

FILED
10-09-2018
Door County
Clerk of Courts
2018CV000191
Honorable Todd Ehlers
Branch 1

STATE OF WISCONSIN

CIRCUIT COURT

DOOR COUNTY

WHITE COTTAGE RED DOOR, LLC
8813 State Highway 42
Fish Creek, WI 54212

Case No.: ____ CV ____
Case Codes: 30701, 30704

CHERRY CREEK INVESTMENTS, LLC
8813 State Highway 42
Fish Creek, WI 54212

Plaintiffs,

vs.

TOWN OF GIBRALTAR
4097 State Highway 42
P.O. Box 850
Fish Creek, WI 54212-0850

Defendant.

SUMMONS

THE STATE OF WISCONSIN, To each person named above as a defendant:

You are hereby notified that the Plaintiffs named above have filed a lawsuit against you.

The Complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this summons, you must respond with a written answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes.

The answer must be sent or delivered to the court, whose address is:

Clerk of the Circuit Court for Door County
1205 S. Duluth Ave.
Door County Justice Center
Sturgeon Bay, Wisconsin 54235

and to Randall Nesbitt, the Plaintiffs' local counsel, whose address is:

Randall J. Nesbitt
Pinkert Law Firm LLP
454 Kentucky St.
Sturgeon Bay, WI 54235

Plaintiffs also request that you please send copies of the answer to Plaintiffs' lead counsel —

Milad Emam and Robert Frommer — whose pro hac vice applications are currently pending.

Their addresses are:

Robert P. Frommer
Milad Emam
Institute for Justice
901 N. Glebe Rd., Suite 900
Arlington, VA 22203

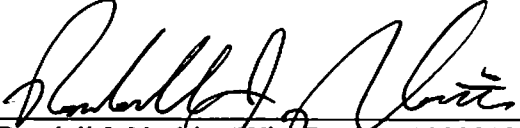
You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, the court may grant judgment against you for the legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law.

Dated this 9th day of October, 2018.

Robert P. Frommer (Va. Bar No. 70086)*
Milad Emam (Va Bar No. 83861)*
INSTITUTE FOR JUSTICE
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** Lead Counsel for Plaintiffs; Pro Hac Vice
Application Pending*


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Local Counsel for Plaintiffs

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Defendant.

CIVIL RIGHTS COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs White Cottage Red Door, LLC and Cherry Creek Investments, LLC, by and through their attorneys, respectfully submit this Complaint against Defendant Town of Gibraltar and allege as follows:

1. This lawsuit seeks to vindicate four entrepreneurs' constitutional right to earn an honest living on their own private property. After Lisa Howard, Kevin Howard, Christopher Hadraba, and Jessica Hadraba opened a state-licensed food truck (*i.e.*, "mobile restaurant") on their family-owned business's parking lot last summer, the Town of Gibraltar (hereinafter, "Gibraltar") banned mobile vending entirely in order to stop them. Gibraltar has no genuine safety reason or other legitimate governmental interest in maintaining the ban.

2. Instead, Gibraltar has stifled Lisa, Kevin, Christopher, Jessica, and other would-be vendors for only one, illegitimate purpose: to protect existing brick-and-mortar businesses from competition. But banning mobile vending in order to enrich restaurants is arbitrary, irrational, and in violation of the Wisconsin Constitution's Due Process and Equal Protection Clauses.

3. Gibraltar's ban also violates state law. Wisconsin has a comprehensive scheme in place for licensing and regulating mobile restaurants. Because Gibraltar cannot ban what the state expressly allows, its anticompetitive ban of state-licensed mobile restaurants is preempted and of no effect.

JURISDICTION AND VENUE

4. Plaintiffs White Cottage Red Door, LLC and Cherry Creek Investments, LLC bring this action under Wis. Stats. §§ 806.04 and 813.01 for violations of art. I, § 1 and art. XI, § 3 of the Wisconsin Constitution.

5. Plaintiffs seek declaratory and injunctive relief against Gibraltar's Amended and Restated Ordinance No. 1982-05, as well as nominal damages.

6. At all times pertinent to this action, the acts complained of have occurred in or are occurring in Door County, Wisconsin.

7. This Court has jurisdiction over this action pursuant to Wis. Stat. § 753.03.

8. This Court has jurisdiction over Defendant Town of Gibraltar pursuant to Wis. Stat. § 801.05.

9. Venue is proper in this Court pursuant to Wis. Stat. § 801.50(2).

THE PARTIES

10. Plaintiff White Cottage Red Door, LLC is a limited liability company organized in Wisconsin, with Lisa Howard, Kevin Howard, Christopher Hadraba, and Jessica Hadraba as its four members, and is the official corporate form for a business named White Cottage Red Door. Were it not for Gibraltar's ban on mobile restaurants, White Cottage Red Door, LLC would operate a mobile restaurant managed by member Christopher Hadraba.

11. Plaintiff Cherry Creek Investments, LLC is a limited liability company organized in Wisconsin, with Lisa Howard and Kevin Howard as its two members, and owns a 2.39 acre parcel of real property located at 8813 State Highway 42 in Fish Creek, Wisconsin, which is where White Cottage Red Door operates. Cherry Creek Investments, LLC pays property tax for this property. Were it not for Gibraltar's ban on mobile restaurants, Cherry Creek Investments, LLC would allow a White Cottage Red Door (and/or other) mobile restaurant to operate on its property.

12. Defendant Town of Gibraltar is a municipal corporation organized under the laws of Wisconsin.

STATEMENT OF FACTS

After Satisfying Applicable Requirements, White Cottage Red Door Opened Its Mobile Restaurant

13. Lisa Howard, her husband Kevin Howard, Lisa's brother Christopher Hadraba, and Christopher's wife Jessica Hadraba long dreamed of opening a family-owned business together as a quartet. To that end, they formed White Cottage Red Door, LLC ("White Cottage Red Door") in 2016.

