

FILED  
03-17-2021  
CIRCUIT COURT  
DANE COUNTY, WI  
2021CF000647

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

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STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 21CF\_\_\_\_\_

BRETT R. BLOMME

300 Farwell Drive

Cottage Grove, Wisconsin 53527

DOB: 06/11/1982

Sex/Race: M/W,

Defendant.

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**CRIMINAL COMPLAINT**

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The undersigned complainant, of the Wisconsin Department of Justice – Division of Criminal Investigation, being first duly sworn on oath, says that:

**COUNT 1: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 1, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image

or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 2: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 1, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 3: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 1, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 4: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 1, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 5: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 7, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 6: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 12, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**COUNT 7: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about November 12, 2020, at 300 Farwell Drive, Cottage Grove, in Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a digital recording of a child engaging in sexually explicit conduct, and reasonably should have

known that the child was under the age of 18, contrary to Wis. Stat. § 948.12(1m) and (3)(a), a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wis. Stat. § 973.042(2), upon conviction for a crime under Wis. Stat. §§ 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in Wis. Stat. § 973.042(1), associated with the crime. The Court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wis. Stat. § 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

#### **STATEMENT OF PROBABLE CAUSE**

On February 11, 2021, Wisconsin Department of Justice (DOJ) Division of Criminal Investigation (DCI) Special Agent (SA) Tamara Taubel began an investigation into a CyberTip provided by the National Center for Missing and Exploited Children (NCMEC). The CyberTip indicated that a Kik messaging application user, “dommasterbb,” uploaded images and videos consistent with child pornography through the application on 27 separate occasions in October and November of 2020. Those files were sent to other Kik users through private chat messages or shared in a messaging group. The email used for registering the Kik account “dommasterbb” was identified in the CyberTip as “brett.blomme@gmail.com.”

This email address associated with the “dommasterbb” Kik account was listed as “verified” by Kik. SA Taubel is aware that to verify an email address for messaging application accounts

and/or social media accounts, a user is typically sent an email by the application or site to their provided email address. Once the user opens that email, they may utilize a link and/or code which verifies that email account with the messaging application and/or social media account. The email address would then be listed as “verified.”

Kik also provided several different Internet Protocol (IP) addresses that were used by “dommasterbb” to upload and share the images and videos. Through queries with American Registry for Internet Numbers (ARIN), SA Taubel discovered that two of the IP addresses were provided by a Milwaukee County government building, one IP address was provided by Charter Communications, one IP address was provided by AT&T, and two IP addresses were provided by Verizon Wireless.

Special Agent Taubel reviewed the images and videos that had been included with the CyberTip and found that they met the definition of child pornography under Wisconsin law. SA Taubel also verified these files through Kik records. According to the CyberTip and Kik records, fifteen files were uploaded from the Charter IP address. The IP address provided by Charter at the time of the uploads was 66.188.192.132. The following is a selection of seven of those files uploaded by “dommasterbb” using this IP address, as described by SA Taubel, delineated according to the particular count in this complaint to which each file corresponds. The file names and upload dates and times are included.

COUNT ONE:

Filename: 143b789d-fb2b-4079-91fd-d4bdf788a98d.mp4

Upload 11-01-2020 14:55:38 UTC

Description: The video was one minute and thirty-seven seconds in length. The video began with a close view of, what appeared to be, a young prepubescent Caucasian boy’s anus area with an adult Caucasian male licking the boy’s anus. The male had brown “scruff” style facial hair. The adult male continued to lick the boy’s anus area and then penetrated the boy’s anus with his tongue. The male masturbated near the boy’s buttocks and then penetrated the boy’s anus with his erect

penis. The male's hand and penis were obviously large in comparison to the boy's buttocks and pelvic area. The male's hand appeared larger than the boy's buttocks, from one side to the other.

COUNT TWO:

Filename: ac42ede1-6a03-4c1c-8c8b-925aabadb86c.mp4

Upload 11-01-2020 15:05:15 UTC

Description: The video was one minute and fifty-three seconds in length. The video began with a young prepubescent Caucasian boy on a turquoise-colored cloth. The boy had his knees tucked beneath him and his upper chest was against the cloth. The boy was not wearing any bottoms and his buttocks were exposed. Within the view of the camera was an adult Caucasian male's erect penis. The male stroked his penis and ejaculated on the boy's buttocks area. The male then attempted to penetrate the boy's anus. The male's hand was obviously large in comparison to the boy's buttocks and torso.

