



1. Plaintiff State of Wisconsin is a sovereign state of the United States of America with its principal offices at the State Capitol in Madison, Wisconsin.

2. Defendant Wild Rose Dairy, LLC (Wild Rose Dairy) is a domestic limited liability company with its principal office located at E11310 Buckeye Ridge Road, La Farge, Wisconsin 54639-8008. Its registered agent is Arthur Thelen located at the same address.

3. Defendant K & D Manure Handling, Inc. (K & D Manure Handling) is a domestic close corporation with its principal office located at 3190 Canary Avenue, Sparta, Wisconsin, 54656. Its registered agent is Kevin D. Hintz located at the same address.

4. At all times relevant to the allegations in this Complaint, Wild Rose Dairy owned and operated a large concentrated animal feeding operation located at E11310 Buckeye Ridge Road, La Farge, Vernon County, Wisconsin (the CAFO).

5. At all times relevant to the allegations in this Complaint, Wild Rose Dairy hired K & D Manure Handling to land apply manure and process wastewater generated by the CAFO to nearby agricultural fields.

6. The State of Wisconsin enacted in Wis. Stat. ch. 283 and DNR administers regulations to prevent and minimize water pollution in the State.

7. Wisconsin Stat. § 283.31(1) prohibits any person from discharging any pollutant into any waters of the state except in compliance with a permit issued by DNR.

8. Wisconsin Admin. Code ch. NR 243 governs the issuance of permits required by Wis. Stat. ch. 283 to and permit terms for animal feeding operations.

9. Wisconsin Admin. Code § NR 243.11(3)(a) requires any person owning or operating a large concentrated animal feeding operation to have a Wisconsin Pollutant Discharge Elimination System permit.

10. On April 1, 2010, DNR issued Wild Rose Dairy Wisconsin Pollutant Discharge Elimination System permit no. WI-0059072-03-0 that authorized Wild Rose Dairy to discharge to the Middle Kickapoo Watershed of the Lower Wisconsin River Basin in accordance with the terms of the permit (the WPDES permit). The WPDES permit was effective April 1, 2010 and expired on March 31, 2015.

11. Pursuant to Wis. Stat. § 283.53(3) and Wis. Admin. Code § NR 200.06, after March 31, 2015, Wild Rose Dairy continued to operate the CAFO under the terms and conditions of the expired WPDES permit until DNR reissued the permit.

12. Wisconsin Admin. Code § NR 243.13(5)(a) states, “If a discharge of manure or process wastewater pollutants to waters of the state occurs, . . . the

discharge shall comply with groundwater and surface water quality standards.”

13. Wisconsin Admin. Code § NR 243.14(2)(a) states, “[T]he permittee is responsible for ensuring that the manure and process wastewater generated or handled at the operation is land applied or disposed of in a manner that complies with this subchapter and the terms and conditions of the WPDES permit,” unless exempted pursuant to Wis. Admin. Code § NR 243.142(2). WPDES permit conditions 1.5 and 3.2.2 repeat this requirement.

14. Wisconsin Admin. Code § NR 243.142(1) states, “Except as provided in sub. (2), the owner or operator shall be responsible for the storage, management and land application of all manure and process wastewater generated by the operation in accordance with terms and conditions contained in the WPDES permit and the approved nutrient management plan.”

15. At all times relevant to this Complaint, the land application of manure and process wastewater (collectively referred to as “manure”) generated by the CAFO to agricultural fields by K & D Manure Handling did not fall under any of the exemptions contained in Wis. Admin. Code § NR 243.142(2).

16. Wild Rose Dairy is the permittee, the owner, and an operator of the CAFO.

17. K & D Manure Handling is an operator of the CAFO.

**VIOLATION ONE: UNAUTHORIZED DISCHARGE OF MANURE TO WATERS OF THE STATE ON OCTOBER 2, 2017**

18. On October 2, 2017, K & D Manure Handling was land applying manure from the liquid manure storage facility at the CAFO to agricultural fields located to the west of the CAFO.

19. On October 2, 2017, K & D Manure Handling ran a hose from the liquid manure storage facility west through agricultural fields and woods.

20. On October 2, 2017, the hose that K & D Manure Handling was using had been patched, and as the hose was placed through the woods, one of the patches was dislodged.

