

Kyle Serilla
Associate Attorney
kyle@muddlaw.com

ATTORNEYS

Principal
Charles Lee Mudd Jr.*

Associates
Joshua Pagan †
Kyle Serilla †

Admitted Key:
* IL, IN, CT, UT
† IL

MUDD LAW

SPACE | INTERNET | CREATIVES | IP | STARTUPS

CHICAGO (MAIN OFFICE)
411 S Sangamon Street
Suite 1B
Chicago, Illinois 60607
312.964.5051 Telephone

PARK CITY
311 Main Street
PO Box 1553
Park City, Utah 84060
435.640.1786 Telephone

Facsimile For All Offices
312.803.1667

BY ELECTRONIC AND USPS PRIORITY MAIL

21 August 2025

Johann Drolshagen
Level Playing Field Solutions
712 H Street NE, Suite 2419
Washington, DC 20002
ceo@levelplayingfield.solutions
johann@drolshagen.me

WITHOUT PREJUDICE

Re: *The Brady List Webpage on Melvin Cornelius*

Mr. Drolshagen:

My firm and I have been retained by Melvin Cornelius (“Mr. Cornelius”) to request the removal of a webpage including several documents on The Brady List’s website about Mr. Cornelius entitled “Public Complaint No. 1668703215 – 63124304” (the “Webpage”).¹

I. Factual Background

In 2021, St. Xavier University (“SXU”) hired Mr. Cornelius as Police Chief. At the beginning of his tenure, Mr. Cornelius found that numerous SXU campus police officers had not been meeting certain minimum individual professional standards, including but not limited to, unclean conditions of squad cars, wearing incorrect uniforms, and smoking in squad cars. Additionally, Mr. Cornelius found that the SXU Public Safety Department had not been meeting certain minimum standards, including the failure to ever conduct an active shooter drill as required by state law. In fact, Mr. Cornelius believes he was brought on, in part, to correct these issues and he did put in place new policies to correct them. However, Mr. Cornelius faced pushback from some of his officers to seemingly any change. To his surprise, even plans for better resources were met with pushback from some.

Additionally, in the fall of 2022, SXU conducted an internal audit of the SXU Public Safety Department’s time and attendance records. It was determined that certain police officers had stopped working and left their posts, and ultimately they were paid for time not worked (“Payroll Fraud”). At the time, Mr. Cornelius recommended that these individuals be criminally charged with fraud, but the SXU administration allowed these individuals to resign. As noted in a 2023 statement from SXU: “During the course of the resulting investigation into the accuracy of the record, certain officers chose to voluntarily resign.”

¹ The Profile can be accessed at <https://giglio-bradylist.com/public-complaint-no-1668703215-631243044>.

Other officers also chose to voluntarily resign around this time, but they did not provide a reason.”²

Unrelated to the Payroll Fraud investigation, Mr. Cornelius later resigned from his position as Police Chief on November 1, 2023.

The Webpage

Sometime later, Mr. Cornelius found the Webpage dedicated to him existed on your website. The Webpage includes the following statement (the “Statement”):

Police Chief Melvin Cornelius used his authority as Chief to punish and make false accusations against numerous police employees causing 14 members, (13 of which were caucasian) to leave this department in 1 month. Complaints were made against him to the school and they were ignored, again the Chief used his title and position to influence the HR department.

Currently, the Webpage also includes three documents.

The first is a complaint that apparently had been sent to SXU, including its President Laurie M. Joyner by Michael Selke accusing Mr. Cornelius of supposed wrongdoings in creating a “hostile work environment” (“Complaint”).³ In reality, SXU’s investigation determined that Mr. Selke was among those officers who committed the Payroll Fraud. It appears that once Mr. Selke did not get the action he wanted from SXU, he then had his Complaint posted on your website.

The second is a letter regarding an investigation at Joliet Junior College (“JJC”), where Mr. Cornelius worked before SXU (“JCC Letter”). It should be noted that the JCC investigation found that no disciplinary action was needed and as noted JCC recognized that Mr. Cornelis did not have “intent... to single out any individual or group based on any protective category.”