COUNT THREE:

Filename: 517fb0f8-f5a9-465e-8ddc-8a5190e3ae20.mp4

Upload 11-01-2020 15:05:48 UTC

Description: The video was one minute and fifty-eight seconds in length. The video began with an adult Caucasian male laying on his back on a bed. The male was not wearing any bottoms and his erect penis was exposed. A young Caucasian prepubescent boy, wearing a neon green shirt, was between the male's leg. The male was holding the boy's head with his hands and the boy's tongue was touching the male's erect penis. The boy pulled away and began rubbing his eye. The male motioned for the boy to come back towards him and then held the boy's head on the side of his penis. The boy's tongue touched the male's penis. Those acts continued until the conclusion of the video.

COUNT FOUR:

Filename: 6384c350-c943-406c-856e-54d86d01f8d0.mp4

Upload 11-01-2020 14:52:40 UTC

Description: The video was three minutes and fifty-two seconds in length. The video began with a prepubescent Caucasian boy standing in between the legs of a seated adult Caucasian male. The camera view was of the boy's torso down to his thigh area. The boy was not wearing a shirt and was wearing dark colored bottoms. The boy pulled down his bottoms, exposing his bikini style underwear. The male pulled down the boy's underwear and then picked the boy up and placed him on his lap. The male's hands were large compared to the boy's torso. One of the male's hand appeared to be larger than the boy's stomach area from one side to the other. The boy's penis was exposed. The boy lacked pubic hair and development. The male utilized his fingers to masturbate and stroke the boy's penis. The video then cut to the boy standing next to the seated male and the male's erect penis exposed. The boy utilized his hand to stroke the male's penis. The video continued with the male manipulating the boy's penis with his fingers and the boy stroking the male's penis.



## COUNT FIVE:

Filename: e8612d31-7754-49a8-afbe-c03f9fb96a17.mp4

Upload 11-07-2020 14:36:03 UTC

Description: The video was one minute and thirty-eight seconds in length. The video was of a toddler aged Caucasian boy laying on his back, on what appeared to be blankets. The boy was wearing a gray long-sleeved shirt, with white sleeves, and Mickey Mouse on the front of the shirt. The boy was not wearing any bottoms. The camera showed the boy's face, which was red and showed he was crying. SA Taubel could also hear the boy crying through the audio of the video. The camera view then moved to the boy's unclothed lower torso, pelvic area, and upper leg area. The boy's penis was exposed, and an erect adult Caucasian male's penis penetrated the boy's anus. The boy continued to cry as the adult male forced his erect penis in and out of the boy's anus. The boy pushed his hand and against the male, appearing to be pushing the male away. The male told the boy to move his hand and continued to penetrate the boy while the boy cried.

## COUNT SIX:

Filename: 7ad2087c-4711-456e-b569-7eda6f6c518d.mp4

Upload 11-12-2020 14:05:50 UTC

Description: The video was thirty-seven seconds in length. The video began with an Asian toddler, wearing a blue and white long-sleeved shirt, standing on a wood floor. The toddler was holding, what appeared to be, toys with each of their hands and arms. In front of the toddler was a Caucasian male's erect penis. The adult male utilized his right hand to grab the toddler's head and pushed his penis against the toddler's mouth. The toddler backed away and then moved their face back towards the adult male. The adult male then placed his penis into the toddler's mouth. The male again grabbed the toddler's head and moved their head back and forth forcing the male's penis in and out of the toddler's mouth.

## COUNT SEVEN:

Filename: b7137c9f-0763-4aba-a5a8-d9d27718b125.jpg

Upload 11-12-2020 18:34:54 UTC

Description: The image was of a prepubescent Caucasian boy with short blond hair and blue eyes. The boy was wearing a yellow and blue sleeveless shirt and was laying on his back on a blue cloth. The boy was holding his legs back, towards his head. The boy was not wearing any bottoms and both his penis and anus were exposed.

In describing image and video files, SA Taubel frequently uses the terms "pubescent" and "prepubescent." SA Taubel has no formal medical training in the use of those terms but in applying them SA Taubel relies on her experience as an investigator and her common experience. SA Taubel users the term "pubescent" to mean a child who has begun to develop and display mature body shape and genital organs and/or secondary sexual characteristics such as the development of breasts in females and the appearance of pubic hair and underarm hair. The term "pubescent"

indicates her opinion that the person depicted is a child but evidences some physical and sexual maturation consistent, generally, with a young teenager or teenager. SA Taubel uses the term “prepubescent” to describe a child who does not exhibit any, or only very limited, physical-sexual development such as those indicators previously mentioned, such that the child appears to be well under the age of eighteen. The terms “toddler” and “very young child” should be given their common meanings and are used to communicate that the child depicted is clearly prepubescent and does not appear to be even nearing pubescence.

