IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

CITY OF CLEVELAND 601 Lakeside Avenue Cleveland, Ohio 44114 Plaintiff, vs. **DEUTSCHE BANK TRUST COMPA** 60 Wall Street New York, New York 10005 - and - **AMERIQUEST MORTGAGE COMPANY** c/o National Registered Agents 145 Baker Street Marion, Ohio 43302 - and - **BANK OF AMERICA CORPORATION** c/o CT Corporation System 1300 East Ninth Street Cleveland, Ohio 44114 - and - **THE BEAR STEARNS COMPANIES** c/o CT Corporation System 1300 East Ninth Street Cleveland, Ohio 44114 - and - **CITIGROUP, INC.** c/o CT Corporation System 17 South High Street – 17th Floor Columbus, Ohio 43215 - and-	) Case No.:_________ Judge: PETER J CORRIGAN CV 08 646970

COUNTRYWIDE FINANCIAL CORP.
4500 Park Granada
Calabasas, California 91302

– and –

CREDIT SUISSE (USA)
c/o CSC Lawyers Incorporating Service
50 Broad Street – Suite 1800
Columbus, Ohio 43215

– and –

FREMONT GENERAL CORPORATION
2425 Olympia Boulevard
Santa Monica, California 90404

– and –

GMAC-RFC
8400 Normandale Blvd., Ste. 250
Minneapolis, MN 55437

– and –

GOLDMAN SACHS GROUP
85 Broad Street
New York, New York 10004

– and –

GREENWICH CAPITAL MARKETS, INC.
600 Steamboat Raod
Greenwich, Connecticut 06830

– and –

HSBC HOLDINGS, PLC
2700 Sanders Road
Prospect Heights, Illinois 60070

– and –

INDYMAC BANCORP, INC.
888 East Walnut Street
Pasadena, California 91101-7211

- and -

J.P. MORGAN CHASE CO.
270 Park Avenue
New York, New York 10017

- and-

LEHMAN BROTHERS HOLDINGS, INC.
c/o Prentice-Hall Corporation System, Inc.
50 West Broad Street - Suite 1800
Columbus, Ohio 43215

- and -

MERRILL LYNCH & CO., INC.
4 World Financial Center
New York, New York 10080

- and -

MORGAN STANLEY
1585 Broadway
New York, New York 10036

- and -

NOVASTAR FINANCIAL, INC.
8140 Ward Parkway - Suite 300
Kansas City, Missouri 64114

- and -

OPTION ONE MORTGAGE CORPORATION
c/o CT Corporation System
1300 East Ninth Street
Cleveland, Ohio 44114

- and -

WASHINGTON MUTUAL, INC.)
1301 Second Avenue)
Seattle, Washington 98101)
)
– and –)
)
WELLS FARGO & COMPANY)
c/o CSC Lawyers Incorporating Service)
50 Broad Street – Suite 1800)
Columbus, Ohio 43215)
)
Defendants.)

COMPLAINT
(Jury Demand Endorsed Hereon)

GENERAL NATURE OF CASE

1. The City of Cleveland sits at the epicenter of a mortgage foreclosure crisis triggered by sub-prime lenders and the monied interests that support them. Over the course of several years, financial institutions routinely made money available to unqualified borrowers who had no realistic means of keeping up with their loan payments over the long term. A rash of defaults inevitably followed, and the ensuing foreclosures have left homes abandoned and boarded-up, transforming them into eyesores, possible fire hazards, and targets for both looters and criminals.

2. This phenomenon claimed entire streets, blocks, and neighborhoods in Cleveland, displacing both homeowners and tenants of absentee landlords who had acquired their property with sub-prime loans. Seemingly overnight, the spate of foreclosures vanquished or reversed the successes that

had established Cleveland as a national leader in neighborhood revitalization.

3. The epidemic of foreclosures has devalued not only the homes directly affected but surrounding properties as well, deeply depleting Cleveland's tax base. The City has also strained to cover the more immediate, tangible costs imposed upon it by the crisis, including increased fire and police expenditures associated with vacant properties, demolition costs, and the like.

4. Sub-prime lending abuses have inflicted this same kind of damage upon cities across the United States. Cleveland's predicament, however, remains distinctive and unique - and not only because its foreclosure rate surpasses those experienced elsewhere by a significant margin. Cleveland's economy and housing situation differed significantly from the rest of the country's at the time sub-prime lending reached its peak. The disparities made mass foreclosures the only possible result of flooding the local market with sub-prime mortgages, even if doing likewise in other cities created no such apparent risk.

5. Simply put, with respect to Cleveland, the purveyors of sub-prime mortgages could have and should have foreseen (and in all likelihood actually did foresee) a foreclosure crisis as the inescapable consequence of their conduct. Forced to clean up the resulting mess, the City

has sustained hundreds of millions of dollars in damages, in the manner described above.

