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STATE OF WISCONSIN

COURT OF APPEALS

DISTRICT IV

Case No. 2014AP000915-CR

STATE OF WISCONSIN,

Plaintiff-Respondent,

v.

JODY A. BOLSTAD,

Defendant-Appellant.

On Appeal from the Judgment of Conviction
Entered in the Crawford County Circuit Court,
the Honorable James P. Czajkowski, Presiding

BRIEF AND APPENDIX OF
DEFENDANT-APPELLANT

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TABLE OF CONTENTS

Page

ISSUE PRESENTED 1

STATEMENT ON ORAL ARGUMENT AND PUBLICATION 1

STATEMENT OF FACTS AND STATEMENT OF THE CASE 1

ARGUMENT 7

Mr. Bolstad's Fifth Amendment Rights Were Violated When He Was Frisked and Interrogated at Length by a Law Enforcement Officer Inside a Law Enforcement Vehicle, Without First Being Informed of His ***Miranda*** Rights. 7

A. Standard of review. 7

B. Mr. Bolstad was in custody. 7

C. Mr. Bolstad was interrogated. 12

D. Warden Hochhausen was a law enforcement officer who had a duty to notify Mr. Bolstad of his ***Miranda*** rights. 12

CONCLUSION 13

APPENDIX 100

CASES CITED

Berkemer v. McCarty,
468 U.S. 420 (1984) 8

Jackson v. State,
528 S.E.2d 232 (Ga. 2000)... 10

Mansfield v. State,
758 So. 2d 636 (Fla. 2000)... 11

Miranda v. Arizona,
384 U.S. 436 (1966) .... 1 passim

Priddy v. State,
55 Wis. 2d 312, 198 N.W.2d 624 (1972) 9

State v. Armstrong,
223 Wis. 2d 331, 588 N.W.2d 606 (1999) 7

State v. Cunningham,
144 Wis. 2d 272, 423 N.W.2d 862 (1988) 7

State v. Karow,
154 Wis. 2d 375, 453 N.W.2d 181
(Ct. App. 1990)... 7

State v. Lonkoski,
2013 WI 30, 346 Wis. 2d 523, 828 N.W.2d 552........ 10

State v. Morgan,
2002 WI App 124, 254 Wis. 2d 602,
648 N.W.2d 23 8

State v. Pounds,
176 Wis. 2d 315, 500 N.W.2d 373
(Ct. App. 1993)... 8

State v. Schloegel,
319 Wis. 2d 741, 769 N.W.2d 130
(Ct. App. 2009)...12

State v. Torkelson,
2007 WI App 272, 306 Wis. 2d 673,
743 N.W.2d 511 ....8, 9, 10

U.S. v. Scheets,
188 F.3d 829 (7th Cir. 1999).......................................9

CONSTITUTIONAL PROVISIONS AND STATUTES CITED

United States Constitution

Fifth Amendment 1, 7, 12

Wisconsin Statutes

Chapter 29 6

29.055 6

29.347(2) 6

29.921(1) 13

967.02(5) 13

ISSUE PRESENTED

Were Mr. Bolstad's Fifth Amendment rights violated when he was frisked and interrogated at length by a law enforcement officer inside a law enforcement vehicle, without first being informed of his ***Miranda***[1] rights?

The trial court answered "no."

STATEMENT ON ORAL ARGUMENT AND PUBLICATION

Publication is unwarranted because the issues can be decided by applying established legal principles to the facts of this case. Mr. Bolstad anticipates that the issues will be fully presented in the briefs, but would welcome oral argument if the court would find it helpful to resolving this case.