The third is a statement from SXU rebutting Mr. Selke’s Complaint (“SXU Rebuttal”). Again, it notes that SXU determined that certain police officers had stopped working and left their posts, and ultimately they were paid for time not worked. Again, this included Mr.

² The full statement from SXU can be accessed at <https://giglio-bradylis.com/sites/default/files/2023-05/Rebuttal%20Statement%20The%20Brady%20List%20May%202023.pdf> and has been attached here as “Exhibit A.”

³ The Complaint can be accessed at https://giglio-bradylis.com/system/files/webform/public_complaint/1209/Dear%20President%20Laurie%20M%20Joyner%20%284%29.pdf

Selke. Additionally, the SXU Rebuttal “denies that it ignored complaints that were made against Chief Cornelius” and “denies that Chief Cornelius asserted any undue influence over the investigative process or the Office of Human Resources.”

Ultimately, the Statement as listed is false. It is assumed that the Statement was written by Mr. Selke in submitting his Complaint. Contrary to the Statement and as noted above, several police employees left the SXU department related to an investigation into Payroll Fraud, including Mr. Selke. Mr. Selke’s implicit and explicit accusations of wrongdoings, including false accusations, racism, and undue influence, are simply false. Moreover, they are baseless and not supported by any investigation. Instead, it appears that Mr. Selke is using your website to seek revenge against Mr. Cornelius and SXU for enforcing basic policies.

The Webpage’s Lasting Effects

While we appreciate your organization’s mission for transparency and accountability in the areas of law enforcement and the criminal justice system, it seems that the Webpage is currently causing confusion. To be clear, we do not believe that this your organization’s intention as you simply posted items that you received, including the SXU Rebuttal which attempted to set the record straight.

However, the Webpage only now highlights a baseless Complaint by a disgruntled former employee who was upset because he was caught committing Payroll Fraud. Again, there is nothing showing that SXU and JCC did not fulfill their due diligence about any supposed issues or complaints regarding Mr. Cornelius.

Moreover, as your website is called “The Brady List” there has been some confusion on whether Mr. Cornelius has been put on such a list for misconduct. In fact, even Mr. Cornelius was confused himself. Upon seeing his name on your website, Mr. Cornelius contacted the Cook County States Attorneys’ Office which maintains the official Brady List for Cook County to see if some kind of mistake had been made. The Assistant to the Cook County States Attorney Deirdre Harrington confirmed that Mr. Cornelius was not on Cook County’s Brady List.⁴ She further explained that, if there had been a legitimate concern with Mr. Cornelius’ integrity he would have received notice by mail and a hearing would have been held where he would have been given an opportunity to attend under general due process rules. No such notice or hearing ever occurred. Ms. Harrington also confirmed your website was not related to their office.

Mr. Cornelius has asked us to send this letter, not to ask for the record to be corrected, but simply because he wishes to move on with his life. However, the Webpage appears to be

⁴ See Cook County State’s Attorney’s Office. “Brady Giglio Do Not Call List” (Oct. 23, 2024) https://www.cookcountystatesattorney.org/sites/g/files/ywwepo351/files/document/file/2024-10/Brady%20Giglio%20Do%20Not%20Call%20List_10.23.24.pdf.

preventing him from doing so, as your website appears prominently when searching for Mr. Cornelius' name in search engines such as Google.

Mr. Cornelius fears the Webpage on a website entitled "The Brady List" has prevented him from employment opportunities, even before he has been able to set the record straight to potential employers. And in instances where he had recent employment opportunities, the Complaint has become the focus of discussion. In fact, at recent interview panel, an interviewer told Mr. Cornelius that if he obtained the position they hoped he would not come in and get rid of employees like he had done at SXU. Mr. Cornelius then had to take time out of his interview to explain why the baseless Complaint was incorrect. It was clear they had not reviewed all the materials on the Webpage thoroughly but were nonetheless colored by the negative contents.

The Webpage and its related search results are overshadowing Mr. Cornelius' decades of public service and his stellar references from numerous superiors.