6. Responsibility for Cleveland's plight rests principally with sub-prime's so-called "securitizers" – investment banking firms from Wall Street and elsewhere that actually provided the cash used to make loans, regardless of the lender or broker nominally involved in the transactions. The "securitizers" accomplished this largely by buying the sub-prime mortgages procured from borrowers – lenders would make sub-prime loans with proceeds received from the sale of mortgages from earlier deals. Through this cycle, Wall Street financed the sub-prime boom that took place in Cleveland and across the country.

7. Investment bankers bought sub-prime mortgages for use as collateral in the sale of mortgage-backed securities. This form of investment became the darling of Wall Street, given the substantial returns that purchasers were supposed to receive (in keeping with the substantial interest that sub-prime borrowers were supposed to pay on the mortgages that backed the securities).

8. "Securitizers," typically paid themselves astronomical fees in putting together new offerings of mortgage-backed securities. Their appetite for mortgage-backed securities became so voracious that "securitizers" explicitly countenanced loans made to borrowers either on financially irrational terms or without any information to corroborate the borrowers'

wherewithal to pay – anything to keep new mortgages coming for the creation of still more mortgage-backed securities.

9. The propagation of sub-prime mortgages in Cleveland and the corresponding foreclosures constitute a public nuisance as defined by Ohio common law. The City has filed suit to redress this misconduct and recoup the losses it has suffered as a result. The Defendants include the predominant "securitizers" of sub-prime mortgages, several of which also made loans directly to consumers.

THE PARTIES

I. The City of Cleveland

10. With approximately 460,000 residents, Cleveland is the second largest city in Ohio.

11. The United States Census Bureau estimates that between 2000 and 2006, Cleveland suffered a sharp decline in home ownership, while the number of vacant housing units has increased by more than 80 percent. Foreclosures on sub-prime mortgages largely account for both of these statistics.

II. The Defendants

12. Defendant Deutsche Bank Trust Company is the American affiliate of a German financial conglomerate and has its headquarters on Wall Street in New York City. Between 2002 and 2006, Deutsche Bank either issued or underwrote more than $120 billion in securities backed by sub-

prime mortgages. Deutsche Bank holds thousands of mortgages in the City of Cleveland, and has filed more than 4,750 foreclosure actions in Cuyahoga County over the past four years alone. Despite these facts, Deutsche Bank has no registered agent in Ohio, and has not filed the paperwork required to do business lawfully within this State.

13. Defendant Ameriquest Mortgage Company "securitized" more than $170 billion in securities backed by sub-prime mortgages between 2002 and 2006. The company has its headquarters in Orange, California but has ceased actively doing business, in the wake of a series of legal and regulatory problems. The mortgages "securitized" by Ameriquest came largely from its sister company, Argent Mortgage Company, which has also effectively gone out of business. Before doing so, however, Argent made more than 4,800 sub-prime loans in the City of Cleveland over the three-year period ending in 2006. That total represented a staggering 27 percent of all sub-prime loans made in the City during that time. Ameriquest and Argent together filed approximately 1,600 foreclosure actions in Cuyahoga County between 2004 and 2007.

14. Based in Charlotte, North Carolina, Defendant Bank of America Corporation is a holding corporation that owns a bank and other financial institutions. The company underwrites and issues securities backed by sub-prime mortgages, and also makes sub-prime loans to consumers. Between

2004 and 2007, Bank of America has filed more than 450 foreclosure actions in Cuyahoga County.

15. Defendant The Bear Stearns Companies, Inc. is a holding company that owns an investment bank, and various other financial-services companies. This Defendant issued or underwrote more than $134 billion in securities backed by sub-prime mortgages between 2002 and 2006. Over the past four years, The Bear Stearns Companies initiated more than 175 foreclosure actions in Cuyahoga County.

16. Based in New York City, Defendant Citigroup, Inc. is a financial services holding company. The company has issued and underwritten approximately $166 billion in securities backed by sub-prime mortgages between 2002 and 2006. Over the last four years, Citigroup initiated more than 600 foreclosure actions in Cuyahoga County.

17. Defendant Countrywide Financial Corporation engages in mortgage lending and other financial operations through its various subsidiaries. The company has its headquarters in Calabasas, California. Countrywide both makes sub-prime loans to consumers and "securitizes" sub-prime mortgages. Over the five-year period ending in 2006, Countrywide issued or underwrote more than $260 billion in securities backed by sub-prime mortgages. Countrywide has filed approximately 1,300 foreclosure actions in Cuyahoga County since 2004.

18. Defendant Credit Suisse (USA) is an international financial services firm that has its American headquarters in New York City. Between 2002 and 2006, Credit Suisse issued and underwrote more than $220 billion in securities backed by sub-prime mortgages.

19. Defendant Fremont General Corporation is a banking- and financial-services company. Its stock trades on the New York Stock Exchange. Fremont issued more than $69 billion in securities backed by sub-prime mortgage between 2002 and 2006.

20. Defendant GMAC-RFC "securitizes" residential mortgages as its primary line of business. The company has its headquarters in Minneapolis. Between 2002 and 2006, GMAC-RFC issued approximately $106 billion in securities backed by sub-prime mortgages.

