



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Appeals**

**MOTION TO...**  
**June 5, 2025 13:01**

By: HEATHER MCCOLLOUGH 0075882

Confirmation Nbr. 3516560

STATE EX REL. LATEEK SHABAZZ

CA 25 115185

vs.

SANDRA MORGAN

**Judge:**

**Pages Filed: 25**

<b>STATE <i>ex rel.</i>, LATEEK SHABAZZ</b>	:	
<b>14340 Euclid Avenue</b>	:	<b>Case No. CA 25-115185</b>
<b>East Cleveland, Ohio 44112</b>	:	
	:	
<b>Petitioner,</b>	:	
<b>vs</b>	:	
	:	<b>MOTION TO DISMISS WRIT OF QUO</b>
<b>SANDRA MORGAN</b>	:	<b>WARRANTO AND MANDAMUS</b>
<b>14340 Euclid Ave. 2<sup>nd</sup> FL</b>	:	<b>AND REQUEST FOR EMERGENCY</b>
<b>East Cleveland, Ohio 44112</b>	:	<b>INJUNCTION TO</b>
<b>Defendant</b>	:	<b>PREVENT LATEEK SHABAZZ FROM</b>
	:	<b>REPRESENTING HIMSELF AS THE</b>
	:	<b>MAYOR OF EAST CLEVELAND</b>

Respondents also seek alternative writs of mandamus and injunction to prevent Lateek Shabazz from taking the office of Mayor of East Cleveland and from representing himself as the mayor of East Cleveland pending the November 2025 election of a successor.

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On October 10, 2024 Mayor Brandon King was indicted by the Cuyahoga County Prosecutor's office on fifteen counts that included felony charges of Theft in Office and Unlawful Interest in a Public Contract. The Prosecutor's office then sought to have King suspended from office pending the outcome of the case. On January 28, 2025 the Special Commission impaneled to determine if King should be suspended and issued its final determination officially suspending Brandon King from office. Council President Lateek Shabazz then stated that he was mayor pursuant to a section of East Cleveland Charter Provision 114 that relates to the "death, resignation, removal or long-term absence of the mayor." At the same time Law Director Willa Hemmons deemed herself "Acting Mayor under the section of 114 that deals with a mayor that is "absent from the city, otherwise not accessible, or temporarily unable for any cause to perform his or her duties. The city thought it best to take this matter to the probate court for resolution. Pursuant to O.R.C. 3.16, if a public official is suspended, the Probate Court in the county in which the public official serves is to appoint an interim replacement.

Cuyahoga County Probate Judge Anthony Russo requested resumes from those seeking an appointment as East Cleveland mayor. He received thirty-four applications. Nine were selected for interview, including Lateek Shabazz. Judge Russo chose Sandra Morgan to be the appointee on February 28, 2025 believing that the city of East Cleveland would be in good hands under her leadership. (See Exhibit A).

Under the terms of this appointment Judge Russo ordered that Sandra Morgan was to serve as interim mayor "until one of the following occurs:

1. The suspended mayor is reinstated to office by an appeal as provided in R.C. 3.16(D), (2) all charges against the suspended Mayor are disposed of by dismissal or by a finding or findings of not guilty; or (3) a successor Mayor is

elected and qualified to serve the next succeeding term of the public official's office.

On May 29, 2025 the jury returned a verdict of guilty on ten of twelve counts, including F4 Theft in Office and F4 Unlawful Interest in a public contract. (See Exhibit B). He is set for sentencing on June 9<sup>th</sup> 2025. On Sunday June 1<sup>st</sup> 2025 in a secret meeting known only to a select few people, Councilwoman Patricia Blochowiak swore in Lateek Shabazz as mayor claiming that since Brandon King had been convicted, that the mayor's seat was now vacant.

#### Law and Argument

Section 3.16 of the Ohio Revised Code is controlling here:

(C)(3) Upon making the final determination described in division (C)(2) of this section regarding a public official who is charged with a felony, including, if applicable, conducting a meeting pursuant to that division for the public official to contest the preliminary determination, the special commission shall issue a written report that sets forth its findings and final determination. The special commission shall send the report by certified mail to the public official, the prosecuting officer, and any other person that the special commission determines to be appropriate. Upon the issuance of the report, one of the following applies:

(a) If the special commission in its final determination does not determine that the public official's administration of, or conduct in the performance of the duties of, the official's office, as covered by the charges, adversely affects the functioning of that office or adversely affects the rights and interests of the public, the special commission shall include in the report a statement to that effect, and the public official shall not be suspended from office. If the public official was

provisionally suspended from office under division (B)(3) of this section, the provisional suspension shall terminate immediately upon the issuance of the report.

(b) If the special commission in its final determination determines that the public official's administration of, or conduct in the performance of the duties of, the official's office, as covered by the charges, adversely affects the functioning of that office or adversely affects the rights and interests of the public, the special commission shall include in the report a holding that the public official be suspended from office. The holding that the public official be suspended from office and the suspension take effect immediately upon the special commission's issuance of the report. If the public official was provisionally suspended from office under division (B)(3) of this section, the holding that the public official be suspended from office shall continue the suspension immediately upon the special commission's issuance of the report. The report and holding shall have the same force and effect as a judgment of a court of record.

