

**APPENEDIX A 09/11/2020 OSC Decision That Is the Subject of This Writ**

# The Supreme Court of Ohio

FILED

SEP 11 2020

CLERK OF COURT  
SUPREME COURT OF OHIO

In re Disqualification of Hon. Tonya Jones and  
Leslie Celebreeze

Supreme Court Case No. 20-AP-075

## JUDGMENT ENTRY AND DECISION

ON AFFIDAVIT OF DISQUALIFICATION in *Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic Relations Division,  
Case No. DR-19-379428.

On August 19, 2020, defendant Wael Lasheen filed an affidavit of disqualification pursuant to R.C. 2701.03 in case No. 20-AP-068 seeking to disqualify Judge Rosemary Grdina Gold from the above-referenced divorce case. On September 1, Judge Gold voluntarily recused herself from the matter, and on September 4, the affidavit of disqualification was dismissed as moot. On the same day, Judge Leslie Ann Celebreeze, the administrative judge of the Cuyahoga County Domestic Relations Court, assigned the case to Judge Tonya R. Jones.

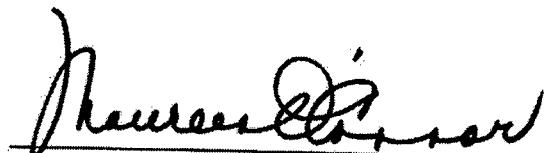
On September 10, Mr. Lasheen filed another affidavit of disqualification pursuant to R.C. 2701.03. He now seeks to disqualify Judge Jones from the divorce case and Judge Celebreeze from performing her duties as administrative judge. Mr. Lasheen appears to believe that Judge Gold lacked authority to recuse herself from the divorce case during the pendency of his first affidavit of disqualification and that Judge Celebreeze committed judicial misconduct and exhibited bias by assigning the case to Judge Jones before the chief justice had formally dismissed Mr. Lasheen's first affidavit against Judge Gold.

Contrary to Mr. Lasheen's contention, Judge Gold had authority to voluntarily recuse herself from the divorce case prior to a ruling on his affidavit of disqualification. Further, Judge

Celebrezze is not assigned to the underlying divorce case, and R.C. 2701.03 does not authorize a litigant to disqualify a court's administrative judge from performing his or her duties. Finally, Mr. Lasheen's affidavit fails to include any specific allegations of bias against Judge Jones—the judge assigned to his case—and therefore he has failed to meet the requirements of R.C. 2701.03(B)(1) (requiring an affidavit to include the "specific allegations on which the claim of interest, bias, prejudice, or disqualification is based and the facts to support each of those allegations"); *In re Disqualification of Mitrovich*, 101 Ohio St.3d 121, 2003-Ohio-7358, 803 N.E.2d 816, ¶ 4 ("An affidavit must describe with specificity and particularity those facts alleged to support the claim of bias or prejudice").

The affidavit of disqualification is denied. The case may proceed before Judge Jones.

Dated this 11th day of September, 2020.



MAUREEN O'CONNOR  
Chief Justice

Copies to: Sandra H. Grosko, Clerk of the Supreme Court  
Hon. Tonya Renee Jones,  
Hon. Leslie Ann Celebrezze, Administrative Judge  
Nailah K. Byrd, Clerk  
Wael Lasheen  
Grace Miclot  
Barbara Roman

**APPENEDIX B** Prior Affidavit of Disqualification



FILED

AUG 20 2020

CLERK OF COURT

SUPREME COURT OF OHIO

## The Supreme Court of Ohio

20 AUG 24 P 3:07

CLERK OF COURTS  
CUYAHOGA COUNTYIn re Disqualification of Hon. Rosemary Grdina  
GoldORIGINAL  
COURT USE ONLY

AUG 24 2020

CUYAHOGA COUNTY  
CLERK OF COURTS

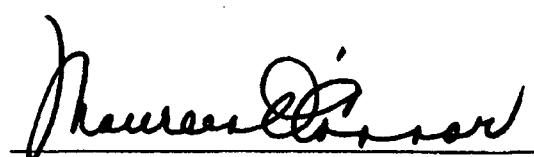
Case No. 20-AP-068

ENTRY

ON AFFIDAVIT OF DISQUALIFICATION in  
*Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic  
Relations Division, Case No. DR-19-378428

Pursuant to R.C. 2701.03(C)(1)(b), notice is hereby given to the clerk of the Cuyahoga County Court of Common Pleas, Domestic Relations Division, that on August 19, 2020, the Clerk of the Supreme Court accepted for filing an affidavit seeking to disqualify Judge Rosemary Grdina Gold from the following matter: *Jill Lasheen v. Wael Lasheen*, Cuyahoga County Court of Common Pleas, Domestic Relations Division, Case No. DR-19-378428.

R.C. 2701.03(C)(1)(c) requires that upon receipt of this notice, the clerk shall enter the fact of the filing of the affidavit on the docket of the proceeding pending in the Cuyahoga County Court of Common Pleas, Domestic Relations Division.

Maureen O'Connor  
Chief Justice

# The Supreme Court of Ohio

FILED

AUG 20 2020

CLERK OF COURT  
SUPREME COURT OF OHIO

In re Disqualification of Hon. Rosemary Grdina  
Gold

Case No. 20-AP-068

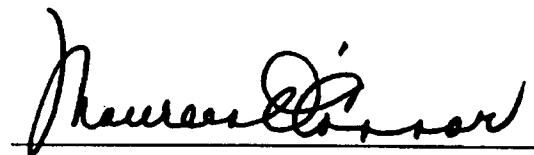
E N T R Y

ON AFFIDAVIT OF DISQUALIFICATION in  
*Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic  
Relations Division, Case No. DR-19-378428

Pursuant to R.C. 2701.03 and S.Ct.Prac.R. 21.01 through 21.04, the Clerk of the Supreme Court accepted for filing an affidavit seeking to disqualify Judge Rosemary Grdina Gold from the following matter: *Jill Lasheen v. Wael Lasheen*, Cuyahoga County Court of Common Pleas, Domestic Relations Division, Case No. DR-19-378428.

Except as provided in R.C. 2701.03(D)(2) through (4), Judge Grdina Gold is deprived of any authority to preside in the proceeding until the Chief Justice rules on the affidavit. Judge Grdina Gold is requested to file a response to the affidavit in accordance with S.Ct.Prac.R. 21.01 and 21.02 within 21 days of the date of this entry. The judge may submit the response in letter, pleading, or affidavit format. Upon receipt of the judge's response, the Chief Justice will review the matter and render a written decision on the affidavit.

Affidavit-of-disqualification files are public records, and unless sealed or confidential, a copy of any materials in the files will be provided to any person who so requests.



Maureen O'Connor  
Chief Justice

UNITED STATES OHIO SUPREME COURT

AFFIDAVIT OF DISQUALIFICATION

20AP068

JILL LASHEEN  
PLAINTIFF  
20422 ALMAR DR  
SHAKER HEIGHTS, OH 44122

: IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO

CASE NO. DR19379428

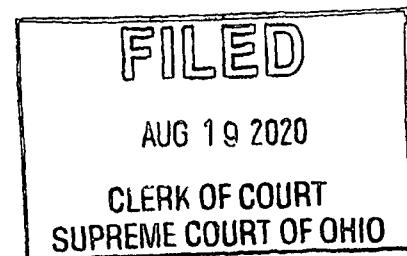
BARBARA K. ROMAN (0014607)  
GRACE MICLOT (0095345)  
Attorneys for Plaintiff  
Meyers, Roman, Friedberg & Lewis  
28601 Chagrin Boulevard, Suite 600  
Cleveland, Ohio 44122  
Tel: (216) 831-0042  
Fax: (216) 831-0542  
Email: [broman@meyersroman.com](mailto:broman@meyersroman.com)  
[gmiclot@meyersroman.com](mailto:gmiclot@meyersroman.com)

JUDGE: ROSEMARY GRDINA GOLD

Date of The Next Scheduled Hearing:  
08/27/2020

VS.

WAEL LASHEEN PRO SE  
DEFENDANT  
PO BOX 20 2555  
SHAKER HEIGHTS, OH 44120  
Tel: (216) 414-8759  
Email: [WAELLASHEEN1@PROTONMAIL.COM](mailto:WAELLASHEEN1@PROTONMAIL.COM)



The Defendant (Affiant) WAEL LASHEEN hereby moves the US OHIO SUPREME COURT to disqualify the Honorable Judge ROSEMARY GRDINA GOLD (Judge Gold) from presiding over **CASE NO. DR19379428** In The Court Of Common Pleas Division Of Domestic Relations Cuyahoga County, Ohio, because of Bias and Prejudice. I move the court to halt all proceeding in the case and transfer the case to another court.

#### **FACTUAL BACKGROUND**

The Plaintiff filed for divorce on 12/03/2019 (Exhibit 1: CASE DOCKET). The Plaintiff filed a temporary restraining order and a domestic violence case on 04/12/2020 after an incident where the Defendant was disciplining his daughter, and where by 911 was called but no police report generated; only a “service call statement” (Exhibit2: Police Statement). An Agreement was reached on 04/23/2020 through the respective attorneys (Exhibit3: Agreement). Defendant dismissed his attorney because he could no longer afford them and because the attorney did not disclose that this agreement will impact child custody in the future; this was journalized on 06/12/2020. A pretrial hearing (First Hearing) was scheduled for 05/11/2020. A pretrial hearing (Second Hearing) scheduled for 06/08/2020 was cancelled without notice to the Defendant or his Attorney of record (Exhibit4: Attorney’s Email). A pretrial hearing (Third Hearing) took place on 06/29/2020. The Third hearing was interrupted by Judge Gold’s unstable internet connection, and the hearing was rescheduled for 07/02/2020 (Fourth Hearing).

## **EVIDENCE / LAW**

**1. The Honorable Judge Gold has a reputation of sexism and activism among attorneys.**

After being served with the lawsuit the Defendant visited several attorneys and on revealing the name of the presiding judge some declined their services while others requested double the cash advance of what is customary in such cases. Eventually an attorney warned of the Judge's reputation "the Judge pressure attorneys too much". That became evident, when the attorney who was eventually hired refused to file any motion or even request for discovery, standard procedure in divorce cases, throughout six months of representation (Exhibit 1: CASE DOCKET).

**2. Unlike other judges, Judge Gold does not provide recordings or transcripts of hearings to the Court Reporting Department as required by law of a court of record. The reporting department denied possession of any recording, transcripts, or record required for an appeal filed by the Defendant on 06/24/2020, and thereafter.**

**3. During the Third Hearing on 6/29/2020 Judge Gold was aggressive, threatening, demeaning, and intimidating. Judge Gold declared her displeasure at self-representation and would not allow the Defendant to challenge the opposing counsel.**

During an exchange about marital debt:

- Plaintiff's Counsel "he claims a marital debt of about 18,000"
- Judge "What about that"
- Defendant "Yes, I took loans from family for about 18,000"
- Judge "If it is from family then it is a personal loan"

- **Defendant** "how it can be a personal loan when I have evidence that I spent it on rent, food, and house supplies?"
- **Judge** "do you have documentation?"
- **Defendant** "Yes I have western union slips with the names of my Mother and sister, my family is overseas! And I sent copies to the opposing counsel"
- **Plaintiff's counsel** "Yes I have them your honor"
- **Judge** "No, do you have a document that says you owe money"
- **Defendant** "I can get such a document"
- **Judge** "Will it have a recent date?"
- **Judge** "if you predate it, I will charge you with fraud"

Judge Gold has prejudged the case from the mere fact that the loan was owed to family, albeit now amicable to view documents that the Defendant might present. A judge is not entitled to draw an opinion based on the proceedings. See *Harrison Franklin v. McCaughtry*, 398 F.3d 955 (7th Cir. 2005). Indeed, Judge Gold has displayed deep-seated and unequivocal antagonism that would make fair judgment impossible.

4. The Third Hearing was cut short, consequently the Defendant was contacted by Lucy DeLeon, Bailiff, to resume pretrial (Exhibit5: Bailiff's Email) on 07/02/2020, the Fourth Hearing. During the Fourth Hearing the attitude changed into a more conciliatory tone, however prejudice remained. In violation of the law no notice of the pretrial's new agenda was served in advance electronic or otherwise, the judge had decided to rule on a Motion submitted by the Defendant on 06/29/2020 (see Exhibit1 Case Docket). Assuming that journalization in the case docket is notice, a reasonable period is required

by law. A Notice is "An elementary and fundamental requirement of due process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. See *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950). See also *Richards v. Jefferson County*, 517 U.S. 793 (1996). In addition, notice must be sufficient to enable the recipient to determine what is being proposed and what he must do to prevent the deprivation of his interest. See *Goldberg v. Kelly*, 397 U.S. 254, 267-68 (1970). Thus, the notice of hearing and the opportunity to be heard must be granted at a meaningful time and in a meaningful manner. See *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965)." These actions undermine the defendant's rights to due process and reflects a greater pattern of bias and prejudice.

5. The Judge scheduled a pretrial hearing on 7/28/2020 for 8/27/2020 for "Motion to Dismiss Agreement" (Exhibit1 CASE DOCKET). However, in a separate judgement entry (Exhibit6: Judgement Entry) Judge Gold refuses to treat the motion as a request to terminate the agreement and instead labels it as a motion to show cause, as the Plaintiff's Counsel suggested during the hearing. The circumstance regarding this motion and the failure of the court to make proper notice is discussed in more details in the section 4.
6. Judge Gold has scheduled a hearing on 8/27/2020 for "Motion to Dismiss Agreement" (Exhibit1 CASE DOCKET). Judge Gold insists on wrongly relabeling, prejudging, and considering that a resolution to this motion has been reached (Exhibit6 Judgement

Entry). This renders the Judge biased and any hope of a fair hearing let alone fair judgment impossible. Considering the Judge Gold's conviction that this motion is resolved it is safe to assume that reason for scheduling this hearing is to intimidate the Defendant into withdrawing the motion and denying his due process.

