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October 20, 2020

Via Email

Michael Tallon, Esq.
45 Exchange Boulevard, Suite 500
Rochester NY 14614

Re: Rochester City Council Investigation: Subpoena to Former Chief La’Ron Singletary

Dear Mr. Tallon:

As you know, this firm serves as the Independent Special Investigator for the Rochester City Council during the course of the Special Investigation authorized by Ordinance Intr. No. 349 (the “Investigation”). I have received your letter of October 19.

The position you assert on behalf of former Chief Singletary is unacceptable. Your client has been served with a subpoena validly issued by the Rochester City Council, compliance with which is required, not optional. Former Chief Singletary’s refusal to comply with the subpoena, as reflected in your letter and the correspondence to date, is an effort to impede the Investigation. It deprives this office of relevant information, in the form of both documents in former Chief Singletary’s personal possession, custody, or control, and the former Chief’s own testimony as to critical events.¹ Notably, he is the only current or former Rochester public official to refuse to participate in the investigation. We have already provided you with the legal basis for our subpoena authority; to suggest otherwise is simply an effort to muddy the record.

Your expressions of concern about alleged obstructive or unethical conduct by the current Mayoral Administration in no way justify your client’s refusal to cooperate in the Investigation, which we are conducting *independent* of the Administration and the Council in all events. The

¹ Our office is always willing to discuss reasonable adjustments to the *schedule* of subpoena compliance based on demonstrated need; it was for this reason that I reached out to you by email on October 13, 2020 to schedule a phone call. Your refusal even to speak with me demonstrates that the issue for your client is not one of logistics.

Administration and the Council have no role in this office's investigation, no access to the information we gather, and no influence over its methods or findings (which will be made public at its conclusion). In short, the former Chief's stated concern about the ethical issues of the current administration has no bearing on his obligations to provide evidence for this wholly independent investigation. In the meantime, our work will continue, even without former Chief Singletary's cooperation. Be advised that adverse inferences may be drawn, and other legal consequences may flow, from former Chief Singletary's refusal to cooperate.

Very truly yours,


Andrew G. Celli, Jr. (Oct 20, 2020 15:01 EDT)

Andrew G. Celli, Jr