

FILED
10-21-2021
CIRCUIT COURT
DANE COUNTY, WI
2021CV002552
Honorable Rhonda L.
Lanford
Branch 16

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

WISCONSIN ELECTIONS COMMISSION
212 East Washington Avenue, Third Floor
Madison, Wisconsin 53707,

MEAGAN WOLFE, in her official
capacity as Administrator of the
Wisconsin Elections Commission
212 East Washington Avenue, Third Floor
Madison, Wisconsin 53707,

Plaintiffs,

v.

Case No. 21-CV-
Declaratory Judgment: 30701

WISCONSIN STATE ASSEMBLY
Wisconsin State Capitol
2 East Main Street
Madison, Wisconsin 53703,

ROBIN VOS, in his official capacity as
Speaker of the Wisconsin State Assembly
Wisconsin State Capitol
State Capitol, Room 217 West
Madison, Wisconsin 53702,

MICHAEL GABLEMAN, in his
official capacity as Special Counsel
200 South Executive Drive, Suite 101
Brookfield, Wisconsin 53005,

ASSEMBLY COMMITTEE ON
CAMPAIGNS AND ELECTIONS
Wisconsin State Capitol
2 East Main Street
Madison, Wisconsin 53703,

JANEL BRANDTJEN, in her
official capacity as Chair of the
Assembly Committee on
Campaigns and Elections
Wisconsin State Capitol
State Capitol, Room 12 West
Madison, Wisconsin 53702,

Defendants.

COMPLAINT

Plaintiffs, the Wisconsin Elections Commission and Meagan Wolfe, Administrator of the Wisconsin Elections Commission, by Attorney General Joshua L. Kaul and Assistant Attorneys General Gabe Johnson-Karp, Thomas C. Bellavia, and Colin A. Hector, bring this civil action seeking declaratory and injunctive relief under the Wisconsin and United States Constitutions and Wis. Stat. §§ 13.31, 806.04, and 813.01–02. Plaintiffs allege as follows:

NATURE OF THE ACTION

1. This is an action for declaratory and injunctive relief from two subpoenas issued in support of a legislative investigation into the conduct of the November 2020 general election in Wisconsin. Plaintiffs seek to temporarily and permanently enjoin the Defendants, their attorneys, or other representatives or agents, from taking any actions to enforce those subpoenas

or to seek sanctions for noncompliance with them. Plaintiffs request a temporary restraining order, a temporary injunction, and a permanent injunction, pursuant to Wis. Stat. § 813.02, and a declaratory judgment under Wis. Stat. § 806.04.

PARTIES

2. Plaintiff Wisconsin Elections Commission (the “Commission”) is an agency of the State of Wisconsin created under Wis. Stat. § 15.61(1)(a). The Commission is the governmental body that administers, enforces, and implements Wisconsin’s laws “relating to elections and election campaigns, other than laws relating to campaign financing.” Wis. Stat. § 5.05(1).

3. Plaintiff Meagan Wolfe is the Administrator of the Commission, appointed pursuant to Wis. Stat. § 15.61(1)(b)1. The Administrator performs such duties as the Commission assigns to her and serves as the chief election officer of the State. Wis. Stat. § 5.05(3d)–(3g).

4. Defendant Wisconsin State Assembly (the “Assembly”) is one of the two chambers of the Wisconsin Legislature, in which the legislative power of the State is vested. Wis. Const. art. IV, § 1. On March 17, 2021, the Assembly adopted 2021 Assemb. Res. 15, which directed the Assembly Committee on Campaigns and Elections “to investigate the administration of elections in Wisconsin, focusing in particular on elections conducted after January 1, 2019.” (Ex. A.)

5. Defendant Robin Vos is the Speaker of the Assembly. He appointed the Special Counsel who is conducting the investigation at issue in this Complaint. Speaker Vos and the Assembly's Chief Clerk also signed the subpoenas that are challenged here.

6. Defendant Michael Gableman is the Special Counsel appointed by Speaker Vos to head the investigation at issue in this Complaint.

7. Defendant Assembly Committee on Campaigns and Elections (the "Committee") is a standing committee of the Assembly. 2021 Assemb. R. 9(1)(c). The Committee has been directed by 2021 Assemb. Res. 15 "to investigate the administration of elections in Wisconsin, focusing in particular on elections conducted after January 1, 2019." (Ex. A.)

