

MADISON COUNTY JUSTICE COURT

2961 SOUTH LIBERTY, CANTON, MS 39046

601-855-5619



SUSAN MCCARTY, JCC

July 25, 2016

Hon. Trey Baxter, President
MADISON COUNTY BOARD OF SUPERVISORS
P O Box 404
Canton MS 39046

HAND DELIVERED

RE: Appointment of Special Prosecutor
Cause No(s) MSO 13864, MIS 26402,
MIS 26403, MSO 121653, MSO 121652,
MSO 121651

Dear Sir:

In reference to the above, attached please find State's Notice of Recusal/Disqualifications due to a personal conflict.

This involves pending criminal charge(s) within the Madison County Justice Court against one Defendant.

Per Attorney General's instructions, upon request of a Special Prosecutor to the Board of Supervisors, the Board may appoint a Special Prosecutor themselves, or approve appointment by the Presiding Justice Court Judge.

I would greatly appreciate the Board making this appointment or allowing this appointment to happen by the Presiding Judge, so that this case may proceed to trial without further delay.

Your usual kind consideration is greatly appreciated.

Yours truly,

MADISON COUNTY JUSTICE COURT



Susan McCarty, JCC



File/

Cc: Hon. Marsha Weems Stacey, JCJ
Hon. Pamela Hancock, County Prosecutor
Hon. Jeanine M. Carefello, Counsel for Defendant

IN THE JUSTICE COURT OF MADISON COUNTY, MISSISSIPPI

STATE OF MISSISSIPPI

PLAINTIFF

V.

MSO 00-121651
MSO 00-121652
MSO 00-121653
MSO 00-013864
MIS 00-026402
MIS 00-026403

NICOLE GOWDY

DEFENDANT

STATE'S NOTICE OF RECUSAL/DISQUALIFICATION

COMES NOW the State of Mississippi, by and through Pamela L. Hancock, Madison County Prosecuting Attorney, the attorney for the State, and files this Notice of Recusal/Disqualification based on the grounds that there is a conflict of interest in this matter between the affiant and Ms. Hancock in this matter being that Ms. Hancock's law firm represented Defendant's ex-husband in a Chancery Court matter related to Defendant.

1.

The State alleges these grounds for recusal/disqualification based upon personal knowledge that is supported by admissible evidence or based on the specifically stated grounds for belief of the allegations.

2.

This notice is filed at least 10 days before the date of the scheduled hearing or trial, or at the earliest practicable time before the beginning of the trial or other hearing.

Respectfully submitted,

Pamela L. Hancock

Pamela L. Hancock (MSB #10676)
Madison County Prosecuting Attorney
2961 South Liberty Street
Canton, Mississippi 39046
Office (601) 855-5735
Pamela.hancock@madison-co.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document was delivered to the following via U.S. Mail, postage pre-paid on the 21st day of July, 2016.

Jeanine M. Carafello, Esq.
1764 Lelia Drive
Jackson, MS 39216

This the 21st day of July, 2016.



Pamela L. Hancock