

IN THE MATTER OF DISCIPLINARY
PROCEEDINGS AGAINST CRAIG E. VANCE,
ATTORNEY AT LAW.

OFFICE OF LAWYER REGULATION,

CASE NO. 2015AP 655 -D

Complainant;

CRAIG E. VANCE

Respondent.

COMPLAINT

RECEIVED

APR 02 2015

CLERK OF SUPREME COURT
OF WISCONSIN

NOW COMES the Wisconsin Supreme Court - Office of Lawyer
Regulation (OLR) by Assistant Litigation Counsel Julie M.
Spoke, and alleges as follows:

1. The OLR was established by the Wisconsin Supreme Court and operates pursuant to Supreme Court Rules. This complaint is filed pursuant to SCR 22.11.
2. Craig E. Vance (Vance) was admitted to the practice of law in Wisconsin on January 14, 2002, State Bar No. 1032325. The most recent address furnished by Vance to the State Bar of Wisconsin is W175N11163 Stonewood Drive, Suite 226, Germantown, Wisconsin 53022-6503.
3. Vance's Wisconsin law license is currently suspended. It was temporarily suspended on February 20, 2014 due to his

failure to cooperate with an OLR investigation in the Alton matter (OLR Matter No. 2013MA435) that is included in this disciplinary Complaint. *Office of Lawyer Regulation v. Craig E. Vance*, 2013XX1641-D. Vance's license has also been suspended since October 31, 2014 due to his failure to pay state bar dues.

Regarding Alton (Counts 1-6)

OLR Matter No. 2013MA435

4. Zak Alton (Alton) retained Vance to represent him in an action against Polaris Industries Inc. (Polaris).

5. On March 5, 2012, Vance filed a lawsuit on Alton's behalf alleging Alton was entitled to damages for breach of express and implied warranty, and breach of contract. *Zak Alton vs. Polaris Industries Inc.*, Sawyer County Circuit Court Case No. 12 CV 40.

6. Vance never informed Alton that he had filed a lawsuit on his behalf. Nor did Alton receive a copy of the Summons and Complaint in the mail.

7. Between March 2012 and August 2012, Vance did not take any action to advance Alton's case.

8. On August 3, 2012, the circuit court judge wrote a letter to the parties inquiring as to the status of the case.

On August 17, 2012, Polaris' attorney, Monica Gould, responded stating that Polaris had an outstanding offer on the table and, if settlement negotiations did not move forward, Polaris would propound written discovery on the plaintiff.

9. Vance failed to notify Alton of any settlement offers made by Polaris.

10. On August 20, 2012, Vance received Requests for Admission (Requests) from Polaris. Vance did not respond or object to the Requests.

11. Vance told OLR that he did not respond to the Requests because they inappropriately asked for legal analysis by his client.

12. On November 1, 2012, Attorney Gould sent Vance an email stating she had prepared a Motion for Summary Judgment seeking dismissal due to Vance's failure to respond to the Requests, which, per Wisconsin law, are deemed admitted and negate the plaintiff's claims. Attorney Gould asked that Vance dismiss the case without prejudice by November 9, 2012 or she would seek costs incurred with filing the motion.

13. Vance failed to respond to Attorney Gould's email. Vance also did not inform Alton of the email.

14. On November 15, 2012, Polaris filed a Notice of Motion and Motion for Summary Judgment. The Notice provided for a hearing date on December 27, 2012.

15. Vance failed to respond to the Motion for Summary Judgment. Vance also failed to appear at the hearing date on December 27, 2012.

16. On December 27, 2012, the circuit court granted Polaris' Motion for Summary Judgment.

17. Alton called Vance regarding Vance's failure to attend the December 27, 2012 hearing. Vance failed to respond.

18. Alton subsequently retained his brother, Brock Alton, to represent him in his claims against Polaris.

19. On February 12, 2013, Attorney Alton wrote a letter to Vance requesting that Vance provide him with a copy of the entire file. Vance failed to respond.