8. Defendant Janel Brandtjen is a member of the Assembly and Chair of the Committee.

9. All Defendants are sued in their official capacity.

JURISDICTION AND VENUE

10. This Court has jurisdiction over the subject matter of this Complaint pursuant to Wis. Const. art. VII, § 8 and Wis. Stat. § 753.03, which give the circuit courts subject-matter jurisdiction over all civil matters within this State.

11. The court is authorized to issue temporary restraining orders and to grant temporary and permanent injunctive relief under Wis. Stat. § 813.02.

12. The court is authorized to issue a judgment declaring the rights, status, and legal relations of the parties with regard to the claims in this Complaint. Wis. Stat. § 806.04(1).

13. The court has personal jurisdiction over the Defendants, who are sued in their official capacities and reside within this State. Wis. Stat. § 801.05.

14. Venue is proper in Dane County for multiple reasons. First, it is the county where the claims in this Complaint arose. Wis. Stat. § 801.50(2)(a). Second, it is the county where tangible documents that are the subject of some of the claims in this Complaint are located. Wis. Stat. § 801.50(2)(b). Third, it is the county where one or more of the Defendants reside and conduct substantial business. Wis. Stat. § 801.50(2)(c). Fourth, because all Defendants are agents of the State sued in their official capacity, venue is proper in the county designated by Plaintiffs. Wis. Stat. § 801.50(3)(a). Here, Plaintiffs have designated Dane County.

FACTUAL BACKGROUND

15. On March 17, 2021, the Assembly adopted 2021 Assemb. Res. 15 (the “Resolution”), which directed the Committee “to investigate the administration of elections in Wisconsin, focusing in particular on elections conducted after January 1, 2019.” (Ex. A.)

16. The purposes of the investigation, as identified in the Resolution, include preserving “the integrity of the electoral process,” promoting citizen

confidence in “the fairness of elections and acceptance of election results,” and determining “the extent to which elections in Wisconsin have been conducted in compliance with the law.” (Ex. A.)

17. The Resolution included a finding that “the integrity of our electoral process has been jeopardized by election officials who, either through willful disregard or reckless neglect, have failed to adhere to our election laws by, at various times, ignoring, violating, and encouraging noncompliance with bright-line rules established by the statutes and regulations governing the administration of elections in Wisconsin.” (Ex. A.)

18. On May 28 and August 27, 2021, the Committee on Assembly Organization adopted ballots authorizing Speaker Vos to hire a Special Counsel to oversee and conduct the investigation authorized by the Resolution, assist the Committee, and hire investigators and other staff. Pursuant to that authorization, Speaker Vos appointed Defendant Gableman as Special Counsel.

19. On October 1, 2021, a subpoena was served on Administrator Wolfe. The subpoena was executed on behalf of the Committee by Speaker Vos and the Chief Clerk of the Assembly. It commanded Administrator Wolfe to appear “in person before the Special Counsel or his designee” on October 15, 2021, at an office location in Brookfield, Wisconsin, “to give evidence and testimony with regard to the November 2020 General Election in

Wisconsin (the “Election”) including, *but not limited to*, potential irregularities and/or illegalities related to the Election.” (Ex. B.)

20. The October 1 subpoena also commanded Administrator Wolfe to produce “all documents contained in your files and/or in your custody, possession, or control, pertaining to the Election.” Attached to the subpoena was an Exhibit A that specified five particular categories of documents that were demanded, but the subpoena expressly noted that the documents demanded were not limited to those categories. (Ex. B.)

21. On October 6, 2021, a subpoena was served on the Commission. That subpoena, too, was executed on behalf of the Committee by Speaker Vos and the Chief Clerk of the Assembly. It commanded the Commission to cause “the person most knowledgeable in regard to the November 2020 General Election in Wisconsin (the ‘Election’) to appear in person before the Special Counsel or his designee” on October 22, 2021, at the office in Brookfield, Wisconsin, “to give evidence and testimony including, *but not limited to*, potential irregularities and/or illegalities related to the Election.” Attached to the subpoena was an Exhibit A that specified eight particular topics of testimony, but the subpoena expressly noted that the testimony demanded of the witness would not be limited to those topics. (Ex. C.)