Section four states:

A suspension imposed or continued under division (C)(3) of this section shall continue until one of the following occurs:

(a) The public official is reinstated to office by an appeal as provided in division (D) of this section;

(b) All charges are disposed of by dismissal or by a finding or findings of not guilty;

(c) A successor is elected and qualified to serve the next succeeding term of the public official's office.

Plaintiff's contention that he is mayor is predicated on the idea that because Brandon King was convicted, that King was automatically "removed" from office and the office of mayor is automatically vacant. This is incorrect. Brandon King was suspended under section (C)(3) of

3.16. Section 4 states that this suspension **shall continue** (*emphasis added*) until his charges are dismissed, he is reinstated on appeal or a successor is elected. King was convicted but he hasn't even been sentenced yet. He is likely to appeal his conviction and the election will not be held until November of 2025. Therefore, Brandon King is still under suspension. He has not been "removed", the mayor's seat is not vacant and Sandra Morgan is still interim Mayor.

Even if R.C. 3.16 didn't clearly state that King was still under suspension, the mayor's seat is not vacant. Merriam-Webster's Dictionary defines vacant as "not occupied by an incumbent, possessor or officer." Sandra Morgan took office March 3, 2025 and has continued to possess the office and conduct the business of the city as mayor ever since.

Section 114 of the East Cleveland Charter was designed to ensure that the business of the city would continue if the elected mayor could not perform his or her duties. The appointment of Sandra Morgan under R.C. 3.16 did just that. The business of the city has continued under the leadership of Mayor Morgan. Lateek Shabazz submitted a resume and was interviewed by Judge Russo along with eight other people. Judge Russo considering all that had been submitted, chose Sandra Morgan as the best person for the job. It is clear that Judge Russo's intention was for Morgan's appointment to continue until either Brandon King was reinstated or a successor was elected because he used the language of 3.16(C)(4) in his order.

Brandon King's indictment caused upheaval within the city government. This was amplified by the confusion of whether the council president was the mayor or if the law director was the mayor and the charter was not clear on the subject. The appointment of Mayor Morgan brought a sense of calm back to the city. The city council meetings were less contentious, legislation was being passed and the city budget was passed as well. The removal of Mayor Morgan would serve only to throw the city government back into chaos. Mayor Morgan's

efforts to bring county and state leadership together in cooperation to aid the City of East Cleveland would be derailed. For these reasons Judge Anthony Russo's order must be followed and Mayor Morgan must retain her position as interim mayor.

#### Request for Injunction

The administration of East Cleveland learned that Mr. Shabazz had been "sworn in as mayor" after a photo was posted on his Facebook page. (See Exhibit C). This sent shockwaves throughout city government and became fodder for the news media. Additionally, Mr. Shabazz had Council Clerk Stacey White draft a news release to be disseminated to the media. (See Exhibit D). Ms. White drafted certifications of the removal of Brandon King and the declaration that Lateek Shabazz was filling the position. (See Exhibits E and F.) These documents were sent via email to the members of city council, Judge William Dawson and various individuals in the city hall departments. (See Exhibit G). This same information was then posted on the community bulletin board at city hall used to publish notices of council meetings and other events. (See Exhibit H). State officials and others have called city hall in confusion about who the current mayor is.

Additionally, to further assert his self-professed authority and hinder and obstruct Mayor Morgan he sent a termination letter to Assistant Law Director Heather McCollough stating that her termination was effective immediately and threatening prosecution. (See Exhibit I). Ms. McCollough is currently, the only attorney in the law department and this would have the effect of shutting down the city. This situation has become untenable.

For these reasons it is imperative that Council President Lateek Shabazz be enjoined from taking the office as mayor or holding himself out as mayor. Mr. Shabazz has pulled a petition to

run for mayor and should concentrate on his campaign to seek the elected office rather than trying to take the position away by stealth and false light.

### Conclusion

Sandra Morgan was appointed interim mayor of the city of East Cleveland by probate Judge Anthony Russo pursuant to O.R.C. 3.16 following the suspension of Mayor Brandon King. Judge Russo's order states that the appointment was meant to last until King's charges were dismissed, he was reinstated on appeal or until a successor was elected. King was convicted but he hasn't been sentenced yet, nor has an election been held. Therefore, under 3.16(C)(4) Brandon is still suspended and it is premature for Petitioner to hold himself out as mayor. Therefore, his writ of quo warranto and mandamus along with a request for injunction and declaratory judgment must be denied and Judge Russo's continued appointment of Sandra Morgan must be upheld.

Petitioner Shabazz has prematurely announced himself as mayor and has been stating such publicly. This has caused confusion and disruption to day-to-day operations and must cease. Therefore, Respondent Morgan prays that her alternative writ requesting that her appointment be upheld and injunctive relief against Mr. Shabazz be granted.

