

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ENRIQUE CRUZ, JR.,

Plaintiff,

v.

Case No: 3:25-cv-120

CITY OF ADAMS, SAM WOLLIN,
AND RICHARD SMITH,

Defendants.

COMPLAINT

Plaintiff Enrique Cruz, Jr. by his lawyers, Strang Bradley, LLC, for his complaint against Defendants, states:

INTRODUCTION

1. On May 20, 2024, Defendant Chief Sam Wollin unlawfully seized Plaintiff Enrique Cruz in his own backyard.

2. Chief Wollin was in Cruz's backyard despite lacking a warrant, probable cause, or any lawful exigency.

3. Chief Wollin detained Cruz after he lawfully exercised his right not to provide Wollin with identification.

4. Chief Wollin did not have reasonable suspicion to believe that Cruz had committed or was going to commit a crime at the time he demanded Cruz present identification.

5. Chief Wollin proceeded to frisk Cruz despite lacking reasonable suspicion that Cruz was armed and dangerous. After the frisk revealed no weapons on Cruz's person, Chief Wollin unlawfully reached into Cruz's pockets and seized his phone and keys.

6. Chief Wollin then placed Cruz under arrest in the back of a locked squad car.

7. Defendant Richard Smith witnessed these constitutional violations but failed to intervene.

8. Cruz's young son saw his father be placed in handcuffs, searched, and placed in a squad car.

JURISDICTION AND VENUE

9. This action is brought pursuant to 42 U.S.C. § 1983 to redress the deprivation under color of law of Plaintiff's rights as secured by the United States Constitution.

10. This Court has jurisdiction over federal claims pursuant to 28 U.S.C. § 1331 and the state law claims for indemnification pursuant to 28 U.S.C. § 1367.

11. Venue is proper under 28 U.S.C. § 1391(b). Defendant City of Adams is a political subdivision of the state of Wisconsin located within this judicial district. Additionally, the events giving rise to the claims asserted herein occurred within this judicial district.

PARTIES

12. Plaintiff Enrique Cruz, Jr. is a resident of the State of Wisconsin.

13. Defendant City of Adams is a political subdivision of the State of Wisconsin and was the employer of individual Defendants Sam Wollin and Richard Smith at the time of the occurrences giving rise to this lawsuit and is required to pay any tort judgment for damages for which its employees are liable for acts within the scope of their employment pursuant to WIS. STAT. § 895.46.

14. Sam Wollin was, at the time of this occurrence, the Chief of Police for the City of Adams Police Department.

15. Wollin is the chief policymaker for the police department.

16. At all times that Defendant Wollin interacted with Plaintiff on May 20, 2024, Wollin was acting under color of state and local law.

17. At all times that Defendant Wollin interacted with Plaintiff on May 20, 2024, Wollin was acting within the scope of his employment with the City of Adams Police Department.

18. Defendant Wollin is sued in his individual and official capacity.

19. Defendant Richard Smith was, at the time of this occurrence, employed as a police officer for the City of Adams Police Department.

20. At all times that Defendant Smith interacted with Plaintiff on May 20, 2024, Smith was acting under color of state and local law.

21. At all times that Defendant Smith interacted with Plaintiff on May 20, 2024, Smith was acting within the scope of his employment with the City of Adams Police Department.

22. Defendant Smith is sued in his individual capacity.

FACTS

23. On May 19–20, 2024, the Columbia County Sheriff’s Department, Adams County Sheriff’s Department, and the Defendants with the Adams Police Department acted with a brazen disregard for Plaintiff’s constitutional rights.

24. Plaintiff Enrique Cruz Jr. is a 28-year-old resident of the City of Adams in Wisconsin.

25. In May 2024, Plaintiff Cruz lived in a home he rented at 117 S. Elm St., in Adams.

26. On May 19, 2024, Keegin Neveln crashed his car in Columbia County. The crash killed Neveln’s girlfriend. Neveln fled the scene on foot.

27. The Columbia County Sheriff’s Department knew what Neveln looked like due to his previous arrests. The Department had booking photos on record.

