

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO

ANTHONY CILLO,
Plaintiff,
v.
MICHAEL A. WILLIAMS SR.,
Specially Appearing Individual / Counterclaimant

Case No.: 25CV218601

Judge: Raymond J. Ewers

AMENDED COUNTERCLAIM

OF MICHAEL A. WILLIAMS SR.

(With Reservation of Rights and Special Appearance)

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.

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.**

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.

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.

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.

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.

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.

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

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

Anthony.cillo@lcfct.org

Dennis P. Quinlan

Attorney purporting to represent Plaintiff Anthony Cillo

/s/ Michael A. Williams Sr.

Michael A. Williams Sr.