Respectfully submitted,

/s/Heather McCollough  
Heather McCollough (0075882)  
14340 Euclid Ave.  
East Cleveland, OH 44112  
Attorney for Mayor Sandra Morgan  
(216) 681-2170 phone  
(216) 681-2199 fax



**CERTIFICATE OF SERVICE**

A copy of the foregoing Response to Writ and Request for Injunction was served via electronic Mail this 5th day of June upon attorney for Petitioner Ken Myers at kdmy@aol.com

/x/Heather McCollough

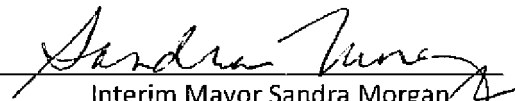
## AFFIDAVIT

STATE OF OHIO                                 )  
  )  
CUYAHOGA COUNTY, OHIO         )         SS

I, Interim Mayor Sandra Morgan, being first duly sworn according to law, depose and state upon personal knowledge and belief as follows:

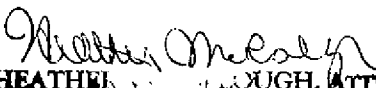
1.       That I possess personal knowledge in regards to the matters as set forth hereinafter.
2.       That I am the Interim Mayor of the City of East Cleveland and have been employed in that capacity as appointed on February 28, 2025.
3.       That, as the Mayor, I supervise the day-to-day operations of the City of East Cleveland, Ohio as well as send and respond to City communications.
4.       That I have met with Cuyahoga County and State of Ohio officials to obtain resources to aid the residents of the city of East Cleveland.
5.       That I have not vacated my seat as Mayor and am able serve as such until a successor has been elected.
6.       That Lateck Shabazz has held himself out as mayor to residents and government officials.
7.       That his assertions of being mayor have created havoc within the city government and with the residents of East Cleveland and neighboring communities.
8.       That I am asking this Court to enjoin Mr. Shabazz from holding himself out as mayor and/or trying to usurp the office of Mayor of East Cleveland.

FURTHER AFFIANT SAYETH NAUGHT.

  
Interim Mayor Sandra Morgan

SWORN TO BEFORE ME and subscribed in my presence this 5<sup>th</sup> day of June, 2025.



  
**HEATHER M. MOSELEY, ARTY.**  
**NOTARY PUBLIC, STATE OF OHIO**  
My commission has no expiration date. \_\_\_\_\_ Notary Public  
Section 147.03 O.R.C.

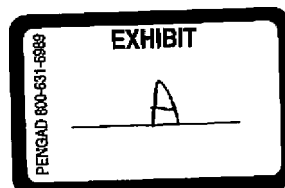
**APPOINTMENT OF  
SANDRA MORGAN AS INTERIM REPLACEMENT MAYOR  
FOR THE CITY OF EAST CLEVELAND  
FEBRUARY 28, 2025**

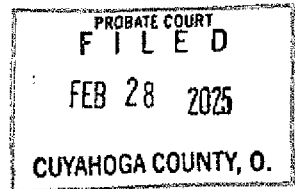


Cuyahoga County Probate Court Presiding Judge Anthony J. Russo is pleased to announce the appointment of Sandra Morgan as the interim Mayor of the City of East Cleveland, effective immediately. In accordance with R.C. 3.16(E)(5), Ms. Morgan will assume all rights, powers, and responsibilities of the office, and will receive the same compensation as the suspended Mayor. Additionally, Ms. Morgan will serve as interim Mayor until one of the following occurs: (1) the suspended Mayor is reinstated to office by an appeal as provided in R.C. 3.16(D); (2) all charges against the suspended Mayor are disposed of by dismissal or by a finding or findings of not guilty; or (3) a successor Mayor is elected and qualified to serve the next succeeding term of the Mayor's office.

Judge Russo received 34 applications for this position. All applicants demonstrated a strong commitment to serve their community. Of those who applied, nine were selected for an interview. Out of all the candidates, many who were extremely qualified, Interim Mayor Morgan distinguished herself due to her dedication to East Cleveland and the broader Northeast Ohio community through her civic involvement and contributions to the economic vitality of the region. Interim Mayor Morgan has immediate plans for East Cleveland which include a clear focus on city finances, public safety, public works, and economic and community development. A long-time resident and registered voter in East Cleveland, she has been an active advocate for the community and has actively worked for the betterment of its residents. In addition to her community work, Interim Mayor Morgan holds an Executive MBA from Kent State University and has served as a member of the State Finance Commission for East Cleveland since 2019. Judge Russo is confident the residents of East Cleveland will be in good hands under the leadership of Interim Mayor Morgan, who will represent the community and their best interest. Judge Russo is also hopeful that all the applicants, members of City Council, and East Cleveland residents will unite in support of Interim Mayor Morgan in her efforts to revitalize the community, fostering a successful future for the city.