28. In the late evening of May 19, 2024, the City of Portage Police Department received a call from a woman requesting a welfare check. The caller did not specify their location, who they were, or who needed the welfare check before hanging up the phone.

29. This call was later relayed to the Columbia County Sheriff’s Department.

30. There are approximately 58,000 residents in Columbia County.¹

¹ <https://www.census.gov/quickfacts/columbiacountywisconsin>

31. The Columbia County Sheriff's Department concluded that the call was "in relation" to Neveln, despite having no evidence this was the case.

32. The Columbia County Sheriff's Department also wrongly concluded that the phone number that had requested the welfare check belonged to Colin Brandt.

33. Brandt is Plaintiff Cruz's half-brother.

34. While Brandt previously had that phone number, he had since received a new phone number. The Columbia County Sheriff's Department failed to verify whether the number that requested the welfare check still belonged to Brandt.

35. Neither Brandt nor Cruz knows Neveln.

36. The following morning, at 9:53 A.M., the Columbia County Sheriff's Department called the Adams County Sheriff's Department.

37. They informed the Adams County Sheriff's Department dispatcher that they were looking for Neveln because he was the suspect in the hit-and-run.

38. The Columbia County Sheriff's Department then told the Adams County Sheriff's Department they had received a call for a welfare check "in relation to Keegin" the previous night.

39. That statement was inaccurate; there was no evidence the welfare check was related to Neveln.

40. The Columbia County Sheriff's Department also provided the incorrect information that the call had been made from Colin Brandt's phone.

41. The Columbia County Sheriff's Department requested a law enforcement officer from Adams County go to Brandt's residence to see if Neveln was present. They instructed the Adams County Sheriff's Department to arrest Neveln if he was located.

42. But the two Sheriff's Departments then realized they didn't know where Brandt lived.

43. The Columbia County Sheriff's Department database showed Brandt living at both 117 S. Elm St. in Adams and another residence in Adams County. However, the Adams County Sheriff's Department showed Brandt living in New Lisbon as recently as October of 2023.

44. The Adams County Sheriff's Department agreed they would dispatch someone to check the 117 S. Elm St. address to see if Brandt resided there. Meanwhile, the Columbia County Sheriff's Department checked 10-12 locations in Columbia County where they thought Brandt and Neveln might be located.

45. A member of the Adams County Sheriff's Department would later be recorded describing this strategy as "throwing darts."

46. The Columbia County Sheriff's Department did not indicate that either Brandt or Neveln was believed to be armed and dangerous.

47. At 10:14 A.M., the Adams County Sheriff's Department contacted Defendant Smith, who was on duty with the City of Adams Police Department.

48. Dispatch informed Smith that Columbia County requested he look for Neveln and Brandt. Smith was further instructed to arrest Neveln for the hit and run that had occurred in Columbia County.

49. In his report, Defendant Smith incorrectly states, "Dispatch stated that Portage PD also received a welfare check request for Colin Brandt..."

50. Dispatch informed Defendant Smith that Columbia County "thought Brandt was at 117 S. Elm St." But dispatch also informed Defendant Smith that Adams County records showed that Brandt lived in various other locations including Marquette County.

51. Based on this information, Defendant Smith knew that law enforcement did not know where Brandt lived, let alone anything about Neveln. Instead, he understood he was being dispatched to one of numerous locations where Brandt and Neveln might be located.

52. Dispatch then warned Smith, "This came in kind of screwed up." Smith responded, "We'll see what kind of mess we step in."

53. Defendant Smith then checked Spillman CAD, which provides information on individuals who have had previous contacts with law enforcement.

54. Smith located Brandt's profile. He observed a picture of Brandt.

55. Smith knew what Brandt looked like prior to arriving at 117 S. Elm St.

56. Smith also checked Neveln's profile to see what he looked like prior to making contact. But Smith was not able to find a booking photo in Neveln's Spillman account.

57. Smith could have contacted the Columbia County Sheriff's Department to get a description of Neveln's appearance. He chose not to.

