the Bar of Ohio, I am responsible for serving certified disciplinary complaints on the parties and maintaining the records of cases certified to the Board.
- 2. On September 26, 2025, a formal complaint was certified to the Board in the case of Disciplinary Counsel v. David Paul Greulich, Case No. 2025-019. Pursuant to Gov. Bar R. V, Section 11, a notice and copy of the complaint were sent via email to the respondent at <a href="mailto:davidgreulich@me.com">davidgreulich@me.com</a> the electronic service address maintained by the Supreme Court Office of Attorney Services. The respondent did not acknowledge receipt of the email or otherwise accept service of the complaint.
- 3. On October 30, 2025, the Clerk of the Supreme Court of Ohio accepted service of the complaint on behalf of the respondent pursuant to Gov. Bar R. V, Section 27(B).
- 4. On October 30, 2025, a notice of intent to certify the respondent's default was sent via email to the respondent at the address listed in ¶2 of this affidavit.
- 5. As of the date of this affidavit, the respondent has not filed an answer to the certified complaint or otherwise responded to the certification or notice of intent.
- 6. Attached to this affidavit are true and accurate copies of the following:
  - a. The formal complaint certified to the Board on September 26, 2025 (Attachment A);
  - b. The certification of service from the Clerk of the Supreme Court issued on October 30, 2025 (Attachment B);
  - c. The notice of intent sent to the respondent on October 30, 2025 (Attachment C).

FURTHER AFFIANT SAYETH NAUGHT.

Elizabeth T. Smith (0012075)

Director

**Board of Professional Conduct** 

Sworn to before me and subscribed in my presence this 17<sup>th</sup> day of November, 2025.

Notary Public

xpires : 10 7 2028

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

FILE D
SEP 2 6 2025

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

BOARD OF PROFESSIONAL CONTILL

Relator,

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Case No. 2025-019

David Paul Greulich, Jr., Esq. Attorney Registration No. 0067366 1370 Ontario Street, #1800 Cleveland, Ohio 44113

Respondent.	
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Complaint and Certificate

Relator, Disciplinary Counsel, alleges that respondent, David Paul Greulich, Jr., an attorney admitted to the practice of law in Ohio, has committed the following misconduct involving the repeated rape of a minor child:

- 1. Respondent was admitted to the practice of law in Ohio on November 22, 1996.
- Respondent is subject to the Ohio Rules of Professional Conduct and the Supreme Court
   Rules for the Government of the Bar of Ohio.
- 3. Respondent has been registered as inactive since October 8, 2012.
- 4. On July 21, 2025, the Supreme Court of Ohio imposed an interim felony suspension based upon respondent's criminal conviction, as described below. 07/21/2025 Case

  Announcements, 2025-Ohio-2549.

Count One

Felony Conviction

- 5. On October 30, 2024, a federal grand jury handed down a seven-count Indictment charging respondent with the following crimes:
  - Count 1: Sexual Exploitation of Children, 18 U.S.C. § 2251(a) regarding sexual exploitation with Minor No. 1 from April 20, 2024, through April 22, 2024.
  - Count 2: Sexual Exploitation of Children, 18 U.S.C. § 2251(a) regarding sexual exploitation with Minor No. 1 from May 11, 2024, through May 13, 2024.
  - Count 3: Interstate Travel to Engage in Illicit Sexual Conduct, 18 U.S.C. § 2423(b) regarding conduct occurring between April 20, 2024, through April 22, 2024.
  - Count 4: Interstate Travel to Engage in Illicit Sexual Conduct, 18 U.S.C. § 2423(b) regarding conduct occurring between May 11, 2024, through May 13, 2024.
  - Count 5: Transportation of Visual Depictions of Real Minors Engaged in Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(1).
  - Count 6: Possession of Child Pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) for child pornography on a cellphone and an iPod Touch.
  - Count 7: Possession of Child Pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) for child pornography on his Google cloud storage account.
- 6. On March 10, 2025, respondent pled guilty to the Indictment. *United States of America v. David P. Greulich*, 1:24-cr-00401, United States District Court, Northern District of Ohio.
- 7. On July 8, 2025, Judge David Ruiz of the United States District Court, Northern District of Ohio sentenced respondent as follows:
  - Count 1: 360 months
  - Count 2: 360 months
  - Count 3: 360 months
  - Count 4: 360 months
  - Count 5: 240 months
  - Count 6: 240 months
  - Count 7: 120 months

8. The trial court ordered each of the terms to run concurrently, resulting in a 30-year sentence, and also ordered lifetime supervised release with conditions, including registering as a sex offender under 34 U.S.C. § 20901, et seq.