21. On October 2, 2017, at approximately 1:40 p.m., K & D Manure Handling turned on a pump to transfer manure from the liquid manure storage facility to agricultural fields through the hose.

22. On October 2, 2017, when K & D Manure Handling began pumping manure through the hose, manure discharged through the exposed hole in the hose. This discharge occurred near the western edge of the forest between Buckeye Ridge Road and Kirking Road, west and slightly southwest of the CAFO.

23. On October 2, 2017, at approximately 2 p.m., K & D Manure Handling realized that manure was discharging through the hole in the hose and shut off the pump.

24. On October 2, 2017, at 2:03 p.m., K & D Manure Handling notified Wild Rose Dairy General Manager Dustin Harris that there had been a manure spill.

25. On October 2, 2017, manure discharged from the hose flowed into a dry run and then southwest and downhill through the dry run to Otter Creek. The manure entered Otter Creek near the intersection of Kirking Road and County Highway D.

26. Otter Creek is a water of the state as defined in Wis. Stat. § 283.01(20) and Wis. Admin. Code § NR 243.03(73).

27. On October 2 and 3, 2017, K & D Manure Handling and Wild Rose Dairy used two dams to contain the manure in the dry run and pumped dammed manure out of the dry run.

28. On October 3, 2017, at 4:50 p.m., Wild Rose Dairy Co-owner Art Thelen left a voicemail message for former DNR Wastewater Specialist Michelle Scarpace stating that there had been a manure spill at the CAFO.

29. On October 4, 2017, at approximately 8 a.m., Ms. Scarpace listened to Mr. Thelen's voicemail message. Ms. Scarpace called Mr. Thelen, and he said that manure went down a dry run; the manure had been dammed and pumped out of the dry run; Wild Rose Dairy had everything cleaned up the night of October 2, 2017; and no manure had crossed County Highway D to reach Otter

Creek. Mr. Thelen estimated 30,000 gallons of manure had spilled. Ms. Scarpace told Mr. Thelen to call DNR's Spills Hotline immediately.

30. On October 4, 2017, at 8:24 a.m., Mr. Thelen reported the manure spill to DNR's Spills Hotline. Again, Mr. Thelen said that the manure had discharged to a dry run; the manure was dammed and pumped out; all spilled manure was cleaned up; and no surface waters were impacted by the manure spill.

31. On October 4, 2017, at approximately noon, Ms. Scarpace, DNR Wastewater Specialist Tyler Dix, Vernon County Conservationist Ben Wojahn, and Vernon County Land & Water Conservation Technician Matt Albright inspected the CAFO and observed the area where the manure spill occurred.

32. On October 4, 2017, large accumulations of manure solids and pools of liquid manure were present in the dry run.

33. On October 4, 2017, Ms. Scarpace told Mr. Thelen that there was still a lot of manure in the dry run that needed to be cleaned up. Ms. Scarpace told Wild Rose Dairy to build up the first dam and pump out any impounded water in the dry run as rain was forecasted for the area.

34. On October 4, 2017, manure solids were present on the bed of Otter Creek and liquid manure remnants were visible.

35. On October 4, 2017, DNR staff took a water quality sample of spring water that entered Otter Creek immediately upstream of where the dry run entered Otter Creek (the “upstream sample”). This location was not affected by the manure spill.

36. On October 4, 2017, DNR staff took a water quality sample in Otter Creek downstream of where the dry run entered Otter Creek. This location was affected by the manure spill (the “downstream sample”).

37. DNR sent the upstream and downstream samples to the Wisconsin State Laboratory of Hygiene for analysis.

38. The downstream sample had *E. coli* of 1,300 MPN/100 mL while the upstream sample had *E. coli* of 9 MPN/100 mL. For the purpose of comparison, DNR’s Beach Monitoring Program requires closure of public beaches on lakes when water quality samples are above 1,000 CFU/100 mL for *E. coli*. The Beach Monitoring Program requires an advisory notice warning the public to swim at their own risk when water quality samples are above 235 CFU/100 mL for *E. coli*.

39. The downstream sample had total phosphorus of 0.139 mg/L while the upstream sample had total phosphorus of 0.028 mg/L.

40. Pursuant to Wis. Admin. Code § NR 102.06(3)(b), the phosphorus water quality criteria for Otter Creek is 0.075 mg/L (75 µg/L).