14. Through their property-holding company—Cherry Creek Investments, LLC (“Cherry Creek Investments”)—Lisa and Kevin Howard purchased real property located at 8813 State Highway 42 in Fish Creek, Wisconsin for White Cottage Red Door’s use. Lisa, Kevin, Christopher, and Jessica painstakingly refurbished a cherry orchard and a roadside store that had previously operated there as “Ray’s Cherry Hut.” After renovations were complete, they opened White Cottage Red Door on this property in May 2017 and have operated it since.

15. Lisa’s, Kevin’s, Christopher’s, and Jessica’s plans for White Cottage Red Door were twofold. They wanted to open both a brick-and-mortar store and, in the store’s adjacent parking lot, a mobile restaurant.

16. White Cottage Red Door’s brick-and-mortar store sells specialty foods, including jams, salsas, butters, candies, dressings, sauces, pickles, and syrups, and baked goods, including pies, fudge, and donuts. The brick-and-mortar store also sells greeting cards, Wisconsin-shaped magnets, and other non-food goods.

17. White Cottage Red Door’s store prepares many of the baked goods it sells in its indoor commercial kitchen, which has been inspected and licensed by Wisconsin’s Department of Agriculture, Trade and Consumer Protection (“DATCP”).

18. In addition to selling food from White Cottage Red Door’s brick-and-mortar store, Lisa, Kevin, Christopher, and Jessica wanted to separately sell sandwiches and burgers at White Cottage Red Door’s mobile restaurant.

19. White Cottage Red Door’s owners intended for their mobile restaurant to fill a gap in their local restaurant market. Many of the restaurants operating in Gibraltar when White Cottage Red Door commenced operations are “sit down” restaurants with table service. Through their mobile restaurant, White Cottage Red Door’s owners intended to serve diners who wanted

to purchase burgers or sandwiches “to go,” such as campers who wanted to eat at their camp sites.

20. Before opening White Cottage Red Door’s store, Christopher spent five years preparing some of the most popular burgers in his old town—Marco Island, FL—at his former business. For four years before that, he owned a restaurant in Sayner, WI where he cooked burgers, along with pizzas, steaks, and fried fish. Given this experience, White Cottage Red Door’s owners intended for him to operate the business’s mobile restaurant.

21. After he passed a DATCP-recognized examination on food safety, Christopher Hadraba earned the National Restaurant Association’s “ServSafe Food Protection Manager” certificate in 2017. The certificate does not expire until 2022.

22. Before White Cottage Red Door’s mobile restaurant opened to the public, it satisfied all applicable land-use requirements.

23. In July 2017, the Door County Land Use Services Department (or “Planning Department”)—which is responsible for zoning in Gibraltar—issued Cherry Creek Investments a zoning permit authorizing a mobile restaurant at 8813 State Highway 42. The zoning permit is currently valid.

24. Before White Cottage Red Door’s mobile restaurant opened to the public, it also satisfied all applicable restaurant regulations.

25. In 2017, White Cottage Red Door’s mobile restaurant passed a health-and-safety inspection by the DATCP and consequently earned a DATCP license as a “retail food establishment,” as defined by Wis. Stat. § 97.30(1)(c).

26. After White Cottage Red Door's mobile restaurant obtained county-level and state-level authorization to operate, Christopher Hadraba operated the mobile restaurant in the business's parking lot at 8813 Highway 42 between August 26, 2017 and October 22, 2017.

27. In 2017, White Cottage Red Door's mobile restaurant offered five types of burgers for sale, along with grilled-cheese, "BLT," and vegetarian sandwiches, potato chips, and sodas.

28. In order to expand its mobile-restaurant menu and sell barbecue foods, such as brisket, White Cottage Red Door asked the DATCP for permission to operate a custom-built barbecue smoker at the business's mobile restaurant.

29. In October 2017, the DATCP approved White Cottage Red Door's application for operating a custom-built barbecue smoker at the business's mobile restaurant.

30. White Cottage Red Door's owners invested heavily in their mobile restaurant as it was a critical part of their business plan.

To Stop White Cottage Red Door's Mobile Restaurant, Gibraltar Bans Mobile Vending

31. Soon after White Cottage Red Door began operating its mobile restaurant in August 2017, Gibraltar's 5-member governing board (the "Gibraltar Town Board") repeatedly tried to stop the restaurant from vending.

32. First, within 45 minutes of White Cottage Red Door opening its mobile restaurant on August 26, 2017, Gibraltar's constable appeared at 8813 State Highway 42 and told Christopher Hadraba to stop vending.

33. After seeing White Cottage Red Door's mobile restaurant's permits to operate, and purchasing a burger from the mobile restaurant, the constable left.

34. Under two hours later on August 26, 2017, the Chairman of the Gibraltar Town Board—Richard Skare—also came to 8813 State Highway 42 to investigate, and also left after Christopher Hadraba warranted that White Cottage Red Door’s mobile restaurant had county-level and state-level authorization to operate.

35. Without notifying White Cottage Red Door’s owners, the Gibraltar Town Board discussed the business’s mobile restaurant at the Board’s September 6, 2017 meeting. After Richard Skare introduced the topic, two of the Board’s 2017 members—Brian Hackbarth and Barbara McKesson—successfully carried a motion for trying to get the mobile restaurant’s zoning permit rescinded, and according to the meeting’s minutes, “protect[ing] the community from having this [mobile vending] ever happen again.”

36. On September 19, 2017, the Gibraltar Town Board again discussed the zoning permit issued for White Cottage Red Door’s mobile restaurant and sent a letter to the director of the Door County Planning Department—Mariah Goode—“demand[ing] [that] the planning department retract the issued permit.” (A true and correct copy of this letter is attached hereto and incorporated herein as Exhibit A.)

