

silver lake group, ltd.

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CEASE AND DESIST NOTICE

SENT VIA FAX TO 217.788.8311

May 27, 2020

Chief Kenny Winslow
City of Springfield
800 East Monroe
Springfield, IL 62701

RE: NO FURTHER CONTACT

Dear Chief Winslow,

Given the magnitude of publicity this has unfortunately received, our firm believes your office is keenly aware that we have at all times represented the following businesses. To the extent you may not have been advised of the same, please accept this correspondence that my clients are represented by counsel.

- 1) Mr. Keith Ayre of Fox Run Restaurant
- 2) Ms. Riley Craig of Bow and Arrow
- 3) Mr. Chris Schmulbach of FitBodies

First off, my client's and I appreciate all of the hard work you and your staff do each and every day to keep the citizens of Springfield safe. We are quite certain your department finds no pleasure in being put in the middle of a dispute between the hard-working business owners of your community and the executive branch of this state which is seemingly determined to destroy their livelihoods under the guise of keeping them safe, notwithstanding your own health department has no objections to their businesses being open in a safe and responsible manner. If the kind words of your officers offered to my clients are any indication of the overall sentiment of your agency, my clients are humbled by and appreciate your support as they try and salvage their livelihoods.

560 Suppiger Way, P.O. Box 188
Highland, Illinois 62249
Telephone 618-654-8341
Facsimile 618-654-8391

☑ 118 North Second Street
Greenville, Illinois 62246
Telephone 618-664-9439
Facsimile 618-664-9486

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I am in receipt of the generic letter your office has recently submitted to Mr. Ayer, and I can only assume your office was likely ordered to deliver the same by the Mayor's office. It was seemingly drafted by competent legal counsel as it is carefully worded to substantively accomplish nothing, and it goes to great lengths to not implicate you or your department in this governmental overreach which could arguably subject state actors to federal civil rights claims.

With all due respect to your agency, please be advised my clients no longer desire to receive communication from your office in such a manner without my presence. By this notice, my clients invoke their right to counsel and as such your officers are prohibited from approaching any of them for any official reason unless I am present. If however, your officers desire to continue patronizing my client's establishments, as many of them have been of recent, my client's welcome them in with open arms.

/s/ Thomas G. DeVore
Thomas G. DeVore
Silverlake Group, Ltd.
Greenville, IL 62246
tom@silverlakelaw.com

CC:

Mr. Keith Ayre
Ms. Riley Craig
Mr. Chris Schmulbach

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