41. The manure discharge caused an exceedance of the phosphorus water quality criteria in Otter Creek.

42. The downstream sample had biological oxygen demand of 67.2 mg/L while the upstream sample had a biological oxygen demand level that was so low it was nondetectable.

43. The downstream sample had ammonia nitrogen of 0.268 mg/L while the upstream sample had ammonia nitrogen of 0.0842 mg/L.

44. On October 2, 2017, the manure discharge caused a large fish kill in Otter Creek from where the dry run enters the creek to approximately 1.1 miles downstream.

45. Otter Creek is classified as a class III trout stream by DNR.

46. In 2014, DNR conducted an electrofishing survey on Otter Creek between Larson Road and Allen Road (site 3) and on Otter Creek close to the intersection of County Highway D and State Route 82 (site 2). At site 3, DNR caught brook trout at a rate of 16 per mile and brown trout at a rate of 692 per mile. At site 2, DNR caught fish at the following rates: 85 brook trout per mile, 229 brown trout per mile, 8 fantail darter per mile, and 525 white sucker per mile.

47. On October 4 and 5, 2017, DNR staff collected dead fish from Otter Creek. DNR collected 94 brook trout; 1,069 brown trout; 2 tiger trout; 1 white sucker; and 1 brook stickleback.

48. On October 26, 2017, Wild Rose Dairy estimated that approximately 6,000 gallons of manure reached Otter Creek. Wild Rose Dairy estimated an additional 20,000 gallons of manure were impounded by the dams in the dry run, pumped out, and land applied to agricultural fields.

49. On October 2, 2017, Wild Rose Dairy and K & D Manure Handling violated Wis. Admin. Code § NR 243.13(5)(a) by discharging manure to Otter Creek that caused an exceedance of applicable water quality criteria for Otter Creek and a large fish kill.

#### **VIOLATION TWO: FAILURE TO NOTIFY DNR WITHIN 24 HOURS OF THE DISCHARGE ON OCTOBER 2, 2017**

50. WPDES permit condition 3.1.15 states:

The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. This includes any upset which exceeds any effluent limitation in the permit, or violations of the discharge limitations listed in the permit.

NOTE: Section 292.11(2)(a), Wisconsin Statutes, requires any person who possesses or controls a hazardous substance or who causes the discharge of a hazardous substance to notify the Department of Natural Resources **immediately** of any discharge not authorized by the permit. The discharge of a hazardous substance that is not authorized by this permit or that violates this permit may be a hazardous substance spill. To report a hazardous substance spill, call DNR's 24-hour HOTLINE at **1-800-943-0003**.

51. On October 2, 2017, at approximately 1:40 p.m., the manure discharge began when K & D Manure Handling started pumping manure through the hose.

52. On October 2, 2017, at 2:03 p.m., K & D Manure Handling notified Mr. Harris that a manure spill had occurred.

53. On October 3, 2017 at 4:50 p.m., Mr. Thelen left a voicemail message for Ms. Scarpace stating that a manure spill had occurred at Wild Rose Dairy.

54. On October 4, 2017, when speaking to Ms. Scarpace and reporting the spill to DNR's Spills Hotline, Mr. Thelen materially misrepresented the impact of the manure spill. Mr. Thelen said that the manure spill had been contained and had not impacted any surface waters. In fact, manure had reached Otter Creek and caused a fish kill over 1.1 miles of the creek.

55. Wild Rose Dairy did not notify DNR of the manure spill until over 26.5 hours after the manure spill occurred when Mr. Thelen first left a voicemail message for Ms. Scarpace.

56. On October 2, 2017, Wild Rose Dairy violated WPDES permit condition 3.1.15 when it failed to orally report the manure spill within 24 hours to DNR.

**VIOLATION THREE: UNAUTHORIZED DISCHARGE OF MANURE  
TO WATERS OF THE STATE ON MAY 15, 2019**

57. On May 15, 2019, K & D Manure Handling was land applying manure from the liquid storage facility at the CAFO to nearby agricultural fields.

58. On May 15, 2019, K & D Manure Handling ran three miles of hose from the liquid storage facility south and west to an agricultural field. The hose ran next to and within an unnamed tributary to Otter Creek that is located along and south of Allen Road.