7. It is worthwhile to mention that the Plaintiff's Counsel seem to wield great influence over the court. The Defendant submitted a motion to release EX PARTE communication, that was stricken from the record (Exhibit6: Judgement Entry). Judge requires explanation or support for this motion. Court Rule 6 states "No attorney or party shall discuss the merits of any case either orally or in writing, with any judge or magistrate presiding over the matter without all legal counsel of record or self-represented parties participating in the discussion". It is established law and code of Judicial Conduct that all parties be informed of all and any ex parte communication. It is the Judge who needs to present an explanation for withholding ex parte communication, provided that the Judge will submit an accurate recount of ALL communication.
8. The Defendant submitted a motion to request a conflict of interest statement from the director of family evaluation services. I had spoken to her over the phone, she was very condescending and seemed to know details which can not be gleaned from records readily available online. It was safe to assume that she was contacted with either the Judge or the Plaintiff's Counsel in which case she would not perform/supervise an impartial service.
9. During communication with Judge's Bailiff and Scheduler I found them unresponsive, and any communication seemed to be readily transmitted to the Plaintiff's Counsel.

## **CONCLUSION**

**28U.S. Code § 455 embodies an objective standard. The test is whether an objective, disinterested, lay observer fully informed of the facts underlying the grounds on which recusal was sought would entertain a significant doubt about the judge's impartiality. In this case, the "appearance of partiality" is apparent to a reasonable person. From lack of hearing transcripts, prejudging the case, improper hearing notice, threats and intimidation, concealing ex parte communication and denying due process. All these factors cause the Defendant, and would cause a casual observer, to reasonably question the partiality of the Court. This motion should be granted.**

Respectfully Submitted,

Sworn to, or affirmed, and subscribed in my presence this 19 day of Aug, 2020.



Signature

WAEL LASHEEN PRO SE

DEFENDANT

PO BOX 20 2555

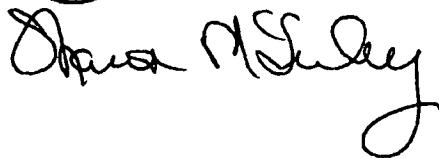
SHAKER HEIGHTS, OH 44120

Tel: 216 414 8759

Email: WAELLASHEEN1@PROTONMAIL.COM



SHARON MCSULEY  
Notary Public, State of Ohio  
My Commission Expires  
November 24, 2020



**CERTIFICATE OF SERVICE**

**Please take notice that this affidavit was served via certified mail, on the 08/19/2020 to the following:**

**GRACE MICLOT**

**Attorney for Plaintiff**

**Meyers, Roman, Friedberg & Lewis**

**28601 Chagrin Boulevard, Suite 600**

**Cleveland, Ohio 44122**

**Tel: (216)831-0042**

**JUDGE ROSEMARY GRDINA GOLD**

**Cuyahoga County Court of Common Pleas**

**Division of Domestic Relations**

**1 W. Lakeside Avenue, 3rd Floor**

**Cleveland, OH 44113-1083**

**Exhibit1**

Print

## CASE INFORMATION

### Docket Information

Filing Date	Side	Type	Description	Image
08/14/20	N/A	JE	IT IS ORDERED THAT DEFT MOTION TO STAY FAMILY EVALUATION (# 434093) IS DENIED. IT IS FURTHER ORDERED THAT DEFT MOTION TO REQUEST CONFLICT OF INTEREST STATEMENTS( #434312) AND MOTION TO RELEASE EX PARTE COMMUNICATION( #434314)ARE STRICKEN... O.S.J. NOTICE ISSUED	
08/13/20	D1	NT	NOTICE OF SERVICE OF DISCOVERY FILED D1 WAEL LASHEEN, ATTORNEY PRO SE 9999999 NOTICE OF SERVICE OF DISCOVERY ANSWERS TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES	
08/12/20	N/A	SR	MOTION(S) ADDED TO HEARING, NOTICE(S) SENT	
08/11/20	D1	MO	MOTION TO/FOR D1 WAEL LASHEEN	
08/11/20	D1	MO	MOTION TO/FOR D1 WAEL LASHEEN CONFLICT OF INTEREST	
08/04/20	P1	SR	JUDGMENT ENTRY(42244788) SENT BY REGULAR MAIL SERVICE. TO: JILL LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122	
08/04/20	P1	NT	NOTICE OF SERVICE OF DISCOVERY FILED P1 JILL LASHEEN NOTICE OF SERVICE OF PLAINTIFF'S RESPONSES TO DEFENDANT'S REQUEST FOR PRODUCTION OF DOCUMENTS AND PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES PROPOUNDED ON PLAINTIFF	
08/03/20	D1	MO	MOTION TO STAY ORDER D1 WAEL LASHEEN MOTION TO STAY FAMILY EVALUATION	
08/03/20	D1	MO	D1 WAEL LASHEEN MOTION TO COMPEL DISCOVERY PRO SE 9999999, ^F^ MOTION FOR ORDER COMPELLING DISCOVERY	
08/03/20	D1	SR	JUDGMENT ENTRY(42244787) SENT BY EMAIL. TO: WAEL LASHEEN WAELLASHEEN1@PROTONMAIL.COM	
08/03/20	P1	SR	JUDGMENT ENTRY(42244786) SENT BY EMAIL. TO: GRACE MARIE MICLOT JRAY@MEYERSROMAN.COM	
08/03/20	P1	SR	JUDGMENT ENTRY(42244785) SENT BY EMAIL. TO: GRACE MARIE MICLOT GMICLOT@MEYERSROMAN.COM	
08/03/20	N/A	SR	JUDGMENT ENTRY(42244784) SENT BY EMAIL. TO: BARBARA K ROMAN JRAY@MEYERSROMAN.COM	
08/03/20	N/A	SR	JUDGMENT ENTRY(42244783) SENT BY EMAIL. TO: BARBARA K ROMAN BROMAN@MEYERSROMAN.COM	
08/03/20	N/A	JE	ORDER FAMILY EVALUATION. IT IS ORDERED THAT THIS MATTER BE REFERRED TO THE COURT'S FAMILY EVALUATION SERVICESFOR A FORENSIC EVALUATION PURSUANT TO R.C. 3109.04(C) AND THE LOCAL RULES OF THE COURT OF COMMON PLEAS OF CUYAHOGA COUNTY, DOMESTIC RELATIONS DIVISION AS TO: ALLOCATION OF PARENTAL RIGHTS AND RESPONSIBILITIES. IT IS SO ORDERED. O.S.J. NOTICE ISSUED	
07/31/20	D1	NT	NOTICE OF SERVICE OF ANSWERS TO DEFENDANT'S REQUEST FILED NOTICE OF SERVICE	
07/29/20	N/A	SR	HEARING SCHEDULED, NOTICE(S) SENT	
07/29/20	N/A	SR	HEARING SCHEDULED, NOTICE(S) SENT	
07/29/20	N/A	SR	HEARING SCHEDULED, NOTICE(S) SENT	

07/29/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
07/28/20	N/A SC	PRETRIAL SET FOR 11/18/2020 AT 10:00 BEFORE JUDGE ROSEMARY GRDINA GOLD.	
07/28/20	N/A SC	PRETRIAL SET FOR 08/27/2020 AT 10:30 BEFORE JUDGE ROSEMARY GRDINA GOLD. MO.# 433196 FILED ON 06/29/2020 MOTION TO DISMISS AGREEMENT	
07/01/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
07/01/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
06/30/20	N/A SC	PRETRIAL SET FOR 07/02/2020 AT 09:30 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD. MO.# 433196 FILED ON 06/29/2020 MOTION TO DISMISS AGREEMENT	
06/29/20	D1 MO	MOTION TO/FOR D1 WAEL LASHEEN MOTION TO DISMISS AGREEMENT	¶
06/26/20	D1 MO	MOTION TO/FOR D1 WAEL LASHEEN DEFENDANT'S FIRST SET OF INTERROGATORIES PROPOUNDED UPON PLAINTIFF 6-26-20	¶
06/26/20	D1 MO	MOTION FOR DISCOVERY SANCTIONS FILED D1 WAEL LASHEEN DEFENDANT'S REQUEST FOR PRODUCTION OF DOCUMENTS 6-26-20	¶
06/19/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
06/19/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
06/18/20	N/A SC	PRETRIAL SET FOR 06/29/2020 AT 02:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
06/12/20	N/A JE	IT IS ORDERED THAT LISA KRAMER'S MOTION TO WITHDRAW AS ATTORNEY OF RECORD IS GRANTED O.S.J. NOTICE ISSUED	¶
05/28/20	D1 MO	D1 WAEL LASHEEN MOTION TO WITHDRAW AS ATTORNEY OF RECORD	¶
05/27/20	N/A SC	HEARING SET FOR 06/08/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD HAS BEEN CANCELED.	
05/12/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
05/12/20	N/A SC	PENDING ISSUES SET FOR 06/08/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
04/23/20	N/A JE	AGREED JUDGMENT ENTRY PLAINTIFF AND DEFENDANT, BY AND THROUGH THEIR UNDERSIGNED COUNSEL HAVE ENTERED INTO THE BELOW AGREEMENT AS IT RELATES TO INTERIM ISSUED COMMENCING APRIL 12, 2020 EXCEPT AS OTHERWISE SET FORTH HEREIN. THE COURT HEREBY ADOPTS THE PARTIES AGREEMENT. IT IS ORDERED, THAT ALL REMAINING ORDERS NOT MODIFIED HEREIN SHALL REMAIN IN FULL FORCE AND EFFECT. O. S. J. NOTICE ISSUED	¶
03/06/20	P1 NT	NOTICE OF SERVICE OF DISCOVERY FILED P1 JILL LASHEEN NOTICE OF SERVICE OF PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED UPON DEFENDANT AND PLAINTIFF'S FIRST SET OF INTERROGATORIES PROPOUNDED ON DEFENDANT	¶
02/28/20	D1 OT	D1 WAEL LASHEEN CERTIFICATE OF ATTENDANCE-PARENTING SEMINAR	¶
02/19/20	N/A JE	AGREED JUDGMENT ENTRY RE: ENGAGING IN COUNSELING FOR THE CHILDREN... COSTS ADJUDGED AGAINST PASSED TO FINAL HEARING O. S. J. NOTICE ISSUED	¶
02/19/20	P1 NT	PARENTING CERTIFICATE FILED P1 JILL LASHEEN NOTICE OF ATTENDANCE AT PARENTING SEMINAR	¶
02/13/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
02/13/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
02/13/20	N/A SC	PRETRIAL SET FOR 05/11/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
02/13/20	N/A SC	PRETRIAL SET FOR 02/13/2020 AT 11:00 IN CRTRM 1A BEFORE MAGISTRATE JASON P. PARKER.	
01/29/20	D1 OT	D1 WAEL LASHEEN FINANCIAL DISCLOSURE STATEMENT WITH AFFIDAVIT OF PROPERTY, INCOME AND EXPENSES	
01/22/20	P1 AF	AFFIDAVIT OF INCOME AND EXPENSES FILED P1 JILL LASHEEN PLAINTIFF'S FINANCIAL DISCLOSURE STATEMENT	

01/08/20 N/A SR HEARING SCHEDULED, NOTICE(S) SENT  
01/07/20 N/A SR HEARING SCHEDULED, NOTICE(S) SENT  
01/07/20 N/A SC PRETRIAL SET FOR 02/13/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.  
01/07/20 P1 AN REPLY TO COUNTERCLAIM FILED P1 JILL LASHEEN PLAINTIFF'S REPLY TO COUNTERCLAIM   
12/27/19 D1 SF DEPOSIT AMOUNT PAID  
12/27/19 D1 AN ANSWER TO COMPLAINT AND COUNTERCLAIM (NO CHILDREN) \$200 FILED., ATTORNEY LISA R KRAEMER(0031338)   
12/07/19 N/A SR FEDEX RECEIPT NO. 40487674 DELIVERED BY FEDEX 12/06/2019 LASHEEN/WAEL/ PROCESSED BY COC 12/07/2019.  
12/03/19 N/A SR SUMMONS E-FILE COPY COST  
12/03/19 D1 CS WRIT FEE  
12/03/19 D1 SR SUMS COMPLAINT(40487674) SENT BY FEDERAL EXPRESS. TO: WAEL LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122   
12/03/19 N/A JE MUTUAL RESTRAINING ORDER ISSUED TO PLAINTIFF AND DEFENDANT PURSUANT TO LOCAL RULE 24   
12/03/19 N/A JE MANDATORY DISCLOSURE ORDER ISSUED TO PLAINTIFF AND DEFENDANT PURSUANT TO LOCAL RULE 14 REV 8-13-2018   
12/03/19 N/A SF JUDGE ROSEMARY GRDINA GOLD ASSIGNED (RANDOM)  
12/03/19 P1 SF LEGAL RESEARCH  
12/03/19 P1 SF LEGAL NEWS  
12/03/19 P1 SF LEGAL AID  
12/03/19 P1 SF DOMESTIC VIOLENCE FUND  
12/03/19 P1 SF DIVORCE DECREE FEE FUND  
12/03/19 P1 SF CLERK COMPUTER FEE  
12/03/19 P1 SF CLERKS FEES  
12/03/19 P1 SF DEPOSIT AMOUNT PAID GRACE MARIE MICLOT  
12/03/19 N/A SF CASE FILED: COMPLAINT, PETITION OR APPLICATION FOR, HEALTH INSURANCE AFFIDAVIT, PARENTING PROCEEDING AFFIDAVIT, PARENTING PROCEEDING AFF. W IV-D APPL., SERVICE REQUEST 

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**Exhibit2**

## CALL FOR SERVICE REPORT

Date: 04/12/2020 Time: 12:59:30 Mrc: T Dispatchers: R309 R309

2030049098

Location: 20422 ALMAR DR City: SHAKER HEIGHTS Zone: 5 Grid: 5 Agency: SH

Call Type: DOMESTIC Incident #: Accident #: EMS #: Fire #

Reviewed By: Disposition: ADVISED

Common Name: Caller:

Caller:

JILL LASHEEN

Caller Address:

Phone  
216-470-4154

## Units / Times

Unit:	Dispatch	Route:	Arrive:	Cleared:	Patient:	Leave:	Hospital:	In Service:	Quarters:	Badge1	Badge2:	Agency
9203	13:02:35		13:03:10	13:54:28						9203		SH
9204	13:02:50	13:02:54		13:03:17						9204		SH
9205	13:02:58		13:01:12	13:58:31						9205		SH
9225	13:00:44			13:02:41						9225		SH
9253	13:00:51	13:02:56	13:08:32	13:14:51						9253		SH
9287	13:03:14		13:12:43	13:42:32						9287		SH

## Narrative

## Vehicles Involved:

HNR3201 OH JF2SHADC7BH732532 SUBA

FEMALE CALLER STATES HER HUSBAND HAS BEEN HITTING HIS DAUGHTER

- From 04/12/2020 12:59:48 To 04/12/2020 13:00:03 Disp R309 -

HE IS NOT HITTING HER NOW

- From 04/12/2020 13:00:26 To 04/12/2020 13:00:37 Disp R309 -

CALLER DOES NOT WANT AN AMBULANCE AND NO WEAPONS IN THE HOUSE

- From 04/12/2020 13:00:53 To 04/12/2020 13:01:41 Disp R309 -

# Fever / Chills - NO

# Cough -NO

# Nasal / Chest Congestion -NO

# Sore Throat - NO

# Body Aches -NO

# Have you or anyone in your family been placed in quarantine -NO

# Have you had close contact with anyone exposed to the Coronavirus in the past 14 days -NO

# If there are any positive responses, please have patient meet responders outside if able -

- From 04/12/2020 13:01:43 To 04/12/2020 13:02:05 Disp R309 -

- Clearance From Unit 9203 04/12/2020 13:54:28 -

SPOKE TO ALL PARTIES INVOLVED. SPOKE TO DAUGHTER, NOOR LASHEEN 1-21-08 WHO STATED HER FATHER, WAEEL LASHEEN 8-16-1971, SLAPPED HER WITH OPEN HANDS ON HER ARMS AND BACK BECAUSE HE WAS UPSET THAT SHE MADE FOOD FOR HERSELF AND NOT FOR THE REST OF THE FAMILY. SPOKE TO FATHER, WAEEL LASHEEN, WHO STATED HE WAS DISCIPLINING HIS DAUGHTER, NOOR, FOR BEING DISRESPECTFUL. NOOR DID NOT DISPLAY ANY SIGNS OF INJURY AND MEDICAL CARE WAS DECLINED.

