

Jeremy J. Quinn, Jr.
Pro-se Relator,

- vs -

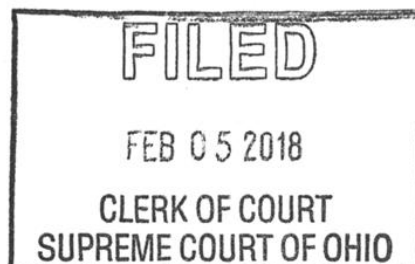
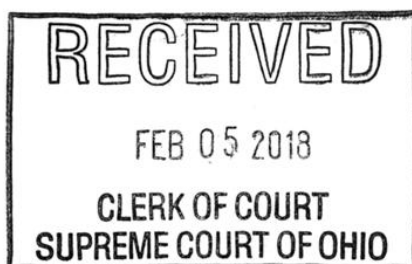
Lucas County Prosecution Office,
Respondent.

Case No. 18-0210

"Writ of Mandamus" pursuant to S. Ct. Prac. R. 12.03
by Jeremy J. Quinn, Jr.

Jeremy J. Quinn, Jr. #509-127
Ohio State Penitentiary
878 Coitsville-Hubbard Rd
Youngstown, Ohio 44505
Pro-se Relator

Brenda J. Majdalani
Assistant Prosecuting Attorney
Lucas County Prosecution
700 Adams Street, Suite 250
Toledo, Ohio 43604-5659
Counsel representing Respondent.



Memorandum

On September 11th, 2017, the Relator Mr. Quinn filed a 2nd letter of a Public-Records request to the Lucas County Prosecution office to Assistant Prosecutor Brenda J. Majdalani, Requesting of "Copies of any police records related to the arrest and subsequent investigation of Mr. Jeremy J. Quinn, Jr. (The Relator in this case) for the crimes involving "Amanda Redlin" in the case of "State-vs-Quinn, Case No. G-4801-CR-0200502529". That included the following records: Medical Records, Police reports, Investigation notes, Evidence reports, and any other materials compiled by the Sylvania-Township Police Department and Toledo Sheriff Department.

Along with this letter requesting these Public Records, Mr. Quinn submitted Two(2) signed affidavits. The Affidavits were: 1.) A sworn statement that this letter was ~~by~~ Mr. Quinn 2nd filing and that his first letter was never responded too. As well as the Notary witness the mailing out to the Prosecution office. and 2.) an Affidavit of Indigency was also submitted.

The Prosecution office of Lucas County, never acknowledge receipt of the letter, and refused to file any type of response to the ~~contents~~ contents in the letter for Public Records Request. This second letter was Submitted on September 11th, 2017, to Assistant Prosecutor Brenda J. Majdalani. The respondent had this letter over 4 months, and refuses to file any response and has not filed one to the date this court receives this.

"A mandamus is the appropriate remedy to compel compliance with O.R.C. 149.43, OHIO's Public Records Act," see State ex rel. Physicians Comm. for Responsible Medicine - vs - Bd. of Trs. of OHIO State Univ., 108 OHIO St. 3d 288; 2006-Ohio-903, 843 N.E.2d 174, ¶ 6; R.C. 149.43 (C)(1).

Although the PRA is accorded liberal construction in favor of access to public records, "the relator must still establish entitlement to the requested extraordinary

relief by clear and Convincing evidence." State ex rel. McCaffrey -vs- Mahoning Cnty. Prosecutor's office, 133 Ohio St. 3d 139, 2012-Ohio-4246, 976 N.E.2d 877, ¶ 16. In addition, unlike in other mandamus cases, "relators in public-records cases - need not Establish the lack of an adequate remedy in the ordinary course of law," State ex rel. Data Trace Information Servs., L.L.C. -vs- Cuyahoga Cnty. Fiscal officer, 131 Ohio St. 3d 255, 2012-Ohio-753, 963 N.E.2d 1288, ¶ 25. (Citing "The State Ex REL. Caster -vs- The City of Columbus ET AL, 2016-Ohio-8394; 2016 OHIO Lexis 3066 at Paragraph 14 and 15.)

This Mandamus is filed due to the Lucas-County Prosecution office refusal to respond and to produce documents that Mr. Quinn asserts are Public Records.

Mr. Quinn is an Indigent defendant/Retalor, and is fighting to prove he was wrongfully convicted in his Criminal case. This public Records request is made to show, the Prosecution is in possession of Exculpatory Evidence that will prove Mr. Quinn is wrongfully convicted. Mr. Quinn has no lawyer, and is acting Pro-se within his case.

Mr. Quinn, asks that the court grant the "Writ of Mandamus" and Move the "prosecution office of Lucas County to produce documents in Mr. Quinn letter of Public Record request, and send the copies of all documents requested to Mr. Quinn"

Respectfully, Jeremy J. Quinn, Jr.
Retalor Pro-se

Jeremy J. Quinn, Jr. #509-127
OHIO State Penitentiary
878 Coitsville-Hubbard Rd
Youngstown, OHIO 44505

Certificate of Service

I certify that this "Writ of Mandamus" was placed

in the prison mailing ~~son~~ system sent to "Brenda J. Magdalani,
Assistant Prosecuting Attorney, Lucas County Prosecution, 700
Adams Street, Suite 250, Toledo, Ohio 43604-5659 on January 29th, 2018

Jeremy J. Quinn Jr.
Petitor Pro-se

In the Supreme Court of Ohio

Jeremy J. Quinn, Jr.
Retalior Pro-se

- vs -

Lucas County Prosecution Office

Case No. _____

Affidavit

Supporting "Affidavit" to writ of Mandamus

I, Jeremy J. Quinn, Jr. hereby make this sworn statement under the penalties of perjury, that the Lucas County Prosecution Office, was sent two (2) letters of Public-Records request, with a Attached Affidavit of Indigence, with the latest being sent on September 11th, 2017, requesting the following documents: Medical Records, Police Reports, Investigation notes, Evidence reports, and any other materials compiled by the Sylvania-Township Police Department and Toledo Sheriff Department. In relation to the arrest and subsequent investigation of Mr. Jeremy J. Quinn, Jr. for the crimes involving "Amanda Redlin".

The Prosecution offices refuses to respond back, or to even send the requested documents. The letter on September 11th, 2017, was not only a Notarized, but witness by the Notary Public, being placed in the prison mailing system mailed out to the Lucas County Prosecution Office.

Mr. Quinn asks that the court move the Lucas County Prosecution Office, to send all copied documents in Mr. Quinn Public Records Request to Mr. Quinn. Jeremy J. Quinn, Jr. Affiant.

Pursuant to Rule S.Ct. Prac. R. 12.02 (IB). This Affidavit is Sworn to, or affirmed, and subscribed in my presense on this 19th day and Month January, 2018.


Notary Public signature



Scott Nowak
Notary Public, State of Ohio
Commission Expires: 4-22-2020

Seal

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