

CITY OF MILWAUKEE

Form CA-43

GRANT F. LANGLEY
City Attorney

RUDOLPH M. KONRAD
Deputy City Attorney

PATRICK B. McDONNELL
LINDA ULISS BURKE
Special Deputy City Attorneys



OFFICE OF CITY ATTORNEY
800 CITY HALL
200 EAST WELLS STREET
MILWAUKEE, WISCONSIN 53202-3551
TELEPHONE (414) 286-2601
TDD 286-2025
FAX (414) 286-8550

BEVERLY A. TEMPLE
THOMAS O. GARTNER
BRUCE D. SCHRIMPF
ROXANE L. CRAWFORD
SUSAN D. BICKERT
HAZEL MOSLEY
HARRY A. STEIN
STUART S. MUKAMAL
THOMAS J. BEAMISH
MAURITA F. HOUREN
JOHN J. HEINEN
MICHAEL G. TOBIN
DAVID J. STANOSZ
SUSAN E. LAPPEN
DAVID R. HALBROOKS
JAN A. SMOKOWICZ
PATRICIA A. FRICKER
HEIDI WICK SPOERL
KURT A. BEHLING
GREGG C. HAGOPIAN
ELLEN H. TANGEN
MELANIE R. SWANK
JAY A. UNORA
DONALD L. SCHRIEFER
EDWARD M. EHRlich
LEONARD A. TOKUS
MIRIAM R. HORWITZ
MARYNELL REGAN
G. O'SULLIVAN-CROWLEY
DAWN M. BOLAND

Assistant City Attorneys

September 24, 2003

To the Honorable Common Council
of the City of Milwaukee
Room 205 - City Hall

Re: Communication from Attorney Laurie A. Eggert, Eggert Law Office, S.C. for legal fees
for Police Officer Matt Guth
C.I. File No. 99-S-114

Dear Council Members:

Returned herewith is a document filed by Attorney Laurie Eggert for attorney's fees for representing Police Officer Matt Guth. The claim is in the amount of \$510.95 including \$4.95 in disbursements for 4.60 hours of service billed at the rate of \$110.00 per hour. We ask that this matter be introduced and referred to the Committee on Judiciary & Legislation.

We have reviewed this claim and advise that in our opinion, the time spent was reasonable. Legal representation was occasioned by a criminal investigation. No criminal charges were brought against the Police Officer on whose behalf this claim was filed.

As we have advised you under similar circumstances in the past, the Common Council has discretion to reject this claim or to pay it in whole or in part. Sec. 895.35, Stats., *Bablitch and Bablitch v. Lincoln County*, 82 Wis. 2d 574 (1978).

Very truly yours,


GRANT F. LANGLEY
City Attorney


JAN A. SMOKOWICZ
Assistant City Attorney

JAS:enm

Enc.

2276

CITY OF MILWAUKEE

Form CA-43

GRANT F. LANGLEY
City Attorney

RUDOLPH M. KONRAD
Deputy City Attorney

THOMAS E. HAYES
PATRICK B. McDONNELL
CHARLES R. THEIS
Special Deputy City Attorneys



MILWAUKEE RECEIVED

MAY -5 PM 12:00

OFFICE OF CITY ATTORNEY

OFFICE OF CITY ATTORNEY
800 CITY HALL
200 EAST WELLS STREET
MILWAUKEE, WISCONSIN 53202-3551
TELEPHONE (414) 286-2601
TDD 286-2025
FAX (414) 286-8550

April 12, 1999

BEVERLY A. TEMPLE
THOMAS O. GARTNER
LINDA ULISS BURKE
BRUCE D. SCHRIMPF
ROXANE L. CRAWFORD
SUSAN D. BICKERT
HAZEL MOSLEY
HARRY A. STEIN
STUART S. MUKAMAL
THOMAS J. BEAMISH
MAURITA F. HOUREN
JOHN J. HEINEN
MICHAEL G. TOBIN
DAVID J. STANOSZ
SUSAN E. LAPPEN
DAVID R. HALBROOKS
JAN A. SMOKOWICZ
PATRICIA A. FRICKER
HEIDI WICK SPOERL
VINCENT J. BOBOT
KURT A. BEHLING
GREGG C. HAGOPIAN
ELLEN H. TANGEN
MELANIE R. SWANK
JAY A. UNORA
DONALD L. SCHRIEFER
EDWARD M. EHRLICH
CHRISTOPHER J. CHERELLA
LEONARD A. TOKUS

