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HON. WILLIAM H. CAREY (1925-2015)

June 7, 2022

Wendy Cochrane
520 Berkley St
Berkley, MA 02779

Re: Jeanne Russo

Dear Ms. Cochrane,

Please be advised that this office represents Jeanne Russo. This letter and claim is asserted against you personally and professionally as Collector/ Treasurer/ Selectperson/ Head of HR and as a member of the Town of Berkley Council on Aging.

On Wednesday May 11, 2022, you convened a "mandatory meeting" of all persons present in Town Hall for the purpose of making and publicizing allegations against my client. As you are aware, Ms. Russo is a long time well-respected elected member of the Berkley Board of Assessors. It appears that you told the group, which was convened at your request, that Ms. Russo had made public statements about you that were intended to undermine your conduct as a Berkley town official. The comments made by you were intended to harm Ms. Russo's reputation in the town and to inhibit her ability to speak on public issues involving town government.

The harm to Ms. Russo from this mandatory meeting was compounded by the fact Ms. Russo was not invited to attend, yet you indicated that she had been notified and chose not to attend.

Prior to the May 11, 2022 "mandatory meeting", you and Ms. Russo had discussed issues in which you had a difference of opinion. You made several derogatory comments regarding Nancy Townley accusing her of criticizing you in your work as a town official. You claimed to Ms. Russo she had "inspired" Ms. Townley to voice complaints about yourself. In fact, none of this happened.

These actions amount to a campaign of potential defamatory words from you regarding Ms. Russo, with the intention to cause her harm and emotional distress simply due to her political differences with you.

I suggest you consult legal counsel with a view toward discussing with me a manner in which this problem can be corrected without further complications.

Very truly yours,

Philip N. Beauregard

PNB/mp