Questions regarding this press release should be directed to Jennifer A. Alexander, Magistrate and Court Administrator by email at [jalexander@cuyahogacounty.gov](mailto:jalexander@cuyahogacounty.gov) or by phone at (216) 443-8979.





**IN THE COURT OF COMMON PLEAS  
PROBATE DIVISION  
CUYAHOGA COUNTY, OHIO**

<b>IN RE:</b>	)	<b>CASE NO. 2021 MSC 260807</b>
<b>INTERIM MAYOR APPOINTMENT,</b>	)	
<b>CITY OF EAST CLEVELAND</b>	)	<b>JUDGE ANTHONY J. RUSSO</b>
	)	
	)	
	)	<b>JUDGMENT ENTRY</b>
	)	

This cause came before the Honorable Judge Anthony J. Russo on February 28, 2025, pursuant to R.C. 3.16(E)(4) to appoint an interim replacement official as Mayor of the City of East Cleveland.

The Court finds that Sandra Morgan has applied for the interim Mayor position. Sandra Morgan is a long-time resident of East Cleveland and has actively worked in her community for the betterment of its residents. After due consideration, the Court finds that Sandra Morgan is willing, able, and suitable to serve as the interim Mayor of the City of East Cleveland.

The Court further finds that Sandra Morgan should be appointed as interim Mayor of the City of East Cleveland, and, pursuant to R.C. 3.16(E)(5), should have all the rights, powers, and responsibilities of, and should be entitled to the same rate of pay as the suspended Mayor.

The Court further finds that Sandra Morgan should serve as interim Mayor of the City of East Cleveland until one of the following occurs: (1) the suspended Mayor is reinstated to office by an appeal as provided in R.C. 3.16(D); (2) all charges against the suspended Mayor are disposed of by dismissal or by a finding or findings of not guilty; or (3) a successor Mayor is elected and qualified to serve the next succeeding term of the public official's office.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED** that Sandra Morgan



MSJE

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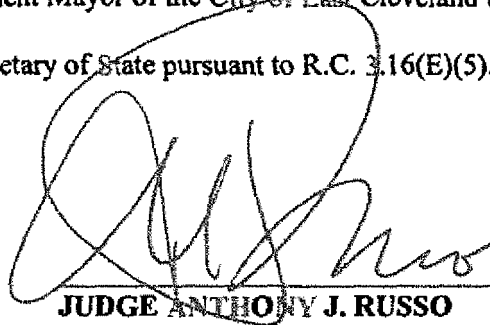
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is hereby appointed as interim Mayor of the City of East Cleveland from the date hereof until one of the following occurs: (1) the suspended Mayor is reinstated to office by an appeal as provided in R.C. 3.16(D); (2) all charges against the suspended Mayor are disposed of by dismissal or by a finding or findings of not guilty; or (3) a successor Mayor is elected and qualified to serve the next succeeding term of the public official's office.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Sandra Morgan shall have all the rights, powers, and responsibilities of, and should be entitled to the same rate of pay as the suspended Mayor.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Sandra Morgan is hereby certified as the interim replacement Mayor of the City of East Cleveland to the Cuyahoga County Board of Elections and the Secretary of State pursuant to R.C. 3.16(E)(5).

**IT IS SO ORDERED.**



**JUDGE ANTHONY J. RUSSO**



196738829

# IN THE COURT OF COMMON PLEAS CUYAHOGA COUNTY, OHIO

THE STATE OF OHIO  
Plaintiff

Case No: CR-24-695872-B

Judge: HOLLIE L GALLAGHER

BRANDON KING  
Defendant

INDICT: 2921.41 THEFT IN OFFICE  
2921.42 HAVING AN UNLAWFUL INTEREST IN A  
PUBLIC CONTRACT  
2921.42 HAVING AN UNLAWFUL INTEREST IN A  
PUBLIC CONTRACT  
ADDITIONAL COUNTS...

## JOURNAL ENTRY

DEFENDANT IN COURT WITH COUNSEL CHARLES TYLER. PROSECUTING ATTORNEY(S) JAMES MAY/ANDREW F. ROGALSKI PRESENT.  
COURT REPORTER PRESENT.

THE JURY RETURNS A VERDICT OF GUILTY OF THEFT IN OFFICE R.C. 2921.41 A(1) F4 AS CHARGED IN COUNT(S) 1 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF GUILTY OF HAVING AN UNLAWFUL INTEREST IN A PUBLIC CONTRACT R.C. 2921.42 A(1) F4 AS CHARGED IN COUNT(S) 2, 3 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF GUILTY OF HAVING AN UNLAWFUL INTEREST IN A PUBLIC CONTRACT R.C. 2921.42 A(4) M1 AS CHARGED IN COUNT(S) 4, 5 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF GUILTY OF RESTRICTIONS ON PRESENT OR FORMER PUBLIC OFFICIALS OR EMPLOY R.C. 102.03 (D) M1 AS CHARGED IN COUNT(S) 6 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF NOT GUILTY OF RESTRICTIONS ON PRESENT OR FORMER PUBLIC OFFICIALS OR EMPLOY R.C. 102.03 (D) AS CHARGED IN COUNT(S) 7 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF GUILTY OF RESTRICTIONS ON PRESENT OR FORMER PUBLIC OFFICIALS OR EMPLOY R.C. 102.03 (E) M1 AS CHARGED IN COUNT(S) 8, 9 OF THE INDICTMENT.