21. Defendant Goldman Sachs Group provides investment-banking and other financial services, predominantly for institutions and wealthy individuals. Based in New York City, the company issued or underwrote more than $80 billion in securities backed by sub-prime mortgages between 2002 and 2006.

22. Defendant Greenwich Capital Markets, Inc. has its headquarters in Greenwich, Connecticut and does business as a financial services firm under the name of RBS Greenwich Capital. Between 2002 and

2006, the company underwrote more than $180 billion in securities backed by sub-prime mortgages.

23. Defendant HSBC Holdings Plc is an international financial conglomerate that encompasses Household Finance, among other subsidiaries. HSBC has both made sub-prime loans to consumers and "securitized" them. Since 2002, HSBC has issued more than $200 billion in securities backed by sub-prime mortgages. The company filed nearly 1,300 foreclosure actions in Cuyahoga County between 2004 and 2007.

24. Defendant IndyMac Bancorp, Inc. has its headquarters in Pasadena, California. The company operates a bank that both makes sub-prime loans to consumers and "securitizes" sub-prime mortgages. Between 2004 and 2007, IndyMac filed more that 160 foreclosure lawsuits in Cuyahoga County.

25. Defendant JP Morgan Chase Co. is an international financial conglomerate based in New York City. The company and its predecessors rank among the largest "securitizers" of sub-prime mortgages. Over the past four years, J.P. Morgan Chase and its affiliates have initiated more than 1,000 foreclosure suits in Cuyahoga County.

26. An international investment banking and financial services firm, Defendant Lehman Brothers Holdings, Inc. has its headquarters in New York City. Between 2002 and 2006, the company underwrote and issued more than $303.5 billion in securities backed by sub-prime mortgages. Until

August 2007, Lehman Brothers also operated a subsidiary that made sub-prime loans to borrowers.

27. Defendant Merrill Lynch & Co., Inc. provides financial services internationally through a variety of subsidiaries and affiliates. The company has its headquarters in New York City. Between 2003 and 2006, Merrill Lynch issued or under-wrote more than $120 billion in securities backed by sub-prime mortgages.

28. Based in New York City, Defendant Morgan Stanley is an international financial services firm that operates an investment bank, a securities broker-dealer, and various related companies and institutions. Between 2002 and 2006, Morgan Stanley issued or underwrote more than $227.5 billion in securities backed by sub-prime mortgages.

29. Based in Kansas City, Missouri, Defendant Novastar Financial, Inc. specializes in the issuance and "securitization" of sub-prime mortgages. Its stock trades on the New York Stock Exchange. Since 2002, Novastar has issued more than $30 billion in securities backed by sub-prime mortgages. Over the last four years, the company has filed approximately 200 foreclosure actions in Cuyahoga County.

30. Defendant Option One Mortgage Corporation belongs to the H&R Block family of financial companies. It has its headquarters in Irvine, California. Option One specializes in servicing sub-prime loans. Between

2002 and 2006, the company issued more than $100 billion in securities backed by sub-prime mortgages.

31. Based in Seattle, Washington, Defendant Washington Mutual, Inc. operates a consumer and small-business banking company. Washington Mutual issued more than $72 billion in securities backed by sub-prime mortgages between 2002 and 2006. The company itself also made sub-prime loans to borrowers (although in December, 2007, it announced its intention to abandon the latter practice). Over the last four years, Washington Mutual has initiated more than 900 foreclosure actions in Cuyahoga County.

32. Defendant Wells Fargo & Company provides a variety of financial services to its clients, including personal and investment banking. The company has its headquarters in San Francisco, California. Between 2002 and 2006, the company issued more than 30 billion in securities backed by sub-prime mortgages. Wells Fargo itself also has originated tens of thousands of sub-prime mortgages. Over the last four years, Wells Fargo has filed more than 4,000 foreclosure actions in Cuyahoga County.

