

December 4, 2019 (revised)

Via e-mail to bchojnacki@walterhav.com

Benjamin Grant Chojnacki
Walter Haverfield LLP
1301 E. Ninth St., Suite 3500
Cleveland, OH 44114

Re: *Criminal charges against Stacy Hinnners of Huron*, Huron Municipal Court Case No. 19 CRB 0126

Dear Director Chojnacki:

Congratulations on becoming the City of Huron's law director.

As you probably know from the transition from prior law director Aimee Lane, formerly of your firm, our office represents Stacy and Jason Hinnners in matters relating to the City of Huron's conduct toward them. This includes our defense of Mrs. Hinnners against criminal charges, which Michael J. O'Shea—a "special" assistant prosecutor appointed by Director Lane—dismissed *without* prejudice on October 7, 2019. That was just moments before an evidentiary hearing that would have proved the prosecution unconstitutionally selective and retaliatory.

Please convey immediately our request that the following be accomplished no later than **noon on December 11, 2019**:

- (1) Council adopts emergency legislation that would permanently terminate any further role by O'Shea or his firm, and you immediately convey the termination to O'Shea.
- (2) Council adopts an emergency resolution directing or requesting the City's prosecutor Michael Kaufman to file—no later than noon on December 11, 2019—a motion to convert the dismissal of the matter against Mrs. Hinnners to a dismissal with prejudice.
- (3) Prosecutor Kaufman files by noon on December 11, 2019 a notice of substitution noting O'Shea's termination, and a motion to convert the dismissal of Mrs. Hinnners's case to a dismissal with prejudice.

By the evening of December 10, Huron's new City Council will have had two meetings. That's long enough for the City to ensure that charges against Mrs. Hinnners are never refiled.

Very truly yours,



Subodh Chandra