

4101 N. Prospect Ave.
Milwaukee, WI. 53211

February 4, 2004

By E-mail and Fax: (414) 271-4438

Mr. Raymond Pollen, Shorewood Village Attorney
The Empire Building
710 N. Plankinton Ave.
Milwaukee, WI 53203

RE: [SCR 20:1.7 Conflict of Interest: General rule](#)

(a) A lawyer shall not represent a client if the representation of that client will be directly adverse to another client, unless:

(1) the lawyer [reasonably believes](#) the representation will not adversely affect the relationship with the other client; and

(2) each client consents in writing after [consultation](#) .

(b) A lawyer shall not represent a client if the representation of that client may be materially limited by the lawyer's responsibilities to another client or to a third person, or by the lawyer's own interests, unless:

(1) the lawyer [reasonably believes](#) the representation will not be adversely affected; and

(2) the client consents in writing after [consultation](#) . When representation of multiple clients in a single matter is undertaken, the [consultation](#) shall include explanation of the implications of the common representation and the advantages and risks involved.

Dear Mr. Pollen:

I am writing this letter as a village resident, not as a litigant.

I have asked Mr. Madere, pursuant to the Wisconsin Public Records Act, for a signed consent by the Village waiving conflict of interest concerns arising from your representation and defense of Tennessee government officials and lawyers who hacked the Web site I publish from Shorewood. He responded that no such document exists.

While I do not allege that there is any residual sense of betrayal or abandonment or astonishment in your firm's aggressive defense of illegal acts perpetrated against a village resident behind my scrutiny of Shorewood affairs, I do request evidence that you have consulted with your clients, alerted them to the conflict, advised them that you may have drawn fire to the village and its officials as

“collateral damage” by your extracurricular activities and to view a written consent as set out in the Wisconsin Disciplinary Rules, specifically:

(a) A lawyer shall not represent a client if the representation of that client will be directly adverse to another client, unless:

(1) the lawyer reasonably believes the representation will not adversely affect the relationship with the other client.

Mr. Pollen, do you reasonably believe that you and your firm’s representation of the Cookeville clients and negotiation of a settlement against the interests of a Village resident will not or has not had any affect on your relationship with your Shorewood clients? Is there any chance that it may have? Is there a waiver?

In this matter, has your firm waived fees in order to avoid the appearance of profiting from troubles your firm may have caused the Village by possible unethical acts?

Very truly yours,

Geoffrey Davidian
(414) 305-8141

Cc: Mark Kohlenberg
Kellie Lang
Edward Madere
James Rice
Michael O’Brien
Vida Langenkamp
Ellen Eckman
Guy Johnson