22. The October 6 subpoena also commanded that the Commission’s designated witness produce “all documents contained in your files and/or in

your custody, possession, or control, pertaining to the Election.” Attached to the subpoena was an Exhibit B that specified five particular categories of documents that were demanded, but the subpoena expressly noted that “[r]esponsive documents include, *but are not limited to*, the items set forth on Exhibit B.” (Ex. C.)

23. The October 1 and October 6 subpoenas described above will hereinafter be referred to as the “Subpoenas.”

24. On October 11, 2021, Defendant Brandtjen issued a press release which stated, in part: “Justice Michael Gableman does not speak for myself or for the Wisconsin Assembly’s Campaigns and Elections Committee. The current subpoenas have not been approved by the Assembly’s Campaigns and Elections Committee that Justice Gableman is supposed to serve, nor have the subpoenas even been submitted to the committee.” (Ex. E.)

25. Also on October 11, 2021, the Commission and Administrator Wolfe, through their legal counsel, sent a letter to the Special Counsel setting out substantive and procedural objections to the Subpoenas. The letter also communicated to the Special Counsel that both the Commission and Administrator Wolfe stand ready to comply with lawful and appropriately tailored Subpoenas regarding legitimate legislative concerns about election administration. (Ex. D.)

26. On October 15, 2021, the Commission and Administrator Wolfe provided the Office of Special Counsel with numerous responsive documents based on discussions with representatives of the Special Counsel. Staff from the Office of Special Counsel indicated that they would contact Plaintiffs with any additional follow-up on that subpoena.

27. Counsel for the Commission and Administrator Wolfe have discussed their objections to the Subpoenas with representatives of the Special Counsel, but the parties have been unable either to resolve those objections or to agree upon a postponement of the testimony scheduled for October 22, 2021, pursuant to the subpoena served on the Commission.

CLAIMS FOR RELIEF

COUNT 1

The non-public deposition procedure commanded by the Subpoenas is statutorily unauthorized.

28. The Subpoenas at issue here rely on Wis. Stat. § 13.31 as the sole basis to compel testimony, and point to Wis. Stat. § 13.26(1)(c) as the basis for a potential charge of contempt for failure to comply. Those statutes do not authorize the current demand for sworn testimony.

29. The legislative subpoena statute, Wis. Stat. § 13.31, provides that a witness may be compelled to testify and to produce documents “before any committee of the legislature, or of either house thereof, appointed to

investigate any subject matter.” Wisconsin Stat. § 13.26(1)(c) then authorizes punishment for contempt where a witness refuses to provide testimony ordered to occur “before the *house or a committee*, or before any person authorized to take testimony *in legislative proceedings*.” Those statutes do not authorize compelling a witness to appear before a person or entity other than a house of the Legislature or a legislative committee. They would authorize subpoenas compelling a witness to appear before the Committee, but not before the Special Counsel or his staff apart from any meeting of the Committee.

30. The Subpoenas at issue here, on their face, do not comply with the plain language of Wis. Stat. §§ 13.31 and 13.26(1)(c). They call for testimony “before the Special Counsel or his designee.” (Exs. B, C.) The Special Counsel and his staff, however, have been charged with assisting the Committee, but they are not themselves a house of the Legislature or a legislative committee. The Subpoenas also command the witnesses to appear not in the state capitol or any other location in which a legislative committee would ordinarily meet, but rather in a non-public office “at 200 South Executive Drive, Suite 101, Brookfield, WI 53005.” (Exs. B, C.) Nor is there any indication that the

testimony commanded by the Subpoenas would be taken in a legislative proceeding, within the meaning of Wis. Stat. § 13.26(1)(c).¹

31. In fact, although the Subpoenas do not use the label “deposition,” the contemplated non-public appearance before the Special Counsel or his designee appears to possess all the hallmarks of the type of deposition procedure typically used to examine a witness in the context of a judicial proceeding. But Wis. Stat. §§ 13.31 and 13.26(1)(c) plainly contemplate compelling a witness to testify in a *legislative* proceeding, not a judicial proceeding. Nothing in those statutes authorizes the use of such mechanisms of civil procedure in a non-judicial, legislative proceeding.

