

NAILAH K. BYRD CUYAHOGA COUNTY CLERK OF COURTS 1200 Outonic Street

1200 Ontario Street Cleveland, Ohio 44113

Court of Appeals

OTHER June 17, 2025 17:27

By: MATTHEW G. VANSUCH 0079328

Confirmation Nbr. 3529231

STATE EX REL. LATEEK SHABAZZ

CA 25 115185

vs.

SANDRA MORGAN

Judge:

Pages Filed: 20

IN THE COURT OF APPEALS EIGHTH APPELLATE DISTRICT CUYAHOGA COUNTY, OHIO

CASE NOS. CA-25-115185 and CA-25-115210 (consolidated)

Regular Calendar

STATE EX REL. LATEEK SHABAZZ,

Relator,

 \mathbf{v}_{ullet}

SANDRA MORGAN

Respondent.

STATE EX REL. MICHAEL C. O'MALLEY

Relator,

v.

LATEEK SHABAZZ

Respondent.

REPLY IN SUPPORT OF MOTION TO DISMISS OF RESPONDENT SANDRA MORGAN OR, IN THE ALTERNATIVE, SUPPLEMENTAL BRIEFING ON THE MOTION TO DISMISS

[IN-PERSON ORAL ARGUMENT REQUESTED]

Kenneth D. Myers (#0053655) 6100 Oak Tree Blvd., Ste. 200 Cleveland, Ohio 44131 Telephone: 216.241.3900 kdmy@aol.com

Counsel for Relator Lateek Shabazz Diana M. Feitl (#0092152) ROETZEL & ANDRESS, LPA 1375 East Ninth Street, 10th Floor Cleveland, Ohio 44114 Telephone: 216.615.4838 dfeitl@ralaw.com

[Listing Continues on Following Page]

Matthew G. Vansuch (#0079328) ROETZEL & ANDRESS, LPA 6550 Seville Dr., Ste. B Canfield, Ohio 44406 Telephone: 330.533.6195 myansuch@ralaw.com

Counsel for Respondent, Sandra Morgan

MICHAEL C. O'MALLEY Prosecuting Attorney of Cuyahoga County, Ohio

REGINA A. RUSSO (#0100295)
Assistant Prosecuting Attorney
Cuyahoga County Prosecutor's Office
The Justice Center, Courts tower
1200 Ontario Street, 8th Floor
Cleveland, Ohio 44113
Telephone: (216) 443-7763

Facsimile: (216) 443-7602

E-Mail:

rrusso@prosecutor.cuyahogacounty.us

Counsel for Relator Michael C. O'Malley

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REPLY IN SUPPORT OF SANDRA MORGAN'S MOTION TO DISMISS AND, IN THE ALTERNATIVE, SUPPLEMENTAL BRIEFING ON THE MOTION TO DISMISS

Respondent Sandra Morgan was appointed the interim Mayor of the City of East Cleveland by Cuyahoga County Probate Court Judge Anthony J. Russo on February 28, 2025 "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." (O'Malley Pet., Ex. B) Because there is no dispute of fact or law that *none* of those conditions have occurred, Morgan is entitled to remain in that office. The petition of Relator Lateek Shabazz should be dismissed, and, similarly, the motion for summary judgment filed by Shabazz against the petition for quo warranto filed by Relator Michael C. O'Malley should be denied.

PROCEDURAL POSTURE

Shabazz filed a Petition for a Writ of Quo Warranto and Emergency Motion for Preemptory or Alternative writ of Quo Warranto and Expedited Determination against Morgan (Case No. CA 25-115185), seeking an order declaring that (a) Morgan has no authority to hold herself out to be the interim Mayor or Mayor of the City of East Cleveland and (b) Shabazz to be the legal mayor of the City of East Cleveland. Morgan immediately filed a Motion to Dismiss Writ of Quo Warranto and Mandamus and Request for Emergency Injunction to Prevent Lateek Shabazz from Representing Himse f as the Mayor of East Cleveland on June 5. Attached to that Motion to Dismiss was an affidavit by Morgan, which Morgan will refer to as the First Morgan Affidavit.