37. In its September 19, 2017 letter, the Gibraltar Town Board incorrectly asserted that a “Hawking Ordinance” enacted by Gibraltar in 1982 prohibited White Cottage Red Door’s mobile restaurant. That ordinance did not prohibit vending on private property, like Cherry Creek Investments’ property. Further, the ordinance applied to “pushcarts, hand carts, or similar vehicles, or an individual moving about the village on foot,” but not trailers like White Cottage Red Door’s.

38. On October 2, 2017, Mariah Goode responded to the Gibraltar Town Board’s demand by confirming that White Cottage Red Door’s mobile restaurant was legal and refusing

to rescind its zoning permit. (A true and correct copy of this letter is attached hereto and incorporated herein as Exhibit B.)

39. Stymied in its attempt to rescind White Cottage Red Door's mobile restaurant's zoning permit, the Gibraltar Town Board proceeded to prohibit all businesses on wheels. At its November 15, 2017 and January 3, 2018 meetings, the Gibraltar Town Board discussed a revision to its 1982 ordinance that would prohibit White Cottage Red Door's mobile restaurant, along with sales from other vehicles.

40. At the January 3, 2018 meeting, one Gibraltar Town Board member expressed concern that—if White Cottage Red Door were allowed to operate a mobile restaurant in Gibraltar—other mobile restaurants would appear in the town.

41. On January 10, 2018, the Gibraltar Town Board voted to adopt “Amended and Restated Ordinance No. 1982-05,” which replaced Gibraltar's original 1982 vending ordinance.

42. On January 13, 2018, Amended and Restated Ordinance No. 1982-05 was published.

43. Amended and Restated Ordinance No. 1982-05 (the “Vending Ban”) provides that:

It shall be unlawful for any person to vend, sell or offer for sale any goods, products, merchandise, wares, tokens, food (including without limitation popcorn, hot-dogs, ice cream, desserts, pizza, sandwiches and tacos) or any other thing (collectively, “Goods”) from a vehicle, truck, trailer, cart, pushcart or handcart at any place whatsoever in the Town of Gibraltar.

44. The Vending Ban is a total ban on sales from vehicles, trucks, trailers, carts, pushcarts and handcarts. It applies to all foods—and all other goods—sold from these sources.

45. The Vending Ban applies to those who wish to sell goods from vehicles, trucks, trailers, carts, pushcarts and handcarts (“mobile vendors”) on either public or private property.

46. The Vending Ban applies to mobile restaurants licensed and regulated by the DATCP.

47. The Vending Ban authorizes fines of up to \$500 per day.

48. In a letter dated February 2, 2018, Plaintiffs' counsel Randall Nesbitt asked Richard Skare and Gibraltar Town Clerk Beth Hagen whether the Vending Ban prohibited White Cottage Red Door's mobile restaurant given that it was operating before the Vending Ban's enactment.

49. On February 13, 2018, an attorney representing the Town of Gibraltar informed Mr. Nesbitt that the Vending Ban prohibited White Cottage Red Door's mobile restaurant.

50. The Gibraltar Town Board plans to enforce the Vending Ban against mobile restaurants that operate in Gibraltar.

51. According to minutes posted for the Gibraltar Town Board's May 2, 2018 meeting, the Board discussed "[f]ood [t]ruck [e]nforcement" at that meeting.

52. To facilitate enforcement of the Vending Ban, Gibraltar's Town Board again demanded that the Door County Planning Department retract its zoning permit for White Cottage Red Door's mobile restaurant. In a May 3, 2018 letter addressed to Mariah Goode, counsel for the Town of Gibraltar said that "the Town request[ed] that [she] rescind the permit." (A true and correct copy of this letter is attached hereto and incorporated herein as Exhibit C.)

53. In a May 11, 2018 response letter on her department's behalf, Mariah Goode again refused to rescind White Cottage Red Door's mobile restaurant's zoning permit. (A true and correct copy of this letter is attached hereto and incorporated herein as Exhibit D.)

54. Upon information and belief, in addition to threatening White Cottage Red Door with \$500 fines if it dared to operate its mobile restaurant, Defendant has threatened to stop at least one other prospective mobile vendor from operating.

The Vending Ban's Purpose Is Economic Protectionism

55. The Vending Ban's purpose is to protect brick-and-mortar restaurants from competition.

56. The Vending Ban only applies to sales from vehicles, trucks, trailers, carts, pushcarts or handcarts, and, thus, does not apply to sales from brick-and-mortar businesses.

57. White Cottage Red Door can legally sell food and other goods in its brick-and-mortar business at 8813 State Highway 42, but it cannot sell the same food and goods from a mobile restaurant at that same location.

58. The Gibraltar Town Board enacted the Vending Ban in order to protect brick-and-mortar restaurants from competition.

59. Gibraltar Chairman Richard Skare owns a brick-and-mortar restaurant in Gibraltar.

60. Former Gibraltar Supervisor Brian Hackbarth is an accountant for a brick-and-mortar restaurant in Gibraltar.

61. While on the Gibraltar Town Board, Brian Hackbarth formally moved the Board to revoke White Cottage Red Door's mobile restaurant's zoning permit, and later voiced support for the Vending Ban.

62. In enacting the Vending Ban, the Gibraltar Town Board discussed the supposed threat mobile vendors posed to brick-and-mortar restaurants. Steve Sohns, another member of the Gibraltar Town Board, publicly said that brick-and-mortar restaurants should fear mobile-

restaurant competition. At the Gibraltar Town Board's January 3, 2018 meeting, he noted that, after eating a mobile restaurant's Italian beef sandwich he called "out of this world," he understood why brick-and-mortar restaurants "should be up in arms" about mobile restaurants.

