

## Shelby County States Attorney - Ruth Woolery

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**From:** Rob Hanlon <[REDACTED]>  
**Sent:** Wednesday, August 14, 2024 10:42 PM  
**To:** statesattorney@shelbycounty-il.gov  
**Cc:** [REDACTED]  
**Subject:** Motion to Quash #2  
**Attachments:** NOM - Motion to Quash - Bobby.pdf; Motion to Quash - Shelby County Subpoena Duces tecum ORMAN FF.pdf; 3 - Appearance - For respondent Bobby.pdf

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Please see attached motion filed with the Circuit Court concerning your unlawful subpoena to your own client.

Mr. Orman forwarded the e-mail you sent to him and it is clear that you do not understand the difference between a Grand Jury Subpoena and an administrative subpoena. Moreover, you should be aware that Ms. Dunnaway did not ask me to appoint her an attorney, she hired Mr. Finks and he represented her. After taking on that representation, Mr. Finks started representing the employees in the Grand Jury, knowing that their testimony was related to his other representational interest with Mrs. Dunnaway. But you had him serve on your hiring committee and even had him interview a prospective employee. (Yes, I know all about that). After accepting the representation of Mrs. Dunnaway, Mr. Finks elected to represent the witnesses in the grand jury concerning Debbie's conduct. I found it a Himmel obligation to refer the matter to the ARDC and adhered to that professional obligation. Had Mrs. Dunnaway made a request for counsel, I would have filed the appropriate motion with the court if I believed it was warranted (not an e-mail to Judge Harlow). But you assumed I declined a request, when no request was ever made.

I would certainly not have dispatched an e-mail to Judge Harlow placing her in an awkward position by your misconduct seeking an advisory opinion. I elected not to include your communication with the Circuit Court out of respect for Judge Harlow. Judge Harlow has budgets with the County and therefore cannot be the judge concerning your audit quest, as she has a conflict. (what did you possibly think the drafts would lead you to, the conspiracy of the likes of Terry Hutchcraft and Mr. Boehm?) In any event, it is improper for you to ask any judge for an advisory opinion. At some point they may spank you and if you tried that in many other counties you would be sanctioned or worse. Its actually astonishing that you make public statements about what I did or didn't do to justify your conduct when you have not properly investigated anything and you likely don't know that in a few cases the evidence was missing! A professional looks at the matter before them and acts based on that matter, not what they think was done by way of analogy of another person and different facts. Did you familiarize yourself with the facts that were admissible at trial for each of the cases you referenced in your response to Mr. Allen? I think not! Your approach demonstrates weakness and incompetence. I say this not to be spiteful, but in the hopes that you will re-direct the negative energy and re-focus on the duties and obligations of your office and that you will decide not be beholden to friends/political allies when you have a legal duty to do otherwise.

BTW- you got bamboozled on the Carlo Oberg case. The concurrent section applies only to one subsection of the CP statute. I'm sure Brad pointed that out as he was obligated to do. My guess he said "as charged" in the 402 conference. Judge Kibler had to have known what you should do, but in a 402 he can't tell you to amend that would ne having his thumb on the scale. Did you think I offered 20 years because I didn't understand? It was just the opposite. The charges Nicole filed repeated the same statute 34 times- (probably because it was a big case and we all make those kind of mistakes drafting a document that large.) all you needed to do was amend counts 1-6 with

a new citation to several other applicable sections with the same facts and you would have easily gotten 30 years for that pedophile POS. But you were quick to bite the hook of a prudent defense attorney not knowing the simple solution. I previously told the Court and Brad that the charges needed to be amended, but that became your job and you didn't understand it was that simple.

In your circulated petitions to get on the ballot you allowed known democrats to sign your republican petition. (i.e. Teresa Boehm and others) When I sought the appointment of a Special Prosecutor for her case it was designed in part to prevent exposing you to claims of misconduct that would naturally arise if you made any decision in that case. Your communication with Judge Harlow has the appearance of impropriety. Because I believe that you can't be objective, and are filled with a pre-fabricated perception, I will find it necessary to educate you, as matters present themselves. The two motions of today are indicia of the beginning of that education.

Robert T. Hanlon, of Counsel  
Netzky Olswang Law Group, LLC

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