59. The unnamed tributary flows west into Otter Creek near the intersection of Allen Road and County Highway D.

60. The unnamed tributary is a water of the state as defined in Wis. Stat. § 283.01(20) and Wis. Admin. Code § NR 243.03(73).

61. On May 15, 2019, at approximately 9:30 a.m., K & D Manure Handling began pumping manure through the hose from the liquid waste storage facility to the agricultural field.

62. On May 15, 2019, at approximately 10:00 a.m., K & D Manure Handling employees in the agricultural field noticed the flow of manure through the hose had stopped, and as a result, shut down the pumps for the hose.

63. On May 15, 2019, K & D Manure Handling notified Mr. Harris of the issue. Shortly thereafter, Mr. Harris discovered a tear in the hose.

64. On May 15, 2019, the hose had ruptured and developed a tear approximately 18 to 24 inches long. The rupture occurred approximately 1,200 feet east of the intersection of Allen Road and County Highway D. The hose was approximately eight to ten feet from the unnamed tributary at the point where it ruptured.

65. On May 15, 2019, manure discharged through the tear in the hose and flowed into the unnamed tributary and downstream into Otter Creek.

66. On May 15, 2019, at approximately 11:00 a.m., Mr. Harris notified DNR Spills Hotline of the manure spill. Mr. Harris and Wild Rose Dairy Co-owner David Abt also notified DNR Wastewater Specialist Eric Struck of the manure spill.

67. On May 15, 2019, Wild Rose Dairy and K & D Manure Handling constructed two temporary dams in the unnamed tributary to collect manure-contaminated water before it reached Otter Creek.

68. On May 15, 2019, around 3:30 p.m., Specialists Struck and Dix arrived at the location of the manure spill.

69. On May 15, 2019, at the location where the hose ruptured, manure had sprayed over a wide area on both sides of the unnamed tributary and completely coated a tree nearby.

70. On May 15, 2019, manure solids coated the bottom and sides of the unnamed tributary from where the hose ruptured downstream to Otter Creek.

71. On May 15, 2019, DNR staff took a water quality sample upstream of where the hose ruptured in the unnamed tributary (the “second upstream sample”). This location was not affected by the manure spill.

72. On May 15, 2019, DNR staff took a water quality sample downstream of where the hose ruptured in the unnamed tributary (the “second downstream sample”). This location was affected by the manure spill.

73. DNR sent the second upstream and downstream samples to the Wisconsin State Laboratory of Hygiene for analysis.

74. The second downstream sample had *E. coli* of 27,550 MPN/100 mL while the second upstream sample had *E. coli* of 770 MPN/100 mL. 162

75. The second downstream sample had total phosphorus of 2.44 mg/L while the second upstream sample had total phosphorus of 0.0168 mg/L.

76. Pursuant to Wis. Admin. Code § NR 102.06(3)(b), the phosphorus water quality criteria for the unnamed tributary is 0.075 mg/L (75 µg/L).

77. The manure discharge caused an exceedance of the phosphorus water quality criteria in the unnamed tributary.

78. The second downstream sample had biological oxygen demand of 80.4 mg/L while the second upstream sample had a biological oxygen demand level that was so low it was nondetectable.

79. The second downstream sample had ammonia nitrogen of 10.3 mg/L while the second upstream sample had an ammonia nitrogen level that was so low it was nondetectable. Levels of ammonia nitrogen can be acutely toxic to fish and other aquatic life between 3.24 and 12.04 mg/L.

80. On May 15, 2019, the manure discharge caused a large fish kill in Otter Creek from the confluence of the unnamed tributary downstream approximately 1.8 miles.

81. On May 15, 16, and 17, 2019, DNR staff collected dead fish from Otter Creek. DNR collected 32 brook trout; 635 brown trout; 6 blacknose dace; 8 creek chub; 1 brook stickleback; and 50 white sucker.

82. On May 15, 2019, Wild Rose Dairy estimated that approximately 5,000 to 10,000 gallons of manure discharged to the unnamed tributary.

83. On May 15, 2019, Wild Rose Dairy and K & D Manure Handling violated Wis. Admin. Code § NR 243.13(5)(a) by discharging manure to the unnamed tributary that caused an exceedance of applicable water quality criteria and a large fish kill in Otter Creek.