Wisconsin Comprehensively Regulates Mobile Restaurants at the State Level

63. Wisconsin has a comprehensive scheme for licensing and regulating mobile restaurants.

64. Outside of four narrow statutory exceptions, "no person" in Wisconsin "may operate a retail food establishment without a valid license issued by the [DATCP] or an agent city or county." Wis. Stat. § 97.30(2)(a).

65. Both mobile restaurants and brick-and-mortar restaurants qualify as "retail food establishments" that must be licensed by the DATCP or an agent city or county. Wis. Stat. § 97.30(1)(c).

66. An "agent city or county" is a city or county granted agent status by the DATCP. Wis. Stat. § 97.30(1)(a). Any local health department granted agent status must still meet standards adopted by the DATCP. *See id.* § 97.41(2).

67. Because the Town of Gibraltar is not an "agent city or county" as defined by Wis. Stat. § 97.30(1)(a), restaurants—including mobile restaurants—operating in Gibraltar must be licensed by the DATCP.

68. To be licensed by the DATCP, restaurants—including mobile restaurants—must be inspected by the DATCP for compliance with state-level laws and regulations. Wis. Stat. § 97.30(2)(c).

69. DATCP-licensed retail food establishments—including both mobile restaurants and brick-and-mortar establishments—must comply with the Wisconsin Food Code. Wis. Admin. Code §§ ATCP 75.05, 75.102.

70. Brick-and-mortar restaurants and mobile restaurants subject to the Wisconsin Food Code must both satisfy Chapters 1 through 7 of that code. Wis. Admin. Code § ATCP 75.102; *id.* § ATCP 75 App. 9-101.10.

71. Chapters 1 through 7 of the Wisconsin Food Code include provisions regulating employees, food safety, sanitation, waste management, physical facilities, and public health.

72. In addition, mobile restaurants must satisfy Chapter 9 of the Wisconsin Food Code, which requires that mobile restaurants return daily to a brick-and-mortar location for cleaning, discharging wastes, and replenishing supplies (“service base”).

73. Brick-and-mortar restaurants and mobile restaurants licensed as a “retail food establishment” must employ a “certified food manager.” Wis. Admin. Code § ATCP 75 App. 2-102.11(B); *see also* Wis. Stat. § 97.33(1r).

74. The DATCP accepts the National Restaurant Association’s “ServSafe Food Protection Manager” certificate as one credential satisfying the “certified food manager” requirement. Wis. Dep’t of Agric., Trade & Consumer Prot., Mobile Food Serv. & Mobile Retail Food Establishments Food Review, https://datcp.wi.gov/Pages/Programs_Services/foodmanager.aspx.

75. In order to be licensed as a retail food establishment by the DATCP, prospective mobile restaurants must provide the DATCP with proof of requisite “certified food manager” credentials, along with their:

- menu of specific foods to be sold; list of equipment to be used;

- plan and contract for obtaining potable water and disposing wastewater;
- plan for employees' toilet access;
- plumbing specifications;
- vehicle specifications;
- service-base plan;
- methods of food preparation, cooking, handling, holding and storage;
- mechanical-refrigeration methods; and
- contingency plans for provisions of water, food, materials, power, wastewater disposal, and waste disposal.

Wis. Dep't of Agric., Trade & Consumer Prot., Food Manager Requirements,

<https://datcp.wi.gov/Documents/mobilesplanreview.pdf>.

76. Through these requirements, Wisconsin has put in place a uniform scheme for regulating restaurants, including mobile restaurants. These requirements apply statewide, including in cities or counties granted agent status by the DATCP.

Injury to Plaintiffs

77. The Vending Ban prohibits White Cottage Red Door from mobile vending in Gibraltar, including on Cherry Creek Investments' property at 8813 State Highway 42.

78. The Vending Ban violates Plaintiffs' right to earn an honest living and their property rights guaranteed by the Wisconsin Constitution.

79. Through the Vending Ban, Plaintiffs are injured irreparably by the ongoing deprivation of their constitutional rights.

80. Plaintiffs understand that disregarding the Vending Ban and operating a mobile restaurant in Gibraltar would subject them to hundreds of dollars of fines per day.

81. White Cottage Red Door would like to operate a mobile restaurant on Cherry Creek Investments' property at 8813 State Highway 42, and not on public property. However, as

a result of the Vending Ban, White Cottage Red Door has not operated a mobile restaurant in 2018.

82. As a result of the Vending Ban, White Cottage Red Door transferred the trailer it previously used for a mobile restaurant to another owner.

83. If not for the Vending Ban, White Cottage Red Door would have operated a mobile restaurant at 8813 State Highway 42 during the spring and summer of 2018.

84. If not for the Vending Ban, White Cottage Red Door's mobile restaurant would be currently operating at 8813 Highway 42.

85. If not for the Vending Ban, Cherry Creek Investments would have permitted White Cottage Red Door's mobile restaurant to operate on its property during the spring and summer of 2018, and the mobile restaurant would currently be operating there. Also, if not for the Vending Ban, Cherry Creek Investments would permit other mobile restaurants to operate on its property at 8813 Highway 42.

86. As a result of the Vending Ban, Christopher Hadraba had to obtain a second job, where he has worked throughout 2018.

87. If not for the Vending Ban, Christopher Hadraba would have worked at White Cottage Red Door's mobile restaurant during the spring and summer of 2018, and he would currently be working there.

88. White Cottage Red Door's mobile restaurant was an integral part of its owners' broader business venture and an important source of income that they planned to rely on to support themselves and their families.

89. The Vending Ban's prohibition on mobile restaurants has cost Plaintiffs thousands of dollars of mobile-restaurant sales in 2018, along with income from future sales.

90. If this Court declared that the Vending Ban was unconstitutional and/or preempted by Wisconsin law, Cherry Creek Investments would permit a White Cottage Red Door (and/or other) mobile restaurant to operate on its property at 8813 State Highway 42.