This Court then entered a journal entry on June 6 granting Shabazz's emergency motion for peremptory or alternative writ and expedited determination "as follows: The respondent shall file a dispositive motion or a brief in opposition to the relator's position within two weeks of service of the complaint. The *relator may file a reply brief within one week of the relator's filing*. The parties may submit evidence with their filings."

Then, the County Prosecutor filed his own *Complaint for Writ of Quo Warranto* against Shabazz (Case No. 25-115210), seeking an order declaring that (a) Shabazz is barred from exercising the function of Mayor of East Cleveland or receiving any compensation for that office, and (b) Morgan is the rightful holder of the position of the interim replacement official for the position of the Mayor of East Cleveland. While Prosecutor O'Malley attached his own affidavit to that *Complaint*, Morgan also submitted another affidavit thereto, which Morgan will refer to as the Second Morgan Affidavit. On June 9, this Court consolidated the County Prosecutor's action (Case No. CA-25-115185) with the one filed by Shabazz (Case No. CA-25-115210) "for all purposes, briefing, evidence, and decision."

Shabazz filed a Response to Morgan's Motion to Dismiss/Motin for Injunction in Case No. CA-25-115185 on June 10. In so doing, Shabazz notes that his response to the Motion to Dismiss is the reply contemplated in the Court's June 6 journal entry and that no further briefing should occur in this matter. On June 13, he filed a similar motion in Case No. CA-25-115210, framing it as Respondent's Motion to Dismiss/Motion for Summary Judgment.

Because the June 6 journal entry is not clear as to which parties are allowed to file what and when (that order contains a typographical error that is highlighted above), Morgan is filing this reply in accordance with that journal entry or, in the alternative, as a supplemental briefing to her *Motion to Dismiss*, all within two weeks of the service of the complaint and as contemplated in the June 6 journal entry.

LAW AND ARGUMENT IN REPLY

The crux of Shabazz's position underlying his filings is that he immediately succeeded (and "self-executing") to the position of Mayor of East Cleveland as a matter of law under the Charter of the City of East Cleveland — and that Morgan's authority under Judge Russo's order immediately evaporated — the moment upon which Brandon L. King was convicted of felony charges. Shabazz is incorrect, and his position ignores the plain statutory language under which Morgan is exercising her lawful authority as interim Mayor.

This is Shabazz's second effort to claim the seat of Mayor of East Cleveland. This past February, Shabazz filed an original action in the Ohio Supreme Court for mandamus, quo warranto, and procedendo (No. 2025-0167) against both Probate Judge Russo and East Cleveland Law Director Willa Hemmons. He essentially challenged Judge Russo's ability to appoint an interim Mayor for East Cleveland after its mayor (Brandon King) was indicted for multiple felonies. *See State ex rel. Shabazz v. Russo*, 2025-Ohio-855. The Ohio Supreme Court dismissed the action on March 13. Therefore, there is no question that Judge Russo had the legal authority to appoint Morgan – and so appointed her – to her current position.

In the meantime, there is no dispute that King was convicted of multiple felonies. There is also no dispute that Shabazz, who had been the president of the City Council, has attempted to assert his right to the office of Mayor by executing what he purports to be an un-notarized Oath of Office (O'Malley Pet., Second Morgan Aff., Ex. E) and a Certification from the Clerk of Council dated June 1 that King had been removed from

office upon his conviction (O'Malley Pet., Second Morgan Aff., Ex. D ("First Certification")).

This is not the first unlawful declaration issued by the Clerk. On June 2, the Clerk issued a "Certification of the Filling of the Vacant Office of the Mayor by Lawful Succession of the President Council" ("Second Certification") in which the Clerk stated that

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.

(First Morgan Aff., Ex. F) The Second Certification went on to state that

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).

Also on June 2, the Clerk sent an email to certain City officials and employees with the subject line of "Lawful change in leadership, Office of the Mayor, City of East Cleveland (Ohio), in which she wrote:

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 record.

