



**Michael C. O'Malley**  
CUYAHOGA COUNTY PROSECUTOR

March 10, 2021

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

Re: Officer Andrew Hayduk Badge # 349

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: City of Cleveland administrative pre-disciplinary letter addressed to Officer Hayduk dated 12.29.2020

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

Thank you very much.

Respectfully,

Lisa Reitz Williamson  
First Assistant Prosecuting Attorney

Cc: Ronald Bakeman, Superintendent, CPD Internal Affairs