91. If this Court declared that the Vending Ban was unconstitutional and/or preempted by Wisconsin law, White Cottage Red Door would sell sandwiches, burgers, barbecue, potato chips, and soda from a DATCP-licensed mobile restaurant at 8813 State Highway 42.

92. If this Court declared that the Vending Ban was unconstitutional, White Cottage Red Door would also sell Wisconsin-shaped magnets at its mobile restaurant at 8813 State Highway 42.

Notice of Claim

93. Plaintiffs have complied with the provisions of Wis. Stat. § 893.80 in providing notice to Defendant for the claims presented herein.

94. Plaintiffs filed a Notice of Claim and Claim (“Notice”) with Gibraltar Town Clerk Beth Hagen on May 9, 2018, pursuant to Wis. Stat. § 893.80. (A true and correct copy of the Notice is attached hereto and incorporated herein as Exhibit E.)

95. The Notice informed Defendant that it had injured Plaintiffs through the Vending Ban and demanded repeal of the Vending Ban so as to allow mobile vending in Gibraltar by those who satisfy applicable county-level and state-level laws and regulations.

96. The Notice also demanded nominal damages in the amount of \$1.

97. In an affidavit of service dated May 15, 2018, the Door County Sheriff’s Office confirmed that it successfully served Plaintiffs’ Notice on May 9, 2018.

98. On or about August 27, 2018, Defendant formally disallowed the Claim presented in Plaintiffs' May 9, 2018 Notice.

99. This suit is brought within the time allowed under Wis. Stat. § 893.80(1g).

COUNT I: DUE PROCESS

100. Plaintiffs re-allege and incorporate by reference the allegations contained in all of the preceding paragraphs.

101. The Due Process Clause of art. I, § 1 of the Wisconsin Constitution provides, in relevant part, that "[a]ll people are born equally free and independent, and have certain inherent rights; among these are life, liberty and the pursuit of happiness."

102. The Due Process Clause protects, among other things, the right to pursue a chosen calling, operate a lawful business, and use one's own private property for productive ends without arbitrary, irrational, unreasonable, or oppressive governmental interference.

103. The Vending Ban is arbitrary, irrational, unreasonable, and oppressive governmental interference with prospective mobile vendors' (including Plaintiffs') ability to pursue their chosen callings, operate lawful businesses, and use their own private property for productive ends.

104. Gibraltar restaurants must satisfy Wisconsin's and the DATCP's health-and-safety requirements regardless of whether they are brick-and-mortar businesses or mobile restaurants. Accordingly, the Vending Ban serves no public health or safety objective.

105. Gibraltar has no compelling, substantial, or legitimate governmental interest in prohibiting the sale of goods from vehicles, trucks, trailers, carts, pushcarts or handcarts.

106. The Vending Ban is not necessary to achieve, narrowly tailored to, reasonably related to, or rationally related to any compelling, substantial, or legitimate governmental interest.

107. The actual purpose of the Vending Ban is to protect brick-and-mortar businesses from competition.

108. Protecting brick-and-mortar businesses from competition is not a legitimate governmental interest.

109. The Vending Ban violates the Due Process Clause of art. I, § 1 of the Wisconsin Constitution.

110. But for the Vending Ban, White Cottage Red Door would operate a mobile restaurant on Cherry Creek Investments' property.

111. Plaintiffs have no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to their constitutional rights caused by the Vending Ban.

112. Unless the Vending Ban is permanently enjoined and declared unconstitutional or illegal, Plaintiffs will continue to suffer great and irreparable harm.

COUNT II: EQUAL PROTECTION

113. Plaintiffs re-allege and incorporate by reference the allegations contained in all of the preceding paragraphs.

114. The Equal Protection Clause of art. I, § 1 of the Wisconsin State Constitution provides in relevant part that “[a]ll people are born equally free and independent, and have certain inherent rights; among these are life, liberty and the pursuit of happiness.”

115. The Equal Protection Clause protects the right of similarly-situated individuals to be treated similarly.

116. Mobile vendors operating on private property are similarly situated to those who sell goods from brick-and-mortar businesses.

117. Yet, the Vending Ban discriminates against mobile vendors operating on private property in favor of brick-and-mortar businesses. While brick-and-mortar businesses are permitted to operate in Gibraltar, mobile vendors operating on private property are prohibited.

118. There is no rational reason to discriminate against mobile vendors operating on private property in favor of brick-and-mortar businesses.

119. There is no substantial distinction between mobile vendors operating on private property and brick-and-mortar businesses.

120. Classifying mobile vendors operating on private property differently from brick-and-mortar businesses is not germane to furthering any compelling, substantial, or legitimate governmental interest.

121. Mobile vendors operating on private property are not so different from brick-and-mortar businesses as to reasonably suggest the propriety of substantially different legislation for these groups.

122. A vendor does not present any threat to any legitimate government interest merely because it sells goods from a vehicle, truck, trailer, cart, pushcart or handcart rather than a brick-and-mortar business.

123. The actual purpose for discriminating against mobile vendors is to protect existing brick-and-mortar businesses in Gibraltar from competition.

124. Protecting brick-and-mortar businesses from competition is not a legitimate governmental interest.

125. The Vending Ban violates the Equal Protection Clause of art. I, § 1 of the Wisconsin Constitution.

126. But for the Vending Ban, White Cottage Red Door would operate a mobile restaurant on Cherry Creek Investments' property.

127. Plaintiffs have no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to their constitutional rights caused by the Vending Ban.

128. Unless the Vending Ban is permanently enjoined and declared unconstitutional or illegal, Plaintiffs will continue to suffer great and irreparable harm.