FACTUAL BACKGROUND

I. The Basics of Sub-Prime Lending

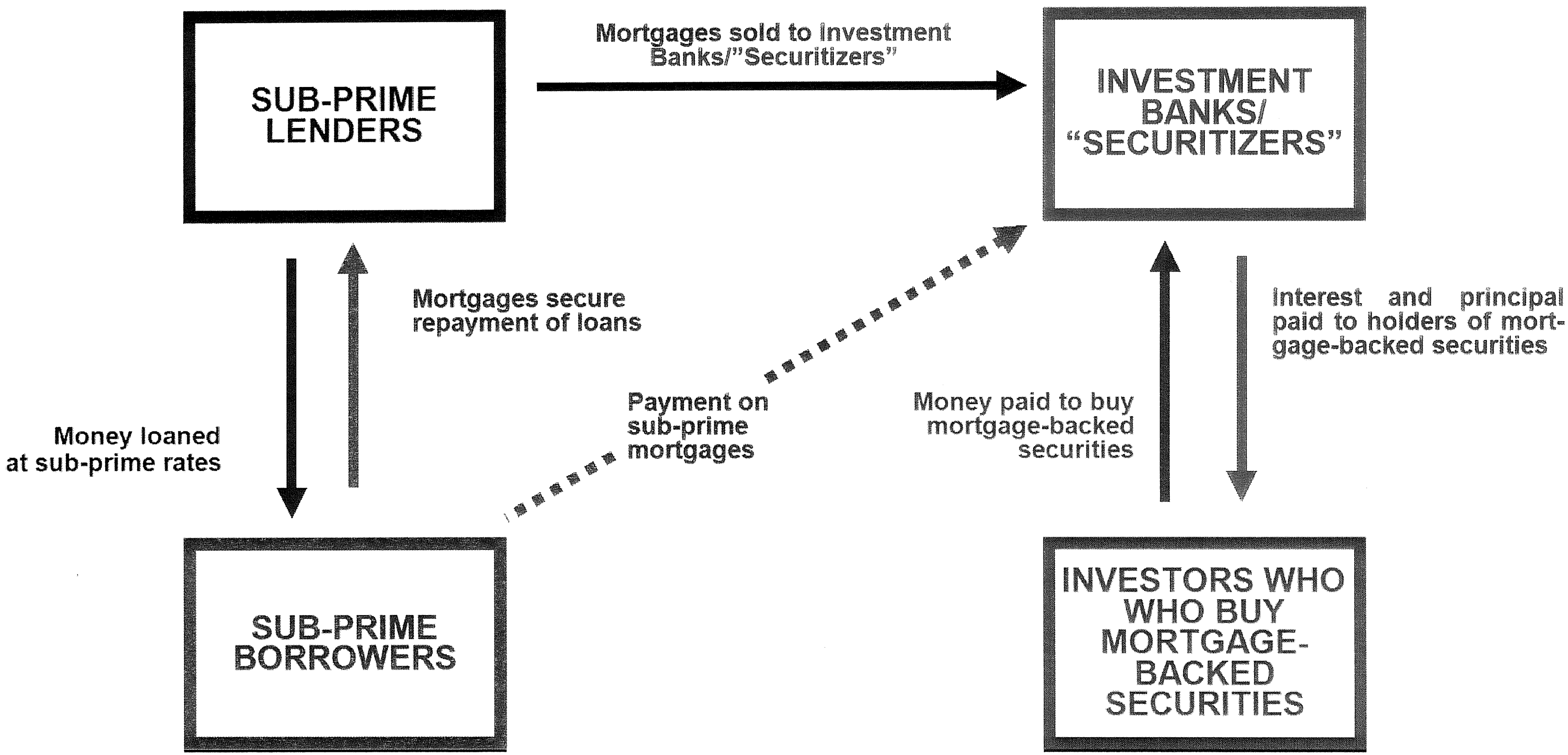
33. As its name implies, sub-prime lending involves loans made at relatively high rates of interest, putatively to borrowers with high credit risk who do not qualify for conventional loans.

34. The popularity of this type of mortgage financing grew

steadily during the 1990s, then exploded at the beginning of the new millennium. Between 2000 and 2006, the number of sub-prime loan originations in the United States jumped by more than 250 percent, from 911,369 to 3,219,749. In 2005 alone, the aggregate amount of sub-prime loans made in the United States exceeded $660 billion.

II. The "Securitization" of Sub-Prime Mortgages

35. As indicated above, Wall Street's love affair with mortgage-backed securities largely spurred the unprecedented surge in sub-prime lending. Mortgage-backed securities essentially are bonds secured by real estate loans. They comprise a collection of mortgages that lenders sell to the issuer of the securities. The issuer uses the sums received from borrowers in repaying their loans to fund disbursements made to investors:


SUB-PRIME LENDERS
Mortgages sold to Investment Banks/"Securitizers"
INVESTMENT BANKS/ "SECURITIZERS"
Mortgages secure repayment of loans
Interest and principal paid to holders of mortgage-backed securities
Money loaned at sub-prime rates
Payment on sub-prime mortgages
Money paid to buy mortgage-backed securities
SUB-PRIME BORROWERS
INVESTORS WHO WHO BUY MORTGAGE-BACKED SECURITIES

36. Approximately two-thirds of all mortgage debt in the United States has undergone "securitization" in accordance with this general process. A substantial portion of this total comes from government-sponsored entities like the Federal Home Loan Mortgage Corporation ("Freddie Mac") and the Federal National Mortgage Association ("Fannie Mae"). As a general rule, however, Freddie Mac and Fannie Mae deal in "conforming mortgages" that meet certain restricted "borrower quality characteristics and loan-to-value ratios."

37. In contrast, Wall Street has relied upon sub-prime mortgages to fund their mortgage-backed offerings. These securities offer investors higher rates of return than those backed by "conforming mortgages," since they involve higher rates of interest. They also involve higher degrees of risk, since sub-prime borrowers (with their relatively poor credit) by definition default with greater frequency than recipients of loans at prime rate.