Assistant City Attorneys

MILWAUKEE POLICE
INTERNAL AFFAIRS
DIVISION
APR 15 AM 11:21
RECEIVED

Deputy Inspector Dale Schunk
Milwaukee Police Department
6680 N. Teutonia Avenue, Room 325
Milwaukee, WI 53233

Re: C.I. File No. 99-S-114
Communication from Laurie Eggert

Dear Deputy Inspector Schunk:

Enclosed please find a claim filed by Attorney Laurie Eggert for Attorney's fees incurred during her representation of Officer Matt Guth.

Please determine whether these officers were in fact involved in the matter described in Ms. Eggert's claim, and have the officers verify Ms. Eggert's representation. Thank you for your anticipated cooperation in this matter.

Very truly yours,

Jan A. Smokowicz
Assistant City Attorney

JAS:beg
Enclosure

4/24/03
O.K.
JAS
Letter #

2276

D. Eggert officer
in D.A.'s letter

EGGERT LAW OFFICE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

CITY OF MILWAUKEE
1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414) 276-8750
FAX (414) 276-8906
99 FEB 23 PM 2:25
RONALD D. LEONHARDT
CITY CLERK

February 19, 1999

Mr. Ronald D. Leonhardt
Milwaukee City Clerk
800 City Hall
200 East Wells Street
Milwaukee, WI 53202

**RE: MPD Criminal Investigation
Regarding PO Matt Guth
Date of Incident: October 20, 1998
Location of Incident: 8th and State**

Dear Mr. Leonhardt:

The above-named police officer has retained us to represent him in connection with the above-referenced matter.

Consistent with its policy, the City Attorney's Office has refused to represent him, and as he was performing the duties of his office at the time of the events giving rise to the incident, the claim is hereby made on his behalf for the indicated legal fees. The allegations arose from an interrogation of a suspect. The Assistant District Attorney issued a letter stating charges will not issued against the officer; attached is a copy.

The attached is an itemization of the time and services rendered.

Sincerely,

EGGERT LAW OFFICE, S.C.

Laurie A. Eggert

Laurie A. Eggert
Attorney at Law

CITY OF MILWAUKEE
RECEIVED
1999 FEB 23 PM 2:49
OFFICE OF
CITY ATTORNEY

LAE/ldl
GUTH

EGGERT LAW OFFICE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414)276-8750
FAX(414)276-8906

February 19, 1999

Mr. Ronald D. Leonhardt
Milwaukee City Clerk
800 City Hall
200 East Wells Street
Milwaukee WI 53202

RE: MPD Criminal Investigation
Regarding: PO Matt Guth
Date of Incident: October 20, 1998
Location of Incident: Police Administration Building

Professional services

	<u>Hours</u>	
10/21/98 Telephone call from client; open file; memo to file.	0.50	
12/9/98 Telephone call from client; appearance at DA's office; conference with client; memo to file; travel.	1.80	
12/11/98 Telephone call from witness; memo to file.	0.20	
12/14/98 Conference with witness; memo to file.	1.20	
12/21/98 Review of correspondence from DA; correspondence to client; correspondence to MPD Open Records.	0.40	
2/4/99 Review MPD reports of criminal investigation; close file.	0.50	
		<u>Amount</u>
For professional services rendered	4.60	\$506.00

Mr. Ronald D. Leonhardt

Page 2

Additional charges:

Amount

12/9/98 Parking and mileage

4.95

Total costs

\$4.95

Total amount of this bill

\$510.95

Balance due

\$510.95

(Rate: \$110.00 per hour)