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.

(First Morgan Aff., Ex. G)

The Clerk did not stop. On June 5, the Clerk issued another purported certification, this time a "Certification of the Clerk of Council Sandra Morgan Is Usurping the Office of Mayor and Obstructing the Official Business of the Municipal Corporation" ("Third Certification"). In this Third Certification, the Clerk proceeded to state that

Pursuant to Section 731.42 of the Ohio Revised Code, the Clerk of Council does hereby certify that private citizen Sandra Morgan's time as interim mayor expired on May 29, 2025, upon the conviction of Brandon L. King for offenses against public administration, that disqualified him from discharging the duties of mayor.

The Clerk of Council did certify on June 1, 2025, that Morgan's authority to hold herself out as the "interim official" for a suspended official charged with felony relating to conduct in office expired with King's conviction.

The Clerk of Council did certify on June 1, 2025, that the vacancy in the office of mayor was filled by the former President of Council, Lateek R. Shabazz, in compliance with Section 114 of the Charter on June 1, 2025, at 5:35 pm.

The Clerk of Council does hereby certify that Lateek R. Shabazz is the only person who meets all the lawful requirements to discharge the duties of the office of Mayor and that Sandra Morgan is a usurper, impersonating an officer of the municipal corporation and obstructing its official business in violation of Ord. No. 525.07.

The Clerk then cited Section 114 of the Charter, emphasizing the first clause and the words President of Council. The Clerk continued with

As Sandra Morgan held a meeting in the mayor's office with media representatives of WOIO on June 3, 2025, and did acknowledge to reporters that she received the Clerk of Council's certifications at her home, the private usurping citizen did acknowledge that she is preventing, obstructing and delaying Mayor Lateek R. Shabazz from performing the authorized acts of his public office.

(Third Certification)

¹ A copy of the Third Certification is attached to this filing as Exhibit 1. As a document prepared by and bearing the signature of the City's Clerk of Council certifying the document under the City's seal, the Third Certification is self-authenticating under Evid.R. 902(1).

To the extent that Shabazz is relying on the Clerk's three Certifications, his reliance is misplaced. The Clerk did not have any authority to issue a Certification of an act that has not yet taken place. In these certifications, the Clerk cited to Section 731.42 as the legal basis for her Certifications. But that statute does not provide her with that authority.² In fact, this Court has already held that, under the current Charter of the City of East Cleveland, the "clerk of Council is not an elected position nor does it constitute a public position to which a portion of the legislative, executive, or judicial authority attach," but is a position "hired and supervised by Council" and the individual serving as clerk "is an employee of Council." *State ex rel. Branch v. Pitts*, 2018-Ohio-1184, ¶ 33 (8th Dist.) (citing § 102 of Charter).

In other words, the Clerk's authority derives from City Council. Yet Shabazz has not put forward any evidence that the City Council of East Cleveland has taken *any* official action in response to King's conviction.³ He has not done so because he cannot do so: the Council has not declared the office of mayor to be vacant as the result of a felony conviction by King, the Council has not declared that the then-President of City

² This statute simply says that, "[t]he printed copies of the bylaws or ordinances of a municipal corporation, published under its authority, and transcripts of any bylaws, resolutions, or ordinances, or of any act or proceeding of a municipal corporation, recorded in any book or entered on any minutes or journal kept under the direction of such municipal corporation, and certified by its clerk, shall be received in evidence throughout the state for any purpose for which the original books, ordinances, minutes, or journals would be received."

³ In response to an email from the City's assistant law director (which itself was a response to the aforementioned Exhibit G), the Clerk advised in an email on June 16, 2025 that no organizational meeting of the City Council (with the purpose of naming a new mayor and council president or to swear in Shabazz as mayor) had taken place. There was no notice of such a meeting to the members of City Council or the public, there was no vote, and there were no minutes. (*Id.*) A copy of this Email is attached as Exhibit 1. As a document prepared by and bearing the signature of the City's Clerk of Council alongside the City's seal, the Email is self-authenticating under Evid.R. 902(1).