III. Wall Street's Preeminence in the Sub-Prime Market

38. Wall Street's involvement in the sub-prime market encompassed more than just the purchase and pooling of mortgages to back new securities offerings. The investment bankers also provided lenders with lines of credit and other means of financing required to accommodate the dramatic increase in the number of mortgages they were procuring.

39. "Securitization" eventually became the key source of capital for sub-prime lenders. The process enabled them to convert mortgages quickly

into funds to make new loans. Investment banking firms thus assumed the central role in the cycle of financing that gave rise to the sub-prime mortgage boom:

(1) **WALL STREET** made financing available to sub-prime lenders, which

(2) used the cash to make sub-prime loans to consumers, then

(3) sold the related mortgages back to **WALL STREET**, which

(4) packaged and resold them to investors in the form of mortgage-backed securities, and

(5) used the proceeds to repeat the process.

40. Mortgage-backed securities funded lavish pay days (by even Wall Street standards) for the firms engaged in this business. As indicated above, investment bankers displayed no shyness about the fees they charged in connection with MBS offerings. Those charges translated into six- and seven-figure bonuses for individual executives responsible for particular clients and deals.

41. The Wall Street firms kept the gravy train rolling by accounting for a substantial portion of the investor demand for mortgage-backed securities. They did so principally through their proprietary trading programs and hedge funds that the firms created and managed.

42. Wall Street necessarily held significant influence over sub-prime lenders, given its concurrent positions as financier, underwriter, and investor

in the sub-prime market. The firms used their preeminent status to set the standard that lenders applied to determine who did (almost everyone) and did not (almost no one) qualify for sub-prime financing.

IV. The Phenomenon of Money-Seeking-Borrowers

43. In 2003, a fundamental shift took place in how Wall Street constructed their securities offerings backed by sub-prime mortgages. By that juncture, the demand for this type of investment had grown so significantly that the offerings essentially involved "money seeking borrowers." The firms, in other words, began directing originators on the type of loans to procure in which amounts in order to fill out the pool needed as collateral for each new security.

44. This process subverted the normal operation of the mortgage market and inevitably led to the abandonment of meaningful underwriting standards. Even borrowers unlikely to meet their obligations would have to receive loans in order for the supply of sub-prime mortgages to keep pace with Wall Street's burgeoning demand. Lenders devised various new products to bring in the necessary volume of business:

> **Hybrid Adjustable Rate Mortgages**, known as "ARMS," that carry low fixed teaser rates that jump to much higher adjustable rates after two or three years
>
> **Low- and No-Documentation Loans**, which borrowers can obtain without having to verify their financial resources.

> **Interest-Only Loans**, which obligate borrowers to pay interest only for a specified period, when the principal becomes due.

45. Each of these arrangements significantly increased the intrinsically high risk of sub-prime mortgages, which in all instances match loans with higher-than-average interest rates with borrowers having less-than-average credit. The booming real estate market in the United States principally explained Wall Street's willingness to ignore these fundamental considerations, regardless of the terms that sub-prime lenders offered to lure new borrowers.

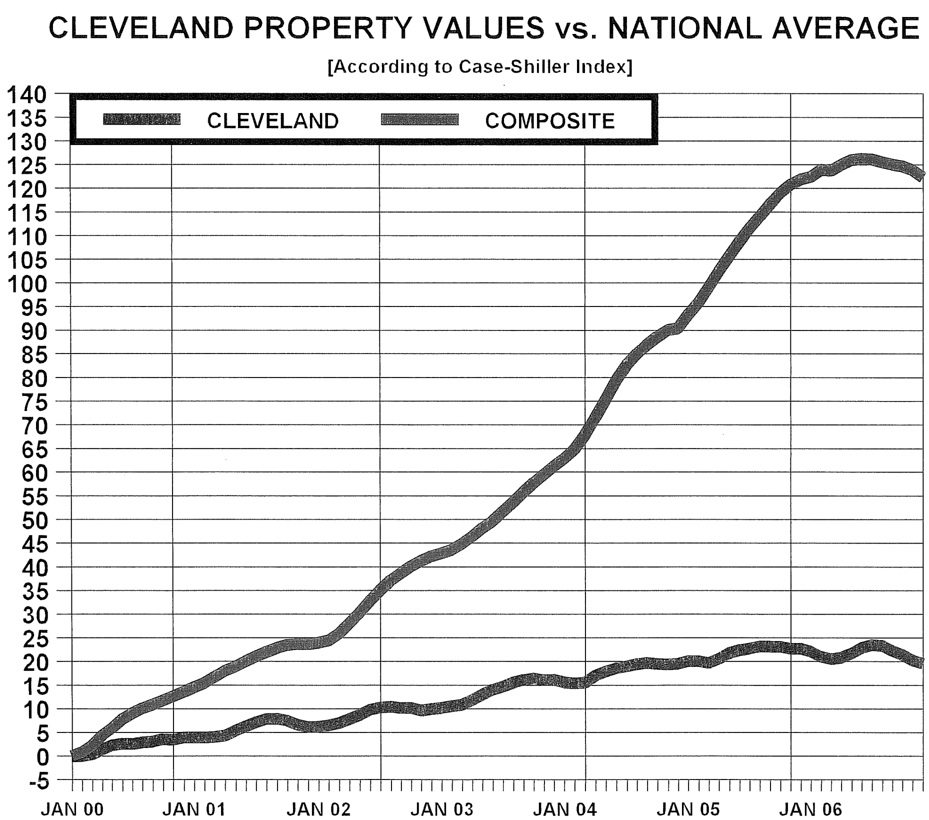
46. Property values in the United States were generally on the rise during the early part of this decade. As a result, the collateral securing new loans was generally appreciating in value – so much so, that default and foreclosure would not necessarily result in a loss.