20. Attorney Alton had to recreate the file and pay to obtain copies from the clerk of court's office.

21. On February 14, 2013, Attorney Alton filed a Notice of Appearance with the court. On March 1, 2013, Attorney Alton filed a Notice of Motion and Motion for Relief from Judgment.

On May 9, 2013, Attorney Alton advised the circuit court that the parties had settled the matter and the hearing on the motion could be removed from the court's calendar.

22. On May 1, 2013, OLR sent correspondence to Vance regarding a grievance filed against him by Attorney Alton, requesting a written response on or before May 24, 2013. Vance failed to respond.

23. On June 12, 2013, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond to the grievance by June 24, 2013. Although Vance signed the certified mail receipt, he failed to respond.

24. On July 18, 2013, OLR filed a Motion Requesting Order to Show Cause for Vance to show why his license should not be suspended for willful failure to cooperate with an OLR investigation. On July 19, 2013, the Supreme Court ordered Vance to show cause within 20 days why OLR's motion should not be granted.

25. On August 9, 2013, OLR received Vance's response to Alton's grievance. OLR withdrew its motion.

26. On September 25, 2013, OLR asked Vance to provide additional information related to the Alton grievance by October 9, 2013. Vance failed to respond.

27. On November 5, 2013, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by November 15, 2013. Although Vance signed the certified mail receipt, he failed to respond.

28. On December 10, 2013, OLR filed a second Motion Requesting Order to Show Cause for Vance to show why his license should not be suspended for willful failure to cooperate with an OLR investigation. On December 13, 2013, the Supreme Court ordered Vance to show cause within 20 days why OLR's motion should not be granted. Vance failed to respond.

29. On February 20, 2014, the Supreme Court temporarily suspended Vance's license due to his willful failure to cooperate in this matter. *Office of Lawyer Regulation v. Craig E. Vance*, 2013XX1641-D.

COUNT ONE

30. By purportedly believing that not responding to the Requests for Admission was an appropriate course of action as counsel for the plaintiff in the action against Polaris,

without seeking a determination of relief from the court, Vance violated SCR 20:1.1¹.

COUNT TWO

31. By failing to pursue Alton's suit, including by failing to respond to Requests for Admission, failing to respond to the Motion for Summary Judgment, and failing to appear at the December 27, 2012 hearing, Vance violated SCR 20:1.3².

COUNT THREE

32. By failing to inform Alton that the Requests for Admission were deemed admitted by operation of law, and that Attorney Gould requested that Vance voluntarily dismiss the suit against Polaris or face summary judgment and potential costs, Vance violated SCR 20:1.4(a)(3)³.

COUNT FOUR

33. By failing to provide Alton's file to successor counsel, causing the client and new counsel to have to

¹ SCR 20:1.1 provides: "A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation."

² SCR 20:1.3 provides: "A lawyer shall act with reasonable diligence and promptness in representing a client."

³ SCR 20:1.4(a)(3) provides: "A lawyer shall keep the client reasonably informed about the status of the matter."

reassemble a file with copies produced by the circuit court at a cost, Vance violated SCR 20:1.16(d)⁴.

COUNT FIVE

34. Following OLR's May 1, 2013 notice of investigation, by failing to timely file an initial written response to the grievance, and doing so only after receiving notice by first class and certified mail, and being ordered to show cause by the Supreme Court, Vance violated SCR 22.03(2)⁵ and SCR 22.03(6)⁶, enforced via SCR 20:8.4(h)⁷.

COUNT SIX

35. By failing to respond to OLR's September 25, 2013 request for a supplemental response, Vance violated SCR 22.03(6), enforced via SCR 20:8.4(h).

⁴ SCR 20:1.16(d) provides in pertinent part: "Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as...surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred..."

⁵ SCR 22.03(2) provides: "Upon commencing an investigation, the director shall notify the respondent of the matter being investigated unless in the opinion of the director the investigation of the matter requires otherwise. The respondent shall fully and fairly disclose all facts and circumstances pertaining to the alleged misconduct within 20 days after being served by ordinary mail a request for a written response. The director may allow additional time to respond. Following receipt of the response, the director may conduct further investigation and may compel the respondent to answer questions, furnish documents, and present any information deemed relevant to the investigation."

