

**IN THE COURT OF COMMON PLEAS**

**LORAIN COUNTY, OHIO**

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**ANTHONY CILLO,**

Plaintiff,

v.

**MICHAEL A. WILLIAMS SR.,**

Specially Appearing Individual / Counterclaimant

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**Case No.: 25CV218601**

**Judge: Raymond J. Ewers**

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**AMENDED COUNTERCLAIM**

**OF MICHAEL A. WILLIAMS SR.**

*(With Reservation of Rights and Special Appearance)*

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**I. INTRODUCTION**

Comes now **Michael A. Williams Sr.**, a private individual, appearing **specially and not generally**, with full reservation of rights under **UCC 1-308**, the **Ohio Constitution**, and the **United States Constitution**, and hereby submits this **Amended Counterclaim** against **Anthony Cillo, Leigh Prugh, and Dennis P. Quinlan**, each of whom acted **under color of law**, and in both their **individual and official capacities**, and states as follows.

This Counterclaim is asserted without waiver of jurisdictional objections and is brought to preserve constitutional rights, prevent retaliation, and redress abuse of public office.

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**II. PARTIES**

1. **Counterclaimant, Michael A. Williams Sr.**, is a private citizen and pro se litigant residing in Lorain County, Ohio.

2. **Anthony Cillo** is the elected **Prosecutor of Lorain County, Ohio**, and at all relevant times acted under color of law and within (and at times outside) the scope of his public office.
3. **Leigh Prugh** and **Dennis P. Quinlan** are **Assistant Prosecutors** under the authority and direction of Anthony Cillo and likewise acted under color of law and within their public positions during all relevant times.

### III. JURISDICTION & VENUE

4. This Counterclaim is brought pursuant to **Ohio Civ.R. 13(A)** as a **compulsory counterclaim**, arising out of the same transaction or occurrence as Plaintiff's original complaint.
5. Jurisdiction is proper under **Ohio Revised Code § 2305.01**, and venue is proper in this Court pursuant to **Ohio Civ.R. 3(C)**.
6. Counterclaimant expressly preserves all objections to personal jurisdiction, subject-matter jurisdiction, service, party status, and standing.

### IV. GENERAL FACTS

7. On or about **December 2025**, Plaintiff **Anthony Cillo**, through the **Lorain County Prosecutor's Office**, filed a civil complaint against Counterclaimant alleging "vexatious litigation."
8. The complaint was filed **while Counterclaimant had multiple pending civil actions** against Lorain County judicial officials and public servants for misconduct, abuse of authority, and constitutional violations.
9. Counterclaimant has engaged in **protected activity**, including filing lawsuits, motions, grievances, and reports of official misconduct.
10. Rather than act impartially or initiate any appropriate investigation, Counter-defendants **retaliated, obstructed access to the courts, and misused public office and public resources** to protect colleagues and punish Counterclaimant.
11. Counterclaimant has been:

- **Physically assaulted** by Lorain County Sheriff's deputies on **August 29, October 21, and October 24, 2025**;
  - **Denied access to the courthouse**;
  - **Prevented from filing documents in person.**
12. Counterclaimant notified the Lorain County Prosecutor's Office **on at least three separate occasions by email** of these assaults and denials of access.
13. These notifications included dates, locations, identifying information, and references to **probable body-camera and courthouse camera footage**.
14. Despite notice, the Prosecutor's Office **refused to investigate**, refer, or otherwise act upon these reports.
15. Instead, the Prosecutor's Office initiated and advanced this retaliatory civil action against Counterclaimant.

## V. COUNTERCLAIMS

### COUNT I – Abuse of Process

*(Against All Counter-Defendants)*

16. Counter-defendants used the civil justice system for an **ulterior purpose**, namely to retaliate against Counterclaimant for exercising constitutional rights.
17. The action was not filed to remedy legitimate harm, but to **punish, deter, and silence** Counterclaimant.
18. Such conduct constitutes **abuse of process** under Ohio law.

### COUNT II – Retaliation for Protected Conduct

*(42 U.S.C. § 1983 – Against All Counter-Defendants)*

19. Counterclaimant's litigation activity, court filings, and reporting of misconduct are protected by the **First Amendment**.
20. Counter-defendants acted under color of law to retaliate against Counterclaimant for this protected conduct.