STATEMENT OF FACTS AND STATEMENT OF THE CASE

Jody A. Bolstad was charged with four counts of illegal deer hunting and moved to suppress oral and written statements he provided to a Wisconsin Conservation Warden on November 22, 2012. (2; 10). A co-defendant, David Myhre, filed a similar suppression motion and a joint suppression hearing was held on both motions. The facts from the complaint and the suppression hearing are as follows:

Wisconsin Conservation Warden Tyler Strelow was manning a deer decoy on November 22, 2012, when he

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[1] ***Miranda v. Arizona***, 384 U.S. 436 (1966).

observed a truck with two occupants. (2:2; 34:43-44). He observed the passenger lay over the top of the driver, aim a rifle out the window, and fire at the decoy. (2:2). Warden Strelow contacted Warden Dale Hochhausen who was parked nearby in his official Department of Natural Resources ("DNR") vehicle. (2:2). Warden Hochhausen stopped the truck and identified the passenger as the defendant, Jody A. Bolstad, and the driver as David Myhre. (2:2-3; 34:9-10). Warden Hochhausen proceeded to interrogate both individuals.

Warden Hochhausen told Mr. Bolstad that he wanted to speak to him "regarding some stuff from the past deer season." (34:24(2)[2]). At the time of the stop, Warden Hochhausen was in a full DNR uniform, which included a holstered firearm, handcuffs and a radio. (16:2; App. 104; 34:12-13, 24(2), 37-38). Warden Hochhausen asked Mr. Bolstad to exit the truck and once he was out, frisked him. (16:1; App. 103; 34:24-25(2)). The two stood outside the vehicle for a few minutes before Warden Strelow, who was also in full DNR uniform, arrived at the scene. (34:24-25). During this time, Warden Hochhausen secured a gun and ammunition found in the truck and alerted the sheriff's department that he had made a traffic stop. (34:25-26). Warden Hochhausen then asked Mr. Bolstad to sit in his squad truck to talk to him about incidents during the past deer season. (16:1; App. 103; 34:24(2)). Mr. Bolstad got into the passenger seat of the squad truck and Warden Hochhausen sat in the driver's seat. (34:24(2)).

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[2] The suppression hearing transcripts has a typographical error and includes two pages marked at page 24. In this brief, Mr. Bolstad refers to the first page 24 as "24(1)" and the second page 24 as "24(2)."

The DNR squad truck was unmarked but inside contained a police radio, a computer, a gun rack (with a shotgun in it), an emergency red and blue light and a box of documents. (16:2; App. 104; 34:34-35). The truck was in effect a mobile office and from the inside it was clear it was a law enforcement vehicle. (34:35-36).

Mr. Bolstad was not placed under any restraints and no weapons were drawn. (16:1; App. 103; 34:25). Warden Strelow stood outside the squad truck while Warden Hochhausen interrogated Mr. Bolstad inside. (16:1; App. 103; 34:45).

At the suppression hearing, Warden Hochhausen stated that after Mr. Bolstad got into the squad truck, he informed him that he was not under arrest, did not have to answer any questions and could stop the questioning at any point. He said and that Mr. Bolstad responded that he understood. (34:26). Mr. Bolstad testified that he was only told he was free to leave at the end of the interrogation, not at the beginning. (34:67). The court found that Warden Hochhausen informed Mr. Bolstad he could leave anytime at the beginning of the interrogation. (16:3; App. 105).

In response to Warden Hochhausen's questioning inside the squad truck, Mr. Bolstad admitted that earlier that same day he had gone deer hunting with a firearm but had not seen any deer. (2:3; 15:1). He also admitted to hunting deer with a firearm on November 17 and 18, 2012. (2:3). Mr. Bolstad also admitted to shooting turkeys on two occasions and failing to tag them. (15:2-3).

Warden Hochhausen confronted Mr. Bolstad with information the DNR had received about an incident in December 2001, in which a deer was shot out of season, at night, with the aid of a spotlight. (2:3; 34:24(2)). Mr. Bolstad

admitted that some time between Christmas Day, 2011, and New Years Day, 2012, he and David Myhre shined a deer with a spotlight and shot and killed it. (2:3; 15:2). Mr. Bolstad admitted he dragged the deer out of the field and took it back to his residence where he skinned it and cut it up. (2:3; 15:2). He confessed that he did not tag the deer. (2:3; 15:2).

At no time did Warden Hochhausen notify Mr. Bolstad of his ***Miranda*** rights. (34:31).