58. Instead, he chose to drive to 117 S. Elm St. without first learning what Neveln looked like.

59. At 10:18 A.M., Smith arrived at 117 S. Elm St. and knocked on the front door.

60. Smith was met by a Hispanic male, later identified as Cruz.

61. Cruz told Smith that 117 S. Elm St. was his home. Cruz explained he did not know Neveln.

62. However, Cruz went on to explain that Colin Brandt was his older brother.

63. At this point Smith knew that Cruz was neither Brandt nor Neveln.

64. Cruz then declined Smith's request to provide his name.

65. When Cruz told Smith that he was not going to provide his name or identification, Smith simply responded, "Ok."

66. Cruz asked Smith why law enforcement was at his house; however, according to Smith's report, he refused to "give Enrique any information as to why [I] was looking for both subjects."

67. Nevertheless, at Smith's request, Cruz returned to the inside of his house to look for Brandt. Cruz did not find Brandt inside the house.

68. Cruz returned to the front door and told Smith that Brandt was not home.

69. Smith then asked Cruz if he could speak to Elizabeth Roberts, who the Spillman CAD had identified as Brandt's girlfriend. Cruz returned to the inside of his home and told Roberts that Smith had requested to speak with her.

70. Cruz then proceeded to get ready to take his young son to school.

71. Chief Wollin was also dispatched to 117 S. Elm St. He arrived at 10:21 A.M.

72. Chief Wollin spoke with Smith after arriving on scene. Smith informed Wollin that he had spoken with Brandt's brother and the home's owner, a Hispanic man, who told him that Brandt was not home. He also explained the Hispanic man told him that he did not know Neveln.

73. At this point, Smith and Chief Wollin had no reason to believe that either Brandt or Neveln was at Cruz's home.

74. But after speaking with Smith, Chief Wollin decided to walk around the house.

75. Chief Wollin did not have a warrant, consent, or other lawfully exigency that justified his entry into the home's curtilage.

76. While Cruz was inside getting ready to take his son to school, Chief Wollin looked into the house through at least three separate windows.

77. These windows were located on the sides and back of Cruz's home.

78. Cruz then stepped outside of his home's backdoor so he could get to his car and drive his son to school.

79. Chief Wollin was standing in Cruz's backyard. When Cruz exited the back door, he yelled at Cruz, "Who are you?"

80. Cruz politely responded by asking Chief Wollin who he was and why Wollin was standing in his back yard.

81. Wollin refused to tell Cruz why he was in Cruz's backyard.

82. Instead, according to Chief Wollin's report, he "told the male subject he *needed* to provide [Chief Wollin] with identification." (emphasis added).

83. Chief Wollin did not have reasonable suspicion that Cruz had committed a crime, was committing a crime, or was going to commit a crime. All Cruz had done was walk out the door at his own home.

84. Cruz again politely declined to identify himself. Instead, he told Chief Wollin that if law enforcement wasn't going to explain what was going on, Wollin needed to leave his property.

85. After Cruz exercised his right not to identify himself, Chief Wollin grabbed Cruz's wrist and forcefully pulled Cruz towards him.

86. Chief Wollin proceeded to detain Cruz by placing him in handcuffs. According to Wollin, Cruz "did not resist and was compliant."

87. Cruz's young son watched as Chief Wollin detained his father.

88. Chief Wollin then forced Cruz to walk towards Smith's squad car.

89. While Chief Wollin was detaining Cruz in the backyard, Roberts came to the front door to speak with Smith.

90. Roberts stated that Brandt was not at the home and that she had driven Brandt to work at Brakebush 6:00 A.M. that morning.

91. Roberts further explained she did not know Neveln.

92. At this point, Smith had corroborating evidence that Brandt and Neveln were not at Cruz's home.

93. Roberts explained that Brandt could not have made the call for a welfare check the previous night. Roberts stated she had been with Brandt the previous night in the Wisconsin Dells. She also stated his phone battery had died at approximately 8:00 P.M.

94. At this point, Smith knew or reasonably should have known that Brandt had not placed the call for a welfare check “in relation to Keegin.”