47. Confidence ran so high that Wall Street believed it could turn a blind eye when lenders and brokers originated loans that made no economic sense, either because they involved borrowers with especially poor credit histories or because the amount borrowed far exceeded the current value of the home. These mortgages would ultimately prove good investments for the holder, so long as the housing market held, since the value of the collateral would eventually appreciate well beyond the face value of the loan.

V. Cleveland's Unique Financial Situation

48. Whatever merit this hypothesis otherwise may have held, it never applied to the City of Cleveland. In 2003, when sub-prime money began "seeking borrowers," Cleveland's economy and housing situation made it clear that including the City in this would-be bonanza could only have produced the mass foreclosures that eventually materialized. The Defendants chose to ignore the obvious facts in pumping hundreds of millions in sub-prime loans into Cleveland.

49. For one thing, property values never skyrocketed in the City as they did elsewhere in the nation, as the following graph reflects:



50. The sub-prime mortgage industry necessarily would have known about Cleveland's exclusion from the national housing boom. It also would have known about the City's struggling, Rust-Belt economy, the disappearance of the manufacturing sector as a significant financial presence, and its inability at the beginning of this decade to attract any meaningful replacement.

51. Cleveland ranked among the poorest cities in the nation in 2003, when sub-prime money began "seeking borrowers." Employment opportunities in the City remained limited, diminishing its attractiveness to new residents and negating any corresponding demand in the housing market.

52. In fact, during this period, foreclosure had already become a serious problem in Cleveland and the rest of Ohio, even while residential real estate remained the hottest of commodities elsewhere in the United States.

53. The Defendants can hardly claim ignorance of these well-known facts, which should have eliminated Cleveland as a market for sub-prime lending. In fact, "securitizers" and lenders were setting the stage for financial catastrophe by

- making credit available to borrowers with below-average credit, abandoning all but a semblance of underwriting standards;
- offering "teaser" rates and other deals that distorted or obscured the true burden of taking on a sub-prime mortgage;

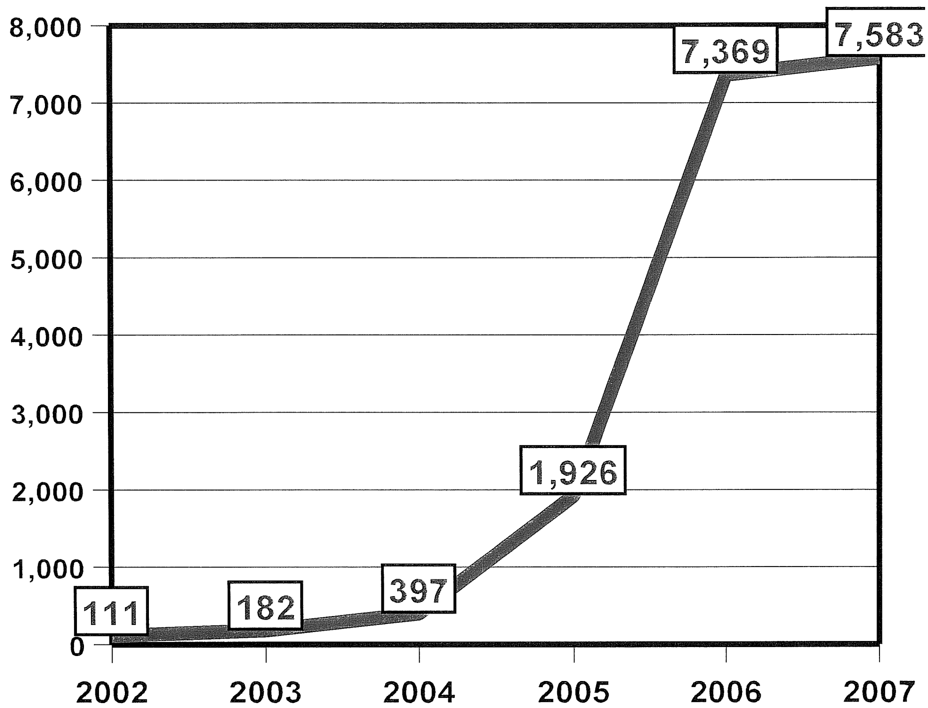
- doing so in a city where economic conditions provided little opportunity or mobility for borrowers, and
- doing so where the housing market effectively froze the value of homes and offered relatively little demand from new buyers.