After interrogating Mr. Bolstad, Warden Hochhausen converted Mr. Bolstad's statements to a "voluntary statement form." (15; 34:27-28). The preprinted portion of the voluntary statement contained the language: "I certify that the statement is voluntary, that it was freely made without duress or promise of clemency, and that it is a true and correct account of what happened to the best of my knowledge and belief." (15:3; 16:1; App. 103). Both Warden Hochhausen and Mr. Bolstad read and signed the form after they initialed certain changes. (16:1; App. 103; 34:29, 72). According to Warden Hochhausen, the interrogation lasted one and one-half to one and three-quarter hours. (34:76). According to Mr. Bolstad, the interrogation lasted for two and one-half hours. (34:75-76). According to Warden Hochhausen, the encounter ended with him stating that he would contact Mr. Bolstad regarding what charges were filed and Mr. Bolstad exiting the vehicle. (34:29-30). Mr. Bolstad stated the encounter ended when he was finally told he was free to leave. (34:67).

After interrogating Mr. Bolstad, Wardens Hochhausen and Strelow interrogated Mr. Myhre who also made incriminating statements. (16:2; App. 104; 34:12).

At the suppression hearing, Warden Hochhausen admitted that he asked both men questions designed to elicit

incriminating answers and the state conceded that both men were interrogated. (34:37, 82). Warden Hochhausen testified that he carries a ***Miranda*** waiver of rights form with him that was made available to him by the DNR but testified that he did not use that form with either Mr. Bolstad or Mr. Myhre. (34:36-37, 40). Warden Hochhausen denied making any threats or promises to either man to obtain responses to questions. (34:33). However, both Mr. Bolstad and Mr. Myhre testified that they did not feel free to leave, felt they were in custody and were told they were free to leave by Warden Hochhausen only at the end of their interrogations, after they signed their voluntary statements. (16:2; App. 104; 34:52-53, 65-67, 69-70).

In addition, Mr. Bolstad testified that he asked Warden Hochhausen if he needed a lawyer and the warden told him he did not need one because he was not under arrest. (34:65-66). He also testified that he was never told that he did not have to talk to Warden Hochhausen and that Warden Hochhausen told him if he did not cooperate he would be arrested. (34:66, 68). Warden Hochhausen confirmed this, saying he told Mr. Bolstad that if he lied it would be considered obstruction, a more serious charge. (34:78). Finally, Mr. Bolstad testified that he was not asked to sign the voluntary form but rather was told he had to sign it and that he did not understand the consequences of signing the form. (34:65, 73).

The court denied Mr. Bolstad's suppression motion in a written decision in which it stated that the statements would not be suppressed because, while Warden Hochhausen's questioning was intended to obtain incriminating statements, the defendants were not, based on the totality of circumstances, in custody at the time they gave their statements. (16:4; App. 106). The court found that a

reasonable person in Mr. Bolstad's situation would have concluded he was free to terminate his interview at any time and leave the truck and therefore Warden Hochhausen was not required to advise Mr. Bolstad of his ***Miranda*** rights. (16:4; App. 106).

The court acknowledged the long period of time Mr. Bolstad was interrogated but stated there was no evidence to suggest he was not free to leave at any time he wished. (16:4; App. 106). The court also acknowledged that both men testified that Warden Hochhausen told them they were free to leave only at the end of their interrogations and that both men had argued this meant they were detained earlier and only free to leave at the end of the interrogations. (16:4; App. 106). However, the court held that Warden Hochhausen's testimony did not establish that Mr. Bolstad and Mr. Myhre were prevented from walking away earlier. (16:4; App. 106).

After having his suppression motion denied, Mr. Bolstad pled no contest to three counts of failing to attach an ear tag to a deer carcass, in violation of Wis. Stat. § 29.347(2), and one count of possessing a deer during a closed season, in violation of Wis. Stat. § 29.055. (24; App. 101). The court withheld sentence and imposed 3 years of probation for each count. (24; App. 101; 36:38). The court also ordered $8,100 in fines, in addition to court costs, ordered Mr. Bolstad to turn over his firearms, and revoked his Chapter 29 privileges for three years. (24; App. 101).

Mr. Bolstad now appeals.