⁶ SCR 22.03(6) provides: "In the course of the investigation, the respondent's wilful failure to provide relevant information, to answer questions fully, or to furnish documents and the respondent's misrepresentation in a disclosure are misconduct, regardless of the merits of the matters asserted in the grievance."

⁷ SCR 20:8.4(h) provides: "It is professional misconduct for a lawyer to fail to cooperate in the investigation of a grievance filed with the office of lawyer regulation as required by SCR 21.15(4), SCR 22.001(9)(b), SCR 22.03(2), SCR 22.03(6), or SCR 22.04(1)."

Regarding Emberts (Counts 7-8)

OLR Matter No. 2014MA1535

36. After the February 20, 2014 temporarily suspension of his law license, Vance was retained by Donald Klahn (Klahn) to represent him related to a TRO/Injunction Petition that was filed on July 16, 2014. *Petitioner vs. Donald Kenneth Klahn*, Washington County Circuit Court Case No. 14 CV 529.

37. On August 5, 2014, Vance appeared with Klahn at a hearing on the temporary restraining order.

38. In August 2014, Melissa Emberts, Petitioner's Service Representative who was present at the TRO/Injunction hearing, filed a grievance against Vance.

39. On September 16, 2014, OLR sent a letter to Vance asking him to respond to Emberts' grievance by October 9, 2014. Vance failed to respond.

40. On October 21, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by October 31, 2014. Although Vance signed the certified mail receipt, he failed to respond.

COUNT SEVEN

41. By accepting a new matter and appearing in court to represent Mr. Klahn at a hearing on the temporary restraining

order on August 5, 2014 while his license was suspended, Vance violated SCR 22.26(2), enforced via SCR 20:8.4(f).

COUNT EIGHT

42. By failing to file a response to the grievance investigation relating to his representation of Mr. Klahn, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

Regarding Kulinski (Counts 9-12)

OLR Matter No. 2014MA1694

43. On January 29, 2013, Raymond Kulinski (Kulinski) retained Vance to represent him related to claims against Ford Motor Company (Ford).

44. On April 1, 2013, Vance filed a complaint on Kulinski's behalf. *Raymond Kulinski vs. Ford Motor Company et al.*, Waukesha County Circuit Court Case No. 13 CV 762.

45. On July 8, 2013, Vance appeared at a telephonic scheduling conference. A final pre-trial was scheduled for January 21, 2014.

46. Vance failed to disclose expert and lay witnesses, and provide expert reports by an August 29, 2013 deadline. On December 23, 2013, Ford's attorney filed a Motion to Dismiss due to Vance's failure to prosecute the case.

47. On January 21, 2014, Vance appeared at the hearing on Ford's Motion to Dismiss. The court held his decision on the motion in abeyance and allowed Vance to file his witness list on that date.

48. Vance failed to inform Kulinski of the Motion to Dismiss, his appearance at the January 21, 2014 hearing, and his filing of a witness list on that date.

49. Thereafter, Vance failed to inform his client, opposing counsel, and the court of the February 20, 2014 temporary suspension of his law license.

50. On July 25, 2014, Ford's attorney notified the court of their inability to communicate with Vance.

51. On July 28, 2014, the circuit court dismissed the lawsuit without prejudice due to Vance's failure to diligently prosecute the case.

52. In August 2014, Kulinski learned of the dismissal by looking at online records.

53. In August 2014, Kulinski filed a grievance with OLR against Vance.

54. On October 14, 2014, OLR asked Vance to respond to Kulinski's grievance by November 10, 2014. Vance failed to respond.

55. On November 26, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by December 8, 2014. The certified letter was returned to OLR as, "Return to Sender, Unclaimed, Unable to forward." Vance failed to respond. The letter sent by first class mail was not returned to OLR by the post office.

COUNT NINE

56. By failing to advance Mr. Kulinski's interests, such that Mr. Kulinski's lawsuit became subject to a motion to dismiss for want of prosecution and, ultimately, dismissal by the circuit court, Vance violated SCR 20:1.3.