#### **VIOLATION FOUR: FAILURE TO SUBMIT A COMPLETE WPDES PERMIT REISSUANCE APPLICATION**

84. Wisconsin Stat. § 283.53(3)(a) states, “Any permittee who wishes to continue to discharge after the expiration date of the permittee’s permit

shall file an application for reissuance of the permit at least 180 days prior to its expiration.”

85. Wisconsin Admin. Code § NR 243.12(1)(d) and WPDES permit condition 3.2.9 implement the statutory requirement in Wis. Stat. § 283.53(3)(a) and require an owner or operator of a large CAFO to submit a complete permit reissuance application at least 180 days prior to the expiration date of its current WPDES permit, subject to an exception that does not apply to Wild Rose Dairy.

86. Wisconsin Admin. Code § NR 243.12(2)(b) specifies the required documentation that must be included in a complete WPDES permit reissuance application for a large CAFO.

87. The WPDES permit expired on March 31, 2015.

88. Pursuant to Wis. Stat. § 283.53(3)(a), Wis. Admin. Code § NR 243.12(1)(d), and WPDES permit condition 3.2.9, Wild Rose Dairy was required to submit a complete permit reissuance application for a WPDES permit by October 1, 2014.

89. On September 23, 2014, Agricultural Runoff Management Specialist Shawn Esser emailed Wild Rose Dairy a reminder that Wild Rose Dairy was required to submit a WPDES permit reissuance application.

90. Wild Rose Dairy did not submit a complete WPDES permit reissuance application by October 1, 2014.



91. On February 2, 2015, Mr. Esser sent a letter to Wild Rose Dairy specifying the outstanding documents that were required to complete Wild Rose Dairy's permit reissuance application. This included information on changes to the operation during the current permit term and anticipated future changes; the location of the existing site and any proposed modifications; scaled drawings and descriptions of facilities; and an updated nutrient management plan, all of which are required by Wis. Admin. Code § NR 243.12(2)(b).

92. From February 2, 2015 until August 8, 2016, Wild Rose Dairy submitted some additional documents, but Wild Rose Dairy still did not submit all of the documentation required for a complete permit reissuance application.

93. On August 9, 2016, Mr. Dix sent Wild Rose Dairy a Notice of Noncompliance stating that Wild Rose Dairy had not submitted a complete permit reissuance application and listing the outstanding documents that Wild Rose Dairy needed to submit, including information on changes to the operation during the current permit term and anticipated future changes as well as scaled drawings and descriptions of facilities.

94. On June 8, 2017, Ms. Scarpace sent Wild Rose Dairy a Notice of Noncompliance stating that Wild Rose Dairy had not submitted a complete permit reissuance application and was in violation of WPDES permit condition 3.2.9.

95. On September 7, 2017, Environmental Enforcement Specialist Deborah Dix sent Wild Rose Dairy a Notice of Violation stating that Wild Rose Dairy had not submitted the required documents for a complete permit reissuance application and was in violation of WPDES permit condition 3.2.9.

96. On September 21, 2017, DNR met with Wild Rose Dairy to discuss Wild Rose Dairy's failure to submit a complete WPDES permit reissuance application.

97. On September 21, 2017, Wild Rose Dairy stated that it had not submitted a complete permit reissuance application for approximately three years because it had been trying to decide how to expand its CAFO operation. This is not a legally relevant reason to excuse Wild Rose Dairy's failure to submit a complete permit reissuance application.

98. On September 21, 2017, DNR told Wild Rose Dairy that Wild Rose Dairy needed to submit the outstanding documents, including final expansion plans, for a complete permit reissuance application as soon as possible.

99. On December 5, 2017, Wild Rose Dairy told DNR that it was working on the outstanding plans and specifications for the CAFO expansion but had not completed them.

100. From December 5, 2017 until June 8, 2018, Wild Rose Dairy submitted some additional documents, but Wild Rose Dairy still did not submit

all of the documents required for a complete permit reissuance application pursuant to Wis. Admin. Code § NR 243.12(2)(b).

101. On June 8, 2018, Wild Rose Dairy told DNR that it no longer planned to expand its CAFO operation due to low milk prices.

