
DAVIDSON & ASSOCIATES
A Professional Law Corporation

January 13, 2011

Paul Zellerbach, Esq.
Riverside County District Attorney

Re: In Re Dawn Holland

Dear District Attorney Zellerbach,

Riverside County Authorities have been aware since at least late December that I represent Ms. Holland in the above-referenced matter. On January 3, 2011, I sent Detective Nagels the attached letter. On Monday, January 10th, I spoke with your lead investigator, Ryan Monis and informed him again that I represent Ms. Holland, that Ms. Holland does not desire prosecution of Ms. Lohan and that any communication with Ms. Holland is to go through my office.

Today, in a blatant attempt to stomp on the 6th Amendment, your office surreptitiously showed up to Ms. Holland's home and attempted to question her about her involvement in this matter. Your efforts are disturbing and are in violation of *Massiah v. United States*, 377 U.S. 201 (1964), and its' progeny. I am deeply troubled that your office directed Investigator Monis to usurp my representation of Ms. Holland.

If you or your office would like to speak with Ms. Holland, please have the professionalism to request such a meeting through my office in writing.

Please call if you have any questions regarding this correspondence or anything else.

Sincerely,

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

Keith M. Davidson
Attorney at Law

cc: Dawn Holland

KMD:vd



DAVIDSON & ASSOCIATES
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January 3, 2011

Detective Nagels
[REDACTED]

Re: Lohan, Lindsay
[REDACTED]

Dear Detective Neagles,

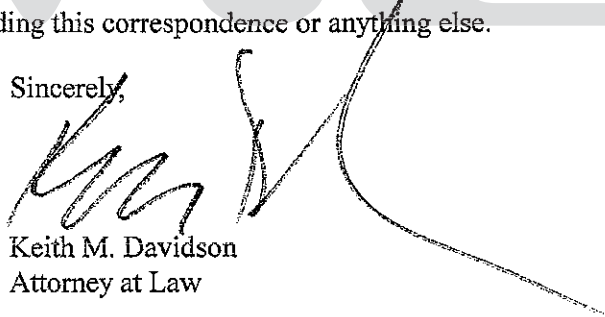
As we discussed, I am the attorney for Dawn Holland who was the Betty Ford Center employee involved with Ms. Lohan on December 12, 2010.

As we discussed, Ms. Holland does not wish to see Ms. Lohan arrested, let alone prosecuted for the described events.

Further, I cannot presently foresee a set of circumstances wherein I would not advise Ms. Holland to refrain from answering any questions posed by any government agent about the incident.

Please call if you have any questions regarding this correspondence or anything else.

Sincerely,



Keith M. Davidson
Attorney at Law

KMD:vd

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