



September 29, 2020

Andrew G. Celli, Jr.
Emery Celli Brinckerhoff Abady Ward & Maazel, LLP
600 Fifth Avenue at Rockefeller Center 10th Floor
New York, New York 10020

Re: Depositions pursuant to the Council Independent Investigation - Death of Daniel Prude

Dear Mr. Celli,

As you know, City Council President Loretta Scott has appointed a special committee to serve as an intermediary between the full City Council and your firm in the course of your independent investigation into the death of Daniel Prude. As has already been made publicly clear, it is the desire of Council that your work be done independently and that even the special committee not be privy to the information that you are collecting until your investigation is complete. This is necessary to maintain the complete independence of your review. Therefore, please be advised that we do not wish to be present at any of the depositions taken by you by virtue of subpoenas already issued or to be issued by the Council President. We understand that you wish to take these depositions outside of public view, in order to ensure the integrity of the investigation. This will confirm that you are authorized to do so; you should feel free to schedule and conduct these depositions in the order and at the times that you deem best from the viewpoint of investigative necessity and administrative convenience.

Sincerely,

Malik D. Evans
Special Committee Member
Member of City Council

Michael A. Patterson
Special Committee Member
Member of City Council