102. On June 12, 2018, Ms. Scarpace sent Wild Rose Dairy a letter listing the outstanding required documents that Wild Rose Dairy needed to submit to complete its permit reissuance application, including a 5-year nutrient management plan, clarified 180-day manure and process wastewater storage calculations, scaled drawings and descriptions of reviewable facilities at the Green Hollow Farm, and updated animal unit calculation forms.

103. On October 11, 2019, Wild Rose Dairy submitted a revised permit reissuance application to DNR.

104. On October 17, 2019, Wild Rose Dairy submitted plans and specifications to DNR as part of the permit reissuance application.

105. On October 29, 2019, DNR determined that Wild Rose Dairy's permit reissuance application was complete based on the October 11 and 17, 2019 submittals.

106. From October 1, 2014 until October 17, 2019, Wild Rose Dairy continuously violated Wis. Stat. § 283.53(3)(a), Wis. Admin. Code § NR 243.12(1)(d), and WPDES permit condition 3.2.9 by failing to submit a

complete permit reissuance application to DNR at least 180 days prior to the date its WPDES permit expired.

### **PENALTIES AUTHORIZED**

107. Wisconsin Stat. § 299.95 authorizes the attorney general to enforce Wis. Stat. ch. 283 and all rules promulgated and permits issued under that chapter by “injunctive and other relief appropriate for enforcement,” subject to exceptions not applicable in this case.

108. Wisconsin Stat. § 283.89(1) requires DNR to refer any person who violates Wis. Stat. ch. 283 and rules or permits issued pursuant to Wis. Stat. ch. 283 to the Department of Justice (DOJ) for prosecution.

109. Pursuant to Wis. Stat. §§ 283.89(4) and 299.95, the circuit court for the county where the violation occurred has jurisdiction to enforce Wis. Stat. ch. 283.

110. Wisconsin Stat. § 283.91(1) states DOJ may “initiate a civil action for a temporary or permanent injunction for any violation of this chapter or any rule promulgated thereunder or of a term or condition of any permit issued under this chapter.”

111. Wisconsin Stat. § 283.87(1) states:

In an action against any person who violates this chapter . . . [DNR] may recover the cost of removing, terminating or remedying the adverse effects upon the water environment resulting from the unlawful discharge . . . of pollutants into the waters of the state, including the cost of replacing fish or other wildlife destroyed by the discharge . . . .

112. Wisconsin Stat. § 283.91(2) states:

Any person who violates this chapter, any rule promulgated under this chapter, any term or condition of a permit issued under this chapter . . . shall forfeit not less than \$10 nor more than \$10,000 for each day of violation, except that the minimum forfeiture does not apply if the point source at which the violation occurred is an animal feeding operation.

113. Wisconsin Stat § 283.91(5) states:

In addition to all other civil . . . penalties prescribed under this chapter, the court may assess as an additional penalty a portion or all of the costs of the investigation, including monitoring, which led to the establishment of the violation. The court may award [DOJ] the reasonable and necessary expenses of the prosecution, including attorney fees.

### **PENALTIES REQUESTED**

WHEREFORE, the State of Wisconsin asks for judgment as follows:

1. Forfeitures as provided for in Wis. Stat. § 283.91(2);
2. The costs of removing, terminating, and remedying the adverse effect of the manure spills upon the water environment, including the costs of replacing fish, as provided for in Wis. Stat. § 283.87(1);
3. The costs of the investigation and the reasonable and necessary expenses of the prosecution, including attorney fees, as provided for in Wis. Stat. § 283.91(5);
4. The 26% penalty surcharge pursuant to Wis. Stat. § 814.75(18); the 20% environmental surcharge pursuant to Wis. Stat. § 814.75(12); the \$25.00 court costs pursuant to Wis. Stat. § 814.63(1); the \$13.00 crime laboratory and drug surcharge pursuant to Wis. Stat. § 814.75(3); the \$68.00

court support services surcharge pursuant to Wis. Stat. § 814.75(2); the 1% jail assessment surcharge pursuant to Wis. Stat. § 814.75(14); and the \$21.50 justice information system surcharge pursuant to Wis. Stat. § 814.75(15); and

5. Such other relief as the Court may deem appropriate.

Dated this 16th day of April, 2021.

JOSHUA L. KAUL  
Attorney General of Wisconsin

*Electronically signed by Emily M. Ertel*

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