ARGUMENT

Mr. Bolstad's Fifth Amendment Rights Were Violated When He Was Frisked and Interrogated at Length by a Law Enforcement Officer Inside a Law Enforcement Vehicle, Without First Being Informed of His ***Miranda*** Rights.

A. Standard of review.

The state bears the burden of showing compliance with ***Miranda***, including the burden to show whether a custodial interrogation occurred. ***State v. Armstrong***, 223 Wis. 2d 331, 347-51, 588 N.W.2d 606 (1999).

Whether a defendant's ***Miranda*** rights were violated presents a question of constitutional fact. This court upholds the trial court's factual findings unless clearly erroneous, but independently applies the constitutional standard to the facts. *See* ***State v. Karow***, 154 Wis. 2d 375, 384-85, 453 N.W.2d 181 (Ct. App. 1990). Whether the law enforcement officer acted in accord with the Constitution is a question of law subject to *de novo* review. ***State v. Cunningham***, 144 Wis. 2d 272, 282, 423 N.W.2d 862 (1988).

B. Mr. Bolstad was in custody.

Mr. Bolstad was in custody when he was frisked and questioned by a DNR warden inside a DNR squad truck.

According to the Supreme Court's holding in ***Miranda***, warnings must be given prior to custodial interrogation. Custodial interrogation is questioning initiated by law enforcement officers after a person is taken into custody or otherwise deprived of his freedom of action in a

significant way. ***Miranda***, 384 U.S. at 444. Thus, the threshold inquiry in this case is whether Mr. Bolstad was in custody.

Miranda protections are required "as soon as a suspect's freedom is curtailed 'to the degree associated with formal arrest.'" ***State v. Pounds***, 176 Wis. 2d 315, 321, 500 N.W.2d 373 (Ct. App. 1993) (quoting ***Berkemer v. McCarty***, 468 U.S. 420, 440 (1984)). To determine if a person is in custody, courts look to "whether a reasonable person in the defendant's position would have considered himself or herself to be in custody, given the degree of restraint under the circumstances."***Id***. (internal quotation omitted). Consideration must be given to the totality of the circumstances, including such factors as: "the suspect's freedom to leave; the purpose, place, and length of the interrogation, and the degree of restraint." ***State v. Torkelson***, 2007 WI App 272, ¶ 17, 306 Wis. 2d 673, 743 N.W.2d 511 (citing ***State v. Morgan***, 2002 WI App 124, ¶ 12, 254 Wis. 2d 602, 648 N.W.2d 23). Various factors are considered in determining the degree of restraint; they include: "whether the suspect is handcuffed, whether a weapon is drawn, whether a frisk was performed, the manner in which the suspect was restrained, whether the suspect was moved to another location, whether questioning took place in a police vehicle, and the number of officers involved." ***Id***.

The circumstances in this case include the following. Mr. Bolstad was asked to get out of the vehicle he was riding in by a DNR warden in full uniform, which included a holstered firearm, handcuffs and a radio. (16:1-2; App. 103-04; 34:24(2)). After exiting the vehicle, he was frisked. (16:1; App. 103; 34:12, 24(2)). He was then asked to get into the DNR squad truck which contained a police radio, a computer, a gun rack (with a gun in it), an emergency red and blue light

and a box of documents, and was interrogated by Warden Hochhausen for one and one-half to two and one-half hours, without a break. (16:1-2; App. 103-04 34:24(2), 34-35, 75-76). A second uniformed DNR officer stood outside the squad truck during the interrogation. (16:1; App. 103; 34:11, 48). According to Mr. Bolstad's testimony, he felt that he was in custody and did not feel he could leave the squad truck. (34:67). He also testified that he asked if he needed an attorney and Warden Hochhausen told him he did not because he was not under arrest. (34:65-66). At no point was he notified of his ***Miranda*** rights.

