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January 27, 2026

**Via Email**

Barbara Rice, Executive Director  
Adirondack Park Agency  
1199 NYS Route 86  
Ray Brook, New York 12977

Re: In the Matter of the Application of Unconventional  
Concepts, Inc. and Michael Hopmeier  
APA Project No. 2021-0276

Dear Ms. Rice:

We write in response to Norfolk Beier PLLC's comments in the January 24, 2026 Adirondack Daily Enterprise article regarding the firm's conflicted representation of the applicant in the above-referenced matter. We also respond based on the indication in the article that APA may address this issue further publicly this week.

In the article, Mr. Norfolk maintains that he had no affirmative obligation to obtain APA's informed consent and maintains that Norfolk Beier PLLC fully complied with Rule 1.11. His unwillingness to acknowledge that his firm was required to obtain APA's informed consent with respect to its conflict in this matter should raise concerns about Mr. Norfolk's unsupported assertions in the article that his firm complied with its duties under Rule 1.11.

For the approximately seven months during which Sarah Reynolds was employed by Norfolk Beier PLLC while the firm continued its representation in this matter, even responding during that time to an APA staff information request that Ms. Reynolds had worked on while still at APA, there is no documented showing that she had no involvement in the representation of the applicant prohibited by Rule 1.11(a) or that she was effectively screened from the representation of the applicant in this matter in compliance with Rule 1.11(b). With Ms. Reynolds's departure from the firm, the question remains as to whether Norfolk Beier PLLC complied with Rule 1.11 while she was there.

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Rule 1.11 is clear on what was specifically expected of Norfolk Beier PLLC during Ms. Reynolds's association with the firm. Norfolk Beier PLLC failed to comply with Rule 1.11 by not informing APA of the conflict or obtaining APA's informed consent with respect to the measures it would take to ensure compliance with Rule 1.11. As with any other compliance issue APA investigates, we respectfully submit that documented proof of compliance is now required here to properly address this failure. Absent the same, the parties in the adjudicatory hearing cannot have confidence that Norfolk Beier PLLC attorneys have complied with Rule 1.11. By failing to fulfill its ethical responsibilities at the outset and for the duration of Ms. Reynolds's association with the firm, Norfolk Beier PLLC has created this threat to the integrity of the hearing process.

Only through such documented compliance by Norfolk Beier PLLC and by APA's affirmatively consenting to the firm's continued representation of the applicant in this matter can the firm's noncompliance with Rule 1.11 now be potentially resolved. We do not take this position lightly and fully appreciate the implications for the applicant of Norfolk Beier PLLC's disqualification and the unnecessary burden placed on APA but cannot take the risk that the hearing will be prejudiced by this conflict. Since Norfolk Beier PLLC's noncompliance with Rule 1.11 created this threat to the integrity of the hearing process, the firm should be made to demonstrate that no harm has occurred.

Thank you for considering our request, which is pertinent to our pending motion to ALJ Greenwood in the adjudicatory hearing. We trust that APA will ensure that Norfolk Beier PLLC provides the documented compliance with Rule 1.11 necessary for APA to make an informed determination as to whether to consent to the firm's continued representation of the applicant in this matter.

Very truly yours,



Paul Van Cott

Cc: Service List