Special Agent Taubel reviewed subscriber information from Charter Communications for the IP address 66.188.192.132. According to those records, the subscriber assigned to that IP address at the date and time of the uploads was [Individual A]. The internet service for that account was provided to 300 Farwell Drive, Cottage Grove, Dane County, Wisconsin.

Pursuant to a warrant served upon Google, SA Taubel received content and subscriber information for the “brett.blomme@gmail.com” Google account. According to the subscriber information, the name of this Google account user was listed as “Brett Blomme” with a date of birth of “June 11, 1982.” A recovery email address of “blomme39@yahoo.com” was also listed on the account.

Throughout SA Taubel’s review of the provided emails she observed numerous communications between members of Cream City Foundation and brett.blomme@gmail.com. On October 8, 2020, brett.blomme@gmail.com sent an email with the subject line: “Blomme PSLF Call.” Within the body of the email, Blomme stated: “Give me a call at 608-807-7877 if you have any questions.” The signature line of that email was as follows:

Brett Blomme  
[cell phone number]  
brett.blomme@gmail.com

On March 10, 2021, SA Taubel reviewed the website for Cream City Foundation, <https://creamcityfoundation.org>. On the “About” page (<https://creamcityfoundation.org/about/>) SA Taubel observed a photograph of Blomme with the text: “Past President & CEO” below his photograph.

There were several emails forwarded from [brett.blomme@gmail.com](mailto:brett.blomme@gmail.com) to [brett.blomme@wicourts.gov](mailto:brett.blomme@wicourts.gov) in November 2020 that included image attachments of Milwaukee County Health Screenings. Based on SA Taubel’s recent experience with the Milwaukee County Government Buildings and information provided by employees within those buildings, that screening information is required to be completed by employees as well as those needing to enter Milwaukee County Government Buildings. Once the online form is completed, the screen shows the user is “CERTIFIED TO WORK ON-SITE.” The images that had been sent between the above emails included the following employee information:

Name: Brett Blomme  
Email: [Brett.blomme@wicourts.gov](mailto:Brett.blomme@wicourts.gov)  
CERTIFIED TO WORK ON-SITE

On November 15, 2020, [brett.blomme@gmail.com](mailto:brett.blomme@gmail.com) sent an email to [milw.dutyjudge@wicourts.gov](mailto:milw.dutyjudge@wicourts.gov) with the subject line: “Test.” The body of the email was empty except for the line: “Sent from my iPhone.”

Between December 2, 2020, and December 8, 2020, [brett.blomme@gmail.com](mailto:brett.blomme@gmail.com) and “Info at Printweber” ([info@printweber.com](mailto:info@printweber.com)) exchanged emails regarding Blomme’s order of holiday cards and envelopes. Blomme requested that the return address on the envelopes be the following:

Blomme for Judge  
6656 W. Moltke Avenue  
Milwaukee, WI 53210

Included in one of the emails was a draft of that holiday card. The holiday card read “BRETT BLOMME Milwaukee County Circuit Court” and had a photograph of Blomme, another male, and a young boy and girl. In the photograph, Blomme was wearing a black judge’s robe. Below the photograph was the text: “HAPPY HOLIDAYS – Brett” and the first name for Individual A, and the two children’s names.

SA Taubel reviewed the photograph from the holiday card and compared the male identified as Individual A in the photograph with Individual A’s Wisconsin Department of Transportation (DOT) photograph. SA Taubel found that both photographs appeared to be of the same individual. SA Taubel observed on “www.brettblomme.com/about” that Individual A was identified as Blomme’s husband.

SA Taubel also observed numerous email communications between brett.blomme@gmail.com, Individual A, and employees from their children’s school. At the bottom of one of the emails was a signature line with the following:

Brett Blomme  
[cell phone number]  
brett.blomme@gmail.com

SA Taubel also observed email correspondence between brett.blomme@gmail.com and employees of Alpine Plumbing. On November 14, 2020, brett.blomme@gmail.com sent an email with the subject line: “Re: Blomme – 6656 W. Moltke Ave.” The email inquired if the “quote is still valid” and inquired about moving forward with scheduling. Another email from brett.blomme@gmail.com, in the same email chain, was sent on November 15, 2020. In that email Blomme provided his contact telephone number of 608-807-7877.