- Alexander G. Blumenthal
- Frederic E. Masette
- William J. Moller
- Gerard R. Falk
- Patrick J. Kenney
- Donald S. Jackson
- Gale G. Shelton
- Terry Magowan
- Gary D. Mahlem
- David Robles
- Deborah Daley
- Fern S. Siegel
- Peg Tarrant
- Douglas J. Simpson
- Cynthia G. Brown
- Norman A. Gahn
- George N. Pritz, III
- Alice E. Reed
- Stephanie Giers Rothman
- Carol E. Stauder
- Steven H. Glamm
- Mary Anne Smith
- Mark S. Williams
- Linda Johnson
- John M. Stober
- Thomas L. Potter
- David Fess
- Rayann Chandler Szycharnski
- Elsa Castellon
- Carole Manchester
- Kenneth R. Berg
- Berbow P. Chasman, Jr.
- Loyal Johnson, Jr.
- Warren D. Zier
- Timothy J. Cotter
- Carol Barry Crowley
- Steven V. Licata
- Brad Vorpeit
- Jane Carroll
- Paul Tittin
- Miriam S. Falk
- Phyllis M. DeCarvalho
- Dennis P. Murphy
- Christopher Ford
- Christine M. Kraus
- Philip A. Ariell
- Bruce J. Landgraf
- Mary K. McCann
- Dana J. Stungl
- David M. Lerman
- Janel C. Madden
- DeAnn L. Heard
- Debra M. Sciano, SSND
- Patricia A. McGowan
- Irene Parthum
- Karen A. Loebel
- Nancy Eberham
- Marcelle DePeters
- Ronald S. Dague
- JoAnn M. Hornak
- Catherine A. Gaudreau
- Laura G. Arbuckle
- Lori S. Kambham
- Karrie O'Byrne
- Maria Dixon
- James W. Frisch
- Kurt B. Benkley
- James C. Griffin
- William P. Pipp
- Audrey Skowarski
- Joanne L. Hardke
- John T. Chisholm
- Megan P. Carmody
- Laura A. Crivello
- Derek C. Mosley
- Sharon Pompe
- Brian J. Reister
- Karen A. Lynch
- Jayne Davis Dewore
- Allison M. Ribber
- Kevin R. Shomen
- Kelly L. Hedge
- Jennifer Rypel
- Beth D. Zingel
- Shannon Carrick Schmidt
- Susan Karen Suh
- Mark A. Sanders
- Paul C. Dedeny
- David T. Malone
- Catherine B. Scherer
- Julius Kim
- Jeffrey J. Altenburg
- Rechal Gossers
- Deborah L. Mills
- Patti Weblach
- Kent L. Lovern
- Paul R. Sander
- Roy L. Williams
- Nelson W. Phillips, III
- Aaron J. Welles
- Bradford J. Logsdon
- Patrick J. Forley
- Joy Bertrand
- Margaret M. Zimmer
- Elizabeth Blackwood
- Bruce W. Becker
- Michael T. Mahoney

Milwaukee County

E. MICHAEL McCANN • District Attorney

December 18, 1998

Arthur L. Jones, Chief of Police
Milwaukee Police Department
749 West State Street
Milwaukee, Wi. 53233

RE: Alleged Battery of Courtney Turner

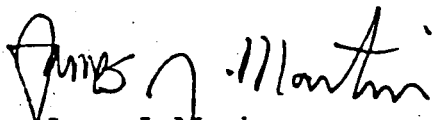
Dear Chief Jones: _____

I reviewed an allegation that detective Léroy Shaw committed a battery on a prisoner, Courtney Turner, on October 20, 1998, in the Police Administration Building.

I concluded that there was insufficient evidence for criminal charges, and that there was no criminal wrongdoing by detective Shaw. Accordingly, no criminal charges will be issued against detective Shaw.

Thank you for your consideration.

Sincerely,


James J. Martin
Deputy District Attorney

cc: Lt. David R. Bruess
Laurie Eggert, Esq.
Michael Schnake, Esq.

MILWAUKEE POLICE DEPARTMENT

MEMORANDUM

TO: PO. MATT GUTH
DISTRICT SEVEN

APRIL 27, 1999

RE: Receipt of Legal Services from Law Firm of
Attorney

Attorney LAURIE EGGERT has made a claim with the City, indicating the attached was provided with legal services arising out of one of the following situations:

- 1) An incident occurring on OCTOBER 20, 1998
- 2) A citizen's complaint made by
- 3) A police shooting incident occurring on

Is this information correct?

