

No. \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES

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LEANDRE JORDAN, PETITIONER

v.

THE STATE OF OHIO, RESPONDENT

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ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF OHIO

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**MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

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**LAW OFFICE OF THE HAMILTON COUNTY  
PUBLIC DEFENDER**

Sarah E. Nelson, Esq.  
Assistant Public Defender  
(*Counsel of Record*)

Raymond T. Faller, Esq.  
Hamilton County Public Defender

Christine Y. Jones, Esq.  
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*Attorneys for Petitioner,  
LeAndre Jordan*

## MOTION

Petitioner LeAndre Jordan (“Jordan”), through undersigned counsel, respectfully requests leave to file his Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis* pursuant to Rule 39.

Jordan is currently serving an 11-year prison sentence in the Mansfield Correctional Institution, an Ohio penitentiary, and is thus without the opportunity to maintain employment during the pendency of these proceedings. He is therefore indigent and unable to hire counsel.

Jordan was also unable to retain counsel in all prior proceedings and was represented by a public defender in the Hamilton County, Ohio Court of Common Pleas (*State v. Jordan*, Nos. B-16007185, B-1702130), the Ohio Court of Appeals, First Appellate District, Hamilton County (*State v. Jordan*, Nos. C-180559, C-180560), and in the Supreme Court of Ohio (*State v. Jordan*, Slip Opinion No. 2021-Ohio-3922). An entry designating public defender as trial counsel for his case in the Hamilton County, Ohio Court of Common Pleas is attached.

Undersigned counsel, an assistant public defender for the Law Office of the Hamilton County Public Defender, represents Jordan pursuant to Ohio Rev. Code Ann. § 120.16(A)(1) which states, in part, that the “county public defender shall provide legal representation to indigent adults and juveniles who are charged with the commission of an offense or act that is a violation of a state statute and for which the penalty or any possible adjudication includes the potential loss of liberty[.]” A copy of Ohio Rev. Code Ann. 120.16(A) is attached.

## CONCLUSION

For the foregoing reasons, Jordan should be granted leave to file the attached Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis*.

Respectfully Submitted,

**LAW OFFICE OF THE HAMILTON COUNTY  
PUBLIC DEFENDER**

*/s/ Sarah E. Nelson*

Sarah E. Nelson, Esq.  
Assistant Public Defender  
(*Counsel of Record*)

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February 7, 2022

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COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

STATE OF OHIO	:	CASE NO: B 1702130-A
Plaintiff,	:	JUDGE: GORMAN
-vs-	:	DESIGNATION OF RODNEY HARRIS AS COUNSEL OF RECORD
	:	<u>LAW OFFICE OF THE PUBLIC</u>
LEANDRE K. JORDAN	:	<u>DEFENDER</u>
	:	(GOAD)
Defendant.	:	□

Pursuant to Hamilton County Common Pleas Local Rule 11(B)(3), Rodney J. Harris, of the Law Office of the Hamilton County Public Defender, the undersigned counsel, hereby states that he is counsel of record for the above captioned defendant.

Respectfully submitted,

/s/Rodney J. Harris

Rodney J. Harris(0067668)  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically with the Hamilton County Clerk of Courts, Common Pleas Criminal Division this 30<sup>th</sup> day of January, 2018 and that said document was served by the Clerk of Courts to the Hamilton County Prosecutor.

/s/Rodney J. Harris

Attorney for Defendant



Ohio Rev. Code Ann. § 120.16(A)

**120.16 Powers of representation by county public defenders**

(A)(1) The county public defender shall provide legal representation to indigent adults and juveniles who are charged with the commission of an offense or act that is a violation of a state statute and for which the penalty or any possible adjudication includes the potential loss of liberty and in postconviction proceedings as defined in this section.

(2) The county public defender may provide legal representation to indigent adults and juveniles charged with the violation of an ordinance of a municipal corporation for which the penalty or any possible adjudication includes the potential loss of liberty, if the county public defender commission has contracted with the municipal corporation to provide legal representation for indigent persons charged with a violation of an ordinance of the municipal corporation.