## Conduct Underlying the Felony Conviction

- 9. In early 2024, respondent began communicating online with a minor victim ("M.V.") who resided in New York.
- 10. During communications via text messaging and an online messaging application, M.V. told respondent that she was 14 years old. Referring to her age, respondent replied that it was "hot."
- 11. Respondent advised M.V. that he was 56 years old.
- 12. Even after M.V. advised respondent that she was 14 years old, respondent continued to have sexually suggestive conversations with M.V. and asked that she produce sexually explicit content of herself and send it to respondent.
- 13. Respondent and M.V. exchanged voluminous child sexual abuse content of M.V. via an online messaging application.
- 14. After communicating with M.V. for approximately two months, respondent picked M.V. up at her home in New York on April 20, 2024, and drove her to a hotel, where they remained for two days.
- 15. During that time, respondent violently raped M.V.
- 16. On one occasion during the stay in the hotel, M.V. told respondent that she did not want to have sex. In response, respondent raped M.V. until she screamed.
- 17. Respondent recorded the sexual assaults on his cell phone.

- 18. On May 11, 2024, respondent picked up M.V. from her home in New York and took her to a nearby hotel, where they remained for two days.
- 19. Again, respondent brutally raped M.V. multiple times, and recorded the assaults on his cell phone.
- 20. Shortly after respondent returned M.V. to her home, M.V. spoke to respondent via an online messaging application and told him that "shit was going down."
- 21. In response, respondent told M.V. to block him and stated that he was deleting his accounts.
- 22. After that, respondent and M.V. stopped communicating.
- 23. Unbeknownst to respondent, before the events described above had transpired, Apple, Inc. had sent a CyberTip to Cleveland HSI¹ alerting them that respondent had sent three separate emails containing child pornography to his own email address. While investigating the CyberTip from Apple, Inc., Cleveland HSI learned of M.V. and notified New York HSI.
- 24. On August 8, 2024, law enforcement agents ("Agents") searched respondent's home in Cleveland, Ohio.
- 25. Agents recovered 20 images of commercial child pornography involving minors other than M.V..
- 26. Agents also recovered 108 images, most of which constituted child pornography, from respondent's cell phone of M.V. by herself and M.V. with respondent.
- 27. Agents also recovered 14 videos from respondent's Google cloud storage account, which depicted respondent sexually assaulting M.V. while at the hotels in New York.

<sup>&</sup>lt;sup>1</sup> HSI stands for Homeland Security Investigations, a federal law enforcement agency within the U.S. Department of Homeland Security.

- 28. Respondent's conduct, as alleged above, violates the following Ohio Rules of Professional Conduct:
  - Prof.Cond.R. 8.4(b) [A lawyer shall not commit an illegal act that reflects adversely on the lawyer's honesty or trustworthiness]; and
  - Prof.Cond.R. 8.4(h) [A lawyer shall not engage in any other conduct that adversely reflects on the lawyer's fitness to practice law].<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Under *Disciplinary Counsel v. Bricker*, 2013-Ohio-3998, relator is charging a violation of Prof.Cond.R. 8.4(h) because relator believes that respondent's conduct is sufficiently egregious that it warrants the finding of an additional violation.

#### Conclusion

Relator requests that respondent be found in violation of the Ohio Rules of Professional Conduct and be sanctioned accordingly.

Respectfully submitted,

/s Joseph M. Caligiuri

Joseph M. Caligiuri (0074786)
Disciplinary Counsel
Office of Disciplinary Counsel
65 East State Street, Suite 1510
Columbus, Ohio 43215-4215
Telephone: (614) 387-9700
Joseph.Caligiuri@odc.ohio.gov
Relator

#### Certificate

The undersigned, Joseph M. Caligiuri, Disciplinary Counsel, hereby certifies that he is authorized to represent relator in the action and has accepted the responsibility of prosecuting the complaint to its conclusion.

Dated: September 9, 2025

/s Joseph M. Caligiuri

Joseph M. Caligiuri (0074786) Disciplinary Counsel

# The Supreme Court of Phio

# <u>CERTIFICATION</u>

I, Robert Vaughn, certify that I was served on the 30<sup>th</sup> day of October, 2025, with a copy of the Notice to Respondent of Filing of Complaint and a copy of the Complaint and Certificate issued in the case of <u>Disciplinary Counsel v. David Paul Gruelich</u> (Case No. 2025-019).

I received true and attested copies of the documents set forth above from the Director of the Board of Professional Conduct in conformity with Rule V, Section 27(B) of the Rules for the Government of the Bar.

Robert Vaughn Clerk of Court THOMAS J. MOYER OHIO JUDICIAL CENTER
65 SOUTH FRONT STREET, 5<sup>TH</sup> FLOOR, COLUMBUS, OH 43215-3431
614.387.9370
www.bpc.ohio.gov

PATRICK M. McLaughlin Chair

TERI R. DANIEL VICE- CHAIR

ELIZABETH T. SMITH
DIRECTOR
D. ALLAN ASBURY
DEPUTY DIRECTOR & SENIOR
LEGAL COUNSEL

October 30, 2025

David Paul Greulich, Jr. 1370 Ontario Street, #1800 Cleveland, OH 44113

# VIA EMAIL ONLY to <u>davidgreulich@me.com</u>

Re: Disciplinary Counsel v. David Paul Greulich, Case No. 2025-019

Dear Mr. Greulich:

On September 26, 2025, the Board of Professional Conduct certified a formal complaint naming you as the respondent in the above-captioned disciplinary matter. A copy of the enclosed complaint was sent to you via email at davidgreulich@me.com, and you neither acknowledged receipt of the email nor filed a timely answer. Pursuant to Gov. Bar R. V, Section 27(B), the complaint was served on the Clerk of the Supreme Court, and the Clerk accepted service on October 30, 2025. As of the date of this letter, the Board has not received your answer to the formal complaint or a motion to extend the time for filing an answer.