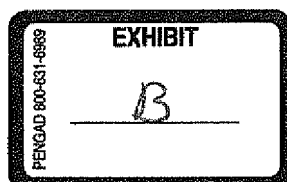
THE JURY RETURNS A VERDICT OF GUILTY OF FINANCIAL DISCLOSURE STATEMENT FILED WITH ETHICS COMMISSION R.C. 102.02 D M1 AS CHARGED IN COUNT(S) 10 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF NOT GUILTY OF THEFT IN OFFICE R.C. 2921.41 A(1) AS CHARGED IN COUNT(S) 11 OF THE INDICTMENT.

THE JURY RETURNS A VERDICT OF GUILTY OF SOLICITING OR RECEIVING IMPROPER COMPENSATION R.C. 2921.43 A(1) M1 AS CHARGED IN COUNT(S) 12 OF THE INDICTMENT.

SENTENCING SET FOR 06/09/2025 AT 10:30 AM.

PVER  
05/29/2025



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Judge Signature


06/02/2025

PVER  
05/29/2025

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1h • 

With the conviction of former Mayor  
Brandon L. King and because of the East  
Cleveland Charter I have been sworn in  
as Mayor of East Cleveland. We will  
build a better East Cleveland!





## **NEWS RELEASE (June 2, 2025)**

**Contact: Clerk of Council Stacey R. White, MSSA**

### **East Cleveland President of Council Lateek R. Shabazz is sworn in as mayor to fill the vacancy created by Brandon L. King's conviction.**

EAST CLEVELAND, OH – On June 1, 2025, Clerk of Council Stacey White certified the vacancy in the mayor's office that was caused by the May 29, 2025, conviction of Brandon L. King and the expiration of Sandra Morgan's appointment as interim mayor.

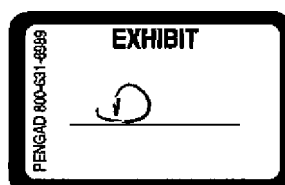
The certification was transmitted to Council President Lateek R. Shabazz informing him that he was required to take an oath of office within 10 days to assume the office of mayor. Had he failed to take the oath of office within 10 days, Council would declare the mayor's office vacant.

Clerk of Council White certified to Morgan that King's May 29, 2025, conviction concluded her interim appointment as mayor on that day. Section 3.16(E)(4) of the Ohio Revised Code empowered Morgan to serve only "for the duration" of King's suspension. The suspension ended upon the Cuyahoga County Court of Commons Pleas jury's finding of guilt.

Council President Shabazz was administered an oath of office by Councilor Dr. Patricia Blochowiak at 5:35 p.m. He promptly filed his oath of office with Clerk of Council White in compliance with Section 92 of the Charter so he could enter the office and discharge its duties.

Clerk of Council White certified that pursuant to Section 114 of the Charter that Shabazz had fulfilled the President of Council's duty to assume the mayor's office. The vacancy in the mayor's office had been filled.

Clerk of Council White said she expects to certify the vacancy in the President of Council's office so city legislators can schedule a reorganization meeting to nominate a new President of Council. Clerk of Council White said Council will also discuss steps to accept applications among Ward 3 residents to fill his vacant council seat.





Office of the Clerk of Council  
14340 Euclid Avenue East Cleveland, OH 44112  
Tel: 216-681-2312

**CERTIFICATION OF THE Clerk of Council  
OF THE REMOVAL OF BRANDON L. KING FROM  
THE OFFICE OF MAYOR DUE TO CONVICTION**

**[OFFICIAL NOTICE: DO NOT REMOVE.]**

Pursuant to Section 731.42 of the Ohio Revised Code, the Clerk of Council does hereby certify that on May 29, 2025, Brandon L. King was convicted of multiple felony violations of law.

The conviction caused Brandon L. King's automatic removal from office of mayor without further order of the Court. His conviction ended his suspension from office pursuant to Section 3.16 of the Ohio Revised Code, "*Suspension of local official charged with felony relating to official conduct.*"

An interim mayor was appointed by the Probate Court of the Cuyahoga County Court of Common Pleas to serve during Brandon L. King's criminal trial for the duration of the suspension, as specified in R.C. 3.16(E)(4). Any mayoral acts committed by an interim mayor after the time of Brandon L. King's May 29, 2025 conviction were/are unauthorized by law and void.

"For the duration of the public official's suspension, an interim replacement official shall be appointed by the probate judge of the court of common pleas if the suspended public official is an elected official of a municipal corporation, township, school district, or other political subdivision, to perform the suspended public official's duties."