95. Smith no longer had a reason to believe, if he ever had reason to believe, there was a connection between Neveln and anyone at 117 S. Elm St.

96. Roberts further stated that Brandt had received a new cellphone number a few months ago. Smith then asked Roberts for Brandt’s current cellphone number.

97. After Roberts provided him with Brandt’s number, Smith asked dispatch to give him the number that had requested the welfare check.

98. Smith then heard Chief Wollin tell dispatch that he had detained an individual.

99. Upon hearing this dispatch, Smith returned to his squad car. There, Chief Wollin was standing in the rain with Cruz, who was in handcuffs.

100. Based on his earlier conversations with Cruz and Roberts, Smith knew that Cruz was not Brandt and that he had no connection to Neveln.

101. Accordingly, Smith knew there was no reason for Chief Wollin to detain Cruz.

102. Rather than explaining to Chief Wollin that Cruz had no connection to Neveln, Smith told Wollin, “He wouldn’t tell me his name.”

103. Cruz responded, “You wouldn’t tell me anything. I’m totally fine with giving you guys whatever you want. But you’re just walking around my place. And you’re not saying anything.”

104. Smith replied, “I asked you to talk to Colin.”

105. Cruz reiterated, "Colin ain't here."

106. Then Chief Wollin frisked Cruz. At the time he frisked Cruz, Chief Wollin had no reason to believe Cruz was armed and dangerous.

107. Chief Wollin's frisk of Cruz was highly invasive and involved Wollin touching Cruz's genitalia over his clothing.

108. Cruz did not consent to this frisk.

109. Smith knew Chief Wollin lacked reasonable suspicion to frisk Cruz; however, he stood by and watched the frisk without intervening.

110. Chief Wollin's frisk uncovered no weapons on Cruz's person.

111. But despite knowing Cruz was not armed, Chief Wollin proceeded to reach into Cruz's pockets and seized his keys and phone. He did not find any illegal items.

112. Cruz did not consent to this search of his person.

113. Smith knew Chief Wollin lacked legal justification to search Cruz's person; however, he stood by and watched Chief Wollin reach into Cruz's pockets without intervening.

114. Chief Wollin then placed Cruz in the back of Smith's squad car and closed the door to the vehicle.

115. Cruz was handcuffed and locked inside a squad car.

116. At this point, Cruz was under arrest.

117. At the time Chief Wollin arrested Cruz, he did not have an arrest warrant or probable cause to believe that Cruz had committed a crime.

118. At the time Chief Wollin arrested Cruz, Smith knew Wollin did not have an arrest warrant or probable cause to believe that Cruz had committed a crime; however, he stood by and watched Chief Wollin unlawfully arrest Cruz without intervening.

119. Smith then returned to the front door to speak with Roberts.

120. While speaking with Roberts this second time, dispatch gave Smith the number that had requested the welfare check. Smith confirmed this number was different than Brandt's current phone number.

121. Roberts then explained that the last name of the man they had just put in the squad car was Cruz.

122. At this point, Smith had additional confirmation that the man who Chief Wollin had arrested was not Brandt or Neveln. He also had additional confirmation that neither Brandt, nor anyone else at 117 S. Elm St., was associated with the call requesting a welfare check "in relation to Keegin."

123. However, Smith continued to talk to Roberts rather than release Cruz from the back of his squad car.

124. After finishing his conversation with Roberts, Smith walked around the house to find Chief Wollin, who was again unlawfully standing in Cruz's curtilage.

125. Chief Wollin and Smith then had a conversation in Cruz's backyard.

126. Chief Wollin and Smith did not have a warrant or valid exigency that justified their entry into Cruz's home or the home's curtilage.

127. Cruz and Roberts had not consented to Chief Wollin and Smith entering the home's curtilage.

128. Chief Wollin and Smith eventually returned to Smith's squad car and released Cruz.

129. Chief Wollin explained that he had detained Cruz because he had been sent there to arrest someone, and he had seen Cruz walk out the back door.