Council is the next in line to fill that office,⁴ the Council has not declared that Shabazz was the President of City Council, and the Council has not declared that Shabazz is the individual who is entitled to take the Oath of Office for Mayor. It is the City Council that exercises the power of local self-government to make such determinations, not the Clerk. *E.g.*, *State ex rel. Hover v. Wolven*, 175 Ohio St. 114, 118 (1963) (recognizing that the local governmental body recognized a vacancy when one of its board members became ineligible to serve on the board, and therefore vacated his office, when the board member accepted membership on another board and the positions were incompatible). And that local body has not declared a vacancy or "appointed or elected" anyone to the office of mayor after King's conviction. *See* R.C. § 3.16(E)(5). King is acting on his own and with some help from a Clerk who is stepping outside her statutory authority.

Nor does the Clerk have any authority to issue any of the legal opinions that masquerade as "certifications," including those which opine that King was automatically removed from office. The City has a law director to provide legal opinions to the City and to the Council. (It is worth noting that Shabazz sent an Interoffice Memorandum to one of the City's attorneys, chastising her for releasing an "unauthorized 'legal opinion'" without first securing Council's approval and claiming that the Clerk "had exercised her 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." (First Morgan Aff., Ex. I)) That is not the Clerk's job.

⁴ The Certifications raise the question of whether Shabazz remains the President of Council and therefore eligible to be named by the mayor by the City Council. And, as noted in Morgan's affidavit, there is a question as to whether Shabazz qualifies as President of Council, since Section 102 requires the President of Council to be a Councilperson-at-large and Shabazz is a ward-specific member of Council.

So that returns the matter to where it began: Morgan is operating under a lawfully entered judicial order appointing her to the position of mayor and the conditions under which that position ends – both in the statute and in the appointment order – have not occurred. Shabazz has already challenged the legal authority of Judge Russo to appoint Morgan as interim Mayor and lost that challenge.

The Charter and the Revised Code are not inconsistent. Section 3.16 specifies when the appointment made thereunder terminates, and that provision does not say that it terminates upon the conviction of the public official at issue. If the General Assembly wanted to say that, then it could have done so. In fact, it did make such a distinction in subsection E(1), when it specifies exactly when a public official is no longer entitled to be paid:

Any public official suspended from office under this section shall not exercise any of the rights, powers, or responsibilities of the holder of that office during the period of the suspension. The suspended public official, however, shall retain the title of the holder of that office during the period of the suspension and continue to receive the compensation that the official is entitled to receive for holding that office during the period of the suspension, until the public official pleads guilty to or is found guilty of any felony with which the public official is charged, or until one of the conditions in division (C)(4)(a), (b), or (c) of this section occurs.

R.C. § 3.16(E)(1) (emphasis added). Hence, Morgan's the email on May 30, 2025 (attached to Shabazz's response to Morgan's motion to dismiss as Exhibit B) indicated that, after being found guilty, Shabazz was "no longer entitled to salary payments."

It is worth noting that the General Assembly specified the "period of suspension" as distinct from the explicit provision as to the termination of the interim official's position:

(4) 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.

R.C. § 3.16(C)(4). Thus, the statute is not silent – and is therefore not ambiguous – as to when Morgan's authority terminates; the triggers have just not occurred.

A court's "paramount concern in examining a statute is the legislature's intent in enacting the statute." *Gabbard v. Madison Local School District Board of Education*, 2021-Ohio-2067, ¶3. And that begins with the "statutory language, reading all words and phrases in context and in accordance with the rules of grammar and common usage, and giving "effect to the words the General Assembly has chosen," "neither add[ing] to nor delet[ing] from the statutory language." *Id.* "When statutory language is unambiguous, we apply it as written without resorting to rules of statutory interpretation or consideration of public policy." *Id.*

To be entitled to the writ of quo warranto, the relator must establish that the office is being unlawfully held and exercised by respondent and that the relator is entitled to the office. State ex rel. Martin v. Shabazz, 2023-Ohio-4533, at ¶10 (8th Dist.). In other words, the relator must demonstrate not only that he is entitled to the office but also demonstrate that the claimed office is unlawfully held and exercised by the respondent. Id. Shabazz has not met that burden: Morgan is not holding office unlawfully, as she is doing so pursuant to a lawful order that, on its face and according to the statute under which it was entered, has not expired or "sunset," as Shabazz claims, and Shabazz has not shown that he has been appointed or elected to fill the

alleged vacancy in the mayor's office as provided by law. Because he cannot do so, he cannot meet his burden, and this Court should dismiss his petition.