The length of the interrogation is one of the main factors used to determine whether an individual was in custody. ***Torkelson***, 306 Wis. 2d 673, ¶ 17. As the Seventh Circuit acknowledged in ***U.S. v. Scheets***, 188 F.3d 829, 841 (7th Cir. 1999), "even if a suspect is not formally arrested an encounter with police may ripen into de facto arrest if the encounter continues too long or becomes too intrusive." This case differs significantly from one like ***Torkelson*** where the court found the defendant was not in custody because the questioning in ***Torkelson*** was temporary and brief, only allowing for a few questions to be asked. ***Torkelson***, 306 Wis. 2d 673, ¶ 19. Here, Mr. Bolstad's interrogation was lengthy - lasting between one and one-half hours and two and one-half hours. The length of the interrogation weighs in favor of a finding that Mr. Bolstad was in custody.

The fact that Mr. Bolstad was frisked also weighs in favor of a finding that he was in custody. *See* ***Priddy v. State***, 55 Wis. 2d 312, 314, 198 N.W.2d 624 (1972) (defendant found to be in custody when he was told to get out of car with hands up and was frisked).

Other factors used to determine custody are whether the individual was moved to another location and whether the interrogation was carried out inside a law enforcement vehicle. ***Torkelson***, 306 Wis. 2d 673, ¶ 17. Here, Mr. Bolstad was asked to exit his vehicle and get into the DNR squad truck. He could have been interviewed in his vehicle or outside, away from the coercive environment of the squad truck, but instead the interrogation was carried out inside the law enforcement vehicle. In some regards Mr. Bolstad's interrogation inside the law enforcement vehicle was akin to interrogation inside a police station as this DNR squad truck operated as a mobile office, according to Warden Hochhausen.[3] And, while not dispositive, an interview conducted inside a law enforcement facility weighs in favor of a finding that an encounter was custodial. ***State v. Lonkoski***, 2013 WI 30, ¶ 28, 346 Wis. 2d 523, 828 N.W.2d 552.

Additionally, while only one warden questioned Mr. Bolstad, the effect of having a second warden outside the squad truck for the course of the interview should also weigh in favor of a finding of custody. A reasonable person would not feel able to stop answering questions, exit the DNR squad truck, walk passed the second uniformed officer (who had a gun), get back into the car he arrived in and leave the scene.

Several courts have also noted, where a person is being questioned by law enforcement officers, the knowledge that these officers suspect him of a crime is a significant factor suggesting custody. *See, e.g.*, ***Jackson v. State***, 528 S.E.2d 232, 235 (Ga. 2000) ("A reasonable person in

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[3] Warden Hochhausen testified the truck was in effect a mobile office and it was obvious from the inside that it was a law enforcement vehicle. (34:35-36).

Jackson's position, having just confessed to involvement in a crime in the presence of law enforcement officers would, from that time forward, perceive himself to be in custody, and expect that his future freedom of action would be significantly curtailed."); ***Mansfield v. State***, 758 So. 2d 636, 644 (Fla. 2000) (custody where, inter alia, defendant "was confronted with evidence strongly suggesting his guilt, and he was asked questions that made it readily apparent that the detectives considered him the prime, if not the only, suspect."). In this case, Warden Hochhausen confronted Mr. Bolstad with evidence of an unresolved hunting incident which prompted Mr. Bolstad to confess. (2:3). As such, Mr. Bolstad was alerted that he was a suspect in that case and thus had reason to believe he was in custody.

Finally, Mr. Bolstad's separation from Mr. Myhre also indicates that he was in custody. The Supreme Court observed in ***Miranda*** that the presence of friends can lend moral support to an individual when faced with the pressures of interrogation. 384 U.S. at 449-51. The court noted that separation from family or friends is often a deliberate ploy used by officers to obtain a confession. ***Id***. Here, Warden Hochhausen could have allowed Mr. Bolstad to remain in the car with Mr. Myhre but instead decided to separate the two men to conduct his investigation, presumably with the intent to obtain a confession.

The question of whether Mr. Bolstad was in custody boils down to whether a reasonable person in Mr. Bolstad's position – that is, one who: (1) is asked to get out of his vehicle by a law enforcement officer in full uniform, (2) is frisked, (3) is asked to get into a law enforcement vehicle to discuss incidents that occurred last season, and (4) is subject to interrogation for one and one-half to two and one-half hours inside the law enforcement vehicle while a second law

enforcement officer stands outside the vehicle - would reasonably believe that he was free to terminate the encounter and leave the situation. A reasonable person in Mr. Bolstad's position would not have felt free to leave.

