

Exhibit 19 to the Complaint



HAND | PONIST
HORVATH SMITH & RAYL

Michael Ray Smith
Attorney at Law

July 22, 2019

USPS Priority Mail Tracking No. 9410803699300111483565

Mr. Paul Terrault
33315 125th Street
Twin Falls, WI 53181-9009

Chicago Picasso Wood Model

Dear Mr. Terrault:

I am writing on behalf of our client, Jean-Christophe Scheere (“Mr. Scheere”) regarding the wooden model of the Chicago Picasso that stands in Daley Plaza (the “Model”).

As you are well aware, the Model was sold at auction by Gary Community Schools Corporation (the “School Corporation”) through Kraft Auction Services, LLC (“Kraft”), and you were declared the winning bidder on March 15, 2019. What you may or may not know is that there was a previous sale of the Model on January 19, 2019 in which Mr. Scheere was declared the winning bidder. The School Corporation maintains that the January 19 sale was invalid.

Mr. Scheere disagrees, as explained in the enclosed Tort Claim Notice to the School Corporation and the City of Gary. If the dispute over the ownership of the Model cannot be resolved by mutual agreement, we are prepared to pursue Mr. Scheere’s legal remedies, including a court order declaring him to be the rightful owner of the Model. We also anticipate asserting additional claims against the School Corporation and others based on a concerted effort to deprive Mr. Scheere of his right to the Model and to conceal from him the fact that bidding on the Model had been reopened, and then extended, until it was too late for him to take action to protect his rights. Because do not currently have any evidence to indicate that you were part of that concerted effort, we anticipate that, should we find it necessary to pursue a legal action, you would be named only for the purpose of seeking a declaratory judgment to the effect that Mr. Scheere is the rightful owner of the Model.

That brings me to the purpose of this letter, which is to caution you against moving the Model from its current location at the Gary Area Career Center until the dispute regarding the right of possession is resolved, either by mutual agreement or by court order. Attempts to move the Model prior to that time could result in civil, or even criminal, sanctions. In addition, we request that you preserve, and caution you against destroying, evidence related to the Model and its sale, including, but not limited to, any written or electronic communications between you and Kraft, the School Corporation, the School Corporation’s emergency manager, the City of Gary (including the Mayor, her staff, and members of the Gary City Council), or any other individual, entity, or governmental body.

HAND PONIST HORVATH SMITH & RAYL, LLC

317-576-8542 | 1512 N. DELAWARE STREET, INDIANAPOLIS, IN 46202 | MSMITH@HANDPONIST.COM

Exhibit 19 to the Complaint

Page 2

If you engage counsel to represent you in this matter, please give your lawyer a copy of this letter and ask that he or she contact us to inform us of the representation. I anticipate that we may be in contact with you (or your lawyer, if you engage one) regarding the possibility of resolving the dispute by mutual agreement, thereby avoiding the expense and disruption of litigation for all involved.

I may be reached at msmith@handponist.com or 3127-576-8542.

Sincerely,



cc: Rachelle N. Ponist, Hand Ponist Horvath Smith & Rayl, LLC (via email)
David Raes, Janson, Brussels, Belgium (via email)