CONCLUSION

For the foregoing reasons, the Court should grant Relator Sandra Morgan's motion to dismiss the complaint for writ of quo warranto. If this Court determines that there is some merit to Shabazz's claim or that there are factual questions that must be answered to resolve Shabazz's claim (as noted herein), then this Court should set a schedule for the presentation of evidence and briefs. *See State ex rel. Johnson v. Richardson*, 2012-Ohio-57, at ¶ 13. Otherwise, this Court should dismiss the petition.

Respectfully submitted,

/s/ Matthew G. Vansuch
Diana M. Feitl (#0092152)
ROETZEL & ANDRESS, LPA
1375 East Ninth Street, 10th Floor
Cleveland, Ohio 44114
Telephone: 216.615.4838
dfeitl@ralaw.com

Matthew G. Vansuch (#0079328) ROETZEL & ANDRESS, LPA 6550 Seville Dr., Ste. B Canfield, Ohio 44406 Telephone: 330.533.6195 mvansuch@ralaw.com

Counsel for Respondent Sandra Morgan

CERTIFICATE OF SERVICE

I hereby certify that on this June 17, 2025, the foregoing *Reply Brief in Support cf Motion to Dismiss* was served via the Court's electronic filing system upon all counsel of record in this appeal.

/s/ Matthew G. Vansuchl
Matthew G. Vansuch (#0079328)



Office of the Clerk of Council

14340 Euclid Avenue, East Cleveland, OH 44112 Tel: (216) 681-2312

CERTIFICATION OF THE CLERK OF COUNCIL SANDRA MORGAN IS USURPING THE OFFICE OF MAYOR AND OBSTRUCTING THE OFFICIAL BUSINESS OF THE MUNICIPAL CORPORATION

[OFFICIAL NOTICE / JUNE 5, 2025 - DO NOT REMOVE.]

Pursuant to Section 731.42 of the Ohio Revised Code, the Clerk of Council does hereby certify that private citizen Sandra Morgan's time as interim mayor expired on May 29, 2025, upon the conviction of Brandon L. King for offenses against public administration, that disqualified him from discharging the duties of mayor.

The Clerk of Council did certify on June 1, 2025, that Morgan's authority to hold herself out as the "interim official" for a suspended official charged with felony relating to conduct in office expired with King's conviction.

The Clerk of Council did certify on June 1, 2025, that the vacancy in the office of mayor was filled by the former President of Council, Lateek R. Shabazz, in compliance with Section 114 of the Charter on June 1, 2025, at 5:35 p.m.