C. Mr. Bolstad was interrogated.

Direct questioning likely to elicit an incriminating response constitutes interrogation triggering a suspect's Fifth Amendment right to counsel and necessitating the administration of ***Miranda*** warnings. ***State v. Schloegel***, 319 Wis. 2d 741, 747, 769 N.W.2d 130 (Ct. App. 2009). One action that is likely to elicit an incriminating response is confronting a suspect with evidence against him. Here, Mr. Bolstad was prompted to confess to a variety of crimes after Warden Hochhausen asked him about many hunting incidents and confronted him with evidence of an unresolved deer hunting incident. In fact, at the suppression hearing, Warden Hochhausen admitted that he asked Mr. Bolstad questions designed to elicit incriminating responses in the squad truck. (34:37). Moreover, the state conceded that Mr. Bolstad was interrogated and the circuit court agreed with this determination in its written decision. (16:4; App. 106; 34:82).

D. Warden Hochhausen was a law enforcement officer who had a duty to notify Mr. Bolstad of his ***Miranda*** rights.

Police officers and other law enforcement officers have a duty to read individuals their ***Miranda*** rights when those individuals are subject to custodial interrogation. ***Miranda***, 384 U.S. at 444. At no point during the course of this case has the state argued that Warden Hochhausen was not a law enforcement officer with such a duty.

Wisconsin Statute § 967.02(5) defines the term "Law enforcement officer" as "any person who by virtue of the person's office or public employment is vested by law with the duty to maintain public order or to make arrests for crimes while acting within the scope of the person's authority." According to Wis. Stat. § 29.921(1), wardens may execute and serve warrants and arrest individuals when they have probable cause to believe certain laws have been violated. As such, wardens meet the definition of "law enforcement officers" and thus have a duty to notify individuals of their ***Miranda*** rights just as any police officer would.

CONCLUSION

For the reasons stated above, this court should vacate the judgment of conviction and order that all of Mr. Bolstad's oral and written statements be suppressed.

Dated this 30th day of June, 2014.

Respectfully submitted,

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CERTIFICATION AS TO FORM/LENGTH

I certify that this brief meets the form and length requirements of Rule 809.19(8)(b) and (c) in that it is: proportional serif font, minimum printing resolution of 200 dots per inch, 13 point body text, 11 point for quotes and footnotes, leading of minimum 2 points and maximum of 60 characters per line of body text. The length of the brief is 3,359 words.

CERTIFICATE OF COMPLIANCE WITH RULE 809.19(12)

I hereby certify that:

I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of § 809.19(12). I further certify that:

This electronic brief is identical in content and format to the printed form of the brief filed on or after this date.

A copy of this certificate has been served with the paper copies of this brief filed with the court and served on all opposing parties.

Dated this 30th day of June, 2014.

Signed:

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APPENDIX

I N D E X
T O
A P P E N D I X

Page

Judgment of Conviction 101-102

Decision on Motions to Suppress Statements 103-107

CERTIFICATION AS TO APPENDIX

I hereby certify that filed with this brief, either as a separate document or as a part of this brief, is an appendix that complies with § 809.19(2)(a) and that contains, at a minimum: (1) a table of contents; (2) the findings or opinion of the circuit court; (3) a copy of any unpublished opinion cited under s. 809.23(3)(a) or (b); and (4) portions of the record essential to an understanding of the issues raised, including oral or written rulings or decisions showing the circuit court's reasoning regarding those issues.

I further certify that if this appeal is taken from a circuit court order or judgment entered in a judicial review of an administrative decision, the appendix contains the findings of fact and conclusions of law, if any, and final decision of the administrative agency.

I further certify that if the record is required by law to be confidential, the portions of the record included in the appendix are reproduced using first names and last initials instead of full names of persons, specifically including juveniles and parents of juveniles, with a notation that the portions of the record have been so reproduced to preserve confidentiality and with appropriate references to the record.

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