32. Moreover, far from complying with Wis. Stat. § 13.31, the Subpoenas at issue here are entirely untethered from the activities of the Committee that the Special Counsel is supposed to be serving. The Chair of the Committee, Defendant Brandtjen, has publicly stated that Special Counsel Gableman does not speak for the Committee, and that the recently issued Subpoenas have not been submitted to or approved by that Committee. (*See Ex. E.*)

¹ Similarly, Wis. Stat. § 13.32(1) provides for summary process to compel the attendance of a witness who has “failed or neglected to appear *before the committee* in obedience to the mandate of [a subpoena issued under Wis. Stat. § 13.31].” Again, the statutes contemplate compelled legislative testimony before a committee, not in a closed proceeding before an attorney.

33. In sum, the Subpoenas are legislatively unauthorized because they command sworn testimony not before a house of the Legislature or a legislative committee, but before an attorney at a non-public office in Brookfield, with no authorization by the Committee and no connection with any public meeting of the Committee. The court, therefore, should declare the Subpoenas statutorily invalid and enjoin their enforcement.

COUNT 2

The Subpoenas are unlawful because the underlying investigation is not in furtherance of a valid legislative purpose, but rather infringes upon the executive function of law enforcement.

34. The Legislature has inherent power to investigate subjects on which it needs information to aid it in discharging its legislative function, and to have such an investigation conducted by a duly authorized legislative committee. *State ex rel. Rosenhein v. Frear*, 138 Wis. 173, 176–77, 119 N.W. 894 (1909); *see also McGrain v. Daugherty*, 273 U.S. 135, 175 (1927).

35. Legislative investigations, however, are not entitled to unlimited deference from the courts. The legislative power to investigate “is justified solely as an adjunct to the legislative process.” *Watkins v. United States*, 354 U.S. 178, 197 (1957). A subpoena from the Legislature, one of its committees, or any authorized agent thus “is valid only if it is ‘related to, and

in furtherance of, a legitimate [legislative] task.” *Trump v. Mazars USA, LLP*, 140 S. Ct. 2019, 2031–32 (2020) (quoting *Watkins*, 354 U.S. at 187).

36. The legitimate purpose of a legislative investigation is to inform the Legislature about subjects susceptible to legislation, not to inform the public about matters the Legislature deems important, to expose facts for the sake of exposure, or to intimidate or assign guilt to individual public officials. See *Mazars USA, LLP*, 140 S. Ct. at 2032; *Watkins*, 354 U.S. at 200; *Miller v. Transamerican Press, Inc.*, 709 F.2d 524, 531 (9th Cir. 1983) (citing *Hutchinson v. Proxmire*, 443 U.S. 111, 132–33 (1979)).

37. In particular, the legitimate legislative purposes of an investigation do not include the function of law enforcement, which is assigned under our Constitution to the Executive branch. See *Mazars USA, LLP*, 140 S. Ct. at 2032. A legislative subpoena, therefore, cannot issue for the purpose of law enforcement. *Id.*

38. This is just as true under the Wisconsin Constitution as it is under the United States Constitution. Under the state Constitution, the legislative power includes the powers “to declare whether or not there shall be a law; to determine the general purpose or policy to be achieved by the law; [and] to fix the limits within which the law shall operate.” *Koschkee v. Taylor*, 2019 WI 76, ¶ 11, 387 Wis. 2d 552, 929 N.W.2d 600 (alteration in original) (quoting *Schmidt v. Dep’t of Res. Dev.*, 39 Wis. 2d 46, 59, 158 N.W.2d 306 (1968)). The Legislature

thus has “the authority to make laws, but not to enforce them.” *Id.* (quoting *Schuette v. Van De Hey*, 205 Wis. 2d 475, 480–81, 556 N.W.2d 127 (Ct. App. 1996)).

