

**Gaal v. State**

A DUI defendant repeatedly changed counsel and accepted but later rejected plea agreements, causing delays in the case. The judge stated on the record that due to these delays, the court would not entertain a plea for less than a maximum sentence. The defendant filed a motion to recuse the judge asserting that the statement demonstrated bias against the defendant. A recusal hearing was held in which it was determined that the judge need not be recused. The decision was reversed on appeal then appealed to the Court of Criminal Appeals.

In reversing the appellate court, the Court of Criminal Appeals observed that the judge's critical remarks were caused by the defendant's own conduct before the court and by evidence of multiple bond violations rather than some personal bias or knowledge of the case. The Court decided that the decision not to recuse the judge fell within the discretion of the hearing court and upheld the denial of recusal.