

SUPREME COURT OF OHIO

State ex rel. Sandy v. Spatny

2026-Ohio-1176 · No. 2025-0960 · Decided April 3, 2026

SUMMARY

The Supreme Court of Ohio denied Joseph Sandy’s request for a writ of mandamus compelling the warden of Grafton Correctional Institution to place him in an opioid-treatment program providing buprenorphine or methadone. The court held that Sandy failed to establish a clear legal right to treatment of his choice or a clear legal duty requiring the warden to provide it, and that he had an adequate remedy through a motion to enforce the trial court’s amended order.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per curiam; Chief Justice Kennedy; Justice Fischer; Justice DeWine; Justice Brunner; Justice Deters; Justice Hawkins; Justice Shanahan
JURISDICTION	Supreme Court of Ohio
DECIDED	April 3, 2026
DOCKET	2025-0960
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Original mandamus action by a state inmate seeking to compel a prison warden to place him in an opioid-treatment program providing buprenorphine or methadone. The Supreme Court of Ohio granted an alternative writ, received evidence and briefs, and denied the writ.
STANDARD OF REVIEW	To obtain mandamus relief, the relator must establish by clear and convincing evidence a clear legal right to the requested relief, a clear legal duty on the respondent to provide it, and the absence of an adequate remedy in the ordinary course of law. Mandamus is an extraordinary remedy exercised with caution.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Joseph Sandy v. Jerry Spatny, Warden

TOPICS

- remedies
- civil procedure
- health law
- administrative law

PRACTICE AREAS

remedies

civil procedure

health law

administrative law

QUESTIONS PRESENTED

1. Whether Sandy established a clear legal right to placement in the K-12 opioid-treatment program for buprenorphine or methadone.
2. Whether the warden had a clear legal duty enforceable in mandamus to place Sandy in the K-12 program based on the trial court's orders.
3. Whether Sandy had an adequate remedy in the ordinary course of law that precluded mandamus relief.
4. Whether Sandy's unsigned evidentiary submission should be stricken under Civ.R. 11.

HOLDINGS

1. Sandy failed to establish by clear and convincing evidence that he had a clear legal right to placement in the K-12 opioid-treatment program or that the warden had a clear legal duty to provide buprenorphine or methadone rather than the clinically recommended naltrexone.
2. Sandy had an adequate remedy in the ordinary course of law, independently precluding mandamus relief.
3. The court denied the respondent's request to strike the unsigned statement of evidence because the failure to sign appeared inadvertent rather than an intentional attempt to defeat Civ.R. 11's purposes, and the respondent had addressed the merits.

KEY QUOTATIONS

“To obtain the requested writ, Sandy must establish by clear and convincing evidence that (1) he has a clear legal right to the requested relief, (2) Spatny has a clear legal duty to provide it, and (3) Sandy does not have an adequate remedy in the ordinary course of the law.” (¶ 22)

“we have held that the creation of a duty enforceable in mandamus is the function of the legislature.” (¶ 23)

“Sandy’s evidence fails to demonstrate either that he has a clear legal right to receive the treatment he prefers for his drug addiction or that Spatny has a clear legal duty to make that treatment available to him.” (¶ 31)

FACTUAL BACKGROUND

Sandy, an inmate at Grafton Correctional Institution, sought medication-assisted treatment for drug addiction with buprenorphine or methadone. Grafton clinical staff evaluated him and recommended naltrexone based on the clinical assessment, including his prior refusal to cooperate with a random drug test; Sandy declined the recommendation. Although the Erie County Court of Common Pleas ordered Sandy's placement in the Department of Rehabilitation and Correction's MAT program and later specified the K-12 program, the record showed that Sandy had not established a legal entitlement to the particular treatment he preferred.

PROCEDURAL HISTORY

Sandy was serving a life sentence imposed by the Erie County Court of Common Pleas. That court first ordered his placement in the Department of Rehabilitation and Correction's medication-assisted-treatment program and later amended the order to specify the K-12 program. Prison clinical staff assessed Sandy and recommended naltrexone under the K-10 protocol, but Sandy declined it and sought placement in the K-12 opioid-treatment program. He then filed this original mandamus action; the Supreme Court granted an alternative writ and denied relief.

DISPOSITION

writ_denied

CASES CITED

- State ex rel. Slager v. Trelka, 2024-Ohio-5125, ¶ 8
- State ex rel. Maras v. LaRose, 2022-Ohio-866, ¶ 18
- State ex rel. Taylor v. Glasser, 50 Ohio St.2d 165, 166 (1977)
- State ex rel. Shie v. Adult Parole Auth., 2022-Ohio-270, ¶ 11
- State ex rel. Tarrier v. Pub. Emps. Retirement Bd., 2021-Ohio-649, ¶ 18
- State ex rel. Perry Twp. Bd. of Trustees v. Husted, 2018-Ohio-3830, ¶ 13
- State ex rel. Sands v. Court of Common Pleas Judge, 2018-Ohio-4245, ¶ 11