54. These considerations made sub-prime lending broadly inappropriate for Cleveland. If anything, however, the Defendants focused their sites more intensely upon the City, rather than shying away from it. Cleveland's demographic profile largely comports with the prototype sub-prime clientele, given its relatively high concentration of lower-income famillES with below-average credit. Cleveland also has a large African-American population. Beginning at least in the late 1990s, the sub-prime industry began targeting that community as a principal consumer of its high-interest loans.

VI. **Foreclosures in Cleveland**

55. The infusion of sub-prime money inflicted the predictable harm on Cleveland. The City has become the poster child for the national foreclosure crisis. The *New York Times*, the *Washington Post*, *CNN*, the *Wall Street Journal*, and other major news outlets have featured Cleveland in stories on the subject. Congressional subcommittees have also conducted hearings that pertain specifically to foreclosures in this area.

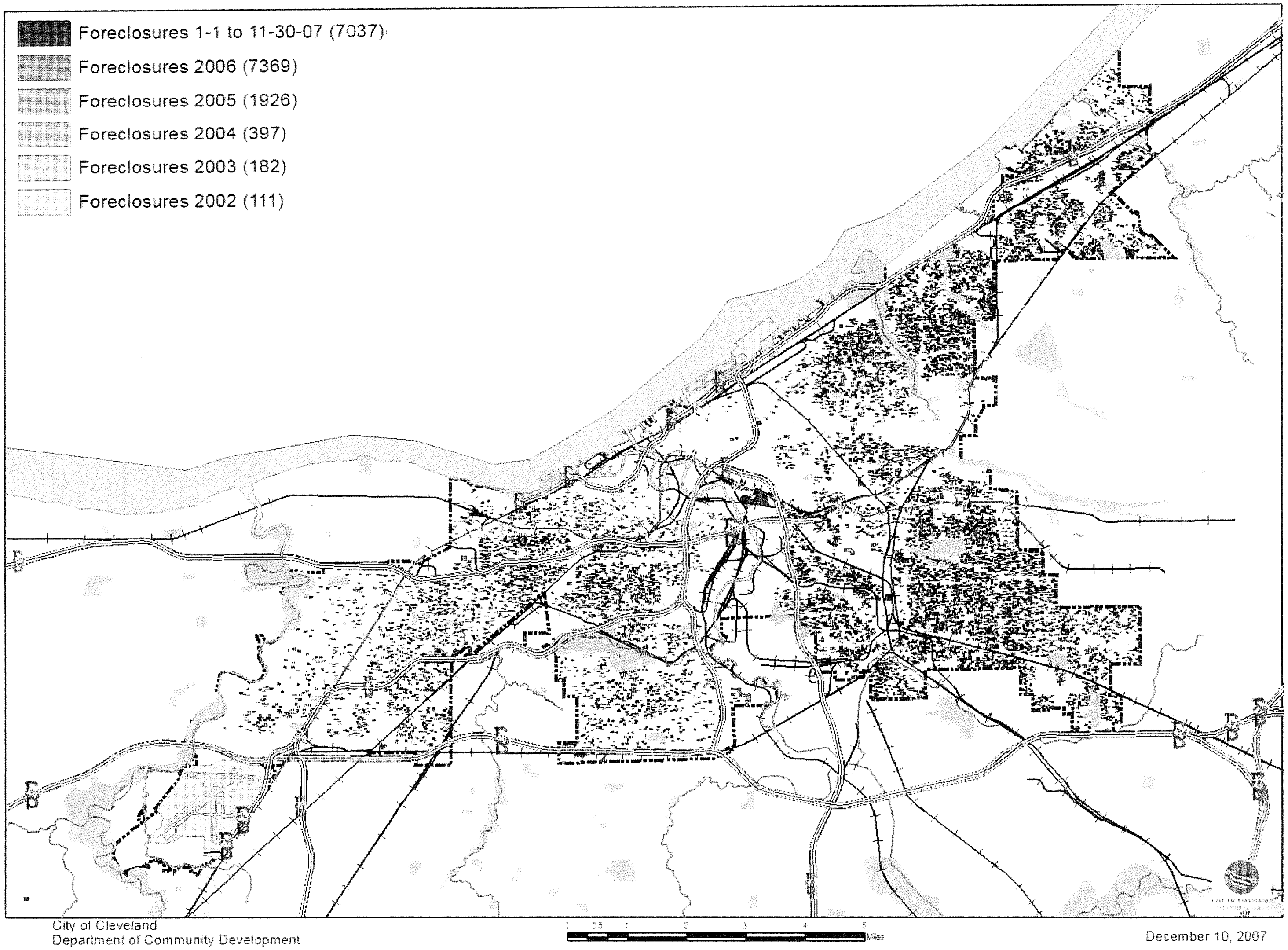
56. The statistics explain precisely why Cleveland is receiving this unfortunate attention. Between 2002 and 2007, the number of foreclosures consummated in the City jumped from fewer than 120 to more than 7,500:



[2007 total projected from actual data as of 12.15.07]

57. An average of 20 Cleveland homeowners faced the grim reality of foreclosure each day during 2007. The epidemic affected almost all parts of the City:

City of Cleveland - Foreclosures



VI. Damages Suffered by the City of Cleveland

58. The City of Cleveland was an innocent bystander with respect to the influx of sub-prime money within its borders. It did not stand to receive any of the financial gain the Defendants were seeking in pushing their loans to unqualified borrowers.