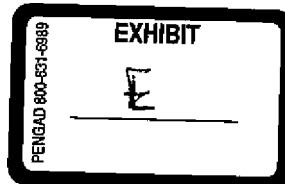
The vacancy in the mayor's office caused by Brandon L. King's conviction and removal from office shall be filled in the manner authorized by Section 114 of the Charter.

*"In the case of death, resignation, removal or long-term absence of the Mayor, the order of succession as Mayor shall be as follows: President of Council, Vice President of Council and ranking Council member based upon aggregate years of service or, in the event of equal years of service, aggregate votes received during all successful elections, except in the event that a vacancy occurs in the office of Mayor and there exists a Mayor-elect who has not yet assumed such office, then, in that event, the person so elected to the office of Mayor shall become Mayor for the unexpired term and for the full term for which such person was elected."*

Certified: Stacey R. White, MSSA

Clerk of Council Stacey R. White

Date: June 1, 2025





**Office of the Clerk of Council**  
14340 Euclid Avenue East Cleveland, OH 44112  
Tel: 216-681-2312

**CERTIFICATION OF THE Clerk of Council  
OF THE FILLING OF THE VACANT OFFICE OF THE MAYOR  
BY LAWFUL SUCCESSION OF THE PRESIDENT OF COUNCIL**

**[OFFICIAL NOTICE: DO NOT REMOVE.]**

Pursuant to §731.42 of the Ohio Revised Code, the Clerk of Council does hereby certify that on June 1, 2025, Lateek R. Shabazz, became the duly sworn of Mayor of East Cleveland, as prescribed by the order of succession mandated in §114 of the Charter of East Cleveland, a self-executing provision of law, immediately effective and requiring no further action by a court or legislature for enforcement.

**§ 114 VACANCY.** During the time when the Mayor is absent from the city, or is otherwise not accessible, or is temporarily unable for any cause to perform his or her duties, the order of succession as Acting Mayor shall be as follows: Director of Finance, Director of Law, and the Director of Public Service. In the case of death, resignation, removal or long-term absence of the Mayor, the order of succession as Mayor shall be as follows: President of Council, Vice President of Council and ranking Council member based upon aggregate years of service or, in the event of equal years of service, aggregate votes received during all successful elections, except in the event that a vacancy occurs in the office of Mayor and there exists a Mayor-elect who has not yet assumed such office, then, in that event, the person so elected to the office of Mayor shall become Mayor for the unexpired term and for the full term for which such person was elected. The successor shall serve as Mayor until the successor for the remainder of the unexpired term is elected at the first regular municipal election, if such election is held more than 120 days after the vacancy shall have occurred. Otherwise, he or she shall serve for the unexpired term. (Amended 11-7-00)

Lateek R. Shabazz lawfully succeeded to the office of the Mayor from his elected seat as the President of East Cleveland City Council to fill the vacancy created by the conviction, disqualification, and automatic removal from office of ex-mayor Brandon L. King, pursuant to the Ohio Revised Code §2961.02 (B).

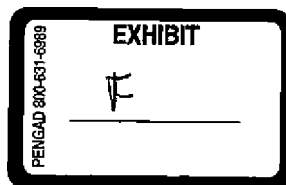
**§2961.02 (B) Person Convicted of Certain Offenses May Not Serve as Public Official or Employee.**

Any person who pleads guilty to a disqualifying offense and whose plea is accepted by the court or any person against whom a verdict or finding of guilt for committing a disqualifying offense is returned is incompetent to hold a public office or position of public employment or to serve as a volunteer, if holding the public office or position of public employment or serving as the volunteer involves substantial management or control over the property of a state agency, political subdivision, or private entity.

Certified: Stacey R. White, MSSA

Clerk of Council: Stacey R. White

Date: 06/02/25



## Heather Mccollough

**From:** Stacey White  
**Sent:** Monday, June 2, 2025 10:45 AM  
**To:** Judge William Dawson; Judge Dawson; Timothy Austin; Timothy Austin; Twon Billings; Twon Billings; Patricia Blochowiak; Patricia Blochowiak; Terrie Richardson; Terrie Richardson; klundy; David Worley; Heather Mccollough; Latasha Williams; Rene Kendall; Claude Mitchell; Antonio Marshall; Anthony Bumbalis; Salondra Wallace; Ponce Russell; Cheryl Holland  
**Subject:** RE: Lawful change in leadership, Office of the Mayor, City of East Cleveland (Ohio)  
**Attachments:** CERT OF VACANCY.pdf; CERT OF SUCCESSION (2).pdf  
**Importance:** High

Officials and Employees of the City of East Cleveland:

As of June 1, 2025, Lateek R. Shabazz, former East Cleveland Council President, is duly sworn into the office of the Mayor of East Cleveland, per the self-executing provision of the East Cleveland Charter, Section 114. Accordingly, such has been certified by the Clerk of Council and reported to the State of Ohio Ethics Commission and the Cuyahoga County Board of Elections for entry into their public records.