II. Mr. Cornelius' Respectful Requests:

Although not currently recognized by the U.S. Federal government or Illinois, the "right of erasure," also known as the "right to be forgotten," is a legal concept employed by the European Union.⁵ This right balances an individual's right to privacy with an organization's right to process someone's information.⁶ While this right is not recognized under our jurisdiction, we do appeal to you borrowing from these core concepts.

Here, due to incorrect nature of the Statement and the Complaint, and the general confusion related to the Webpages, Mr. Cornelius' right of erasure outweighs the current need and current purpose for the Webpage.

Thus, Mr. Cornelius respectfully requests that Level Playing Field Solutions fulfill the following:

1. Remove the Webpage on Mr. Cornelius, including all documents included therein, from your website making them inaccessible through online search engines; and
2. Remove the Webpage from any search engine cache or online platform.

To be clear, we do not wish to add to the existing narrative on the Webpage with this letter or any further statement. Assuming Level Playing Field Solutions complies with the foregoing request, my client will consider this matter resolved.

⁵ Article 17 GDPR; see *Everything you need to know about the "Right to be forgotten,"* Proton AG, <https://gdpr.eu/right-to-be-forgotten> (last visited August 19, 2025).

⁶ Id.

Conclusion

We appeal to your company's good nature and request your assistance in helping a lifelong public servant move on with his life. Again, we feel that the above request is an appropriate action that will not harm the journalistic integrity of your publication as the newsworthy period of the Articles has passed.

The foregoing requests have been limited for the purposes of this letter to facilitate a prompt and expeditious resolution. I look forward to hearing from you by September 2, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Serilla". The signature is fluid and cursive, with the first name "Kyle" written in a larger, more prominent script than the last name "Serilla".

Kyle Serilla

KGS/mms

Encl.

Exhibit A

Exhibit B

EXHIBIT A

Rebuttal Statement by Saint Xavier University

An unidentified individual filed Public Complaint No. 1668703215–631243044 (the “Complaint”) against Saint Xavier University’s Chief Public Safety Officer, Melvin Cornelius, alleging that Chief Cornelius abused his authority on September 16, 2022. The Complaint includes links to two “supporting documents,” but those documents are not publicly available and, therefore, the University cannot directly respond to them. The Complaint allegations were posted directly to the website, however, and state the following:

“Police Chief Melvin Cornelius used his authority as Chief to punish and make false accusations against numerous police employees causing 14 members, (13 of which were caucasian) to leave this department in 1 month. Complaints were made against him to the school and they were ignored, again the Chief used his title and position to influence the HR department.”

The University denies that Chief Cornelius abused his authority or made false accusations against police employees. In the fall of 2022, Deputy Chief of Police William Sheehy completed an internal audit of the Public Safety Department’s time and attendance records. The audit revealed that certain police officers in the Public Safety Department had stopped working and left their posts before the time set forth in their time and attendance records. As a result, they were paid for time not worked. Other officers were responsible for reviewing those time and attendance records for accuracy and approving them. Failing to accurately report time and attendance and ensure the accuracy of those records when approving them was a violation of Department policy. During the course of the resulting investigation into the accuracy of the records, certain officers chose to voluntarily resign. Other officers also chose to voluntarily resign around this time, but they did not provide a reason.

The University also denies that it ignored complaints that were made against Chief Cornelius. All complaints that were made to the Office of Human Resources were promptly and thoroughly investigated in accordance with the University’s standard procedures. The University denies that Chief Cornelius asserted any undue influence over the investigative process or the Office of Human Resources.

EXHIBIT B

Robert Wallett
Interim Chief Financial Officer
Saint Xavier University
3700 West 103rd,
Chicago. IL 60566

November 1, 2023

Dear Mr. Wallett,

Please accept my letter of resignation. During the three years that I have served in the role of Chief of Police/Director of Public Safety here at SXU, I worked with Azdell Morgan Consulting LLC, our administration and other stake holders to implement many improvements in our Department. These improvements have benefited the SXU Community significantly. I will always value the experience that I had during my time here. After serving over 32 years in campus law enforcement, I have decided to retire.

Sincerely,

A handwritten signature in black ink, appearing to read "Melvin Cornelius", written over the printed name.

Melvin Cornelius

Chief of Police/ Director of Public Safety