**SHAKER HEIGHTS PD**

Incident Number

Page # 2

*Persons Involved with Incident*

Incident #:	Relation:	Arrest #:	CAD #:	Date of Contact:	Phone:
	PRP		2030049098	04/12/2020	
First Name:	Middle	Last Name:	Til:	DOB:	SSN:
JILL		LASHEEN			Pager:
Street #:	Street Name:	Apt:	City:	St:	Zip:

Hgt: Wgt: Hair: Eyes: Race: Sex: Physical Marks:

Offenses:

Resident Class:	Suspected of using:	Victim Type:
	/	/

Incident #:	Relation:	Arrest #:	CAD #:	Date of Contact:	Phone:
			2030049098	04/12/2020	
First Name:	Middle	Last Name:	Til:	DOB:	SSN:
WAEL		LASHEEN		08/16/1971	Pager:
Street #:	Street Name:	Apt:	City:	St:	Zip:
20422	ALMAR DR		SHAKER HEIGHTS	OH	44122
Hgt:	Wgt:	Hair:	Eyes:	Race:	Sex: Physical Marks:
600	170	BRO	BRO	M	

Offenses:

Resident Class:	Suspected of using:	Victim Type:
	/	/

Reviewing Supervisor:

Bureau Supervisor:

Officer:

# SHAKER HEIGHTS

Page # 3

*Vehicles Involved with the Incident*



CAD Number  
**2030049098**

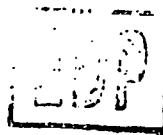
Plate: HNR3201 LIC St.: OH LIC Type: PC Vehicle Yr.: 2011 VIN #:  
JF2SHADC7BH732532

Year: 2011 Make: SUBA Model: Style: Color:  
GRY /

**Exhibit3**

ORIGINAL  
COURT USE ONLY  
APR 29 2020  
CLERK OF COURTS  
CUYAHOGA COUNTY

DR19379428  
113212587



IN THE COURT OF COMMON PLEAS  
DOMESTIC RELATIONS DIVISION  
CUYAHOGA COUNTY, OHIO

JILL LASHEEN	)	CASE NO. DR 19 379428
	)	
Plaintiff,	)	JUDGE ROSEMARY GRDINA GOLD
	)	
V.	)	
	)	<u>AGREED JUDGMENT ENTRY</u>
WAEL LASHEEN	)	
	)	
Defendant.	)	

Plaintiff, Jill Lasheen, and Defendant, Wael Lasheen, by and through their undersigned counsel have entered into the below agreement as it relates to interim issues commencing April 12, 2020 except as otherwise set forth herein. The Court hereby adopts the parties' agreement as set forth below.

**IT IS THEREFORE HEREBY ORDERED, ADJUDGED AND DECREED that:**

1. Plaintiff shall be entitled to exclusive possession of the residence located at 20422 Almar Drive Shaker Heights, Ohio 44122. Defendant shall not interfere with Plaintiff's right to occupy the residence including, but not limited to canceling utilities or insurance or interrupting telephone service, mail delivery, or the delivery of any other documents.
2. Defendant shall not remove, damage, hide, or dispose of any property or pets owned or possessed by Plaintiff. Defendant shall be entitled to remove his clothing and everyday personal effects from the residence on a date and time agreed upon by the parties' counsel and a police officer shall be present to supervise. Defendant shall also leave his garage door opener in the mailbox of the residence at the time of his retrieval of his personal effects. The full division of all other personal property, household goods, and furnishings shall be addressed in the global divorce settlement/trial.
3. Defendant shall not initiate or have any contact with Plaintiff, except as set forth herein. Contact includes, but is not limited to, landline, cordless, cellular or digital telephone; text; instant messaging; fax; e-mail; voice mail; delivery service; social networking media; blogging; writings; electronic communications; or communications by any other means directly or through another person.

The parties shall have no communication with each other except as it relates to necessary communication regarding the parties' children, which shall be done only via Our Family Wizard. Both parties shall purchase a subscription to Our Family Wizard and create a functional account no later than April 22, 2020. Both parties

(01824167)

shall provide their attorneys access to view the communication on their account.

4. Except for required Court appearances for the parties' divorce and the children's school/sporting events, Defendant shall not be present within 500 feet or (distance) of Plaintiff wherever Plaintiff may be found, or any place Defendant knows or should know Plaintiff is likely to be. If Defendant accidentally comes in contact with Plaintiff in any public or private place, Defendant must depart immediately. This includes encounters on public and private roads, highways, and thoroughfares.
5. Commencing April 22, 2020, so long as Defendant has an operational Our family Wizard account, Defendant shall be entitled to parenting time with the parties' minor children as follows: Until such time as Defendant secures stable housing (defined as a residence with at least two bedrooms), Defendant shall be entitled to parenting time with the children on Wednesdays from after school and activities or 5:00 p.m. if no school, until 8:00 p.m. and alternating weekends from Saturdays at 11:00 a.m. until 4:00 p.m. and Sundays from 11:00 a.m. until 4:00 p.m. So long as the governor's shelter in place order is in effect, neither party shall take the children to operating businesses and both parties shall ensure that they and the children are practicing proper social distancing during their respective parenting time. Defendant shall pick up and drop off the children at the designated times herein in the parking lot of J. Pistone café.
6. Defendant shall not interfere with the residence, or place of employment of Plaintiff, including the buildings, grounds, and parking lots at those locations.
7. Defendant shall set up a post office box and Plaintiff shall forward all mail to Defendant at said address in a timely fashion. This will continue for a period of three months, or until the marital residence is refinanced, whichever is sooner.
8. Plaintiff shall not cancel or otherwise alter the health or auto insurance of the Defendant until the parties' divorce is journalized or requested to do so sooner by the Defendant.
9. Until the parties' divorce is finalized, or until requested to do so by the Defendant, whichever is sooner, Defendant shall pay 50% of the health insurance premiums within thirty (30) days of receipt from his attorney.
10. Defendant shall not cause or encourage any person to do any act prohibited by this Order.

**IT IS FURTHER ORDERED** that all remaining orders not modified herein shall remain in full force and effect.

**IT IS SO ORDERED.**

  
**JUDGE ROSEMARY GRDINA GOLD**

/s/ Grace M. Miclot  
**BARBARA K. ROMAN (0014607)**  
**GRACE MICLOT (0095345)**  
*Attorneys for Plaintiff*

/s/ Lisa R. Kraemer (per electronic consent)  
**LISA R. KRAEMER (0031338)**  
*Attorney for Defendant*

RECEIVED FOR FILING

APR 1 2007

Cuyahoga County  
Clerk of Courts  
By  Deputy

(01824167)

**Exhibit4**

---

**From:** Lisa R Kraemer <[lisarkraemer@yahoo.com](mailto:lisarkraemer@yahoo.com)>  
**Date:** May 27, 2020 at 4:40:02 PM EDT  
**To:** Wael Lasheen <[lasheendivorce@gmail.com](mailto:lasheendivorce@gmail.com)>  
**Subject:** Re: Parenting Time Issues

Wael-

I am not sure when our communication broke down.

I am certainly sorry that it did.

I thought we had worked through a resolution of many of the issues in the case at some point.

I did forward you the agreed judgment entry that was filed, and I will send it again.

Today I was simply forwarding an email from opposing counsel.

I did advise that the court was not having any in person hearings. I am sorry that I wasn't more clear.

It is hard to know when in person hearings are resuming for the court. I did inform the judge that you wanted to attend the next hearing. I believe it will be scheduled as a zoom hearing.

I have attached my motion to withdraw.

Lisa R. Kraemer Attorney at Law 20133 Farnsleigh Road Cleveland, OH 44122 216-991-6200  
fax 216-991-6199 The information contained in this electronic message is intended for use only by the individual or entity to which it is addressed and may be an attorney-client communication, and as such, is privileged and confidential. If the reader of the message is not the intended recipient or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by email or telephone 216-991-6200 and delete the original message. Thank you.

**Exhibit5**

---

## **RE: DR \_19 379428**

Received: Tuesday, June 30, 2020 2:23 PM

From: Lucy Deleon [ldeleon1@cuyahogacounty.us](mailto:ldeleon1@cuyahogacounty.us)

To: Wael Lasheen [Waelllasheen1@protonmail.com](mailto:Waelllasheen1@protonmail.com)

Thanks, you will receive the new ZOOM invitation shortly.

From: Wael Lasheen <[Waelllasheen1@protonmail.com](mailto:Waelllasheen1@protonmail.com)>

Sent: Tuesday, June 30, 2020 2:22 PM

To: Lucy Deleon <[ldeleon1@cuyahogacounty.us](mailto:ldeleon1@cuyahogacounty.us)>

Subject: RE: DR \_19 379428

yes

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Tuesday, June 30, 2020 2:20 PM, Lucy Deleon <[ldeleon1@cuyahogacounty.us](mailto:ldeleon1@cuyahogacounty.us)> wrote:

Mr. Lasheen.

Can you be available to resume the pretrial by ZOOM this coming Thursday, at 9:30? Please respond promptly so that I can send new ZOOM invitations out...

---

Lucy DeLeon, Bailiff  
Judge Rosemary Grdina Gold  
Cuyahoga County Court of Common Pleas  
Division of Domestic Relations  
1 W. Lakeside Avenue, 3<sup>rd</sup> Floor, Ctrm. 1-A  
Cleveland, OH 44113-1083  
(216) 443-8812  
[ldeleon1@cuyahogacounty.us](mailto:ldeleon1@cuyahogacounty.us)

**From:** Wael Lasheen <[Waelllasheen1@protonmail.com](mailto:Waelllasheen1@protonmail.com)>  
**Sent:** Tuesday, June 30, 2020 9:54 AM  
**To:** Lucy Deleon <[ldeleon1@cuyahogacounty.us](mailto:ldeleon1@cuyahogacounty.us)>  
**Subject:** DR \_19 379428

Good Morning Lucy,

Any news about the new date?

Thank you

Wael Lasheen

Sent with [ProtonMail](https://protonmail.com) Secure Email.

---

**Exhibit6**

COURT DR19379428  
DIVISION 114153379  
CUYAHOGA COUNTY, OHIO



JILL LASHEEN,

Plaintiff,

v.

WAEL LASHEEN,

Defendant.

114153379  
ORIGINAL  
COURT USE ONLY

AUG 14 2020

COMMERCIAL COUNTY  
CLERK OF COURTS

Case No. DR19 379428

JUDGE ROSEMARY GRDINA GOLD

JUDGMENT ENTRY

This matter is before the Court upon Defendant's *Motion to Stay Family Evaluation* (Motion No. 434093) filed on August 3, 2020, *Motion to Request Conflict of Interest Statements* (Motion No. 434312) filed on August 11, 2020 and *Motion to Release Ex Parte Communication* (Motion No. 434314) filed on August 11, 2020.

Defendant's *Motion to Stay Family Evaluation* requests that this Court "stay proceedings of family evaluation pending the outcome of Motion to Dismiss Agreement, MO.# 433196 filed on 06/29/2020".<sup>1</sup> At the outset, the Court finds that the outcome of Defendant's *Motion to Dismiss Agreement*, which is essentially a *Motion to Show Cause* claiming that he has been denied visitation does not impact the process of this Court's Family Evaluation Services.<sup>2</sup>

Moreover, the parties were referred to the Court's Family Evaluation Services for a forensic evaluation on August 3, 2020 after Defendant indicated he was concerned about Plaintiff's ability to care for the parties' minor children. Defendant and Plaintiff's counsel agreed to the referral. The order of referral specifically provides that all parties "shall participate in and cooperate with all aspects of the evaluation." The Court finds Defendant has offered no basis by which this Court can justify delaying the Family Evaluation process, which is being conducted in the best interests of the minor children. Defendant's *Motion to Stay Family Evaluation* is therefore denied.

Defendant's *Motion to Request Conflict of Interest Statements* requests that the Court's Director of Family Evaluation Services submit "conflict of interest statement regarding this case and participating attorneys/firms" and his *Motion to Release Ex Parte Communication* asks for a statement regarding "all ex parte communication pertaining to this case. Including but not limited to dates, participants, and all available information [sic]". Defendant offers no explanation or

<sup>1</sup> The Court notes that Defendant asserts that the Family Evaluation Services process should be stayed pursuant to "Title 9 U.S. Code § 3, as amended", which pertains to International Commercial Arbitration. The cited statute is thus inapplicable to these proceedings.

<sup>2</sup> It must also be noted that Defendant agreed withdraw this Motion during the 7/2/2020 pretrial conducted in this matter, as he has been getting regular visitation.

support for either of these requests. The Court finds these Motions are too vague to be considered and are therefore stricken as improper.