YES X NO _____

Did you receive legal representation
in this matter?

YES X NO _____

Your signature: _____

Matthew R. Guth

Print your name: _____

MATTHEW R. GUTH

Upon completion, please return this memorandum to the Internal Affairs Division at the Police Academy (Room 325) as soon as possible.

Dale T. Schunk

DALE T. SCHUNK *SH*
Deputy Inspector of Police
Internal Affairs Division

DTS:dnp

COPY

EGGERT LAW OFFICE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414) 276-8750
FAX (414) 276-8906

February 19, 1999

Mr. Ronald D. Leonhardt
Milwaukee City Clerk
800 City Hall
200 East Wells Street
Milwaukee, WI 53202

RE: MPD Criminal Investigation
Regarding PO Matt Guth
Date of Incident: October 20, 1998
Location of Incident: 8th and State

Dear Mr. Leonhardt:

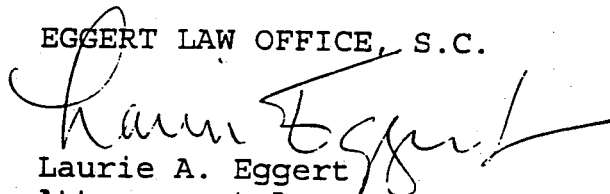
The above-named police officer has retained us to represent him in connection with the above-referenced matter.

Consistent with its policy, the City Attorney's Office has refused to represent him, and as he was performing the duties of his office at the time of the events giving rise to the incident, the claim is hereby made on his behalf for the indicated legal fees. The allegations arose from an interrogation of a suspect. The Assistant District Attorney issued a letter stating charges will not issued against the officer; attached is a copy.

The attached is an itemization of the time and services rendered.

Sincerely,

EGGERT LAW OFFICE, S.C.


Laurie A. Eggert
Attorney at Law

LAE/ldl
GUTH

EGGERT LAW OFFICE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414)276-8750
FAX(414)276-8906

February 19, 1999

Mr. Ronald D. Leonhardt
Milwaukee City Clerk
800 City Hall
200 East Wells Street
Milwaukee WI 53202

RE: MPD Criminal Investigation
Regarding: PO Matt Guth
Date of Incident: October 20, 1998
Location of Incident: Police Administration Building

Professional services

	<u>Hours</u>	
10/21/98 Telephone call from client; open file; memo to file.	0.50	
12/9/98 Telephone call from client; appearance at DA's office; conference with client; memo to file; travel.	1.80	
12/11/98 Telephone call from witness; memo to file.	0.20	
12/14/98 Conference with witness; memo to file.	1.20	
12/21/98 Review of correspondence from DA; correspondence to client; correspondence to MPD Open Records.	0.40	
2/4/99 Review MPD reports of criminal investigation; close file.	0.50	
	<u>4.60</u>	<u>Amount</u>
For professional services rendered	4.60	\$506.00

Mr. Ronald D. Leonhardt

Page 2

Additional charges:

	<u>Amount</u>
12/9/98 Parking and mileage	4.95
Total costs	<u>\$4.95</u>
Total amount of this bill	<u>\$510.95</u>
Balance due	<u><u>\$510.95</u></u>

(Rate: \$110.00 per hour)



