

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

<p>LAURA HOFFMAN, <i>et al.</i>,  Plaintiffs,  vs.  MICHAEL O'MALLEY, <i>et al.</i>,  Defendants.</p>	<p>Case No. 1:18-CV-00309  Judge Christopher A. Boyko  <b>Declaration of Rachel Dissell</b></p>
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I, Rachel Dissell, have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

1. I have been a reporter for The Cleveland Plain Dealer since 2002, covering justice issues, corruption and other enterprise stories.

2. In or around early February of 2017, I was contacted by representatives of the Cuyahoga County Prosecutor's Office who informed me that a number of sexual assault cases had been mishandled by the juvenile unit, and that the Office wished to present me with additional information so that I might report on this issue.

3. Shortly after this initial contact, I was invited to the Prosecutor's Office to participate in a meeting where Michael O'Malley, Gregory Mussman, possibly Joanna Whinery, Jennifer Driscoll, Russ Tye, and Diane Russell spoke with me in detail about the allegedly mishandled sexual assault cases.

5. After this meeting, I conducted additional reporting about the subject as it was presented to me, including contacting additional parties with knowledge of the Juvenile Court and how sexual assault cases were handled by the Prosecutor's Office.

**EXHIBIT 1**

6. After completing my additional reporting, I advised my editorial supervisors of its results and that I would be willing to write a report on this issue that contained a wider perspective than that presented to me by the Prosecutor's Office.

7. Upon consideration of the results of my investigation, it was determined that I would not report on this story.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on 7/28/19.



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Signature of Declarant