**IT IS THEREFORE ORDERED** Motion No. 434093 is DENIED.

**IT IS FURTHER ORDERED** Motions No. 434312 and 434314 are STRICKEN.

  
JUDGE ROSEMARY GRDINA GOLD

RECEIVED FOR FILING  
AUG 14 2020  
CUYAHOGA COUNTY  
CLERK OF COURTS  
By:  Deputy

**APPENEDIX D** Ohio Revised Code (O.R.C). 2701.03

## **2701.03 Disqualification of common pleas judge - affidavit.**

(A) If a judge of the court of common pleas allegedly is interested in a proceeding pending before the court, allegedly is related to or has a bias or prejudice for or against a party to a proceeding pending before the court or a party's counsel, or allegedly otherwise is disqualified to preside in a proceeding pending before the court, any party to the proceeding or the party's counsel may file an affidavit of disqualification with the clerk of the supreme court in accordance with division (B) of this section.

(B) An affidavit of disqualification filed under section 2101.39, 2501.13, 2701.031, or 2743.041 of the Revised Code or division (A) of this section shall be filed with the clerk of the supreme court not less than seven calendar days before the day on which the next hearing in the proceeding is scheduled and shall include all of the following:

(1) The specific allegations on which the claim of interest, bias, prejudice, or disqualification is based and the facts to support each of those allegations or, in relation to an affidavit filed against a judge of a court of appeals, a specific allegation that the judge presided in the lower court in the same proceeding and the facts to support that allegation;

(2) The jurat of a notary public or another person authorized to administer oaths or affirmations;

(3) A certificate indicating that a copy of the affidavit has been served on the probate judge, judge of a court of appeals, judge of a court of common pleas, judge of a municipal or county court, or judge of the court of claims against whom the affidavit is filed and on all other parties or their counsel;

(4) The date of the next scheduled hearing in the proceeding or, if there is no hearing scheduled, a statement that there is no hearing scheduled.

(C)

(1) Except as provided in division (C)(2) of this section, when an affidavit of disqualification is presented to the clerk of the supreme court for filing under division (B) of this section, all of the following apply:

(a) The clerk of the supreme court shall accept the affidavit for filing and shall forward the affidavit to the chief justice of the supreme court.

(b) The supreme court shall send notice of the filing of the affidavit to the probate court served by the judge if the affidavit is filed against a probate court judge, to the clerk of the court of appeals served by the judge if the affidavit is filed against a judge of a court of appeals, to the clerk of the court of common pleas served by the judge if the affidavit is filed against a judge of a court of common pleas, to the clerk of the municipal or county court served by the judge if the affidavit is filed against a judge of a municipal or county court, or to the clerk of the court of claims if the affidavit is filed against a judge of the court of claims.

(c) Upon receipt of the notice under division (C)(1)(b) of this section, the probate court, the clerk of the court of appeals, the clerk of the court of common pleas, the clerk of the municipal or county court, or the clerk of the court of claims shall enter the fact of the filing of the affidavit on the docket of the probate court, the docket of the court of appeals, the docket in the proceeding in the court of common pleas, the docket of the proceeding in the municipal or county court, or the docket of the proceeding in the court of claims.

(2) The clerk of the supreme court shall not accept an affidavit of disqualification presented for filing under division (B) of this section if it is not timely presented for filing or does not satisfy the requirements of divisions (B)(2), (3), and (4) of this section.

(D)

(1) Except as provided in divisions (D)(2) to (4) of this section, if the clerk of the supreme court accepts an affidavit of disqualification for filing under divisions (B) and (C) of this section, the affidavit deprives the judge against whom the affidavit was filed of any authority to preside in the proceeding until the chief justice of the

supreme court, or a justice of the supreme court designated by the chief justice, rules on the affidavit pursuant to division (E) of this section.

(2) A judge against whom an affidavit of disqualification has been filed under divisions (B) and (C) of this section may do any of the following that is applicable:

(a) If, based on the scheduled hearing date, the affidavit was not timely filed, the judge may preside in the proceeding.

(b) If the proceeding is a domestic relations proceeding, the judge may issue any temporary order relating to spousal support pendente lite and the support, maintenance, and allocation of parental rights and responsibilities for the care of children.

(c) If the proceeding pertains to a complaint brought pursuant to Chapter 2151. or 2152. of the Revised Code, the judge may issue any temporary order pertaining to the relation and conduct of any other person toward a child who is the subject of a complaint as the interest and welfare of the child may require.

(3) A judge against whom an affidavit of disqualification has been filed under divisions (B) and (C) of this section may determine a matter that does not affect a substantive right of any of the parties.

(4) If the clerk of the supreme court accepts an affidavit of disqualification for filing under divisions (B) and (C) of this section, if the chief justice of the supreme court, or a justice of the supreme court designated by the chief justice, denies the affidavit of disqualification pursuant to division (E) of this section, and if, after the denial, a second or subsequent affidavit of disqualification regarding the same judge and the same proceeding is filed by the same party who filed or on whose behalf was filed the affidavit that was denied or by counsel for the same party who filed or on whose behalf was filed the affidavit that was denied, the judge against whom the second or subsequent affidavit is filed may preside in the proceeding prior to the ruling of the chief justice of the supreme court, or a justice designated by the chief justice, on the second or subsequent affidavit.

(E) If the clerk of the supreme court accepts an affidavit of disqualification for filing under divisions (B) and (C) of this section and if the chief justice of the supreme court, or any justice of the supreme court designated by the chief justice, determines that the interest, bias, prejudice, or disqualification alleged in the affidavit does not exist, the chief justice or the designated justice shall issue an entry denying the affidavit of disqualification. If the chief justice of the supreme court, or any justice of the supreme court designated by the chief justice, determines that the interest, bias, prejudice, or disqualification alleged in the affidavit exists, the chief justice or the designated justice shall issue an entry that disqualifies that judge from presiding in the proceeding and either order that the proceeding be assigned to another judge of the court of which the disqualified judge is a member pursuant to the court's random assignment process, to a judge of another court, or to a retired judge.

Amended by 130th General Assembly File No. TBD, HB 261, §1, eff. 7/10/2014.

Effective Date: 01-01-2002 .

**APPENEDIX E Supreme Court of Ohio Rules of Practice 21.02(e)**

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**RULES 21.02-21.04**

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**(E) Motion for Reconsideration**

No motion for reconsideration may be filed and the Clerk of the Supreme Court shall refuse to file a motion for reconsideration regarding an affidavit of disqualification.

Effective Date: March 1, 2019

**S.Ct.Prac.R. 21.03. Service of Documents Filed Relating to Affidavits of Disqualification.**

All documents filed under these rules shall be served by the affiant or by the judge against whom the affidavit was filed by personal service, U.S. mail, facsimile transmission, or e-mail.

Effective Date: March 1, 2019

**S.Ct.Prac.R. 21.04 Application of Other Supreme Court Rules of Practice.**

Unless clearly inapplicable, S.Ct.Prac.R. 3.01 through 3.14 and S.Ct.Prac.R. 4.01 through 4.06 shall apply and supplement these rules as necessary.

Effective Date: March 1, 2019

**APPENEDIX G Affidavit of Disqualification Related to the Decision Subject  
of This Writ**

DR19379428

114439262

FILED

SEP 11 2020

CLERK OF COURT  
SUPREME COURT OF OHIO

## The Supreme Court of Ohio

In re Disqualification of Hon. Tonya Jones and  
Judge Leslie Celebrezze

Case No. 20-AP-075

ENTRY

ON AFFIDAVIT OF DISQUALIFICATION in  
*Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic  
Relations Division, Case No. DR-19-379428

Pursuant to R.C. 2701.03(C)(1)(b), notice is hereby given to the clerk of the Cuyahoga County Court of Common Pleas, Domestic Relations Division, that on September 10, 2020, the Clerk of the Supreme Court accepted for filing an affidavit seeking to disqualify Judge Tonya R. Jones and Judge Leslie A. Celebrezze from the following matter: *Jill Lasheen v. Wael Lasheen*, Cuyahoga County Court of Common Pleas, Domestic Relations Division, Case No. DR-19-379428.

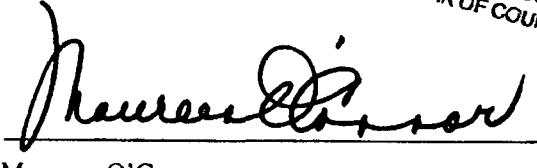
R.C. 2701.03(C)(1)(c) requires that upon receipt of this notice, the clerk shall enter the fact of the filing of the affidavit on the docket of the proceeding pending in the Cuyahoga County Court of Common Pleas, Domestic Relations Division.

FILED

WU SEP 14 P 1:53

CLERK OF COURTS  
CUYAHOGA COUNTYORIGINAL  
COURT USE ONLY

SEP 14 2020

CUYAHOGA COUNTY  
CLERK OF COURTS  
Maureen O'Connor  
Chief Justice

UNITED STATES OHIO SUPREME COURT

AFFIDAVIT OF DISQUALIFICATION

20AP075

JILL LASHEEN  
PLAINTIFF  
20422 ALMAR DR  
SHAKER HEIGHTS, OH 44122

IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO

CASE NO. DR19379428

BARBARA K. ROMAN (0014607)  
GRACE MICLOT (0095345)  
Attorneys for Plaintiff  
Meyers, Roman, Friedberg & Lewis  
28601 Chagrin Boulevard, Suite 600  
Cleveland, Ohio 44122  
Tel: (216) 831-0042  
Fax: (216) 831-0542  
Email: [broman@meyersroman.com](mailto:broman@meyersroman.com)  
[gmiclot@meyersroman.com](mailto:gmiclot@meyersroman.com)

The Honorable JUDGE: TONYA R JONES  
AND  
The Honorable JUDGE: LESLIE ANN  
CELEBREZZE

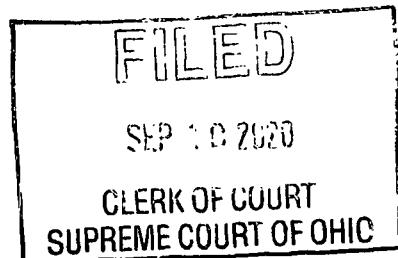
Date of The Next Scheduled Hearing:  
None

VS.

WAEL LASHEEN PRO SE  
DEFENDANT /AFFIANT  
PO BOX 20 2555  
SHAKER HEIGHTS, OH 44120  
Tel: (216) 414-8759  
Email: [WAELLASHEEN1@PROTONMAIL.COM](mailto:WAELLASHEEN1@PROTONMAIL.COM)

(s) Wael Lasheen

1



The Defendant (Affiant) WAEL LASHEEN hereby moves the OHIO SUPREME COURT (OSC) to disqualify the Honorable Judge TONYA R JONES (Judge Jones) from presiding over CASE NO. DR 19379428 In The Court Of Common Pleas Division Of Domestic Relations Cuyahoga County, Ohio, because The Honorable JUDGE: LESLIE ANN CELEBREZZE (Judge Celebreeze) lacked JURISDICTION to make such an assignment at the time it was made. The Affiant Hereby moves the OSC to DISQUALIFY Judge Celebreeze from her administrative duties over CASE NO. DR 19379428 due to judicial misconduct and the appearance of prejudice, bias, and impropriety. We charge Judge Celebreeze with Judicial Misconduct. The Affiant hereby moves the OSC to halt all proceeding in the case and TRANSFER THE CASE TO ANOTHER COUNTY to avoid any appearance of prejudice, bias, or impropriety.

#### FACTUAL BACKGROUND

The Affiant filed an Affidavit of Disqualification AP-20-068 on 08/19/2020 (Exhibit 1) and a supplement to the affidavit AP-20-068 on 08/26/2020 (Exhibit 2). After the initial filing on 08/19/2020 the affiant inquired at the OSC if the Family Evaluation Services will be halted, the Defendant was referred to the Clerk of the Court of Common Pleas and no answer was forthcoming. Therefore, the Affiant submitted a motion to Dismiss Family Evaluation Services which was to be referred to Judge Gold (as informed by the Clerk). On 8/24/2020 The Honorable ROSEMARY GRDINA GOLD (Judge Gold) issued an order (Exhibit 3) affirming the OSC mandate (Exhibit 4) to halt all proceedings, including Family Evaluation Services, until the Affidavit of Disqualification was settled. Judge Gold then recused themselves on 09/01/2020 (Exhibit 5). The Administrative Judge, Judge Celebreeze, assigned on 09/04/2020 8:38 AM Judge Jones to the divorce case DR 19379428 (Exhibit 6). The same day, the Defendant contacted the

OSC Clerk to inquire about the status of the Affidavit of Disqualification AP-20-068, the Clerk called back at 11:17 AM to inform that a Judgment was rendered. Later the OSC Clerk confirmed in an Email that the Judgement was received and Filed around 11AM (Exhibit 7).

#### **EVIDENCE / LAW**

1. It is not unethical to be imperfect, and it would be unfair to sanction a judge for not being infallible while making hundreds of decisions often under pressure. In addition, if every error of law or abuse of discretion subjected a judge to discipline as well as reversal, the independence of the judiciary would be threatened. *In re Curda*, 49 P.3d 255, 261 (Alaska 2002). Yet it cannot be stressed enough that courts have questioned whether the invocation of judicial independence in judicial disciplinary proceedings misapplies the concept because judicial independence "does not refer to independence from judicial disciplinary bodies (or from higher courts).  
  
"In the traditional sense, the concept of an independent judiciary refers to the need for a separation between the judicial branch and the legislative and executive branches. .... Judicial independence requires a judge to commit to following the constitution, the statutes, common law principles, and precedent without intrusion from or intruding upon other branches of government." *In re Hammermaster*, 985 P.2d 924, 936 (Wash. 1999). Even a federal court suggested that the constitutional measures meant to protect judicial independence were not intended to insulate individual judges from accountability to "the world as a whole (including the judicial branch itself)," but "to safeguard the branch's independence from its two competitors." *McBryde v. Comm. to Review Circuit Council Conduct and Disability Orders*, 264 F.3d 52, 65 (D.C. Cir. 2001).

Still some argue that judicial decisions that are not derived from improper influence, bias, or corruption should not lead to discipline, that view is not supported by case law. Judges are not unfrequently sanctioned. In many of these cases, there were no indications that the judges knew that their conduct was contrary to law, which suggests that "good faith" is not always a defense.