COUNT TEN

57. By failing to inform Mr. Kulinski of case developments, including that the case was subject to a motion to dismiss for want of prosecution, that a hearing on the motion was scheduled and heard, and that he filed a witness

list on the date of the hearing on the motion to dismiss, Vance violated SCR 20:1.4(a)(3) and SCR 20:1.4(a)(4)⁸.

COUNT ELEVEN

58. By failing to notify Mr. Kulinski, the court, or opposing counsel of his February 20, 2014 license suspension, Vance violated SCR 22.26(1)⁹, enforced via SCR 20:8.4(f)¹⁰.

COUNT TWELVE

59. By failing to file a response in OLR's grievance investigation relating to his representation of Mr. Kulinski, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

⁸ SCR 20:1.4(a)(4) provides: "A lawyer shall promptly comply with reasonable requests by the client for information..."

⁹ SCR 22.26(1) provides: "On or before the effective date of license suspension or revocation, an attorney whose license is suspended or revoked shall do all of the following: (a) Notify by certified mail all clients being represented in pending matters of the suspension or revocation and of the attorney's consequent inability to act as an attorney following the effective date of the suspension or revocation. (b) Advise the clients to seek legal advice of their choice elsewhere. (c) Promptly provide written notification to the court or administrative agency and the attorney for each party in a matter pending before a court or administrative agency of the suspension or revocation and of the attorney's consequent inability to act as an attorney following the effective date of the suspension or revocation. The notice shall identify the successor attorney of the attorney's client or, if there is none at the time notice is given, shall state the client's place of residence. (d) Within the first 15 days after the effective date of suspension or revocation, make all arrangements for the temporary or permanent closing or winding up of the attorney's practice..."

¹⁰ SCR 20:8.4(f) provides: "It is professional misconduct for a lawyer to violate a statute, supreme court rule, supreme court order or supreme court decision regulating the conduct of lawyers."

Regarding Mattice (Counts 13-14)

OLR Matter No. 2014MA556

60. Laurie Mattice retained Vance to represent her in a matter related to a petition for a restraining order filed against her, *Petitioner vs. Laurie M Mattice*, Jefferson County Circuit Court Case No. 13 CV 718, and a disorderly conduct charge, *State of Wisconsin vs. Laurie M Mattice*, Jefferson County Circuit Court Case No. 14 CM 13.

61. On January 14, 2014, Vance appeared at an injunction hearing in Case No. 13 CV 718 on Ms. Mattice's behalf. The court granted the injunction.

62. Vance failed to notify his client, the district attorney, and the court of his February 20, 2014 temporary license suspension.

63. On February 25, 2014, Vance appeared at a court hearing on the disorderly conduct charge in Case No. 14 CM 13. The matter was scheduled for a status conference on March 19, 2014, and later rescheduled to April 8, 2014.

64. Vance failed to appear at the April 8, 2014 status conference. Ms. Mattice informed the court that Vance had not been responsive to her or performed his job as her attorney.

The court terminated Vance's representation and referred Ms. Mattice to the State Public Defender's Office.

65. On March 17, 2014, Ms. Mattice filed a grievance with OLR against Vance.

66. On June 3, 2014, OLR wrote to Vance asking him to respond to Ms. Mattice's grievance by June 26, 2014. Vance failed to respond.

67. On July 1, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by July 11, 2014. The certified letter was delivered on July 7, 2014. Vance failed to respond.

COUNT THIRTEEN

68. By failing to notify Ms. Mattice, the district attorney, and the court of his suspension, and by appearing at a hearing on February 25, 2014 when his license was suspended, Vance violated SCR 22.26(1) and SCR 22.26(2)¹¹, enforced via SCR 20:8.4(f).

¹¹ SCR 22.26(2) provides: "An attorney whose license to practice law is suspended or revoked or who is suspended from the practice of law may not engage in this state in the practice of law or in any law work activity customarily done by law students, law clerks, or other paralegal personnel..."