39. Contrary to these limits, the Resolution that authorized the investigation at issue here is pointedly focused on law enforcement, not lawmaking. The Resolution asserts that action is needed because “the integrity of our electoral process has been jeopardized by election officials who, either through willful disregard or reckless neglect, have failed to adhere to our election laws by, at various times, ignoring, violating, and encouraging noncompliance with bright-line rules established by the statutes and regulations governing the administration of elections in Wisconsin.” The plain language of the Resolution is focused not on supplying the Legislature with information pertinent to future legislative efforts to *improve* Wisconsin’s election statutes, but rather on enforcing compliance with *existing* “bright-line rules.” The language of the Resolution thus is plainly directed at the executive function of law enforcement, not at facilitating future legislative activity. (Ex. A.)

40. In fact Speaker Vos himself recently acknowledged that the Special Counsel’s investigation is effectively equivalent to a law enforcement investigation. Vos publicly announced that he is resisting any public release of records related to the investigation because it would be akin to a district

attorney releasing records in the middle of a murder investigation: “If you think about just the basic way an investigation is conducted, if the district attorney decides they’re going to try to find out who killed somebody on the street corner, they do not put out for public display, for everybody to read, who they’re talking to and who they’re investigating—giving an advantage to the people who actually committed the crime to avoid prosecution,” Vos said. “That’s exactly what would happen if we decided to put all the documents out.” It could hardly be made clearer that Speaker Vos, who hired the special Counsel to conduct the investigation at issue here, considers that investigation to be in furtherance of the executive functions of law enforcement, rather than in furtherance of a legitimate legislative purpose. Molly Beck, *Assembly Speaker Robin Vos says he wants to withhold records on taxpayer-funded election review until it’s over*, Milwaukee Journal-Sentinel, October 20, 2021, 2021 WLNR 34547842.

41. The Subpoenas challenged here are directed at the same purposes set forth in the Resolution. Those Subpoenas, too, lack a legitimate legislative purpose and instead seek to serve the executive purpose of law enforcement. They thus exceed the investigative power of the Legislature and violate the constitutional separation of powers between the Legislative and Executive branches. On that basis, the court should declare the Subpoenas invalid and enjoin their enforcement.

COUNT 3

The Subpoenas are not clear enough or definite enough to meet the constitutional requirement of due process.

42. Due process of law is constitutionally required both by Wis. Const. art. I, § 8 and by U.S. Const. amend. 14. That constitutional requirement applies to legislative investigations and to subpoenas issued in furtherance of such investigations.

43. Due process requires that the subject matter of a legislative investigation be “defined with sufficient explicitness and clarity to provide a reasonable basis for judgment by the witness whether a specific question put to him is pertinent to that subject matter.” *Goldman v. Olson*, 286 F. Supp. 35, 43 (W.D. Wis. 1968).

44. Just like in any other context in which a witness is required to testify under oath and on penalty of perjury or contempt, due process requires that the subject be informed of the subject of questioning “with the same degree of explicitness and clarity that the Due Process clause requires in the expression of any element of a criminal offense.” *Watkins*, 354 U.S. at 209. To avoid this “vice of vagueness,” the authorizing committee and any authorized agents must make clear the “question under inquiry.” *Id.* (citation omitted).

45. Neither the Resolution nor the subpoenas at issue here are sufficiently clear or definite to avoid this vice of vagueness and satisfy the demands of due process.

46. The Resolution directs the Committee to “investigate the administration of elections in Wisconsin.” (Ex. A.) This extreme sweep is narrowed only slightly by limiting the inquiry to the past three years. During that time, there have been multiple elections conducted across Wisconsin, including its 72 counties and 1,850 municipalities.

47. Such “[b]roadly drafted and loosely worded” resolutions give investigators an impermissible amount of discretion, inviting actions that are either not in accordance with the authorizing committee’s intention, or not even sufficiently related to lawful exercises of the legislative power. *Watkins*, 354 U.S. at 201. It is therefore imperative, both for potential witnesses as well as any court that might review the matter, that the scope of the inquiry be properly defined. *See id.*; *see also Gibson v. Fla. Legislative Investigation Comm.*, 372 U.S. 539, 545 (1963).

48. Like the Resolution, the Subpoenas challenged here also provide nothing close to the explicitness and clarity necessary to compel testimony under oath. Although the Subpoenas, unlike the Resolution, seek evidence related only to the November 2020 general election, each subpoena nonetheless lists as possible topics of inquiry “potential irregularities and/or illegalities

related to the Election” (emphasis added). (Exs. B, C.) Even when limited to November 2020, that includes nearly 2,000 separately administered election jurisdictions throughout the State. Moreover, the Subpoenas purport to demand testimony “including, *but not limited to*” this already sweeping topic. (Exs. B, C.)