OFFICE OF DISTRICT ATTORNEY

Milwaukee County

E. MICHAEL McCANN • District Attorney

Robert D. Donohoo
Jon N. Reddin
Carol Lynn White
James J. Martin

Thomas A. Schultz
Alexander G. Sklenarz
Freddie E. Matelec
William J. Moller
Gerald R. Falk
Patrick J. Kenney
Donald S. Jackson
Gale G. Shelton
Terry Magowan
Gary D. McWhorter
David Robles
Deborah Daley
Fern S. Siegel
Peg Tarrant
Douglas J. Simpson
Cynthia G. Brown
Norman A. Gahn
George N. Prietz, III
Alice E. Read
Stephanie Gineris Rothstein
Carol E. Stauder
Steven H. Glamm
Mary Anne Smith
Mark S. Williams
Linda Johnson
John M. Stober
Thomas L. Potter
David Feiss
Rayann Chandler Stychinski
Elisa Castellon
Carole Manchester
Kenneth R. Berg
Benbow P. Chesman, Jr.
Lovell Johnson, Jr.
Warren D. Zier
Timothy J. Cotter
Carol Berry Crowley
Steven V. Licata
Brad Vorpahl
Jene Carroll
Paul Tiffin
Miriam S. Falk
Phyllis M. DeCarvalho
Dennis P. Murphy
Christopher Ford
Christine M. Kraus
Philip A. Anieff
Bruce J. Landgraf
Mary K. McCann
Denis J. Stiglitz
David M. Lerman
Janet C. Madden
DeAnn L. Heard
Debra M. Sciano, SSND
Patricia A. McGowan
Irene Parthum
Karen A. Losbel
Nancy Ettenheim
Marcella DePeters
Ronald S. Dague
JoAnn M. Hornak
Catherine A. Gaudreau
Laura G. Arbuckle
Lori S. Kornblum
Karna O'Byrne
Maria Dixon
James W. Fritsch
Kurt B. Benkley
James C. Griffin
William P. Papp
Audrey Siewierawski
Joanne L. Hardike
John T. Chisholm
Megan P. Carmody
Laura A. Crivello
Derek C. Moseley
Shawn Pompe
Brian J. Reeler
Karen A. Lynch
Jayne Davis Dewire
Alison M. Ritter
Nevin R. Shomin
Kelly L. Hedges
Jennifer Rypal
Beth D. Zingel
Shannon Carrick Schmidt
Susan Kwon Suh
Mark A. Sanders
Paul C. Desinsky
David T. Malone
Catherine B. Scherer
Julius Kim
Jeffrey J. Altenburg
Rachel Gosans
Deborah L. Mills
Patti Wabitsch
Karl L. Lovren
Paul R. Sander
Roy L. Williams
Nelson W. Phillips, III
Aaron J. Weles
Bradford J. Logsdon
Patrick J. Farley
Joy Bertrand
Margaret M. Zimmer
Elizabeth Blackwood
Bruce W. Becker
Michael T. Maroney

December 18, 1998

Arthur L. Jones, Chief of Police
Milwaukee Police Department
749 West State Street
Milwaukee, Wi. 53233

RECEIVED

DEC 21 1998

EGERTMAN OFFICE, S.C.

RE: Alleged Battery of Courtney Turner

Dear Chief Jones:

I reviewed an allegation that detective Leroy Shaw committed a battery on a prisoner, Courtney Turner, on October 20, 1998, in the Police Administration Building.

I concluded that there was insufficient evidence for criminal charges, and that there was no criminal wrongdoing by detective Shaw. Accordingly, no criminal charges will be issued against detective Shaw.

Thank you for your consideration.

Sincerely,

James J. Martin
James J. Martin
Deputy District Attorney

cc: Lt. David R. Bruess
Laurie Eggert, Esq.
Michael Schnake, Esq.

EGGERT LAW OFFICE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414) 276-8750
FAX (414) 276-8906

October 25, 1999

Mr. Jan Smokowicz
Assistant City Attorney
800 City Hall
200 East Wells Street
Milwaukee, WI 53202

**RE: MPD Criminal Investigation regarding PO Matt Guth
Date of Incident: October 20, 1998**

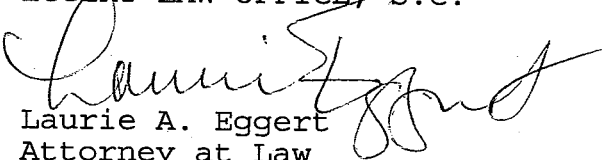
Dear Jan:

In our conversation of October 22, 1999, you asked for confirmation that the legal services provided to PO Guth (as represented in my statement and claim dated February 19, 1999) were in connection with the criminal investigation of the allegations of Courtney Turner against Det. LeRoy Shaw. I represented PO Guth in that criminal investigation.