130. Cruz responded, "On my property."

131. Chief Wollin replied, "I get that."

132. Cruz was then released. He never did anything wrong, and he was never charged with any crimes.

133. Cruz lodged a complaint with the Adams Police Department against Chief Wollin for illegally seizing him.

134. One of Chief Wollin's subordinates investigated the complaint.

135. The subordinate cleared Chief Wollin without explanation.

136. As a direct and proximate result of the acts of Chief Wollin and Officer Smith, as detailed above, Plaintiff suffered, *inter alia*, body injury, pain, suffering, mental distress, humiliation, loss of liberty, and loss of reputation.

COUNT I:

42 U.S.C. § 1983 Claim for First Unlawful Entry into Curtilage

137. Plaintiff realleges the above paragraphs.

138. Chief Wollin entered the curtilage of Plaintiff's home to search Plaintiff's private property and seize any occupant who left Plaintiff's home.

139. The actions of Chief Wollin entering the curtilage of Plaintiff's home without a warrant, and without any other lawful reason violated Plaintiff's Fourth

Amendment right to be free from unreasonable searches and seizures and thus violated 42 U.S.C. § 1983.

140. The aforementioned actions of Chief Wollin were the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Chief Wollin and because he acted maliciously, wantonly, or oppressively, punitive damages; the costs of this action, attorneys' fees; and such other and further relief that the Court deems just and equitable.

COUNT II:
42 U.S.C. § 1983 Claim for Unlawful Seizure

141. Plaintiff realleges the above paragraphs.

142. The intentional actions of Chief Wollin in seizing Plaintiff, without reasonable suspicion that Plaintiff had committed a crime, was committing a crime, or was going to soon commit a crime, violated his Fourth Amendment right to be free from unreasonable search and seizure, and thus violated 42. U.S.C. § 1983.

143. Chief Wollin acted recklessly and with callous indifference to the federally protected rights of Plaintiff.

144. As a direct and proximate result of Chief Wollin's unlawful actions, Plaintiff has suffered and will continue to suffer damages.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Chief Wollin and because he acted maliciously,

wantonly, or oppressively, punitive damages; the costs of this action, attorneys' fees; and such other and further relief that the Court deems just and equitable.

**COUNT III:
42 U.S.C. § 1983 Claim for Unlawful Arrest
and Failure to Intervene**

145. Plaintiff realleges the above paragraphs.

146. Chief Wollin elevated the seizure to an arrest of Plaintiff when he placed Plaintiff in handcuffs and locked him in the back of Defendant Smith's squad car.

147. At the time Chief Wollin arrested Plaintiff, he did so without probable cause that Plaintiff had committed a crime, without a warrant, and without any other permissible legal justification.

148. Defendant Smith knew that Chief Wollin lacked probable cause, a warrant, or any other legal justification to arrest Plaintiff.

149. Defendant Smith failed to intervene in a constitutional violation that he knew was happening before him and that he could have stopped.

150. Defendants Wollin and Smith thus violated Plaintiff's Fourth Amendment right to be free from unreasonable seizure and thus violated 42 U.S.C. § 1983.

151. The aforementioned actions of Defendants Wollin and Smith were the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Defendants Wollin and Smith and because they acted

maliciously, wantonly, or oppressively, punitive damages; the costs of this action, attorneys' fees; and such other and further relief that the Court deems just and equitable.

**COUNT IV:
42 U.S.C. § 1983 Claim for Unlawful Search
and Failure to Intervene**

152. Plaintiff realleges the above paragraphs.

153. Chief Wollin searched Plaintiff by frisking him.

154. Plaintiff did not consent, and Wollin did not have reasonable suspicion or any other constitutional justification to support that further search and seizure.

155. Chief Wollin did not have reasonable suspicion to believe that Plaintiff had committed, was committing, or was about to commit a crime.

156. Chief Wollin did not have reasonable suspicion to believe that Plaintiff was armed and dangerous.

157. The actions of Chief Wollin in frisking Plaintiff without a warrant and without any other permissible lawful reason to do so violated Plaintiff's Fourth Amendment right to be free from unreasonable search and seizure and thus violated 42 U.S.C. § 1983.