Mayor Shabazz is exclusively entitled to exercise the powers of his office, provided for by Section 113 of the East Cleveland Charter. Please see the attached notices posted publicly at East Cleveland City Hall.

My apologies for the incomplete email below, sent today at 10:17 AM. It should read as above.

Truly,



**Stacey R. White, MSSA**  
Clerk of Council  
CITY OF EAST CLEVELAND  
Ph: (216) 681-2310  
Fax: (216) 681-5440  
[swhite@eastclecouncil.org](mailto:swhite@eastclecouncil.org)

**From:** Stacey White  
**Sent:** Monday, June 2, 2025 10:17 AM  
**To:** Judge William Dawson <judgedawson@eccourt.com>; Judge Dawson <judgewilliamdawson@gmail.com>; Timothy Austin <timraustin@aol.com>; Timothy Austin <Taustin@eastclecouncil.org>; Twon Billings <Tbillings@eastclecouncil.org>; Twon Billings <twonbillings70@yahoo.com>; Patricia Blochowiak <pblochowiak@gmail.com>; Patricia Blochowiak <pblochowiak@eastclecouncil.org>; Terrie Richardson <Trichardson@eastclecouncil.org>; Terrie Richardson <msterrierichardson@gmail.com>; klundy <klundy@eastclevelandpolice.org>; David Worley <dworley@eastcleveland.org>; Heather Mccollough <hmccollough@eastcleveland.org>; Latasha Williams <lwilliams@eastcleveland.org>; Rene Kendall <rkay@eastcleveland.org>; Claude Mitchell <cmitchell@eastcleveland.org>; Antonio Marshall <amarshall@eastcleveland.org>



**Cc:** Anthony Bumbalis <tbumbalis@eastcleveland.org>; Salondra Wallace <swallace@eastcleveland.org>; Ponce Russell <prussell@eastcleveland.org>; Cheryl Holland <cholland@eastcleveland.org>

**Subject:** Lawful change in leadership, Office of the Mayor, City of East Cleveland (Ohio)

**Importance:** High

As of June 1, 2025, Lateek R. Shabazz, former East Cleveland Council President, is duly sworn into the office of the Mayor of East Cleveland, per the self-executing provision of the East Cleveland Charter, Section 114. has been certified and duly entered into the State of Ohio's public records. Please see the attached notices posted publicly at East Cleveland City Hall. Mayor Shabazz is exclusively entitled to exercise the powers of the office, as provided for by Section 113 of the East Cleveland Charter.

Truly,



**Stacey R. White, MSSA**

Clerk of Council

CITY OF EAST CLEVELAND

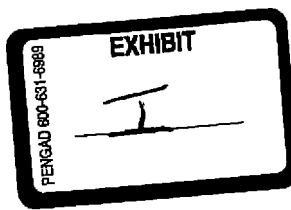
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**Office of Mayor Lateek R. Shabazz**  
14340 Euclid Avenue East Cleveland, OH 44112

**Interoffice Memorandum**

DATE: June 4, 2025

TO: Heather McCollough, Attorney  
All East Cleveland officers and employees  
Office of Disciplinary Counsel, Supreme Court of Ohio  
Attorney Registration, Supreme Court of Ohio  
Cuyahoga County Prosecutor Michael O'Malley

FROM: Lateek R. Shabazz, Mayor

RE: ***Termination of Attorney Heather McCollough's employment as a municipal attorney for the city of East Cleveland***

Attorney Heather McCollough. Your employment with the City of East Cleveland is terminated. You are instructed to immediately depart your office and surrender all city property.

You are hereby notified that you lack any authorization to hold yourself out as a director of law, assistant director of law, chief prosecuting attorney, assistant prosecuting attorney or any other title you have created without authority or an oath that associates you with the municipal corporation. You are not to file or answer any action in the city's name, or appear in court on any matter in the city's name.

Today the Clerk of Council filed a criminal complaint in the East Cleveland municipal court against private citizen and your fellow usurper, Sandra Morgan, for obstructing the official business of the municipal corporation in violation of Ord. No. 525.07.

Despite your knowing that the Clerk of Council, an officer of the municipal corporation, had exercised the authority of her public office on June 1, 2025 to certify a vacancy in the mayor's office, and to certify that the vacancy had been filled in compliance with Section 114 of the Charter, you participated in a June 3, 2025 news event with the usurper of the mayor's office and defended an inapplicable state law instead of Section 114 of the Charter.

The net effect of your broadcast statements is that you offered an unauthorized "legal opinion" that contradicted the lawful acts of a duly-sworn officer of the municipal corporation and obstructed Clerk of Council Stacey White in the performance of her official certification duties. The only authorized "legal opinions" of the municipal corporation are those created and released in compliance with Rule 8(d) of Council's Rules of Order.