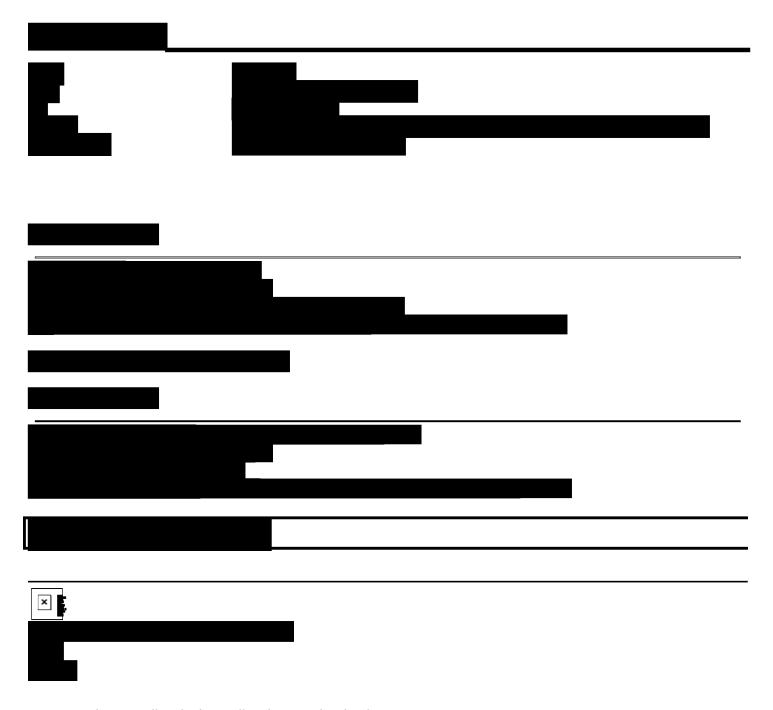
"In the case of death, resignation, removal or long-term absence of the Mayor, the order of succession as Mayor shall be as follows: President of Council, Vice President of Council and ranking Council member based upon aggregate years of service or, in the event of equal years of service, aggregate votes 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 Clerk of Council does hereby certify that Lateek R. Shabazz is the only person who meets all the lawful requirements to discharge the duties of the office of Mayor and that Sandra Morgan is a usurper, impersonating an officer of the municipal corporation and obstructing its official business in violation of Ord. No. 525.07.

As Sandra Morgan held a meeting in the mayor's office with media representatives of WOIO on June 3, 2025, and did acknowledge to reporters that she received the Clerk of Council's certifications at her home, the private usurping citizen did acknowledge that she is preventing, obstructing and delaying Mayor Lateek R. Shabazz from performing the authorized acts of his public office.

Certified: Stacey White, Clerk of Council

Date: <u>04/05/20</u>25



From: Heather Mccollough hmccollough@eastcleveland.org

Sent: Monday, June 16, 2025 3:49 PM

<dworley@eastcleveland.org>; Latasha Williams <|williams@eastcleveland.org>; Rene Kendall

<l

<rkay@eastcleveland.org>; Claude Mitchell <cmitchell@eastcleveland.org>; Antonio Marshall

<amarshall@eastcleveland.org>; Anthony Bumbalis <tbumbalis@eastcleveland.org>; Salondra Wallace

<swallace@eastcleveland.org>; Ponce Russell prussell@eastcleveland.org>; Cheryl Holland

<cholland@eastcleveland.org>; Mayor Sandra Morgan <mayormorgan@eastcleveland.org>; Mansell Baker Electronically Filed 06/17/2025 17:27 / MOTION / CA 25 115185 / Confirmation Nbr. 3529231 / CLPXP

<mbaker@eastcleveland.org>

Cc: Stacey White <stacey4ec@gmail.com>

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

Thank you for your response

From: Stacey White <swhite@eastclecouncil.org>

Sent: Monday, June 16, 2025 3:47 PM

To: Heather Mccollough < hmccollough@eastcleveland.org; Judge William Dawson < judgedawson@eccourt.com;

Judge Dawson < <u>judgewilliamdawson@gmail.com</u>>; Timothy Austin < <u>timraustin@aol.com</u>>; Timothy Austin

<Taustin@eastclecouncil.org>; Twon Billings <Tbillings@eastclecouncil.org>; Twon Billings

<twonbillinges70@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>; Latasha Williams <lwilliams@eastcleveland.org>; Rene Kendall

<rkay@eastcleveland.org>; Claude Mitchell <cmitchell@eastcleveland.org>; Antonio Marshall

<amarshall@eastcleveland.org>; Anthony Bumbalis <tbumbalis@eastcleveland.org>; Salondra Wallace

<swallace@eastcleveland.org>; Ponce Russell prussell@eastcleveland.org>; Cheryl Holland

<mbaker@eastcleveland.org>

Cc: Stacey White < stacey4ec@gmail.com >

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

Ms. McCullough:

In response to the items #1-5, requested below:

- 1. No such organizational meeting occurred, and no such public notice was made.
- 2. No such organizational meeting occurred, and no such notice was made to Council members
- 3. The Oath of Mayor Shabazz is attached to this email.
- 4. No such organizational meeting occurred, and no such minutes were made.
- 5. No such organizational meeting occurred; no roll was taken and no votes were cast.