158. Defendant Smith knew there was not reasonable suspicion to believe that the Plaintiff was armed and dangerous but allowed him to be frisked anyway.

159. Defendant Smith failed to intervene in a constitutional violation he knew was happening before him and he could have stopped.

160. Defendants Wollin and Smith thus violated Plaintiff's Fourth Amendment rights to be free from unreasonable searches.

161. Chief Wollin further unlawfully searched Plaintiff by putting his hands in Plaintiff's pockets. The search was unlawful because Plaintiff did not consent and Chief Wollin did not have a warrant to search Plaintiff's person.

162. The search of Plaintiff's person was not done incident to a lawful arrest.

163. The actions of Chief Wollin in searching Plaintiff, without a warrant, and without any other permissible lawful reason to do so, violated Plaintiff's Fourth Amendment right to be free from unreasonable search and seizure, and thus violated 42 U.S.C. § 1983.

164. Defendant Smith knew Chief Wollin did not have a warrant to search Plaintiff's person. He also knew Plaintiff had not consented and that Chief Wollin's search was not incident to a lawful arrest.

165. Defendant Smith failed to intervene in constitutional violations he knew were happening before him, and he could have stopped.

166. The aforementioned actions of Chief Wollin and Defendant Smith were the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, under 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Defendants Wollin and Smith; and because they acted maliciously, wantonly, or oppressively, punitive damages; the costs of this action; attorneys' fees; and such other and further relief that the Court deems just and equitable.

COUNT V:

42 U.S.C. § 1983 Claim for Second Unlawful Entry into Curtilage

167. Plaintiff realleges the above paragraphs.

168. Chief Wollin and Smith re-entered the curtilage of Plaintiff's home to search Plaintiff's private property and seize any occupant who left Plaintiff's home.

169. The actions of Chief Wollin and Smith re-entering the curtilage of Plaintiff's home without a search warrant, an arrest warrant, and without any other lawful reason to do so violated Plaintiff's Fourth Amendment right to be free from unreasonable searches and seizures and thus violated 42 U.S.C. § 1983.

170. The aforementioned actions of Chief Wollin and Smith were the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Chief Wollin and Smith because they acted maliciously, wantonly, or oppressively, punitive damages; the costs of this action, attorneys' fees; and such other and further relief that the Court deems just and equitable.

COUNT VI
42 U.S.C. § 1983 *Monell* Policy Claim

171. Plaintiff realleges the above paragraphs.

172. Chief Wollin, in his role as the Chief of Police for the City of Adams, was the chief policymaker for the City on decisions on when to detain citizens, when to conduct frisks, how to conduct searches of private property, how to conduct welfare checks, and when to seek warrants.

173. Chief Wollin was directly involved in the decisions to enter Plaintiff's home's curtilage without a warrant or lawful exigency.

174. Chief Wollin was directly involved in the decision to illegally detain and later arrest Plaintiff without reasonable suspicion and probable cause, respectively.

175. Chief Wollin was directly involved in the decisions to unreasonably frisk and search Plaintiff's person and seize his property without reasonable suspicion that he was armed and dangerous.

176. The direct involvement of Defendant Wollin was the moving force and the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Defendant City of Adams plus the cost of this action, attorney's fees, and such other and further relief that the Court deems just and equitable.

**COUNT VII:
Indemnification Claim Against City of Adams**

177. Plaintiff realleges the above paragraphs.

178. Wisconsin law, WIS. STAT. § 895.46, requires public entities to pay any tort judgment for damages for which employees are liable for acts within the scope of their employment.

179. At all times relevant to this action, Defendants Wollin and Smith were engaged in the conduct complained of while they were on duty and in the course and scope of their employment with the City of Adams.

WHEREFORE, pursuant to 42 U.S.C. § 1983, Plaintiff demands actual or compensatory damages against Defendant City of Adams plus the cost of this action, attorney's fees, and such other and further relief that the Court deems just and equitable.

JURY DEMAND

Plaintiff hereby demands a trial by jury, pursuant to FED. R. CIV. PRO. 38(b), on all issues so triable.

Respectfully submitted,

Dated: 18 February 2025,

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