2. On 09/04/2020 8:38 AM Judge Celebreeze, assigned Judge Jones to case DR 19379428 (Exhibit 6). At that time Judge Celebreeze had no Jurisdiction over the case because 1- the OSC had not filed a judgement on the affidavit of disqualification (Exhibit 7); 2-Judge Gold's order filed on 8/24/202 prohibited further action on the case, "IT IS ORDERED that no further action will be taken on this case until the Chief Justice has ruled on the Affidavit, and any scheduled events are hereby cancelled." (Exhibit 3). The US Supreme Court in *Carlisle v. United States*, 517 U.S. 416 (1996) held that observing deadlines is not left for court discretion and rejected that it is permissible for the sake of simplicity or expediency "(c) The Court also rejects petitioner's remaining arguments: ... (2) that the failure to allow the District Court to order acquittal would violate the Fifth Amendment's Due Process Clause; and (3) that prohibiting a district court from granting an acquittal motion filed only one day late will lead to needless appeals and habeas corpus proceedings. pp. 428-430." The US Supreme Court also rejects the idea of inherent power of courts and equates it to rewriting the law "(d) The Court rebuts arguments put forward by the dissent, including the proposition that permissive rules do not withdraw pre-existing inherent powers, and the dissent's reliance on this Court's precedents to support the existence of the "inherent power" petitioner invokes. pp.

430-433." and "(b) This Court rejects petitioner's invocation of courts' "inherent supervisory power" as alternative authority for the District Court's action. Whatever the scope of federal courts' inherent power to formulate procedural rules not specifically required by the Constitution or the Congress, it does not include the power to develop rules that circumvent or conflict with the Federal Rules of Criminal Procedure."

3. If for the sake of argument we entertain the possibility that Judge Gold's withdrawal from the case return Jurisdiction of the case to Judge Celebreeze we will counter that the OSC have the authority to reject Judge Gold's withdrawal from the case, so will we have two judges assigned to the same case? Also Judge Gold is prohibited from taking any action on the case by the OSC except as provided in R.C. 2701.03(D)(2) through (4) and as such cannot issue an order to reassign the case.
4. It is noteworthy that there are no pending actions on the case that necessitate an emergency appointment of a Judge (Exhibit 8 Case Docket), and should such an emergency arise a number of Magistrates are always available and more than capable of handling emergency situations as done on a daily basis in domestic violence cases.
5. The appointment of Judge Jones in an untimely manner while awaiting a judgement on an affidavit for disqualification AP-20-068 is a questionable conduct, given the nature of the affidavit. Judges must avoid all impropriety and appearance of impropriety. Judge Celebreeze must expect to be the subject of public scrutiny, therefore accept conduct restrictions that might be viewed as burdensome. The unjustifiable appointment of Judge Jones is at odds with OSC Code of Ethics Canon 2 "A Judge Shall Respect and Comply with the Law and Shall Act at all Times in a Manner that Promotes Public

Confidence in the Integrity and Impartiality of the Judiciary", and MAYBE viewed at odds with OSC Code of Ethics Canon 4 (A) "A judge shall not allow family, social, political, or other relationships to influence the judge's judicial conduct or judgment.". An unbiased observer might rightly view that appointment in the absence of a need to justify it, before a ruling on the Affidavit is released, and in apparent violation of Judge Gold's own order with skepticism and will view Judge Celebreeze actions as damning evidence of prejudice and bias against the Affiant. "For generations before and since it has been taught that a judge must possess the confidence of the community; that he must not only be independent and honest, but, equally important, believed by all men to be independent and honest. A cloud of witnesses testify that 'justice must not only be done, it must be seen to be done.' Without the appearance as well as the fact of justice, respect for the law vanishes in a democracy." Are Courts Going the Way of the Dinosaur? *American Bar Association Journal Vol. 57, No. 3 (MARCH 1971)*.

6. In 2017 the US SUPREME COURT in *Rippo v. Baker*, 580 U.S. \_\_\_\_ (2017), vacated the Nevada Supreme Court's judgment that relied on the presence of actual bias as opposed to an objective probability of actual bias.
7. Since the initial filing on 8/19/2020 of the affidavit of disqualification 20-AP-068, the Judge recused themselves (Exhibit 4), opposing counsel is no longer affiliated with the law firm (Exhibit 9), and the affidavit was dismissed as moot (Exhibit 10). Although the Judge disqualified themselves, many concerns remain, particularly as to the court's administration and the influence of the law firm over the court staff, especially now that

the case returned to the same court the opposing counsel seems too confident they refuse to talk to the Defendant.

**8. We charge Judge Celebreeze with Judicial misconduct:**

- I. Appellate review "seeks to correct past prejudice to a particular party" while judicial discipline "seeks to prevent potential prejudice to future litigants and the judiciary in general." *Laster, 274 N.W.2d at 745. See also In re Lichtenstein, 685 P.2d 204, 209 (Colo. 1984).* Although the appellate and judicial discipline systems have different goals accomplishing both objectives in some cases requires both appellate review and judicial discipline. *In re Schenck, 870 P.2d 185 (Or. 1993).***
- II. Judge Celebreeze defied Judge Gold's order (Exhibit3) by appointing Judge Jones to the case DR19379428, and exhibited an appearance of impropriety by preceding the OSC Judgement on the affidavit of disqualification 20-AP-068, thus violating OSC Code of Ethics Canon 2 "A Judge Shall Respect and Comply with the Law and Shall Act at all Times in a Manner that Promotes Public Confidence in the Integrity and Impartiality of the Judiciary". A clear legal error. An unbiased observer might rightly view that appointment in the absence of a need to justify it, before a ruling on the Affidavit is released, and in apparent violation of Judge Gold's own order with skepticism and will view Judge Celebreeze actions as improper and will have to wonder if prejudice and bias against the Affiant played a role in that decision.**

III. During hearings we are aware of about three instances where Judge Gold was out on medical leave. Judge Gold exhibited impaired capacity at times and was unaware of basic current events, for example she was unaware of the OSC filing deadline extension and wanted to punish the Defendant erroneously for "late filing", in June. Judge Gold became dependent on the opposing counsel (as the lawyer in the group), and hence the defendant request for *ex parte* communications in his previous affidavit of disqualification (Exhibit 1). We contend that Judge Celebreeze should have been aware of Judge Gold health limitations and impact on performance of her judicial duties, and Judge Celebreeze failure to protect Judge Gold exposed Judge Gold to predatory practices and the Affiant to dire consequences. This is a violation of OSC Code of Ethics Canon 3 (c).

IV. Judge Celebreeze failed to ensure that Judge Gold provided recordings, transcripts, or any record of hearings to the Court Reporting Department as required by law of a court of record. The reporting department denied possession of any recording, transcripts, or record required for an appeal filed by the Defendant on 06/24/2020, and for at least a month thereafter. This a violation of OSC Code of Ethics Canon 3

Respectfully Submitted,

Sworn to, or affirmed, and subscribed in my presence this 10<sup>th</sup> Day of Sept. 2020



*Signature*

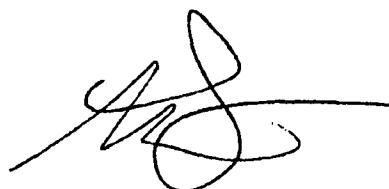
WAEL LASHEEN PRO SE

PO BOX 20 2555

SHAKER HEIGHTS, OH 44120

Tel: (216) 414-8759

Email: WAELLASHEEN1@PROTONMAIL.COM



Alec Sweress

09/10/2020



ALEC JAMES SWERESS  
NOTARY PUBLIC, STATE OF OHIO  
SUMMIT COUNTY  
My Commission Expires 9/8/2021

(s) Wael Lasheen

**CERTIFICATE OF SERVICE**

**Please take notice that this affidavit was served via US mail, on 09/10/2020 to the following:**

**BARBARA K. ROMAN (0014607)**

**Attorney for Plaintiff**

**Meyers, Roman, Friedberg & Lewis**

**28601 Chagrin Boulevard, Suite 600**

**Cleveland, Ohio 44122**

**The Honorable JUDGE: TONYA R JONES**

**AND**

**The Honorable JUDGE: LESLIE ANN CELEBREZZE**

**Cuyahoga County Court of Common Pleas**

**Division of Domestic Relations**

**1 W. Lakeside Avenue**

**Cleveland, OH 44113-1083**

**(s) Wael Lasheen**

**Appendix 1**

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UNITED STATES OHIO SUPREME COURT

AFFIDAVIT OF DISQUALIFICATION

20 AP 068

JILL LASHEEN  
PLAINTIFF  
20422 ALMAR DR  
SHAKER HEIGHTS, OH 44122

: IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO

CASE NO. DR19379428

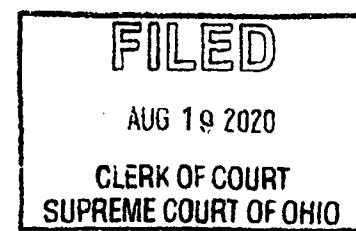
BARBARA K. ROMAN (0014607)  
GRACE MICLOT (0095345)  
Attorneys for Plaintiff  
Meyers, Roman, Friedberg & Lewis  
28601 Chagrin Boulevard, Suite 600  
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[gmiclot@meyersroman.com](mailto:gmiclot@meyersroman.com)

JUDGE: ROSEMARY GRDINA GOLD

Date of The Next Scheduled Hearing:  
08/27/2020

VS.

WAEL LASHEEN PRO SE  
DEFENDANT  
PO BOX 20 2555  
SHAKER HEIGHTS, OH 44120  
Tel: (216) 414-8759  
Email: [WAELLASHEEN1@PROTONMAIL.COM](mailto:WAELLASHEEN1@PROTONMAIL.COM)



1

(s) Wael Lasheen

The Defendant (Affiant) WAEL LASHEEN hereby moves the US OHIO SUPREME COURT to disqualify the Honorable Judge ROSEMARY GRDINA GOLD (Judge Gold) from presiding over CASE NO. DR19379428 in The Court Of Common Pleas Division Of Domestic Relations Cuyahoga County, Ohio, because of Bias and Prejudice. I move the court to halt all proceeding in the case and transfer the case to another court.

#### FACTUAL BACKGROUND

The Plaintiff filed for divorce on 12/03/2019 (Exhibit 1: CASE DOCKET). The Plaintiff filed a temporary restraining order and a domestic violence case on 04/12/2020 after an incident where the Defendant was disciplining his daughter, and where by 911 was called but no police report generated; only a "service call statement" (Exhibit2: Police Statement). An Agreement was reached on 04/23/2020 through the respective attorneys (Exhibit3: Agreement). Defendant dismissed his attorney because he could no longer afford them and because the attorney did not disclose that this agreement will impact child custody in the future; this was journalized on 06/12/2020. A pretrial hearing (First Hearing) was scheduled for 05/11/2020. A pretrial hearing (Second Hearing) scheduled for 06/08/2020 was cancelled without notice to the Defendant or his Attorney of record (Exhibit4: Attorney's Email). A pretrial hearing (Third Hearing) took place on 06/29/2020. The Third hearing was interrupted by Judge Gold's unstable internet connection, and the hearing was rescheduled for 07/02/2020 (Fourth Hearing).

## EVIDENCE / LAW

**1. The Honorable Judge Gold has a reputation of sexism and activism among attorneys.**

After being served with the lawsuit the Defendant visited several attorneys and on revealing the name of the presiding judge some declined their services while others requested double the cash advance of what is customary in such cases. Eventually an attorney warned of the Judge's reputation "the Judge pressure attorneys too much". That became evident, when the attorney who was eventually hired refused to file any motion or even request for discovery, standard procedure in divorce cases, throughout six months of representation (Exhibit 1: CASE DOCKET).

**2. Unlike other judges, Judge Gold does not provide recordings or transcripts of hearings to the Court Reporting Department as required by law of a court of record. The reporting department denied possession of any recording, transcripts, or record required for an appeal filed by the Defendant on 06/24/2020, and thereafter.**

**3. During the Third Hearing on 6/29/2020 Judge Gold was aggressive, threatening, demeaning, and intimidating. Judge Gold declared her displeasure at self-representation and would not allow the Defendant to challenge the opposing counsel.**

During an exchange about marital debt:

- Plaintiff's Counsel "he claims a marital debt of about 18,000"
- Judge "What about that"
- Defendant "Yes, I took loans from family for about 18,000"
- Judge "If it is from family then it is a personal loan"

- Defendant "how it can be a personal loan when I have evidence that I spent it on rent, food, and house supplies?"
- Judge "do you have documentation?"
- Defendant "Yes I have western union slips with the names of my Mother and sister, my family is overseas! And I sent copies to the opposing counsel!"
- Plaintiff's counsel "Yes I have them your honor"
- Judge "No, do you have a document that says you owe money"
- Defendant "I can get such a document"
- Judge "Will it have a recent date?"
- Judge "if you predate it, I will charge you with fraud"

Judge Gold has prejudged the case from the mere fact that the loan was owed to family, albeit now amicable to view documents that the Defendant might present. A judge is not entitled to draw an opinion based on the proceedings. See *Harrison Franklin v. McCaughtry*, 398 F.3d 955 (7th Cir. 2005). Indeed, Judge Gold has displayed deep-seated and unequivocal antagonism that would make fair judgment impossible.

4. The Third Hearing was cut short, consequently the Defendant was contacted by Lucy DeLeon, Bailiff, to resume pretrial (Exhibit5: Bailiff's Email) on 07/02/2020, the Fourth Hearing. During the Fourth Hearing the attitude changed into a more conciliatory tone, however prejudice remained. In violation of the law no notice of the pretrial's new agenda was served in advance electronic or otherwise, the judge had decided to rule on a Motion submitted by the Defendant on 06/29/2020 (see Exhibit1 Case Docket).

Assuming that journalization in the case docket is notice, a reasonable period is required

by law. A Notice is "An elementary and fundamental requirement of due process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. See *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950). See also *Richards v. Jefferson County*, 517 U.S. 793 (1996). In addition, notice must be sufficient to enable the recipient to determine what is being proposed and what he must do to prevent the deprivation of his interest. See *Goldberg v. Kelly*, 397 U.S. 254, 267-68 (1970). Thus, the notice of hearing and the opportunity to be heard must be granted at a meaningful time and in a meaningful manner. See *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965)." These actions undermine the defendant's rights to due process and reflects a greater pattern of bias and prejudice.

