



SHAKER HTS. MUNI CT  
2020 SEP 14 A 9 33

IN THE SHAKER HEIGHTS MUNICIPAL COURT  
SHAKER HEIGHTS, OHIO

CITY OF BEACHWOOD, OHIO	)	CASE NO.: 20 ARW 00001
	)	
PLAINTIFF,	)	
	)	JUDGE K.J. MONTGOMERY
-vs-	)	
	)	<b>MOTION OF PROSECUTING</b>
MICHAEL BURKONS,	)	<b>ATTORNEY TO WITHDRAW</b>
	)	<b>AS COUNSEL AND</b>
DEFENDANT.	)	<b>APPOINTMENT OF SPECIAL</b>
	)	<b>PROSECUTOR</b>

The City of Beachwood, by and through its Prosecutor, Nathalie E. Supler, respectfully requests this Court allow the Prosecutor to withdraw from the above captioned matter. The basis for this request is that a conflict of interest exists. The Defendant, Michael Burkons, is a member of the Beachwood City Council. The Prosecutor is appointed to serve by the Beachwood City Council pursuant to the City Charter. Based on this professional relationship, this Motion is necessary to avoid any appearance of impropriety or a suggestion of conflicting interest.


When the complaint was made to the City of Beachwood, the City of Beachwood immediately engaged the University Heights Prosecutor, Stephanie Scalise, to gather and review all of the relevant evidence. The City of Beachwood engaged the University Heights Prosecutor to review the matter for criminal charges to ensure the review process was fair and unbiased. The University Heights Prosecutor contacted the Beachwood Prosecutor to communicate the findings of her investigation and this is the basis for the City of Beachwood's request to withdraw.

For these reasons, it is respectfully requested that this Honorable Court allow the

Prosecuting Attorney for the City of Beachwood to withdraw from the above matter. Further, the City of Beachwood requests the Court appoint the University Heights Prosecutor, Stephanie Scalise as Special Prosecutor for all matters concerning the prosecution of the above matter.

Respectfully submitted,

NATHALIE E. SUPLER  
ASSISTANT LAW DIRECTOR  
CITY OF BEACHWOOD

By:   
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**IN THE SHAKER HEIGHTS MUNICIPAL COURT  
SHAKER HEIGHTS, OHIO**

CITY OF BEACHWOOD, OHIO	)	CASE NO.:
	)	
PLAINTIFF,	)	
	)	JUDGE K.J. MONTGOMERY
-vs-	)	
	)	<b><u>ORDER</u></b>
MICHAEL BURKONS,	)	
	)	
DEFENDANT.	)	

For good cause shown, the Court hereby orders the Motion of the Prosecuting Attorney for the City of Beachwood to withdraw in the above matter is hereby granted. Further, the above matter is transferred to the docket of University Heights Prosecutor, Stephanie Scalise.

\_\_\_\_\_  
Judge K.J. Montgomery  
Shaker Heights Municipal Court

\_\_\_\_\_  
Date