Pursuant to Gov. Bar R. V, Section 14, you are hereby notified that the Board will certify your default to the Supreme Court 14 days from the date of this letter. To avoid certification of default, you must file an answer to the formal complaint with the Board prior to the expiration of the 14-day period. By rule, no extension of time to file an answer is authorized.

Please note that the certification of default may result in your immediate suspension from the practice law by the Supreme Court of Ohio.

Sincerely,

Elizabeth T. Smith

Director

Enclosure

cc: Relator's counsel (via email)

THOMAS J. MOYER OHIO JUDICIAL CENTER
65 SOUTH FRONT STREET, 5<sup>TH</sup> FLOOR, COLUMBUS, OH 43215-3431
614.387.9370
www.bpc.ohio.gov

PATRICK M. MCLAUGHLIN CHAIR

TERI R. DANIEL VICE- CHAIR

ELIZABETH T. SMITH
DIRECTOR
D. ALLAN ASBURY
DEPUTY DIRECTOR & SENIOR
LEGAL COUNSEL

TO: Relator, Respondent, and Counsel of Record

FROM: Elizabeth T. Smith 275

DATE: September 26, 2025

SUBJECT: Disciplinary Counsel v. David Paul Greulich, Jr., Case No. 2025-019

On this date, a formal complaint was certified to the Board of Professional Conduct. Enclosed is the notice of certification of the complaint.

Enclosure

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

In re:

Complaint against

David Paul Greulich, Jr. (0067366) 1370 Ontario Street, #1800 Cleveland, OH 44113 NOTICE OF FILING AND CERTIFICATION OF COMPLAINT

RESPONDENT

Disciplinary Counsel 65 East State Street, Suite 1510 Columbus, OH 43215-4215 FILEU EP 26 2025

Case No. 2025-019

BOARD OF PROFESSIONAL CONDUCT

#### RELATOR

Respondent is hereby notified that the director of the Board of Professional Conduct, having received a formal complaint from Relator that alleges misconduct on the part of Respondent and the complaint appearing to satisfy the applicable requirements of Gov. Bar R. V, assigned the complaint to a duly constituted probable cause panel of the Board. Upon review of the formal complaint and summary of investigation provided by Relator, the panel determined that probable cause exists for the filing of a formal complaint and certified the complaint to the Board of Professional Conduct.

#### Respondent will take notice that:

- 1. Attached is a copy of the certified complaint filed against you by Relator and certified by a probable cause panel to the Board of Professional Conduct.
- 2. You are required to e-File your written answer to this complaint with the Board of Professional Conduct on or before **October 16, 2025**. A copy of the answer must be served upon counsel of record named in the complaint.

FAILURE TO FILE A TIMELY ANSWER TO THIS COMPLAINT MAY RESULT IN YOUR IMMEDIATE SUSPENSION FROM THE PRACTICE OF LAW BY THE SUPREME COURT OF OHIO PURSUANT TO GOV. BAR R. V, SECTION 14.

Elizabeth T. Smith
Director

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

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

v.

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Relator,

BOARD OF PROFESSIONAL CONDUC

Case No. 2025-019

David Paul Greulich, Jr., Esq. Attorney Registration No. 0067366 1370 Ontario Street, #1800 Cleveland, Ohio 44113

Resp	ond	ent.
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<sup>&</sup>lt;sup>2</sup> Under *Disciplinary Counsel v. Bricker*, 2013-Ohio-3998, relator is charging a violation of Prof.Cond.R. 8.4(h) because relator believes that respondent's conduct is sufficiently egregious that it warrants the finding of an additional violation.

#### Conclusion

Relator requests that respondent be found in violation of the Ohio Rules of Professional Conduct and be sanctioned accordingly.

Respectfully submitted,

/s Joseph M. Caligiuri

Joseph M. Caligiuri (0074786)
Disciplinary Counsel
Office of Disciplinary Counsel
65 East State Street, Suite 1510
Columbus, Ohio 43215-4215
Telephone: (614) 387-9700
Joseph.Caligiuri@odc.ohio.gov
Relator

#### Certificate

The undersigned, Joseph M. Caligiuri, Disciplinary Counsel, hereby certifies that he is authorized to represent relator in the action and has accepted the responsibility of prosecuting the complaint to its conclusion.

Dated: September 9, 2025

/s Joseph M. Caligiuri
Joseph M. Caligiuri (0074786)
Disciplinary Counsel