***"Legal opinions. Legal opinions by the Law Director shall be requested and transmitted in the same manner as legislation. All legal opinions shall be considered confidential, except in cases wherein***



opinions are directed by motion, carried by three affirmative votes of the Council members at a regular public meeting to be read and incorporated in the minutes of such meeting."

The unauthorized "legal opinion" you publicly released as a defense for the usurper was not kept confidential or approved three members of Council in compliance with Rule 8(d) of Council's Rules of Order. It was not read into the record of a regular meeting of the legislative authority. As such, you were not authorized to violate the ordinance's confidentiality requirements to share it with the media or in any legal argument in the city's name. The Council has approved no legal opinion that Section 3.16 governs the succession of a removed mayor.

Your use of an unauthorized "legal opinion" to aid a private citizen arguing against the enforcement of Section 114 of the Charter of a home rule municipal corporation is recklessly insubordinate. If you were lawfully holding yourself out as the "assistant director of law" for the municipal corporation, your duty was to defend its governing authorities as a lawyer for the organization. The Clerk of Council's certification is the authorized legal position of the municipal corporation.

You also violated Section 102.03(B) of the Ohio Revised Code with your release of an unauthorized "legal opinion" Rule 8(d) made statutorily confidential.

"No present or former public official or employee shall disclose or use, without appropriate authorization, any information acquired by the public official or employee in the course of the public official's or employee's official duties that is confidential because of statutory provisions, or that has been clearly designated to the public official or employee as confidential when that confidential designation is warranted because of the status of the proceedings or the circumstances under which the information was received and preserving its confidentiality is necessary to the proper conduct of government business."

I note that during the usurper's media event, the defense you offered of usurper Sandra Morgan's obstruction of the city's official business was shared as part of a legal strategy you were offering as her personal attorney. The fact that you were in a public building on city time offering a defense for your private client is evidence of dereliction and theft in office. It supports past allegations that you were handling the duties of personal clients at city hall, using city equipment and on city time.

On Council I voted on January 26, 2023 to approve Res. No. 11-23 that removed you from office. I voted for the 2023 and 2024 appropriations that did not include wages for you, attorney Willa Mae Hemmons or any of the outside law firms the convicted ex-mayor misappropriated public funds to hire with you as a witness. Since January 26, 2023 you have received public funds without lawful authority and usurped an office of the law department to unlawfully hold yourself out as a law enforcement officer in the municipal court. Your discharging the duties of a prosecutor without an oath of office from a vacated office creates a major civil rights liability for the municipal corporation's taxpayers.

A law director is required to obtain council approval to respond to suits or complaints and you did not. I've spent the last nearly three years fighting a law department that criminally bypassed council to make legal and settlement decisions. The reckless violation of Section 733.53 of the Ohio Revised Code, "Duties as to suits," has ended. Council approval is required before any legal action commences. If you were not terminated you could not indemnify and defend your fellow usurper without a resolution of council.

"The city director of law, when required to do so by resolution of the legislative authority of the city,

*shall prosecute or defend on behalf of the city, all complaints, suits, and controversies in which the city is a party, and such other suits, matters, and controversies as he is, by resolution or ordinance, directed to prosecute. He shall not be required to prosecute any action before the mayor of the city for the violation of an ordinance without first advising such action."*

Pursuant to Disciplinary Rule 1.7 of Ohio's Rules of Professional Conduct for lawyers, you first needed the written permission of the municipal corporation's legislative officers to provide personal representation to your fellow usurper Sandra Morgan. You were required to disclose your representation of Morgan in writing as she fights the Clerk of Council's certification that she is not authorized to fill the vacancy of a mayor who has been removed from office pursuant to Section 114 of the Charter.

As you did not disclose the conflict of interest in writing, and did not first seek the legislative authority's permission in writing before committing yourself to your fellow usurper's defense, this matter will be referred to the Supreme Court of Ohio's disciplinary counsel for an investigation.

You, personally, criminally obstructed complaints I and other officers of the legislative authority filed with the municipal court seeking to hold King and other law violating officials and employees accountable during my time on Council. My administration is not going to perpetuate the civil rights violations and obstructions you participated in and tolerated under the King administration.

There will be no obstructed criminal complaints or you making individual unauthorized legal decisions and issuing unauthorized legal opinions on the city's behalf. My administration will not tolerate attorneys filing actions that harass or unlawfully obstruct the official acts of the city's legislative officers.

Your employment is terminated. You can provide legal representation to the usurper on your own time if you disclose your conflict of interest in writing and obtain the legislative authority's written legal permission in compliance with Disciplinary Rule 1.7 you've previously been warned by the Eighth District Court of Appeals and U.S. District Court Judge James Gwin not to violate.

Should you disregard my termination because you've misaligned yourself with your fellow usurper, and you are operating on your own self-interest to protect your unlawful interest in your public employment, my administration will ensure you are fully held accountable using every tool available within the law.

Do not hold yourself out as an attorney for the city of East Cleveland or file any action or defense of any action in the municipal corporation's name. **YOUR EMPLOYMENT IS TERMINATED.**