COUNT III: STATE-LAW PREEMPTION

129. Plaintiffs re-allege and incorporate by reference the allegations contained in all of the preceding paragraphs.

130. Under art. XI, § 3 of the Wisconsin Constitution, municipal ordinances are “subject . . . to such enactments of the [state] legislature of statewide concern as with uniformity shall affect every [municipality].” Accordingly, municipal ordinances that logically conflict with, defeat the purpose of, or go against the spirit of these enactments are preempted by state law.

131. Municipal prohibitions of state-licensed businesses logically conflict with, defeat the purpose of, and go against the spirit of state law.

132. Wisconsin's comprehensive scheme for regulating and licensing mobile restaurants, pursuant to Wis. Stat. § 97.30 and attendant regulations, is a legislative enactment of statewide concern that uniformly affects the state's municipalities.

133. The Vending Ban is a prohibition on all mobile vendors in Gibraltar, including mobile restaurants that are licensed and regulated by the DATCP.

134. By prohibiting state-licensed mobile restaurants like White Cottage Red Door's from selling state-approved food products, the Vending Ban impermissibly conflicts with Wisconsin law and is, thus, illegal.

135. Plaintiffs have no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm caused by the Vending Ban.

136. Unless the Vending Ban is permanently enjoined and declared unconstitutional or illegal, Plaintiffs will continue to suffer great and irreparable harm.

REQUEST FOR RELIEF

Plaintiffs respectfully request that the Court grant the following relief:

A. A declaratory judgment that, facially and as applied to Plaintiffs, the Vending Ban violates the Due Process Clause of art. I, § 1 of the Wisconsin Constitution;

B. A declaratory judgment that, facially and as applied to Plaintiffs, the Vending Ban violates the Equal Protection Clause of art. I, § 1 of the Wisconsin Constitution;

C. A declaratory judgment that, as applied to Plaintiffs' and state-licensed vendors' food sales, the Vending Ban is preempted by Wisconsin law;

D. A permanent injunction prohibiting Defendant from enforcing the Vending Ban;

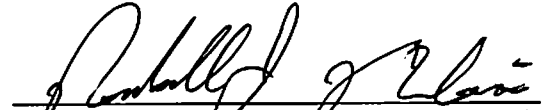
E. Nominal damages in the amount of \$1.00;

F. Reasonable costs and attorneys' fees; and

G. Such other legal or equitable relief as this Court may deem appropriate and just.

Dated this 9th day of October, 2018.

Respectfully submitted,



Randall J. Nesbitt (Wis. Bar No. 1000013)

PINKERT LAW FIRM LLP

454 Kentucky St.

Sturgeon Bay, WI 54235

Tel: (920) 743-6505

Fax: (920) 743-2041

Email: RNesbitt@pinkertlawfirm.com

Local Counsel for Plaintiffs

Robert P. Frommer (Va. Bar No. 70086)*

Milad Emam (Va. Bar No. 83861)*

INSTITUTE FOR JUSTICE

901 N. Glebe Rd., Suite 900

Arlington, VA 22203

Tel: (703) 682-9320

Fax: (703) 682-9321

E-mail: rfrommer@ij.org; memam@ij.org

Lead Counsel for Plaintiffs

**Pro Hac Vice Application Pending*

White Cottage Red Door, LLC et al. v. Town of Gibraltar

Exhibit A to Plaintiffs' Complaint



SEP 25 2017

TOWN OF GIBRALTAR

September 19, 2017

Dear Ms. Goode:

The Town Board wants to express its total opposition to the recent decision by Door County Planning to permit a food truck at the White Cottage Red Door property located at 8813 Highway 42. The Town Board believes that this type of use is contrary to the Gibraltar Comprehensive Plan.

The location where the mobile food truck was permitted is within the GC zoning district that only exists in the Town of Gibraltar, which certainly indicates that the Town of Gibraltar considers this land use different from the other commercial districts allowed in other towns. The County Zoning Code does not define, address, or permit food trucks, so any approval should be subject to written clarification with the Resource Plan Commission as a zoning text amendment.

Our review of the County Zoning Code reaches a different conclusion, which is that food carts are NOT permitted.

A restaurant is permitted in the General Commercial District as a principal use. A principal structure is a building or other structure that houses the principal use. A principal structure may have multiple principal uses. A structure is anything constructed, erected, or manufactured and placed on or in the ground. It does not state that a structure is movable or transported from one location to another.

Restaurants are a principal use in this zoning district. However, accessory buildings have restrictions which "food trucks" do not meet. Therefore, this principal use in a nonconforming accessory structure should not be allowed.

The definition of trailer is important. "Trailer" a portable structure built on a chassis which can be towed by an appropriate motor vehicle and is designated to be used as a temporary dwelling for travel, recreation, or vacation use, and which does not fall into the definition of a manufactured home. The food truck may meet the definition of a structure except it is mobile and not a permanent structure so it is a trailer. Based on the trailer definition it is clear that it is not a structure. The Zoning permit requires building elevations and compliance with the sewerage and water requirements, which cannot exist for a temporary structure.

The state regulates mobile and temporary restaurants differently from regular restaurants, which clearly indicates that they are not the same. The County code makes no provision for a restaurant as a temporary use. The County staff has erroneously determined they are the same.

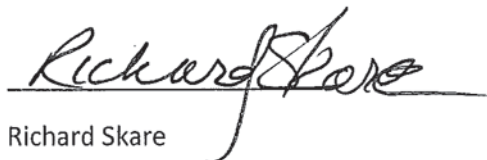
The State requires a mobile food establishment to obtain a Service Base license and the Mobile Food Establishment License prior to issuing a permit. Were those documents for the food truck reviewed? If so, please provide a listing of all of the establishments that have been issued a zoning permit to operate

a Service Base, with their State License number and all the mobile food trucks issued a zoning permit with their Mobile Food Establishment license number.

