



Michael C. O'Malley
CUYAHOGA COUNTY PROSECUTOR

August 28, 2019

Chief Calvin Williams
Cleveland Police Department
1300 Ontario Street
Cleveland, Ohio 44113

Re: Officer Joseph Russo Badge #231

Dear Chief Williams,

The Cuyahoga County Prosecutor's Office is required by law to obtain and to disclose to the defense any and all potential impeachment evidence relative to its witnesses. Potential impeachment evidence includes, but is not limited to, any disciplinary actions against officers and any instances involving dishonesty or a lack of candor, or a demonstration of bias. The Cuyahoga County Prosecutor's Office has determined that the following material is potential impeachment evidence that this Office must disclose to opposing counsel: Internal Affairs Investigation report CPD 2018-0101; City Of Cleveland Municipal Court Docket 2018 TRC 034255.

We respectfully request that you notify Officer Russo of this decision.

Thank you very much.

Respectfully,

Lisa Reitz Williamson
First Assistant Prosecuting Attorney

Cc: Ronald Bakeman, Superintendent, CPD Internal Affairs

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Office of the
Prosecuting Attorney