

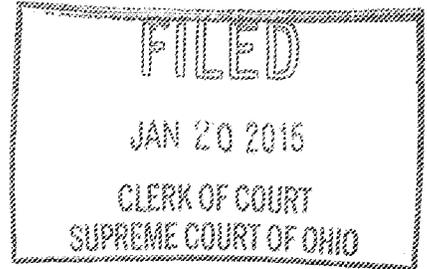
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January 15, 2015

Sandra Grosko
Clerk of Ohio Supreme Court
65 South Front Street, 8th Floor
Columbus, Ohio 43215-3431

RE: *State ex rel. McIntyre v. Summit County Court of Common Pleas, et al*,
Ohio Supreme Court Case No. 2015-0080

Dear Ms. Grosko:

On behalf of Lewis Leroy McIntyre, Jr., aka Leroy L. McIntyre, I hereby request the
recusal of Chief Justice Maureen O'Connor in the above referenced case.

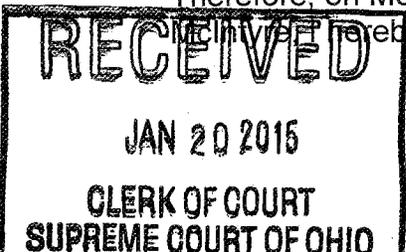
The case seeks extraordinary writs against the Summit County Court of Common Pleas
and three individual judges who have presided over McIntyre's criminal case, *State of
Ohio v. Leroy L. McIntyre*, Summit County Case No. CR-91-01-0135, since its inception
in 1991.

Most of the acts underlying the writs of prohibition took place in 1991 and 1992. During
this time, according to her biography on the Ohio Supreme Court website, Chief Justice
O'Connor worked as a magistrate for the Summit County Court of Common Pleas and
later as a judge from 1993 to 1995. She then became the Summit County Prosecutor
and held that post until being elected Lieutenant Governor in 1998.

For the last 24 years, McIntyre has tirelessly contested the charges in the case. This
includes the period of 1995 to 1998, when Chief Justice O'Connor was Summit County
Prosecutor. McIntyre's efforts were opposed by prosecutor's office.

Because Chief Justice O'Connor was an employee of Summit County Court of Common
Pleas at time McIntyre's trial and sentencing took place and later an adversary of
McIntyre as prosecutor, she has a conflict of interest in adjudicating McIntyre's request
for extraordinary writs.

Therefore, on McIntyre's behalf and pursuant to the attached affidavit executed by
McIntyre, I hereby request the recusal of Chief Justice O'Connor and for a visiting



justice to sit in her place for not only this case, but for any matters pertaining to McIntyre and his 1991 criminal case.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Hanudel", written in a cursive style.

Stephen P. Hanudel
Attorney for Lewis Leroy McIntyre, Jr.

STATE OF OHIO

)

) ss:

AFFIDAVIT

COUNTY OF MARION

)

Lewis Leroy McIntyre, Jr., being first duly cautioned and sworn, deposes and states the following:

1. I am the defendant in *State of Ohio v. Leroy L. McIntyre*, Summit County Case No. CR-91-01-0135. I was tried and sentenced in August 1991. Since that time, I have strenuously and consistently maintained my innocence and contested the charges against me, mostly on a pro se basis.

2. By the time this affidavit is received, I will have filed a Complaint for Writs of Prohibition, Mandamus, and Procedendo, which solely addresses the issues contained in my criminal case. The Complaint seeks writ relief from the Ohio Supreme Court to compel the Summit County Court of Common Pleas to properly proceed, adjudicate, and dispose my 1991 case. Many of the issues I am raising pertain to actions by the trial court and its judges that took place in 1991 and 1992.

3. To my best understanding and knowledge, Chief Justice Maureen O'Connor worked for the Summit County Court of Common Pleas from 1985 to 1993 as a magistrate and then as a judge from 1993 to 1995. She then became the Summit County Prosecutor and held that position until she was elected lieutenant governor in 1998.

4. Chief Justice O'Connor was an employee of the Summit County Court of Common Pleas during the time I am alleging the court to commit non-jurisdictional acts in my criminal case. During the time Chief Justice O'Connor was prosecutor, I filed motions and appeals, all of which all opposed by her office.

5. For the foregoing reasons, I feel Chief Justice O'Connor has a conflict of interest in presiding and participating in the adjudication of my Complaint.

6. I respectfully request that Chief Justice O'Connor recuse herself in the matter regarding my Complaint for Writs of Prohibition, Mandamus, and Procedendo and any future matters that involve me in a manner that creates a conflict of interest.

Further, affiant sayeth naught.


Lewis Leroy McIntyre, Jr.

Sworn and subscribed before me, a Notary Public in and for said County in said State, on this 9TH day of January, 2015.


Notary Public



STEPHEN P. HANUDEL
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.