

RECEIPT



LORAIN COUNTY Court of Common Pleas

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RECEIPT INFORMATION

Receipt Number: 25-0027527	Receipt Date/Time Sep 12 2025 10:04AM
Receipt Type: Civil Case Receipt	

CASE INFORMATION

Case Number: 25CV218000	Judge: Hon. Judge D. Chris Cook
Case Caption: REBECCA S CAMPBELL V/S MICHELLE L HUNG	

PAYMENT INFORMATION

Paid By: GEMELAS WILSON MERRILL &	Paid For:
Payment Type: Check	Paid To: K.Z.
Amount Tendered: \$350.00	Balance Due: \$0.00
Description: NEW CIVIL	



25CV218000

FILED
LORAIN COUNTY

2025 SEP 12 A 10:05

COURT OF COMMON PLEAS
TOM ORLANDO

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO
CIVIL DIVISION

REBECCA S. CAMPBELL
8342 Ginger Drive
North Ridgeville, Ohio 44039

Plaintiff,

vs.

MICHELLE L. HUNG
37037 Chaddwyck Lane
North Ridgeville, Ohio 44039

Defendant.

) CASE NO.

) JUDGE

) JUDGE D. CHRIS COOK

) COMPLAINT

Now comes the Plaintiff, Rebecca Campbell, by and through her counsel, Michael S.

Wilson, of Gemelas, Wilson, Merrill & Fritz, Co. LPA, and for her Complaint against the

Defendant, Michelle Hung, states the following:

JURISDICTION AND VENUE

1. Plaintiff, Rebecca Campbell is a resident of the North Ridgeville, Lorain County,
~~Ohio and current wife of Jeffrey Hung.~~

2. Defendant, Michelle Hung is a resident of the North Ridgeville, Lorain County,
Ohio and former wife of Jeffrey Hung.

3. At all times relevant to this action, conduct and actions of the Defendant occurred
in Lorain County, therefore, the Lorain County Court of Common Pleas has jurisdiction over the
Defendant and is the proper venue for this case to be heard.

FACTS COMMON TO ALL COUNTS

4. Defendant, Michelle Hung is the former wife to Jeffrey Hung.

5. While separated from the Defendant, Jeffrey Hung began dating the Plaintiff, Rebecca Campbell.

6. After lengthy litigation, Jeffrey Hung became legally divorced on from the Defendant in the summer of 2023.

7. After a few years of dating, on December 17, 2024, Rebecca Campbell and Jeffrey Hung married.

8. Since the beginning of Rebecca and Jeffrey's relationship and until December 31, 2024, Defendant was a sitting Lorain County Commissioner.

9. Defendant has never accepted her ex-husbands relationship with Rebecca, and from the onset, to this day, Defendant will disparage and insult Rebecca in communications with Jeffrey, which, by court order, are to be solely about custody matters involving Defendant and Jeffrey's daughter.

10. Defendant's conduct escalated on the evening of May 24, 2022 when she called the North Ridgeville Police to Jeffery and her Chaddwyck Lane home because Jeffery brought Rebecca over to meet their daughter for the first time.

11. North Ridgeville Police arrived, investigated and determined nothing criminal had occurred.

12. At this time, Defendant began to use her position as Lorain County Commissioner and her connections to local law enforcement as vehicle to harass and intimidate Rebecca.

13. On September 16, 2022, Defendant, who was an acting Lorain County Commissioner, requested the Lorain County Sheriff's Department (LCSD) investigate Rebecca Campbell for menacing by stalking.

14. That same day, an investigation for menacing by stalking by Rebecca was opened by the LCSD, which continued on for about 2 ½ years.

15. On March 7, 2024 both Parties attended the Lincoln Day Gala political event at the German Villa in Vermilion, Ohio.

16. After this event, Defendant contacted the LCSD and alleged Rebecca Campbell had touched her shoulder and threaten to "beat her ass" in front of many patrons.

17. The next day, on March 8, 2024 Captain Vansant of the LCSD contacted an officer Holmes of the Vermilion Police Department (VPD) and stated LCSD had an ongoing stalking and menacing investigation involving Rebecca Campbell and requested Officer Holmes investigate the March 7th incident alleged by Michelle Hung.

18. Officer Holmes investigated the March 7th incident fully and submitted his findings to the LCSD.

19. Officer Holmes findings determined no witnesses nor a video of the interaction corroborated Michelle Hung's statement of events.

20. No charges were filed by the VPD against Rebecca Campbell, but LCSD's menacing by stalking investigation of Rebecca continued through persistence of the Defendant.

21. On August 21, 2024 Major Bosley of the LSCD assigned Deputy Bungard to take over the menacing by stalking investigation of Rebecca.

22. On or about September 17, 2024 Defendant alleged, while campaigning in a booth at the Lorain County Fair, Rebecca stopped by and threaten her.

23. Defendant immediately reported this to Deputy Bungard of the LCSD, who that same day, made personal contact with Rebecca to inquire.

