



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

January 29, 2020

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

Re: Officer William Tell, Badge # 2323

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 Department of Public Safety Office of Professional Standards Citizen Complaint Investigation Report -OSP Complaint No. 18-085.

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

Thank you very much.

Respectfully,

Lisa Reitz Williamson  
First Assistant Prosecuting Attorney

Cc: Ronald Bakeman, Superintendent, CPD Internal Affairs

**OFFICE OF THE PROSECUTING ATTORNEY**  
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