59. Having had absolutely nothing to gain from the sub-prime industry, Cleveland now must deal with the devastation it has inflicted upon the City. Each and every foreclosure creates certain tangible costs for Cleveland, particularly if the property remains vacant for any extended period of time. As indicated above, these may include increased expenditure for fire and police protection, or the cost of demolition. In many individual cases, the City's expenses range well into five figures.

60. The sub-prime mortgage crisis has also ravaged Cleveland's property-tax revenues, the amount of which turns upon the appraised value of real estate in the City.

61. Foreclosures decrease the value not only of the affected homes, but surrounding properties as well. The magnitude of this spillover effect is tremendous – a study recently released by the Center for Responsible Lending determined that homes in Cuyahoga County collectively depreciated more than ***$462 MILLION*** due to their proximity to foreclosed property. Cleveland residents have already begun challenging assessments on their homes in light of the blight inflicted by the foreclosure crisis.

62. The municipal cost of foreclosure has long been known. For instance, in June 2000, the United States Treasury Department and the Department of Housing and Urban Development issued a joint report on predatory lending. The report addresses the elevated rate of sub-prime foreclosures, and their role in hastening the deterioration of various urban communities. Various economists and academicians had also extensively addressed this same topic. Just as the Defendants could have and should have foreseen the mass foreclosures they were causing in Cleveland, they could have and should have anticipated the damages the City would suffer as a result of their actions.

COUNT ONE
[Public Nuisance]

63. The City of Cleveland incorporates by reference all preceding paragraphs of this Complaint.

64. The Defendants are liable to the City of Cleveland for public nuisance for their respective roles in proliferating toxic sub-prime mortgages within its borders, under circumstances that made the resulting spike in foreclosures a foreseeable and inevitable result.

65. The City suffered damage as the direct and proximate result of the Defendants' unlawful conduct, including (a) the cost of monitoring, maintaining, and demolishing foreclosed properties, and (b) decreased tax revenues resulting from the depreciated value of the affected homes and all surrounding real estate.

WHEREFORE, the City of Cleveland respectfully requests the following relief:

- compensatory damages of more than $25,000, in an amount it will specifically quantify at trial, plus
- interest;
- an award of costs and reasonable attorneys fees; and
- any other relief that the Court deems just and equitable.

Joshua R. Cohen (0032368)
jcohen@crklaw.com
Ellen M. Kramer (0055552)
emk@crklaw.com
Cohen Rosenthal & Kramer LLP
The Hoyt Block Building – Ste. 400
700 West St. Clair Avenue
Cleveland, Ohio 44113
(216) 781-7956 **(Telephone)**
(216) 781-8061 **(Facsimile)**

Robert J. Triozzi, Director (0016532)
rtriozzi@city.cleveland.oh.us
Gary S. Singletary (0037329)
gsingletary@city.cleveland.oh.us
Michael F. Cosgrove (0072795)
mcosgrove@city.cleveland.oh.us
City of Cleveland Law Department
Cleveland City Hall
601 Lakeside Avenue- Room 106
Cleveland, Ohio 44114
(216) 664-2800 **(Telephone)**
(216) 664-2663 **(Facsimile)**

Andris G. Nikiforovs (0055400)
andyn@commhousingsolutions.org.
Community Housing Solutions
12114 Larchmere Boulevard
Cleveland, Ohio 44120
(216) 231-5815 **(Telephone)**
(216) 231-5845 **(Facsimile)**

Paul B. Bellamy (0005314)
pbbellamy@sbcglobal.net
Judith B. Goldstein (009655)
jgoldstein@equaljusticefoundation.com
Equal Justice Foundation
88 East Broad Street – Suite 1590
(614) 221-9800 **(Telephone)**
(614) 221-9810 **(Facsimile)**

Mark A. Stanton (per consent – JRC)

Mark A. Stanton (007919)
Short Sheppard & Stanton
Rockefeller Building – Ste. 1300
614 Superior Avenue NW
Cleveland, Ohio 44113
(216) 687-0725 **(Telephone)**
(216) 664-6999 **(Facsimile)**

JURY DEMAND

Pursuant to Civ. R. 38, the City of Cleveland respectfully demands trial by jury on all eligible issues, claims, and defenses.

Joshua R. Cohen