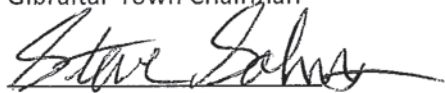
The Town of Gibraltar has a "Hawking Ordinance" approved on September 7, 1982, which is attached. The food truck is peddling food and operating from a vehicle which means the operator is violating the Town's Code. Because this use is in violation of a Town ordinance, we demand the planning department retract the issued permit. We will also be seeking legal alternatives.

Better communication could have avoided this problem. The Town Board is likely to direct the Plan Commission to consider new Special Development Requirements under 3.15(3) to make sure that no confusion exists as to what activities the Town wishes to permit.

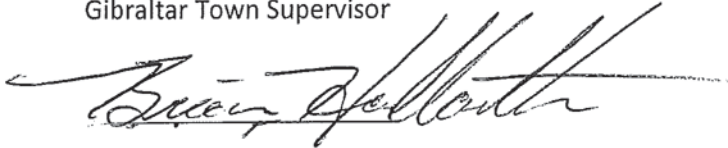
Sincerely:



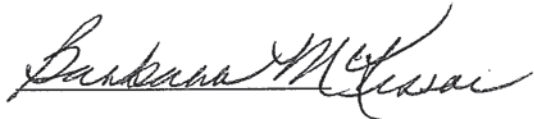
Richard Skare
Gibraltar Town Chairman



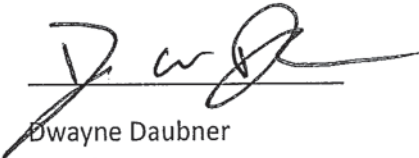
Steve Sohns
Gibraltar Town Supervisor



Brian Hackbarth
Gibraltar Town Supervisor



Barbara McKesson
Gibraltar Town Supervisor



Dwayne Daubner
Gibraltar Town Center

White Cottage Red Door, LLC et al. v. Town of Gibraltar

Exhibit B to Plaintiffs' Complaint



County of Door LAND USE SERVICES DEPARTMENT

County Government Center
421 Nebraska Street
Sturgeon Bay, WI 54235

Mariah Goode, Director

Direct line: (920) 746-2224

Main office line: (920) 746-2323

FAX: (920) 746-2387

E-mail: mgoode@co.door.wi.us

Website: <http://map.co.door.wi.us/planning>

October 2, 2017

Gibraltar Town Board of Supervisors
c/o Town Clerk-Administrator Beth Hagen
P.O. Box 850
Fish Creek, WI 54212

Dear Gibraltar Town Board members:

I am writing in response to your letter of September 19th, 2017, which we received September 25th, regarding Door County zoning regulations pertaining to food trucks.

When the first inquiry came in perhaps 6-7 years ago as to whether or how food trucks could be authorized under the county zoning ordinance, county staff reviewed the zoning regulations and determined the following:

1. Restaurants are not defined in the county zoning ordinance, in which case the ordinance dictates turning to Webster's Dictionary and using its definition. A food truck meets the Webster's Dictionary definitions of a restaurant (public eating place, business establishment where meals or refreshments may be purchased, etc.).
2. Restaurants are a principal use.
3. Any structure housing a principal use is by county zoning ordinance definition viewed and treated as a principal structure.
4. While the county zoning ordinance has prohibitions regarding items which may not be used as accessory structures, the ordinance does not have any such prohibitions regarding principal structures.
5. There is no ordinance definition of a "permanent structure," nor is there a requirement that a structure not be potentially "mobile." If a structure is in place for longer than the ordinance's temporary use provisions allow, a zoning permit is required, unless it is a minor structure exempt from permit requirements.

Given the above, county staff determined that food trucks could be authorized under the county zoning ordinance as described below.

Option 1. With property owner permission, a food truck may be placed on any lot in any zoning district as a temporary use. Temporary uses do not require a county zoning permit, but do need to meet all temporary use regulations regarding number of days in effect/existence on a lot, setbacks, etc.

Gibraltar Town Board of Supervisors
October 2, 2017
Page Two

Option 2. A food truck may be placed on a lot zoned for the principal use "restaurants" and authorized as such. A zoning permit is required, the application process for which includes submittal of a site plan showing where the food truck will be placed. Setbacks and parking requirements need to be met.

Option 3. With the permission of the relevant right-of-way authority, a food truck may be parked in an on-street, municipally-designated parking space (i.e., painted and paved) as long as the space hasn't been specifically designated by this department as serving a different use in order to meet ordinance parking requirements.


To date, the county has issued zoning permits for 4-5 food trucks, all under Option 2.

The county zoning ordinance requires that, before issuing a zoning permit, the county sanitarian review the adequacy of any sanitary provisions. That review occurred for the food truck in question, as well as for the others previously authorized.

The county zoning ordinance does not allow the county to hold off on issuing, or to deny or to revoke, a permit based on another entity's comprehensive plan, ordinances, statutes, codes, permit requirements or issuance thereof. Please note that, when working with applicants on permits, staff in this department notify applicants both verbally and in writing on the face of the permit itself that a town permit or permits may be required. Applicants are also advised to check to make sure they have any required state-level authorizations for their projects.

Please feel free to contact me with any further questions.

Sincerely,



Handwritten signature of Mariah Goode in black ink.

Mariah Goode

cc w/ enc. (Gibraltar Town Board letter of September 19, 2017):

✓ Rick Brauer, Door County Zoning Administrator
Grant Thomas, Door County Corporation Counsel
Ken Pabich, Door County Administrator
Ken Fisher, Door County Resource Planning Committee Chair
David Lienau, Door County Board of Supervisors Chair
Chris Hadraba, White Cottage Red Door
Jackson Parr, Peninsula Pulse

White Cottage Red Door, LLC et al. v. Town of Gibraltar

Exhibit C to Plaintiffs' Complaint



Robert R. Gagan
Attorney at Law

O'NEIL CANNON
HOLLMAN DEJONG & LAING ^{SC}
Wisconsin's Premier Lawyers & Litigators

Robert.Gagan@wilaw.com

May 3, 2018

Mariah Goode, Director
Door County Land Use Services Department
County Government Center
421 Nebraska Street
Sturgeon Bay, WI 54235

Re: Town of Gibraltar

Dear Ms. Goode:

I represent the Town of Gibraltar. I am responding to your letter to the Town dated October 2, 2017.