5. The Judge scheduled a pretrial hearing on 7/28/2020 for 8/27/2020 for "Motion to Dismiss Agreement" (Exhibit1 CASE DOCKET). However, in a separate judgement entry (Exhibit6: Judgement Entry) Judge Gold refuses to treat the motion as a request to terminate the agreement and instead labels it as a motion to show cause, as the Plaintiff's Counsel suggested during the hearing. The circumstance regarding this motion and the failure of the court to make proper notice is discussed in more details in the section 4.
6. Judge Gold has scheduled a hearing on 8/27/2020 for "Motion to Dismiss Agreement" (Exhibit1 CASE DOCKET). Judge Gold insists on wrongly relabeling, prejudging, and considering that a resolution to this motion has been reached (Exhibit6 Judgement

Entry). This renders the Judge biased and any hope of a fair hearing let alone fair judgment impossible. Considering the Judge Gold's conviction that this motion is resolved it is safe to assume that reason for scheduling this hearing is to intimidate the Defendant into withdrawing the motion and denying his due process.

7. It is worthwhile to mention that the Plaintiff's Counsel seem to wield great influence over the court. The Defendant submitted a motion to release EX PARTE communication, that was stricken from the record (Exhibit6: Judgement Entry). Judge requires explanation or support for this motion. Court Rule 6 states "No attorney or party shall discuss the merits of any case either orally or in writing, with any judge or magistrate presiding over the matter without all legal counsel of record or self-represented parties participating in the discussion". It is established law and code of Judicial Conduct that all parties be informed of all and any ex parte communication. It is the Judge who needs to present an explanation for withholding ex parte communication, provided that the Judge will submit an accurate recount of ALL communication.
8. The Defendant submitted a motion to request a conflict of interest statement from the director of family evaluation services. I had spoken to her over the phone, she was very condescending and seemed to know details which can not be gleaned from records readily available online. It was safe to assume that she was contacted with either the Judge or the Plaintiff's Counsel in which case she would not perform/supervise an impartial service.
9. During communication with Judge's Bailiff and Scheduler I found them unresponsive, and any communication seemed to be readily transmitted to the Plaintiff's Counsel.

## CONCLUSION

28U.S. Code § 455 embodies an objective standard. The test is whether an objective, disinterested, lay observer fully informed of the facts underlying the grounds on which recusal was sought would entertain a significant doubt about the judge's impartiality. In this case, the "appearance of partiality" is apparent to a reasonable person. From lack of hearing transcripts, prejudging the case, improper hearing notice, threats and intimidation, concealing ex parte communication and denying due process. All these factors cause the Defendant, and would cause a casual observer, to reasonably question the partiality of the Court. This motion should be granted.

Respectfully Submitted,

Sworn to, or affirmed, and subscribed in my presence this 19 day of Dec 25, 2020.



Signature

Wael Lasheen PRO SE

DEFENDANT

PO BOX 20 2555

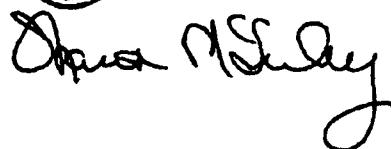
SHAKER HEIGHTS, OH 44120

Tel: 216 414 8759

Email: WAELLASHEEN1@PROTONMIAL.COM



SHARON MCGRUEY  
Notary Public, State of Ohio  
My Commission Expires  
November 24, 2020



(S) Wael Lasheen

**Appendix 2**

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UNITED STATES OHIO SUPREME COURT  
SUPPLEMENT TO AFFIDAVIT OF DISQUALIFICATION

JILL LASHEEN  
PLAINTIFF  
20422 ALMAR DR  
SHAKER HEIGHTS, OH 44122

BARBARA K. ROMAN (0014607)  
GRACE MICLOT (0095345)  
Attorneys for Plaintiff  
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Cleveland, Ohio 44122  
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Fax: (216) 831-0542  
Email: broman@meyersroman.com  
gmiclot@meyersroman.com

: OHIO SC CASE No. 20-AP-068

IN THE COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO

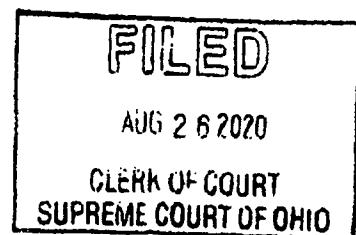
CASE NO. DR19379428

JUDGE: ROSEMARY GRDINA GOLD

Date of The Next Scheduled Hearing:  
NONE

vs.

WAEL LASHEEN PRO SE  
DEFENDANT  
PO BOX 20 2555  
SHAKER HEIGHTS, OH 44120  
Tel: (216) 414-8759  
Email: WAELLASHEEN1@PROTONMAIL.COM



(s) Wael Lasheen

The Defendant (Affiant) WAEL LASHEEN hereby moves the US OHIO SUPREME COURT to accept this SUPPLEMENT to the Affidavit Of Disqualification filed on August 19<sup>th</sup> 2020 to disqualify the Honorable Judge ROSEMARY GRDINA GOLD (Judge Gold) from presiding over CASE NO. DR19379428 In The Court Of Common Pleas Division Of Domestic Relations Cuyahoga County, Ohio, because of Bias and Prejudice.

#### **SUPPLEMENT TO EVIDENCE / LAW**

1. **Supplement to Section 3.** The general rule is that remarks a judge makes in the course of ongoing judicial proceedings, remarks that are in the nature of reactions to what the judge has observed, do not warrant disqualification. The US Supreme Court in *Liteky v. United States* added, however, that "[i]t is wrong in theory, though it may not be too far off the mark as a practical matter," to say that disqualification for bias requires an extrajudicial source. Rather, an extrajudicial source "is the only common basis [for disqualification] but not the exclusive one." The Court referred to two different scenarios when disqualification follows from remarks made during judicial proceedings: when the remarks reveal an extrajudicial bias, and when the remarks reveal an excessive bias arising from information acquired during judicial proceedings. The Court took pains to emphasize that courtroom bias—one that arises from what the judge learns in the courtroom—may also warrant disqualification: "A favorable or unfavorable predisposition can also deserve to be characterized as "bias" or "prejudice" because, even though it springs from the facts adduced or the

events occurring at trial, it is so extreme as to display clear inability to render fair judgment."

In a case similar to ours where the Judge went on a tirade, in United States v. Whitman, 209 F.3d 619 (6th Cir. 2000) the Sixth Circuit remanded the sentencing of a criminal

defendant to a different trial judge after the original judge engaged in a "lengthy harangue" of the defense attorney that "had the unfortunate effect of creating the impression that the impartial administration of the law was not his primary concern."

Judge Gold has unequivocally declared "moneys from family is a personal loan" and then set off to justify that position. In United States v. Antar, 53 F.3d 568 (3d Cir. 1995)

the trial judge commented during a sentencing hearing on the amount of restitution he might award: "My object in this case from day one has always been to get back to the public that which was taken from it as a result of the fraudulent activities of this

defendant and others." The Third Circuit held that the remark reflected a mindset

requiring disqualification: "[T]his is a case where the district judge, in stark, plain and unambiguous language, told the parties that his goal in the criminal case, from the

beginning, was something other than what it should have been and, indeed, was

improper. . . . It is difficult to imagine a starker example of when opinions formed during the course of judicial proceedings display a high degree of antagonism against a criminal

defendant. After all, the best way to effectuate the district judge's goal would have

been to ensure that the government got as free a road as possible towards a conviction,

which then would give the judge the requisite leverage to order a large amount of

restitution" The court noted the trial judge's reputation for fairness, and acknowledged

the perils of focusing on one sentence out of volumes of transcripts. However, "In determining whether a judge had the duty to disqualify him or herself, our focus must be on the reaction of the reasonable observer. If there is an appearance of partiality, that ends the matter."

Similarly, in *United States v. Franco-Guillen*, 196 F. App'x 716 (10th Cir. 2006) the district judge withdrew the defendant's guilty plea and set the matter over for trial after the defendant objected to certain information in the presentence report. In the course of the hearing, the judge said, "I will not put up with this from these Hispanics or anybody else, any other defendants"; and again, "I'm not putting up with this. I've got another case involving a Hispanic defendant who came in here and told me that he understood what was going on and that everything was fine and now I've got a 2255 from him saying he can't speak English. And he is lying because he told me he could." The Tenth Circuit reversed the conviction and remanded the case for reassignment to a different judge, with the explanation, "The judge's statements on the record would cause a reasonable person to harbor doubts about his impartiality, without regard to whether the judge actually harbored bias against Franco-Guillen on account of his Hispanic heritage.

2. **Supplement to Section 5.** It is noteworthy that the "Motion to Dismiss Agreement" was filed on 06/29/2020 the same day as the Third Hearing that was interrupted, and three days before the Fourth Hearing that was scheduled as a continuation on 07/03/2020. Only the Judge could have ordered Hearing of said motion unless there was ex parte communication between Opposing Counsel and the Court that the Defendant was not

privy to and was not disclosed, ultimately it is the Judge's responsibility regardless of how it came about. Holding the hearing for said motion gave the Plaintiff procedural, and substantive advantages especially that the Defendant is not a lawyer and no reasonable person could assume that he will be ready without notice or a day's notice, unless the purpose was to rule in the Plaintiff's favor.

3. Supplement to Section 6. The judge's statements on the record (Exhibit 6 Judgement Entry), that said motion is resolved and that it is a motion to show cause rather than to terminate the agreement, would cause a reasonable person to harbor doubts about their impartiality, without regard to whether the judge actually harbored bias against the Defendant, if the Judge is forced to rehear the motion.

4. Supplement to Section 7. By withholding ex parte communications and requiring "evidence or support" for their release Judge Gold is in violation of Ohio Supreme Court Rules of Conduct Rule 2.9 (B) "If a judge receives an unauthorized ex parte communication bearing upon the substance of a matter, the judge shall make provision promptly to notify the parties of the substance of the communication and provide the parties with an opportunity to respond" and potentially Rule 2.9 (C) "A judge shall not investigate facts in a matter independently, and shall consider only the evidence presented and any facts that may properly be judicially noticed." Assuming such communications had no bearing on the hearings, there is no way to know, it remains common practice if not a requirement in some jurisdiction to disclose them. Given the inherent rights of the Defendant to such communication to protect his due process and the gravity of the consequences from such a request striking the motion from the

records reflects a measure of animus, prejudice, and bias that would drive a lay observer to suspect foul play even if none exists.

5. **Supplement to Section 8.** This motion too was stricken from the record (Exhibit6: Judgement Entry).
6. **Supplement to Section 9.** I found the behavior of the scheduler especially troubling: she would not schedule hearings on my request only on Plaintiff's Counsel request and at their convenience, she would not answer the Defendant's questions (for example does the court require the brief to be a certain format) decrying she cannot give legal advice, yet she readily gives legal advice when she declares the Defendant cannot submit a brief without sufficient time for opposing counsel to respond. Finally, she blocked the Defendant's official email address (See Exhibit S1). So, the Defendant cannot communicate with the scheduler on his case.
7. **Supplement to Conclusion:** The defendant submitted several arguments, each of which individually merits disqualifications as similar cases have been ruled on by the US Supreme Court and several Circuit Courts as presented. If no singular argument rises enough to the standard of bias and prejudice, then a reasonable focus must be on the reaction of the reasonable observer if all the arguments are taken collectively. Indeed it is unreasonable to assume that a series of events just happens to favor the Plaintiff and be biased against the Defendant by pure chance in a court of law where all events are controlled and actions deliberate. If there is an appearance of partiality, that ends the matter.

(s) Waed Lasheen

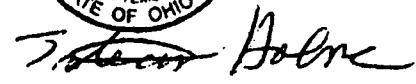
Respectfully Submitted,

Sworn to, or affirmed, and subscribed in my presence this 26th DAY of August 2020



Signature

WAEEL LASHEEN PRO SE  
PO BOX 20 2555  
SHAKER HEIGHTS, OH 44120  
Tel: (216) 414-8759  
Email: WAEELASHEEN1@PROTONMAIL.COM



(s) Wael Lasheen

**Appendix 3**

DR19379428

114226808

COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO

JILL LASHEEN,

Plaintiff,

v.

WAEL LASHEEN,

Defendant.

Case No. DR19 379428

JUDGE ROSEMARY GRDINA GOLD

ORIGINAL  
COURT USE ONLY

JUDGMENT ENTRY

AUG 24 2020

CUYAHOGA COUNTY  
CLERK OF COURTS

Defendant having filed an Affidavit of Disqualification with the Clerk of the Supreme Court of Ohio seeking to disqualify the undersigned Judge from this matter, and pursuant to the Supreme Court's Entry of August 20, 2020,

IT IS ORDERED that no further action will be taken on this case until the Chief Justice has ruled on the Affidavit, and any scheduled events are hereby cancelled.

  
JUDGE ROSEMARY GRDINA GOLD

cc: Bailiff  
Scheduler  
Family Evaluation Services  
Plaintiff  
Plaintiff's counsel  
Defendant

RECEIVED FOR FILING

AUG 24 2020

CUYAHOGA COUNTY  
CLERK OF COURTS  
By:  Deputy

**Appendix 4**

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The Supreme Court of Ohio

FILED

AUG 20 2020

CLERK OF COURT  
SUPREME COURT OF OHIO

In re Disqualification of Hon. Rosemary Grdina  
Gold

Case No. 20-AP-068

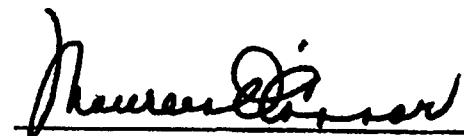
ENTRY

ON AFFIDAVIT OF DISQUALIFICATION in  
*Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic  
Relations Division, Case No. DR-19-378428

Pursuant to R.C. 2701.03 and S.Ct.Prac.R. 21.01 through 21.04, the Clerk of the Supreme Court accepted for filing an affidavit seeking to disqualify Judge Rosemary Grdina Gold from the following matter: *Jill Lasheen v. Wael Lasheen*, Cuyahoga County Court of Common Pleas, Domestic Relations Division, Case No. DR-19-378428.