24. Rebecca again denied threatening the Defendant while speaking to Deputy Bungard.

25. LCSD investigation into the September 17, 2024 incident concluded with a determination no criminal conduct was committed by Rebecca and no charges were filed, again.

26. In November of 2024, Defendant lost her bid for reelection as a Lorain County Commissioner and would relinquish her seat January 1, 2025.

27. Coincidentally, at this same time and 2 ½ years after its opening, LCSD closed its menacing by stalking investigation of Rebecca and submitted their findings to the Lorain County Prosecutor's Office, for which no charges were filed.

28. Not to be deterred by her failure to levy criminal charges against Rebecca, Defendant continued her harassment by filing a meritless petition for a civil stalking protection order (CSPO) against Rebecca on or about February 6, 2025.

29. As a result of Defendant's former position as County Commissioner, all sitting Lorain County Court of Common Pleas Judges had to recuse themselves and Judge Timothy McGinty was appointed visiting judge by the Supreme Court of Ohio to hear the Defendant's Petition.

30. After one continuance was granted to the Defendant, a full hearing was set and scheduled for May 1, 2025.

31. On May 1, 2025, a full review hearing was scheduled. However, the Defendant was not prepared to move forward with her petition and motioned the court for another continuance, which was denied.

32. Not wanting to move forward with her petition, the Defendant dismissed her petition and the case was closed.

33. Defendant has failed to timely appeal the denial to her motion to continue the full hearing.

34. The Defendant's aforementioned conduct was committed with intent to harass and intimidate Rebecca under the false pretense that Defendant was a victim of menacing by stalking.

35. Using her position as county commissioner and connections to local law enforcement, Defendant persuaded the LCSD to perform a 2 ½ year criminal investigation of her ex-husband's new girlfriend.

36. The Defendant's conduct during this time period has caused Rebecca Campbell severe emotional distress, attorney fees, medical costs and Rebecca being asked to resign from her position on the G-4 District, Central Committee.

COUNT I

(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

37. Plaintiff realleges all the preceding statements as if fully rewritten herein.

38. Defendant used her elected position and political connections to have law enforcement criminally investigate Rebecca Campbell for 2 ½ years, once the investigation closed, Defendant continued such conduct and filed a meritless petition for civil stalking protection order against Rebecca which was subsequently dismissed, such conduct was committed with the intent to cause Rebecca severe emotional distress or committed with reckless disregard that it would be the result.

39. As a direct and proximate result of Defendant's extreme and outrageous conduct, Plaintiff, Rebecca Campbell suffered severe emotional distress damages in excess of \$25,000.00, the exact extent, nature and amount of which will be established at trial.

COUNT II

(MALICIOUS PROSECUTION)

40. Plaintiff realleges all the preceding statements as if fully rewritten herein.

41. Defendant's petition for civil stalking protection order filed February 6, 2025 lacked probable cause.

42. Defendant's petition for civil stalking order was filed with intent to harass and intimidate Rebecca and not for the purpose of protecting Defendant.

43. Defendant's petition for civil stalking protection order against Rebecca was dismissed on May 1, 2025.

44. As a direct and proximate result of the Defendant's malicious conduct, Plaintiff, Rebecca Campbell has suffered damages in excess of \$25,000.00, the exact extent, nature and amount of which will be established at trial.

COUNT III

(ABUSE OF PROCESS)

45. Plaintiff realleges all the preceding statements as if fully rewritten herein.

46. Defendant filed a petition for civil stalking protection order against Rebecca Campbell on February 6, 2025 in the Lorain County Court of Common Pleas.

47. Defendant filed this petition not for the purpose of seeking protection from Rebecca but rather for the improper purpose of harassing and intimidating Rebecca.

48. As a direct and proximate result of the Defendant's abuse, Plaintiff, Rebecca Campbell has suffered damages in excess of \$25,000.00, the exact extent, nature and amount of which will be established at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Rebecca Campbell requests this Court to order judgment in her favor as follows:

1. As to Counts I, II and III, for award of compensatory damages in excess of Twenty-Five Thousand Dollars (\$25,000.00), the exact extent, nature and amount of which will be established at trial;
2. As to all Counts:
 - A. Award of punitive damages for Defendant's malicious and intentional conduct in the amount of \$250,000.00
 - B. Award of such other and further relief in law or equity which this Court may find Plaintiff entitled, including, but not limited to, attorney fees, prejudgment interest and costs of this action.

Respectfully submitted,


**GEMELAS, WILSON, MERRILL
& FRITZ CO., LPA**



Michael S. Wilson, #0078954
Attorney for Plaintiff
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Elyria, Ohio 44035
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JURY DEMAND

A trial by jury is respectfully demanded.



Michael S. Wilson, #78954
Attorney for Plaintiff

PRAECIPE FOR SERVICE

TO THE CLERK:

Please serve the Defendants a copy of this Complaint as follows: by certified mail at the address set forth in the above caption.



Michael S. Wilson, #78954
Attorney for Plaintiff