COUNT FOURTEEN

69. By failing to file a response to OLR's grievance investigation relating to his representation of Ms. Mattice, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

Regarding OLR Inquiry (Counts 15-17)

OLR Matter No. 2014MA396

70. Holly and Matthew Bailey (the Baileys) retained Vance to represent them in an action against the Chrysler Group. Vance filed a lawsuit on their behalf on April 22, 2013. *Matthew Bailey et al. vs. Chrysler Group LLC*, Grant County Circuit Court No. 13 CV 196.

71. On September 4, 2013, Vance appeared at a scheduling conference. The court set a trial date for February 24, 2014.

72. After the scheduling conference, Vance failed to perform any further work in furtherance of the Baileys' case.

73. On November 29, 2013, the Chrysler Group filed a Notice of Motion and Motion for Partial Summary Judgment. A motion hearing was scheduled for January 23, 2014.

74. Vance failed to file a response to the motion and failed to appear at the January 23 motion hearing.

75. On February 3, 2014, the circuit court granted Chrysler Group's Motion for Partial Summary Judgment.

76. On February 6, 2014, the Chrysler Group filed a Motion to Dismiss. A motion hearing was scheduled for February 11, 2014.

77. Vance failed to respond to the motion and failed to appear for the February 11 motion hearing.

78. On February 21, 2014, the court entered an order granting Chrysler Group's Motion to Dismiss.

79. The Baileys had been trying to contact Vance on multiple occasions by phone and email and had not heard from him. The Baileys were unaware of the motion to dismiss and were expecting a trial.

80. On February 24, 2014, OLR received a grievance against Vance regarding his conduct in the Bailey matter.

81. On April 10, 2014, OLR sent a letter to Vance, asking him to respond to the grievance by May 2, 2014. Vance failed to respond.

82. On May 30, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by

June 9, 2014. The certified letter was received on June 6, 2014. Vance failed to respond.

COUNT FIFTEEN

83. By failing to file any response to the defendant's November 29, 2013 motion for Partial Summary Judgment and by failing to appear at the January 23, 2014 motion hearing; and further, by failing to file any response to the defendant's February 6, 2014 Motion to Dismiss and by failing to appear at the February 11, 2014 motion hearing, Vance violated SCR 20:1.3.

COUNT SIXTEEN

84. By failing to inform his clients of case developments, such that they were expecting their case to proceed to trial up to the point that they received the notice of dismissal from the circuit court, Vance violated SCR 20:1.4(a)(3).

COUNT SEVENTEEN

85. By failing to file a response in the OLR grievance investigation relating to his representation of the plaintiffs in *Bailey vs. Chrysler*, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

Regarding Marianne J. (Counts 18-21)

OLR Matter No. 2014MA660

86. Marianne (MJ) retained Vance to represent her in multiple restraining order matters. At the time, MJ was living in a domestic abuse shelter in West Bend, Wisconsin.

87. On October 17, 2013, Vance and MJ entered into a Legal Services Agreement. MJ paid Vance \$500 to represent her at a TRO hearing on October 18, 2013.

88. Shortly after the hearing, MJ asked Vance to represent her in her divorce case, Washington County Circuit Court Case No. 13 FA 533, and two pending CHIPS cases. Vance did not have MJ sign another retainer agreement and informed her they would "work out" the fee.

89. In early November 2013, MJ and Vance began a sexual relationship. Between November 2013 and January 2014, MJ and Vance had sex at his office over twenty times.

90. While at his office, Vance would play his voicemails in MJ's presence. He would also share case names and details with her.

91. Vance would not discuss MJ's cases with her until after they had sex. MJ believed that if she did not respond

to Vance's requests for sex he would not take action to pursue her cases.

92. In mid-to-late January, MJ told Vance she was no longer interested in a sexual relationship. In response, Vance made her perform oral sex on him.

93. Vance continued to represent MJ and appeared at a hearing on her behalf in February 2014.

94. Vance failed to inform MJ of his February 20, 2014 temporary license suspension.

95. In April 2014, MJ retained another attorney to represent her, and a grievance was filed with OLR against Vance.

96. On May 21, 2014, OLR wrote to Vance, asking him to respond to the grievance by June 13, 2014. Vance failed to respond.