SA Taubel also observed numerous email communications regarding Blomme’s residential address, 300 Farwell Drive, Cottage Grove, Wisconsin. Between October 5, 2020, and February

11, 2020, brett.blomme@gmail.com received five emails from UWHPS@UWHEALTH.ORG. Each email had the same subject line: “Your Order Has Shipped from UW Health Pharmacy.” Within the body section of each email, the following shipping information was provided:

Shipped to:  
Brett R. Blomme  
300 Farwell Dr  
Cottage Grove, WI 53527  
US

On February 15, 2021, brett.blomme@gmail.com and Individual A were sent an email regarding a refinance of their home loan. The subject of that email was: “Congratulations! Your loan is cleared to close for 300 Farwell Dr.” The body of the email read, in part: “I am excited to tell you that your refinance loan is fully approved and cleared to close for 300 Farwell Dr!”

A query through the WI DOT showed that Brett Blomme and Individual A’s listed addresses were both 300 Farwell Drive, Cottage Grove, Wisconsin. Those records also showed that Brett Blomme’s date of birth is June 11, 1982. This is the same date of birth used to register the Brett.Blomme@gmail.com account.

SA Taubel also observed two emails regarding the “dommasterbb” Kik account. The first email was sent to brett.blomme@gmail.com from Kik (no-reply@kik.com) on November 22, 2020 at 3:09 a.m. The subject of the email was: “Your friends are messaging you.” Within the body of the email, it advised that the user had messages waiting for them. The body of the email also included the following: “Your username is: DomMasterBB.”

The second email was sent from Kik (no-reply@kik.com) to brett.blomme@gmail.com, on November 29, 2020 at 12:17 a.m. That email had the subject line of: “Still want to delete your Kik account?” Within the body section of the email the following line was included: “Still want to permanently deactivate your DomMasterBB account?”

SA Taubel obtained subscriber information for the AT&T IP addresses also contained in the CyberTip and Kik records. AT&T identified that subscriber as Individual B on South Swift Avenue in Milwaukee, Wisconsin. SA Taubel found several emails between brett.blomme@gmail.com and Individual B's email address. On March 16, 2021, SA Ricardo Tijerino and SA Lindsay Conrad interviewed Individual B. Individual B confirmed that Individual B is a friend of Brett Blomme. Individual B also showed SA Conrad and SA Tijerino text message conversations Individual B had with Brett Blomme regarding days Blomme was at Individual B's house. Some of those dates coincided with the dates from the Kik records when "dommasterbb" used Individual B's AT&T internet service to upload child pornography videos and images.

Records were obtained from Verizon Wireless and Kik to determine the phone number used to upload child pornography images through the Verizon Wireless IP addresses. The records were provided to Wisconsin Statewide Intelligence Center (WSIC) Intelligence Analyst (IA) Michael Hemberger. IA Hemberger was able to find only one phone number in common over three separate uploads through the Verizon IP addresses. That phone number was (608) 807-7877. SA Taubel found several occurrences in the "brett.blomme@gmail.com" account of that cell number used by the defendant as his contact phone number.

SA Taubel is aware that the defendant is a Circuit Court Judge for Milwaukee County, and that the defendant's courtroom is located in the Vel R. Phillips Juvenile Justice Center, a Milwaukee County government building, at 10201 W. Watertown Plank Road, Milwaukee, Wisconsin. SA Taubel is aware that in addition to wired network connections in that building, employees of the building can access the building's WiFi internet connection.

On March 15, 2021, SA Taubel received authorization for five search warrants to search for and seize evidence of child pornography. Included in those were warrants to search 300 Farwell

Drive, Cottage Grove, Wisconsin, and the person of Brett Blomme (DOB: 06/11/1982). On March 16, 2021, SA Taubel and other law enforcement agents executed those warrants. The defendant, Brett Blomme, was located at his home at 300 Farwell Drive, along with Individual A.

This complaint contains a summary of facts necessary to establish probable cause. It does not contain all of the facts known to complainant that may be relevant to this investigation

Tamara Taubel  
Special Agent  
Wisconsin Department of Justice

Subscribed and sworn to before me  
this 17th day of March 2021.

Notary Public, State of Wisconsin  
My commission is permanent.



APPROVED FOR FILING:

DAVID W. MAAS  
Assistant Attorney General  
State Bar No. 1025522