Except as provided in R.C. 2701.03(D)(2) through (4), Judge Grdina Gold is deprived of any authority to preside in the proceeding until the Chief Justice rules on the affidavit. Judge Grdina Gold is requested to file a response to the affidavit in accordance with S.Ct.Prac.R. 21.01 and 21.02 within 21 days of the date of this entry. The judge may submit the response in letter, pleading, or affidavit format. Upon receipt of the judge's response, the Chief Justice will review the matter and render a written decision on the affidavit.

Affidavit-of-disqualification files are public records, and unless sealed or confidential, a copy of any materials in the files will be provided to any person who so requests.



Maureen O'Connor  
Chief Justice

**Appendix 5**

---

EDP

DR19379428  
COURT OF  
DIVISION OF DOMESTIC  
114316177  
CUYAHOGA COUNTY, OHIO

JILL LASHEEN,

Plaintiff,

v.

WAEL LASHEEN,

Defendant.

Case No. DR19 379428

ORIGINAL  
COURT USE ONLY

JUDGE ROSEMARY GRDINA GOLD

JUDGMENT ENTRY

SEP - 1 2020

CUYAHOGA COUNTY  
CLERK OF COURTS

This matter is before the Court upon the *Affidavit of Disqualification* filed by Defendant against this Judge on August 20, 2020. Without admitting any fault, bias, prejudice, or lack of impartiality on the part of the assigned judge, Judge Rosemary Grdina Gold hereby voluntarily removes herself from the above captioned case.

The Complaint was filed December 3, 2019. The date by which it must be resolved, pursuant to the Supreme Court case guidelines, is June 25, 2021. The remaining 297 days for conclusion of this case shall be transferred with the case to the newly assigned judge.

Therefore, to preclude any appearance of impropriety or conflict of interest, the assigned Judge Rosemary Grdina Gold hereby voluntarily removes herself from the above-captioned case. The case shall be reassigned at random to another Judge of this Court, pursuant to Local Rule 2(A)(2)(b).

IT IS SO ORDERED.

  
JUDGE ROSEMARY GRDINA GOLD

RECEIVED FOR FILING

SEP 01 2020

CUYAHOGA COUNTY  
CLERK OF COURTS  
By:   
Deputy

H110 (Revised 04/2014)

**Appendix 6**

**COURT OF COMMON PLEAS  
DIVISION OF DOMESTIC RELATIONS  
CUYAHOGA COUNTY, OHIO**

**JILL LASHEEN,**

: Case No. DR19 379428

Plaintiff.

: JUDGE LESLIE ANN CELEBREZZE

v.

: JUDGMENT ENTRY

**WAEL LASHEEN,**

Defendant.

To preclude any impropriety or the appearance of a conflict of interest on the part of the assigned Judge, **ROSEMARY GRDINA GOLD** voluntarily removes from the above captioned case. This case is hereby reassigned to Judge **TONYA R. JONES** (via electronic judge roll) to resolve all pending and future issues.



**JUDGE LESLIE ANN CELEBREZZE  
ADMINISTRATIVE JUDGE**

Copies to: Grace M. Miclot, Counsel for Plaintiff  
Pro Se, Counsel for Defendant  
Court File

II204 (revised 01/2018)

RECEIVED FOR FILING  
09/04/2020 08:38:48  
NAILAH K. BYRD, CLERK  
Docket ID: 114356789

**Appendix 7**



## RE: 20-AP-68 [EXTERNAL]

Received: ← Tuesday, September 8, 2020 10:57 AM

From: Patterson, Kathryn Kathryn.Patterson@sc.ohio.gov

To: Wael Lasheen Waellasheen1@protonmail.com

That information isn't recorded. All I can tell you is that, based on the time our office received the entry, it was probably some time around 11 AM.

Kathryn Patterson | Assistant Deputy Clerk | Supreme Court of Ohio

85 South Front Street • Columbus, Ohio 43215-3431

614.387.9543 (telephone) • 614.387.9539 (fax)

[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)

[www.supremecourt.ohio.gov](http://www.supremecourt.ohio.gov)

From: Wael Lasheen <Waellasheen1@protonmail.com>  
Sent: Tuesday, September 8, 2020 10:37 AM  
To: Patterson, Kathryn <Kathryn.Patterson@sc.ohio.gov>  
Subject: RE: 20-AP-68 [EXTERNAL]

I need to know what time the Clerk of the Supreme Court Filed the order,

How can I find out?

Sent with ProtonMail Secure Email.

----- Original Message -----

On Tuesday, September 8, 2020 10:33 AM, Patterson, Kathryn <[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)> wrote:

A time of day is not listed on the docket.

Kathryn Patterson | Assistant Deputy Clerk | Supreme Court of Ohio

65 South Front Street • Columbus, Ohio 43215-3431

614.387.8543 (telephone) • 614.387.8539 (fax)

[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)

[www.supremecourt.ohio.gov](http://www.supremecourt.ohio.gov)

**From:** Wael Lasheen <[Wael拉斯heen1@protonmail.com](mailto:Wael拉斯heen1@protonmail.com)>

**Sent:** Tuesday, September 8, 2020 10:27 AM

**To:** Patterson, Kathryn <[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)>

**Subject:** RE: 20-AP-68 [EXTERNAL]

Thank you what time of day was it filed, 10AM, 11 AM etc?

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Tuesday, September 8, 2020 10:24 AM, Patterson, Kathryn <[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)> wrote:

Good morning,

A PDF containing the Chief Justice's judgment entry and decision is attached.

Kathryn

Kathryn Patterson | Assistant Deputy Clerk | Supreme Court of Ohio

65 South Front Street • Columbus, Ohio 43215-3431

614.387.8543 (telephone) • 614.387.8539 (fax)

[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)

[www.supremecourt.ohio.gov](http://www.supremecourt.ohio.gov)

**From:** Wael Lasheen <[WaellaSheen1@protonmail.com](mailto:WaellaSheen1@protonmail.com)>  
**Sent:** Tuesday, September 8, 2020 10:21 AM  
**To:** Patterson, Kathryn <[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)>  
**Subject:** Re: 20-AP-68 [EXTERNAL]

Hi Kathryn,

I was told that the Chief Justice has ruled on my Affidavit 20-AP-68  
Would you kindly email me a copy  
and include the date and time of filing, or email me the date and time of filing  
Thank you

Wael Lasheen

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Friday, September 4, 2020 4:53 PM, Patterson, Kathryn <[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)> wrote:

A file-stamped copy of the supplemental affidavit is attached.

Kathryn Patterson | Assistant Deputy Clerk | Supreme Court of Ohio

65 South Front Street • Columbus, Ohio 43215-3431

614.387.0543 (telephone) • 614.387.0539 (fax)

[Kathryn.Patterson@sc.ohio.gov](mailto:Kathryn.Patterson@sc.ohio.gov)

[www.supremecourt.ohio.gov](http://www.supremecourt.ohio.gov)

**CAUTION:** This email originated from outside of the court. The actual "from" email address is [WaellaSheen1@protonmail.com](mailto:WaellaSheen1@protonmail.com). DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

**Appendix 8**

Print

## CASE INFORMATION

### Docket Information

Filing Date	Side	Type	Description	Image
09/04/20	P1	SR	JUDGMENT ENTRY(42483509) SENT BY REGULAR MAIL SERVICE. TO: JILL LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122	
09/04/20	D1	SR	JUDGMENT ENTRY(42483508) SENT BY REGULAR MAIL SERVICE. TO: WAEL LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122 CLEVELAND, OH 44122-0000	
09/04/20	D1	SR	JUDGMENT ENTRY(42483510) SENT BY EMAIL. TO: WAEL LASHEEN WAELLASHEENI@PROTONMAIL.COM	
09/04/20	N/A	SR	JUDGMENT ENTRY(42483507) SENT BY EMAIL. TO: BARBARA K ROMAN JRAY@MEYERSROMAN.COM	
09/04/20	N/A	SR	JUDGMENT ENTRY(42483506) SENT BY EMAIL. TO: BARBARA K ROMAN BROMAN@MEYERSROMAN.COM	
09/04/20	P1	SR	JUDGMENT ENTRY(42483505) SENT BY EMAIL. TO: GRACE MARIE MICLOT GRACEMICLOT@GMAIL.COM	
09/04/20	N/A	JE	JUDGE REASSIGNMENT JE	
09/01/20	N/A	JE	IT IS ORDERED THAT TO PRECLUDE ANY APPEARANCE OF IMPROPRIETY OR CONFLICT OF INTEREST, THE ASSIGNED JUDGE ROSEMARY GRDINA GOLD, VOLUNTARILY REMOVES HERSELF FROM THE ABOVE CAPTIONED CASE. THE CASE SHALL BE REASSIGNED AT RANDOM TO ANOTHER JUDGE OF THIS COURT.. O.S.J. NOTICE ISSUED	
08/25/20	D1	CM	ON AFFIDAVIT OF DISQUALIFICATION IN JILL LASHEEN V WAEL LASHEEN, CUYAHOGA COUNTY COURT OF COMMON PLEAS, DOMESTIC RELATIONS DIVISION	
08/24/20	N/A	SR	HEARING CANCELED, NOTICE(S) SENT	
08/24/20	N/A	SR	HEARING CANCELED, NOTICE(S) SENT	
08/24/20	N/A	SR	HEARING CANCELED, NOTICE(S) SENT	
08/24/20	N/A	SR	HEARING CANCELED, NOTICE(S) SENT	
08/24/20	N/A	SC	HEARING SET FOR 11/18/2020 AT 10:00 BEFORE JUDGE ROSEMARY GRDINA GOLD HAS BEEN CANCELED.	
08/24/20	N/A	SC	HEARING SET FOR 08/27/2020 AT 10:30 BEFORE JUDGE ROSEMARY GRDINA GOLD HAS BEEN CANCELED. MO.# 434094 FILED ON 08/03/2020 MOTION TO COMPEL DISCOVERY MO.# 433196 FILED ON 06/29/2020 MOTION TO DISMISS AGREEMENT	
08/24/20	N/A	JE	DEFT HAVING FILED AN AFFIDAVIT OF DISQUALIFICATION WITH THE CLERK OF THE SUPREME COURT OF OHIO SEEKING TO DISQUALIFY THE UNDERSIGNED JUDGE FROM THIS MATTER, AND PURSUANT TO THE SUPREME COURT'S ENTRY OF AUGUST 20,2020 , IT IS ORDERED THAT NO FURTHER ACTION WILL BE TAKEN ON THIS CASE UNTIL THE CHIEF JUSTICE HAS RULED ON THE AFFIDAVIT, AND ANY SCHEDULED EVENTS ARE HEREBY CANCELLED.. O.S.J. NOTICE ISSUED	
08/21/20	D1	MO	D1 WAEL LASHEEN EMERGENCY MOTION TO DISMISS ORDER FOR FAMILY EVALUATION SERVICES PRO SE 9999999	
08/14/20	N/A	JE	IT IS ORDERED THAT DEFT MOTION TO STAY FAMILY EVALUATION ( # 434093) IS DENIED. IT IS FURTHER ORDERED THAT DEFT MOTION TO REQUEST CONFLICT OF INTEREST STATEMENTS( #434312) AND MOTION TO	



RELEASE EX PARTE COMMUNICATION( #434314)ARE STRICKEN... O.S.J.  
NOTICE ISSUED

08/13/20 D1 NT NOTICE OF SERVICE OF DISCOVERY FILED D1 WAEL LASHEEN, ATTORNEY PRO SE 9999999 NOTICE OF SERVICE OF DISCOVERY ANSWERS TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES

08/12/20 N/A SR MOTION(S) ADDED TO HEARING, NOTICE(S) SENT

08/11/20 D1 MO MOTION TO/FOR D1 WAEL LASHEEN

08/11/20 D1 MO MOTION TO/FOR D1 WAEL LASHEEN CONFLICT OF INTEREST

08/04/20 P1 SR JUDGMENT ENTRY(42244788) SENT BY REGULAR MAIL SERVICE. TO: JILL LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122

08/04/20 P1 NT NOTICE OF SERVICE OF DISCOVERY FILED P1 JILL LASHEEN NOTICE OF SERVICE OF PLAINTIFF'S RESPONSES TO DEFENDANT'S REQUEST FOR PRODUCTION OF DOCUMENTS AND PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES PROPOUNDED ON PLAINTIFF

08/03/20 D1 MO MOTION TO STAY ORDER D1 WAEL LASHEEN MOTION TO STAY FAMILY EVALUATION

08/03/20 D1 MO D1 WAEL LASHEEN MOTION TO COMPEL DISCOVERY PRO SE 9999999, ^F^ MOTION FOR ORDER COMPELLING DISCOVERY

08/03/20 D1 SR JUDGMENT ENTRY(42244787) SENT BY EMAIL. TO: WAEL LASHEEN WAELLASHEEN1@PROTONMAIL.COM

08/03/20 P1 SR JUDGMENT ENTRY(42244786) SENT BY EMAIL. TO: GRACE MARIE MICLOT JRAY@MEYERSROMAN.COM

08/03/20 P1 SR JUDGMENT ENTRY(42244785) SENT BY EMAIL. TO: GRACE MARIE MICLOT GMICLOT@MEYERSROMAN.COM

08/03/20 N/A SR JUDGMENT ENTRY(42244784) SENT BY EMAIL. TO: BARBARA K ROMAN JRAY@MEYERSROMAN.COM

08/03/20 N/A SR JUDGMENT ENTRY(42244783) SENT BY EMAIL. TO: BARBARA K ROMAN BROMAN@MEYERSROMAN.COM

08/03/20 N/A JE ORDER FAMILY EVALUATION. IT IS ORDERED THAT THIS MATTER BE REFERRED TO THE COURT'S FAMILY EVALUATION SERVICESFOR A FORENSIC EVALUATION PURSUANT TO R.C. 3109.04(C) AND THE LOCAL RULES OF THE COURT OF COMMON PLEAS OF CUYAHOGA COUNTY, DOMESTIC RELATIONS DIVISION AS TO: ALLOCATION OF PARENTAL RIGHTS AND RESPONSIBILITIES. IT IS SO ORDERED. O.S.J. NOTICE ISSUED

07/31/20 D1 NT NOTICE OF SERVICE OF ANSWERS TO DEFENDANT'S REQUEST FILED NOTICE OF SERVICE

07/29/20 N/A SR HEARING SCHEDULED, NOTICE(S) SENT

07/28/20 N/A SC PRETRIAL SET FOR 11/18/2020 AT 10:00 BEFORE JUDGE ROSEMARY GRDINA GOLD.