Your request is fulfilled and closed.

Truly,



Stacey R. White, MSSA

Clerk of Council CITY OF EAST CLEVELAND Ph: (216) 681-2310

Fax: (216) 681-5440

swhite@eastclecouncil.org

From: Heather Mccollough hmccollough@eastcleveland.org

Sent: Monday, June 2, 2025 12:47 PM

To: Stacey White <swhite@eastclecouncil.org>; 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
- <twonbillinges70@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>; Latasha Williams <lwilliams@eastcleveland.org>; Rene Kendall
- <rkay@eastcleveland.org>; Claude Mitchell <cmitchell@eastcleveland.org>; Antonio Marshall
- <amarshall@eastcleveland.org>; Anthony Bumbalis <tbumbalis@eastcleveland.org>; Salondra Wallace
- <swallace@eastcleveland.org>; Ponce Russell prussell@eastcleveland.org>; Cheryl Holland
- <<u>cholland@eastcleveland.org</u>>; Mayor Sandra Morgan <<u>mayormorgan@eastcleveland.org</u>>; Mansell Baker
- <mbaker@eastcleveland.org>

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

Pursuant to R.C. 149.43, the Ohio Public Records Act, I am requesting the following:

- 1. A copy of the notice that was posted for the public of the organizational meeting where Councilor Blochowiak was named president of Council and Mr. Shabazz was sworn in as mayor
- 2. A copy of the notice that was given to the members of city council of the organizational meeting's date, place and time
- 3. A copy of the oath of office of Mr. Shabazz after his swearing in
- 4. The meeting minutes of the organizational meeting where Blochowiak was named president of council and Shabazz was sworn in as mayor
- 5. A list of all council members who were present at this meeting and how they voted.

From: Stacey White <swhite@eastclecouncil.org>

Sent: Monday, June 2, 2025 10:45 AM

To: Judge William Dawson < <u>judgedawson@eccourt.com</u>>; Judge Dawson < <u>judgewilliamdawson@gmail.com</u>>; Timothy

Austin < timraustin@aol.com; Timothy Austin < Taustin@eastclecouncil.org; Twon Billings

- <Tbillings@eastclecouncil.org>; Twon Billings <twonbillinges70@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(liams@eastcleveland.org>; Rene Kendall
- <rkay@eastcleveland.org>; Claude Mitchell <cmitchell@eastcleveland.org>; Antonio Marshall
- <amarshall@eastcleveland.org>; Anthony Bumbalis <tbumbalis@eastcleveland.org>; Salondra Wallace
- <swallace@eastcleveland.org>; Ponce Russell prussell@eastcleveland.org>; Cheryl Holland
- <cholland@eastcleveland.org>

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

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 record.

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

From: Stacey White

Sent: Monday, June 2, 2025 10:17 AM

To: Judge William Dawson < judgewilliamdawson@gmail.com; Timothy

Austin <timraustin@aol.com>; Timothy Austin <Taustin@eastclecouncil.org>; Twon Billings

<<u>Tbillings@eastclecouncil.org</u>>; Twon Billings <<u>twonbillinges70@yahoo.com</u>>; 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

<<u>rkay@eastcleveland.org</u>>; Claude Mitchell <<u>cmitchell@eastcleveland.org</u>>; Antonio Marshall

<amarshall@eastcleveland.org>

 $\textbf{Cc:} \ Anthony \ Bumbalis < \underline{tbumbalis@eastcleveland.org} >; Salondra \ Wallace < \underline{swallace@eastcleveland.org} >; Ponce \ Russell = \underline{tbumbalis@eastcleveland.org} >; Po$

cprussell@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 Ph: (216) 681-2310

Fax: (216) 681-5440

swhite@eastclecouncil.org