21. Such retaliation violates **42 U.S.C. § 1983**.

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### **COUNT III – Violation of Due Process Rights**

*(Against All Counter-Defendants)*

22. Counter-defendants denied Counterclaimant procedural and substantive due process by:

- Obstructing access to court;
- Allowing misrepresentation of parties and counsel;
- Advancing default and adverse rulings without jurisdictional clarity.

23. These actions violate the **Fourteenth Amendment** and **Article I, § 16** of the Ohio Constitution.

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### **COUNT IV – Abuse of Public Office Resulting in Loss of Public Confidence**

*(Against All Counter-Defendants)*

24. Counter-defendants abused their public offices by:

- Filing retaliatory litigation;
- Defending judicial colleagues at public expense;
- Obstructing accountability mechanisms.

25. This conduct has irreparably damaged public confidence in the **Lorain County Prosecutor's Office** and the administration of justice.

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### **COUNT V – Misuse of Prosecutor's Office to Shield Judicial Officials**

*(Against All Counter-Defendants)*

26. Assistant Prosecutors **Leigh Prugh** and **Dennis P. Quinlan**, under direction of Anthony Cillo, provided legal representation and protection to judicial officials named as civil defendants by Counterclaimant, including:

- Judge Chris Cook

- Judge Lisa Swenski
- Judge Denise McColley
- Judge Glass
- Magistrate Sam Bradley
- Magistrate Brandon Oliver
- Magistrate Terrence Butler
- Magistrate Barbara Butler

27. This representation occurred:

- **Without notices of appearance;**
- **Without cost to the judicial officials;**
- **Using taxpayer-funded staff and resources.**

28. This constitutes a conflict of interest, misuse of public resources, and obstruction of civil accountability.

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## **COUNT VI – Dereliction of Duty and Abuse of Prosecutorial Discretion**

*(Against Anthony Cillo)*

29. Counter-defendant **Cillo** failed to investigate or refer for investigation civil complaints alleging conduct by judicial officials that **rose to the level of potential criminal violations.**

30. Counterclaimant provided notice of assaults, denial of access, and harassment by deputies under **Lt. Howell**, allegedly acting at the direction of **Judge Lisa Swenski.**

31. Despite this notice, the Prosecutor's Office **refused to act**, while initiating retaliatory litigation instead.

32. This conduct constitutes **malfeasance, dereliction of duty**, and violation of public trust.

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## VI. PRAYER FOR RELIEF

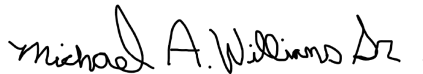
WHEREFORE, Counterclaimant respectfully requests:

- A. Judgment in his favor on all counts;
- B. Compensatory and punitive damages;
- C. Declaratory relief recognizing constitutional and ethical violations;
- D. Injunctive relief barring further misuse of public office and resources;
- E. An order striking improper appearances by Assistant Prosecutors in civil defenses of judicial officers;
- F. Referral to the **Ohio Attorney General** or appropriate oversight authorities;
- G. An order requiring all hearings to be conducted **via Zoom** due to prior assaults and courthouse denials on **August 29, October 21, and October 24, 2025**;
- H. Costs and all other relief the Court deems just and proper.

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Respectfully submitted,

**January 16, 2026**



**/s/ Michael A. Williams Sr.**

Specially Appearing Individual

Reserving All Rights

2913 Devore ct, Lorain oh 44052

440-320-8795/williamsinvestmentgroup1000@gmail.com

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## CERTIFICATE OF SERVICE

*(Ohio Civ.R. 5(B)(4))*

I hereby certify that a true and correct copy of the foregoing **Amended Counterclaim** was served on **January 13, 2026**, by:

- ☒ Electronic filing through the Lorain County Clerk of Court e-filing system
- ☒ Electronic mail upon:

- [dennis.quinlan@lcfct.org](mailto:dennis.quinlan@lcfct.org)

[Anthony.cillo@lcfct.org](mailto:Anthony.cillo@lcfct.org)

**Dennis P. Quinlan**

Attorney purporting to represent Plaintiff Anthony Cillo

**/s/ Michael A. Williams Sr.**

*Michael A. Williams Sr.*

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