If you have any other questions, please let me know.

Respectfully,

EGGERT LAW OFFICE, S.C.


Laurie A. Eggert
Attorney at Law

LAE/ldl
Enclosure
CC\SM102599.LLE

CITY OF MILWAUKEE

Form CA-43

GRANT F. LANGLEY
City Attorney

RUDOLPH M. KONRAD
Deputy City Attorney

THOMAS E. HAYES
PATRICK B. McDONNELL
LINDA ULISS BURKE
Special Deputy City Attorneys



BEVERLY A. TEMPLE
THOMAS O. GARTNER
BRUCE D. SCHRIMPF
ROXANE L. CRAWFORD
SUSAN D. BICKERT
HAZEL MOSLEY
HARRY A. STEIN
STUART S. MUKAMAL
THOMAS J. BEAMISH
MAURITA F. HOUREN
JOHN J. HEINEN
MICHAEL G. TOBIN
DAVID J. STANOSZ
SUSAN E. LAPPEN
DAVID R. HALBROOKS
JAN A. SMOKOWICZ
PATRICIA A. FRICKER
HEIDI WICK SPOERL
KURT A. BEHLING
GREGG C. HAGOPIAN
ELLEN H. TANGEN
MELANIE R. SWANK
JAY A. UNORA
DONALD L. SCHRIEFER
EDWARD M. EHRLICH
LEONARD A. TOKUS
MIRIAM R. HORWITZ
MARYNELL REGAN
G. O'SULLIVAN-CROWLEY

December 9, 2002

OFFICE OF CITY ATTORNEY

800 CITY HALL
200 EAST WELLS STREET
MILWAUKEE, WISCONSIN 53202-3551
TELEPHONE (414) 286-2601
TDD 286-2025
FAX (414) 286-8550

Laurie A. Eggert, Esq.
Eggert & Cermele
1840 North Farwell Avenue, #303
Milwaukee, WI 53202

Assistant City Attorneys

Re: **Criminal Investigation Relating to Police Officer Matt Guth**
Date of Incident: October 20, 1998
Location of Incident: 8th and State Street
CI File No. 99-S-114

Dear Ms. Eggert:

With regard to the above-noted matter, you wrote to me on October 25, 1999 indicating that you had represented Officer Guth "in connection with the criminal investigation of the allegations of Courtney Turner against Detective LeRoy Shaw." I appreciate that you may have represented Officer Guth in connection to that investigation, however I need more than just that in order to confirm that your claim falls within the terms of the statute.

Would you please provide me with an appropriate statement demonstrating that Officer Guth was not merely a witness, but that he was also an object of the investigation. For your convenience, I am enclosing a copy of your original claim letter and your explanatory letter to me of October 22, 1999. Thank you for your patience in attending to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jan A. Smokowicz". The signature is fluid and cursive, written over a horizontal line.

JAN A. SMOKOWICZ
Assistant City Attorney

JAS:emm
Encs.

EGGERT & CERMELE, S.C.

Attorneys at Law

Laurie A. Eggert
Jonathan Cermele

1840 North Farwell Avenue
Suite 303
Milwaukee, Wisconsin 53202
(414) 276-8750
FAX (414) 276-8906

February 11, 2003

Mr. Jan Smokowicz
Assistant City Attorney
800 City Hall
200 East Wells Street
Milwaukee, WI 53202

**RE: Criminal Investigation Relating to PO Matt Guth
C.I. File No.: 99-S-114
ELO File No.: 1209**

Dear Mr. Smokowicz:

In your letter of December 9, 2002 (copy enclosed), you asked for an indication that the legal services performed on behalf of Officer Guth fell within the terms of the statute. I represented Officer Guth in the criminal investigation concerning Courtney Turner's interrogation and custody. Officer Guth was questioned about his role in that interrogation and contact with Mr. Turner.