07/28/20 N/A SC PRETRIAL SET FOR 08/27/2020 AT 10:30 BEFORE JUDGE ROSEMARY GRDINA GOLD. MO.# 433196 FILED ON 06/29/2020 MOTION TO DISMISS AGREEMENT

07/01/20 N/A SR HEARING SCHEDULED, NOTICE(S) SENT

07/01/20 N/A SR HEARING SCHEDULED, NOTICE(S) SENT

06/30/20 N/A SC PRETRIAL SET FOR 07/02/2020 AT 09:30 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD. MO.# 433196 FILED ON 06/29/2020 MOTION TO DISMISS AGREEMENT

06/29/20 D1 MO MOTION TO/FOR D1 WAEL LASHEEN MOTION TO DISMISS AGREEMENT

06/26/20 D1 MO MOTION TO/FOR D1 WAEL LASHEEN DEFENDANT'S FIRST SET OF INTERROGATORIES PROPOUNDED UPON PLANTIFF 6-26-20

06/26/20 D1 MO

		MOTION FOR DISCOVERY SANCTIONS FILED D1 Wael Lasheen DEFENDANT'S REQUEST FOR PRODUCTION OF DOCUMENTS 6-26-20	
06/19/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
06/19/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
06/18/20	N/A SC	PRETRIAL SET FOR 06/29/2020 AT 02:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
06/12/20	N/A JE	IT IS ORDERED THAT LISA KRAMER'S MOTION TO WITHDRAW AS ATTORNEY OF RECORD IS GRANTED O.S.J. NOTICE ISSUED	
05/28/20	D1 MO	D1 Wael Lasheen MOTION TO WITHDRAW AS ATTORNEY OF RECORD	
05/27/20	N/A SC	HEARING SET FOR 06/08/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD HAS BEEN CANCELED.	
05/12/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
05/12/20	N/A SC	PENDING ISSUES SET FOR 06/08/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
04/23/20	N/A JE	AGREED JUDGMENT ENTRY PLAINTIFF AND DEFENDANT, BY AND THROUGH THEIR UNDERSIGNED COUNSEL HAVE ENTERED INTO THE BELOW AGREEMENT AS IT RELATES TO INTERIM ISSUED COMMENCING APRIL 12, 2020 EXCEPT AS OTHERWISE SET FORTH HEREIN. THE COURT HEREBY ADOPTS THE PARTIES AGREEMENT. IT IS ORDERED, THAT ALL REMAINING ORDERS NOT MODIFIED HEREIN SHALL REMAIN IN FULL FORCE AND EFFECT. O. S. J. NOTICE ISSUED	
03/06/20	P1 NT	NOTICE OF SERVICE OF DISCOVERY FILED P1 Jill Lasheen NOTICE OF SERVICE OF PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED UPON DEFENDANT AND PLAINTIFF'S FIRST SET OF INTERROGATORIES PROPOUNDED ON DEFENDANT	
02/28/20	D1 OT	D1 Wael Lasheen CERTIFICATE OF ATTENDANCE-PARENTING SEMINAR	
02/19/20	N/A JE	AGREED JUDGMENT ENTRY RE: ENGAGING IN COUNSELING FOR THE CHILDREN... COSTS ADJUDGED AGAINST PASSED TO FINAL HEARING O. S. J. NOTICE ISSUED	
02/19/20	P1 NT	PARENTING CERTIFICATE FILED P1 Jill Lasheen NOTICE OF ATTENDANCE AT PARENTING SEMINAR	
02/13/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
02/13/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
02/13/20	N/A SC	PRETRIAL SET FOR 05/11/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
02/13/20	N/A SC	PRETRIAL SET FOR 02/13/2020 AT 11:00 IN CRTRM 1A BEFORE MAGISTRATE JASON P. PARKER.	
01/29/20	D1 OT	D1 Wael Lasheen FINANCIAL DISCLOSURE STATEMENT WITH AFFIDAVIT OF PROPERTY, INCOME AND EXPENSES	
01/22/20	P1 AF	AFFIDAVIT OF INCOME AND EXPENSES FILED P1 Jill Lasheen PLAINTIFF'S FINANCIAL DISCLOSURE STATEMENT	
01/08/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
01/07/20	N/A SR	HEARING SCHEDULED, NOTICE(S) SENT	
01/07/20	N/A SC	PRETRIAL SET FOR 02/13/2020 AT 11:00 IN CRTRM 1A BEFORE JUDGE ROSEMARY GRDINA GOLD.	
01/07/20	P1 AN	REPLY TO COUNTERCLAIM FILED P1 Jill Lasheen PLAINTIFF'S REPLY TO COUNTERCLAIM	
12/27/19	D1 SF	DEPOSIT AMOUNT PAID	
12/27/19	D1 AN	ANSWER TO COMPLAINT AND COUNTERCLAIM (NO CHILDREN) \$200 FILED, , ATTORNEY LISA R KRAMER(0031338)	
12/07/19	N/A SR	FEDEX RECEIPT NO. 40487674 DELIVERED BY FEDEX 12/06/2019 LASHEEN/WAEL/ PROCESSED BY COC 12/07/2019.	
12/03/19	N/A SR	SUMMONS E-FILE COPY COST	
12/03/19	D1 CS	WRIT FEE	
12/03/19	D1 SR		

SUMS COMPLAINT(40487674) SENT BY FEDERAL EXPRESS. TO: WAEL  
LASHEEN 20422 ALMAR DRIVE SHAKER HEIGHTS, OH 44122

12/03/19	N/A JE	MUTUAL RESTRAINING ORDER ISSUED TO PLAINTIFF AND DEFENDANT PURSUANT TO LOCAL RULE 24	█
12/03/19	N/A JE	MANDATORY DISCLOSURE ORDER ISSUED TO PLAINTIFF AND DEFENDANT PURSUANT TO LOCAL RULE 14 REV 8-13-2018	█
12/03/19	N/A SF	JUDGE ROSEMARY GRDINA GOLD ASSIGNED (RANDOM)	
12/03/19	P1 SF	LEGAL RESEARCH	
12/03/19	P1 SF	LEGAL NEWS	
12/03/19	P1 SF	LEGAL AID	
12/03/19	P1 SF	DOMESTIC VIOLENCE FUND	
12/03/19	P1 SF	DIVORCE DECREE FEE FUND	
12/03/19	P1 SF	CLERK COMPUTER FEE	
12/03/19	P1 SF	CLERKS FEES	
12/03/19	P1 SF	DEPOSIT AMOUNT PAID GRACE MARIE MICLOT	
12/03/19	N/A SF	CASE FILED: COMPLAINT, PETITION OR APPLICATION FOR, HEALTH INSURANCE AFFIDAVIT, PARENTING PROCEEDING AFFIDAVIT, PARENTING PROCEEDING AFF. W IV-D APPL., SERVICE REQUEST	█

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**Appendix 9**

On Wednesday, September 2, 2020, Wael Lasheen <lasheenw2@gmail.com> wrote:

Good Morning Barbara,

That's an unfortunate turn of events.

I will contact my ex-lawyer , Lisa Kramer,

And see if she would be willing to come back

Onboard. I will be in touch.

Wael

On Tuesday, September 1, 2020, Barbara K. Roman <BRoman@meyersroman.com> wrote:

→ Wael, Grace is no longer affiliated with Meyers Roman. For now, I will be the legal contact on behalf of Jill. If you have a reasonable responsive proposal to make which takes into consideration the negotiations and terms previously presented by Jill, I will be happy to entertain a discussion to bring this case to a conclusion.

Sent from my IPad

> On Sep 1, 2020, at 1:34 PM, Wael Lasheen <lasheenw2@gmail.com> wrote:

>

> Hi Grace,

> Hope all is well. It is unfortunate that this divorce

> Is dragging too long

> Is there a way we can

> Return to negotiate and perhaps bring this case

> To an amicable closure that would be agreeable to

> All parties?

> Thank you

> Wael

>

>

> --

> Wael.Lasheen

>

Wael Lasheen

Wael Lasheen

**Exhibit 10**

# The Supreme Court of Ohio

FILED

SEP 04 2020

CLERK OF COURT  
SUPREME COURT OF OHIO

In re Disqualification of Hon. Rosemary Grdina  
Gold

Supreme Court Case No. 20-AP-068

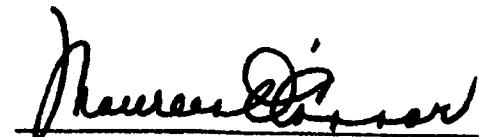
JUDGMENT ENTRY AND DECISION

ON AFFIDAVIT OF DISQUALIFICATION in *Jill Lasheen v. Wael Lasheen*, Cuyahoga  
County Court of Common Pleas, Domestic Relations Division,  
Case No. DR-19-378428.

Defendant Wael Lasheen has filed an affidavit pursuant to R.C. 2701.03 seeking to  
disqualify Judge Rosemary Grdina Gold from the above-referenced case.

Judge Grdina Gold has voluntarily recused herself from the matter. Therefore, the affidavit  
of disqualification is dismissed as moot. The case is returned to the administrative judge of the  
Cuyahoga County Court of Common Pleas, Domestic Relations Division, for random re-  
assignment to another judge of that court.

Dated this 4th day of September, 2020.



MAUREEN O'CONNOR  
Chief Justice

Copies to: Sandra H. Grosko, Clerk of the Supreme Court  
Hon. Rosemary Grdina Gold  
Hon. Leslie Ann Celebreeze, Administrative Judge  
Nailah K. Byrd, Clerk  
Wael Lasheen  
Jill Lasheen

**APPENEDIX H Court's Case Information with Administrative Judge Acting  
as the Case's Judge (Court's Website)**

## CASE INFORMATION

### Summary

**Case Number:** DR-19-379428  
**Case Title:** JILL LASHEEN vs. WAEL LASHEEN  
**Case Designation:** DIVORCE-CHILDREN  
**Filing Date:** 12/03/2019  
**Judge:** LESLIE ANN CELEBREZZE  
**Hearing Officer:** N/A  
**Room:** N/A  
**Next Action:** N/A  
**File Location:** DR - COURTROOM 1A (GOLD)  
**Last Status:** ACTIVE  
**Last Status Date:** 12/03/2019  
**Last Disposition:** NEWLY FILED  
**Last Disposition Date:** 12/03/2019  
**Prayer Amount:** \$0.00  
**Court of Appeals Case:** N/A  
**Original Case:** N/A  
**Refiled Case:** N/A

← *Administrative Judge*

*10/02/2020*

**APPENEDIX I 28 U.S. Code § 455**

# 28 U.S. Code § 455 - Disqualification of justice, judge, or magistrate judge

U.S. Code      Notes

---

**(a)** Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.

**(b)** He shall also disqualify himself in the following circumstances:

**(1)** Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;

**(2)** Where in private practice he served as lawyer in the matter in controversy, or a lawyer with whom he previously practiced law served during such association as a lawyer concerning the matter, or the judge or such lawyer has been a material witness concerning it;

**(3)** Where he has served in governmental employment and in such capacity participated as counsel, adviser or material witness concerning the proceeding or expressed an opinion concerning the merits of the particular case in controversy;

**(4)** He knows that he, individually or as a fiduciary, or his spouse or minor child residing in his household, has a financial interest in the subject matter in controversy or in a party to the proceeding, or any other interest that could be substantially affected by the outcome of the proceeding;

**(5)** He or his spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person:

**(i)** Is a party to the proceeding, or an officer, director, or trustee of a party;

**(ii)** Is acting as a lawyer in the proceeding;

**(iii)** Is known by the judge to have an interest that could be substantially affected by the outcome of the proceeding;

**(iv)** Is to the judge's knowledge likely to be a material witness in the proceeding.

**(c)** A judge should inform himself about his personal and fiduciary financial interests, and make a reasonable effort to inform himself about the personal financial interests of his spouse and minor children residing in his household.

**(d)** For the purposes of this section the following words or phrases shall have the meaning indicated:

**(1)** "proceeding" includes pretrial, trial, appellate review, or other stages of litigation;

**(2)** the degree of relationship is calculated according to the civil law system;

**(3)** "fiduciary" includes such relationships as executor, administrator, trustee, and guardian;

**(4)** "financial interest" means ownership of a legal or equitable interest, however small, or a relationship as director, adviser, or other active participant in the affairs of a party, except that:

**(i)** Ownership in a mutual or common investment fund that holds securities is not a "financial interest" in such securities unless the judge participates in the management of the fund;

**(ii)** An office in an educational, religious, charitable, fraternal, or civic organization is not a "financial interest" in securities held by the organization;

**(iii)** The proprietary interest of a policyholder in a mutual insurance company, of a depositor in a mutual savings association, or a similar proprietary interest, is a "financial interest" in the organization only if the outcome of the proceeding could substantially affect the value of the interest;

**(iv)** Ownership of government securities is a "financial interest" in the issuer only if the outcome of the proceeding could substantially affect the value of the securities.

**(e)** No justice, judge, or magistrate judge shall accept from the parties to the proceeding a waiver of any ground for disqualification enumerated in subsection (b). Where the ground for disqualification arises only under subsection (a), waiver may be accepted provided it is preceded by a full disclosure on the record of the basis for disqualification.

**(f)** Notwithstanding the preceding provisions of this section, if any justice, judge, magistrate judge, or bankruptcy judge to whom a matter has been assigned would be disqualified, after substantial judicial time has been devoted to the matter, because of the appearance or discovery, after the matter was assigned to him or her, that he or she individually or as a fiduciary, or his or her spouse or minor child residing in his or her household, has a financial interest in a party (other than an interest that could be substantially affected by the outcome), disqualification is not

required if the justice, judge, magistrate judge, bankruptcy judge, spouse or minor child, as the case may be, divests himself or herself of the interest that provides the grounds for the disqualification.

(June 25, 1948, ch. 646, 62 Stat. 908; Pub. L. 93-512, § 1, Dec. 5, 1974, 88 Stat. 1609; Pub. L. 95-598, title II, § 214(a), (b), Nov. 6, 1978, 92 Stat. 2661; Pub. L. 100-702, title X, § 1007, Nov. 19, 1988, 102 Stat. 4667; Pub. L. 101-650, title III, § 321, Dec. 1, 1990, 104 Stat. 5117.)