97. On June 30, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by July 10, 2014. The certified letter was delivered on July 8, 2014. Vance failed to respond.

COUNT EIGHTEEN

98. By having a sexual relationship with MJ when no sexual relationship existed prior to MJ hiring him to represent her, Vance violated SCR 20:1.8(j)¹².

COUNT NINETEEN

99. By listening to his voicemails in MJ's presence and discussing his other cases with her, Vance violated SCR 20:1.6(a)¹³.

COUNT TWENTY

100. By failing to notify MJ of his suspension, Vance violated SCR 22.26(1), enforced via SCR 20:8.4(f).

COUNT TWENTY-ONE

101. By failing to file a response in OLR's grievance investigation relating to his representation of MJ, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

¹² SCR 20:1.8(j) provides: "A lawyer shall not have sexual relations with a current client unless a consensual sexual relationship existed between them when the client-lawyer relationship commenced."

¹³ SCR 20:1.6(a) provides: "A lawyer shall not reveal information relating to the representation of a client unless the client gives informed consent, except for disclosures that are impliedly authorized to carry out the representation, and except as stated in pars. (b) and (c)."

Regarding OLR Inquiry and Leyer (Counts 22-23)

OLR Matter No. 2014MA879

102. After February 20, 2014 his temporary suspension, Paul Leyer retained Vance in April 2014 to represent him regarding a petition for TRO/Injunction filed against him on April 18, 2014. *Stacie L Emerich vs. Paul Leyer*, Ozaukee County Circuit Court Case No. 14 CV 171.

103. Vance did not inform Leyer that his law license was suspended.

104. On April 24, 2014, Vance sent Leyer an email requesting that they meet at his office to discuss the complaint and for Leyer to provide Vance with payment for the representation.

105. Vance appeared on Leyer's behalf at a May 1, 2014 hearing and asked for an adjournment of the hearing to allow him and Leyer time to review documents. The hearing was adjourned to May 13, 2014.

106. On May 5, 2014, Vance sent an email to Leyer requesting that he stop by his office to pay \$500 in attorneys' fees for the May 13, 2014 hearing.

107. Leyer never paid the \$500 fee. Leyer filed a grievance with OLR against Vance on May 23, 2014. In

addition, OLR had commenced its own inquiry into Vance's representation of Leyer.

108. On May 29, 2014, OLR asked Vance to respond to OLR's inquiry by June 20, 2014. Vance failed to respond.

109. On June 30, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by July 10, 2014. The certified letter was delivered on July 8, 2014. Vance failed to respond.

110. OLR combined OLR's inquiry and Leyer's grievance and on August 19, 2014 sent another letter to Vance requesting a response by September 12, 2014. Vance failed to respond.

111. On September 18, 2014, OLR sent a second letter to Vance, by first class and certified mail, asking him to respond by September 29, 2014. The certified letter came back as "Return to Sender, Unclaimed, Unable to Forward." The first class letter was not returned to OLR by the post office. Vance failed to respond.

COUNT TWENTY-TWO

112. By accepting a new matter and appearing in court to represent Leyer at a May 1, 2014 court hearing when his license

was suspended, Vance violated SCR 22.26(2), enforced via SCR 20:8.4(f).

COUNT TWENTY-THREE

113. By failing to file a response to the OLR's investigations relating to his representation of Leyer, Vance violated SCR 22.03(2) and SCR 22.03(6), enforced via SCR 20:8.4(h).

WHEREFORE, the Office of Lawyer Regulation asks that Attorney Craig E. Vance be found in violation of the Supreme Court Rules as alleged in connection with Counts One through Twenty-Three of this complaint; that the Court suspend Craig E. Vance's license for eighteen (18) months; and that the Supreme Court of Wisconsin order such other and further relief as may be just and equitable, including an award of costs.

Dated this 2 day of April, 2015.

OFFICE OF LAWYER REGULATION



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