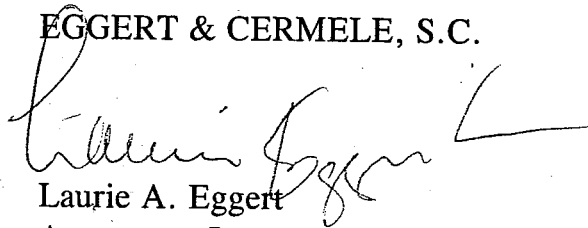
Mr. Turner claimed that Officer Guth had been directly outside the interrogation room when Det. Shaw allegedly struck him in the head and face multiple times, and that Guth "heard him whippin' my ass." While Det. Shaw was the focus of the battery investigation, Mr. Turner's allegations included claims that Guth was aware of the battery and did nothing about it, and in fact, supported Shaw's contention that he had not hit Mr. Turner.

Mr. Turner's allegations, if believed, would support not only a battery investigation against Det. Shaw, but also a misconduct in public office investigation against Officer Guth. The fact that Officer Guth was not the "target" of the battery investigation would not be a bar to prosecuting him as the "target" of misconduct in public office charges if Mr. Turner's allegations were believed. As a result, it is appropriate for the City to pay for Guth's representation.

If you have any other questions, please contact me.

Sincerely,

EGGERT & CERMELE, S.C.

A handwritten signature in black ink, appearing to read "Laurie A. Eggert", with a long horizontal flourish extending to the right.

Laurie A. Eggert
Attorney at Law

LAE/ldl
enclosure
SMOKOWICZ 21003 GUTH

CITY OF MILWAUKEE

Form CA-43

GRANT F. LANGLEY
City Attorney

RUDOLPH M. KONRAD
Deputy City Attorney

THOMAS E. HAYES
PATRICK B. McDONNELL
LINDA ULISS BURKE
Special Deputy City Attorneys



COPY

DEC 11 2002

EGGERT & CERMELE, P.C.

BEVERLY A. TEMPLE
THOMAS O. GARTNER
BRUCE D. SCHRIMPF
ROXANE L. CRAWFORD
SUSAN D. BICKERT
HAZEL MOSLEY
HARRY A. STEIN
STUART S. MUKAMAL
THOMAS J. BEAMISH
MAURITA F. HOUEN
JOHN J. HEINEN
MICHAEL G. TOBIN
DAVID J. STANOSZ
SUSAN E. LAPPEN
DAVID R. HALBROOKS
JAN A. SMOKOWICZ
PATRICIA A. FRICKER
HEIDI WICK SPOERL
KURT A. BEHLING
GREGG C. HAGOPIAN
ELLEN H. TANGEN
MELANIE R. SWANK
JAY A. UNORA
DONALD L. SCHRIEFER
EDWARD M. EHRLICH
LEONARD A. TOKUS
MIRIAM R. HORWITZ
MARYNELL REGAN
G. O'SULLIVAN-CROWLEY

Assistant City Attorneys

December 9, 2002

OFFICE OF CITY ATTORNEY

800 CITY HALL
200 EAST WELLS STREET
MILWAUKEE, WISCONSIN 53202-3551
TELEPHONE (414) 286-2601
TDD 286-2025
FAX (414) 286-8550

Laurie A. Eggert, Esq.
Eggert & Cermele
1840 North Farwell Avenue, #303
Milwaukee, WI 53202

Re: **Criminal Investigation Relating to Police Officer Matt Guth**
Date of Incident: October 20, 1998
Location of Incident: 8th and State Street
CI File No. 99-S-114

Dear Ms. Eggert:

With regard to the above-noted matter, you wrote to me on October 25, 1999 indicating that you had represented Officer Guth "in connection with the criminal investigation of the allegations of Courtney Turner against Detective LeRoy Shaw." I appreciate that you may have represented Officer Guth in connection to that investigation, however I need more than just that in order to confirm that your claim falls within the terms of the statute.

Would you please provide me with an appropriate statement demonstrating that Officer Guth was not merely a witness, but that he was also an object of the investigation. For your convenience, I am enclosing a copy of your original claim letter and your explanatory letter to me of October 22, 1999. Thank you for your patience in attending to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jan A. Smokowicz'.

JAN A. SMOKOWICZ
Assistant City Attorney
JAS:enm
Encs.