

#37-3

ELYRIA POLICE DEPARTMENT
601 West Broad Street
Elyria, Ohio 44035

To: Shawndell C Donald
Thru: Attorney Mary Papcke
From: Detective A.L. Leiby
Ref: Ron Lally Homicide Investigation

March 23, 1995

Mr Donald,

On March 23, 1995 I had a meeting with Prosecutor Jon Rosenbaum and briefed him on the request for this letter. Mr Rosenbaum is aware of, and has agreed to it's terms.

This letter is done at the request of your attorney, Mary Papcke. The purpose of this letter is to inform you of your status in the Ron Lally Homicide Investigation. It is my intention to list you as a witness in this investigation and not charge you with any crime, if:

1. You were not a principle in, nor present at, the execution of Ronald Lally.
2. You provide a complete and truthful statement regarding all knowledge you have concerning the events surrounding the execution of Ron Lally.
3. You can successfully pass a polygraph examination, if requested by the State, verifying your statement to police concerning the death of Ron Lally. The state of Ohio reserves the absolute right to determine who will administer this test, when and where it will be administered, at State expense. Passing a test means, for the purposes of this agreement, that you show no reactions indicative of deception on any question asked of you concerning the execution of Ron Lally.
4. You completely and truthfully cooperate whenever and wherever the Elyria Police Department, and/or the State of Ohio require you to do so concerning the death of Ron Lally
5. A failure of any condition of this agreement will void this agreement.

Detective A.L. Leiby, Elyria Police Department.....

I have read, and/or had explained to me the contents of this agreement and agree to the terms.

Shawndell C Donald.....

Atty. Mary Papcke.....

EXHIBIT
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