49. Both the Subpoenas and the underlying Resolution are of such sweeping and uncertain scope that they fail to inform the subpoenaed witnesses of the subject of questioning with sufficient clarity and definiteness to satisfy the constitutional requirement of due process. On this basis, too, the court should declare the Subpoenas invalid and enjoin their enforcement.

COUNT 4

In the alternative, the Subpoenas are unreasonably overbroad and burdensome.

50. Even if the Subpoenas were not found invalid for any of the reasons discussed above, their demands for testimony and document production are unreasonably overbroad and burdensome, and must be narrowed before the Subpoenas can be enforced.

51. As previously noted, the Subpoenas demand documents and testimony “including, *but not limited to*, potential irregularities and/or illegalities related to the [2020 General] Election.” (Exs. B, C.) The use of “*but not limited to*” makes this already broad demand unlimited in scope. In

particular, the command that the Commission and Administrator Wolfe produce “all documents contained in [their] files and/or in [their] custody, possession, or control, pertaining to the Election” would cover millions of election-related documents in the files and databases of the Commission. (Exs. B, C.) That document request sweeps far more broadly than the purposes of the investigation authorized by the Resolution. (*See* Ex. A.) It also imposes an extreme undue burden on the Commission and on Administrator Wolfe, both in terms of effectively preparing to give testimony and in terms of the impossible logistics of producing such a massive quantity of documents.

52. Even the somewhat more specific requests enumerated in the exhibits attached to the two Subpoenas are unreasonably overbroad as written. For example, Exhibit A to the Wolfe subpoena and Exhibit B to the Commission subpoena both demand documents containing communications between any Commission personnel and various municipal officials, and between any Commission personnel and various non-governmental persons and organizations, “regarding or in any way related to the Election.” (Exs. B, C.) Similarly, the topics of testimony enumerated in Exhibit A to the Commission subpoena include the same categories of communications “regarding or in any way related to the Election in Wisconsin.” (Ex. C.) The demand for documents and testimony regarding or in any way related to the November 2020 general election is unreasonably overbroad and imprecise.

53. The exhibits to the Subpoenas also try to identify the communications in question as involving not only specified municipal officials, and specified non-governmental persons and organizations, but also communications with “any other employee, representative agent or other person affiliated with them.” (Exs. B, C.) That demand is also unreasonably overbroad and imprecise.

54. These objectionable demands must be narrowed and clarified before Administrator Wolfe and the Commission can reasonably be required to comply with the Subpoenas. Both the Commission and Administrator Wolfe stand ready to comply with lawful and appropriately tailored subpoenas regarding legitimate legislative concerns about election administration.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully ask this Court to enter judgment in their favor and to provide the following relief:

a. An immediate temporary restraining order pursuant to Wis. Stat. § 813.02(1), preserving the status quo by prohibiting the Defendants, their attorneys, or other representatives or agents, from taking any actions to enforce the Subpoenas or to seek sanctions for noncompliance with the Subpoenas, until such time as the Court may hear and decide Plaintiffs’ request for a temporary injunction.

b. Following a hearing, a temporary injunction pursuant to Wis. Stat. § 813.02(1), prohibiting Defendants, their attorneys, or other representatives or agents, from taking any actions to enforce the Subpoenas or to seek sanctions for noncompliance with the Subpoenas during the pendency of this case.

c. A declaratory judgment pursuant to Wis. Stat. § 806.04, declaring that the Subpoenas are invalid and unenforceable under the United States and Wisconsin Constitutions and the laws of the State of Wisconsin.

d. A permanent injunction prohibiting Defendants, their attorneys, or other representatives or agents, from taking any actions to enforce the Subpoenas or to seek sanctions for noncompliance with the Subpoenas.

e. In the alternative, an order requiring that the Subpoenas be narrowed and clarified before Administrator Wolfe and the Commission can be required to comply with them.

f. Any such other relief as the Court may deem just and proper.

Dated this 21st day of October, 2021.

Respectfully submitted,

JOSHUA L. KAUL
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Electronically signed by:

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