Your zoning permit of a mobile food truck in the Town of Gibraltar was issued in error and the Town requests that you rescind the permit. The analysis you provided of Door County's decision to approve the permit is based on defining a mobile food truck as a principal structure. Any court reviewing this decision would agree that a mobile food truck is not a principal structure because the food truck is mobile. Furthermore, any court reviewing this matter would find that a mobile food truck is different than a restaurant. Mobile food trucks and restaurants have different regulations issued by the State of Wisconsin. The Town considers a mobile food truck an accessory use to the retail operation located on the property. This mobile food truck is not permitted based upon Section 3.12 (5) of the ordinance.

Please notify me whether your department will be rescinding the zoning permit or whether the Town will need to take further legal action. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,

O'NEIL, CANNON, HOLLMAN, DEJONG & LAING S.C.

Robert R. Gagan
RRG/caj

cc: Town of Gibraltar
Attorney Randall J. Nesbitt

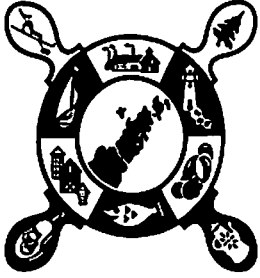
RECEIVED

MAY 07 2018

DOOR COUNTY
LAND USE SERVICES DEPARTMENT

White Cottage Red Door, LLC et al. v. Town of Gibraltar

Exhibit D to Plaintiffs' Complaint



County of Door LAND USE SERVICES DEPARTMENT

County Government Center
421 Nebraska Street
Sturgeon Bay, WI 54235

Mariah Goode, Director

Direct line: (920) 746-2224

Main office line: (920) 746-2323

FAX: (920) 746-2387

E-mail: mgoode@co.door.wi.us

Website: <http://map.co.door.wi.us/planning>

May 11, 2018

Robert R. Gagan
Attorney at Law
O'Neil, Cannon, Hollman, DeJong & Laing
716 Pine Street
Green Bay, WI 54301-4929

Re: Regular Zoning Permit issued July 28, 2017
Parcel Identification Number 014-01-05302734A1

Dear Attorney Gagan:

I am writing in response to your letter dated May 3, 2018, received May 7, 2018.

The county's interpretation and application of the relevant Door County Comprehensive Zoning Ordinance (DCCZO) provisions have not changed since my letter of October 2, 2017. Therefore, the county will not be rescinding the permit in question.

The zoning administrator's decision was rendered on July 28, 2017, when the Regular Zoning Permit was issued. This was and remains a definite and final decision. The time and process for appealing a zoning administrator's decision is clearly specified in section 11.07(1), DCCZO, and §§ 59.694 (4) - (10), Wis. Stats. Any appeal must be filed within the 30-day time period prescribed by the ordinance and statute. The time for the Town of Gibraltar to appeal the zoning administrator's decision began to run on July 28, 2017 or, at the latest, when the Town of Gibraltar found out about the decision. It is clear that the Town had actual or constructive notice of the decision no later than mid-September, based on the September 19, 2017 letter the Town sent the county, and that they had the county's rationale for its decision in early October 2017 when they received my October 2nd letter. Simply put, the time for appealing the decision at issue here has long passed.

Please feel free to contact me with any further questions.

Respectfully,



Mariah Goode

enc.: Gagan May 3, 2018; County October 2, 2017; & Town September 19, 2017 letters
July 28, 2017 Regular Zoning Permit
DCCZO s. 11.07(1)
Wisconsin Statutes §§ 59.694(4)-(10)

White Cottage Red Door, LLC et al. v. Town of Gibraltar

Exhibit E to Plaintiffs' Complaint

NOTICE OF CLAIM AND CLAIM PURSUANT TO WIS. STAT. § 893.80(1d)

To: Beth Hagen, Town Clerk
Town of Gibraltar
4097 State Highway 42
P.O. Box 850
Fish Creek, WI 54212

Introduction

1. Pursuant to Wis. Stat. § 893.80(1d)(a), Wisconsin companies White Cottage Red Door, LLC and Cherry Creek Investments, LLC (“Claimants”) hereby give notice to the Town of Gibraltar, via its agent the Town Clerk, that the Town has injured them through its prohibition on vending goods from vehicles. This prohibition both violates Article I, Section 1 of the Wisconsin Constitution, which guarantees Claimants the right to earn an honest living free from arbitrary regulations, and is preempted by Wisconsin law.

2. White Cottage Red Door, LLC, whose four members are Lisa Howard, Kevin Howard, Jessica Hadraba, and Christopher Hadraba, is the official corporate form for a business named White Cottage Red Door.

3. Cherry Creek Investments, LLC, whose two members are Lisa Howard and Kevin Howard, owns a parcel of real property located in Fish Creek, Wisconsin at 8813 State Highway 42, which is where White Cottage Red Door operates.

4. White Cottage Red Door includes a brick-and-mortar store that sells specialty foods like jams and salsas, along with baked goods prepared in its state-inspected and state-licensed commercial kitchen.

5. In order to expand White Cottage Red Door’s menu and offer sandwiches and other goods, Claimants would like to operate White Cottage Red Door’s mobile restaurant, colloquially known as a “food truck,” next to White Cottage Red Door’s brick-and-mortar store,

on Cherry Creek Investments, LLC property at 8813 State Highway 42. The mobile restaurant has authorization to operate there through a zoning permit issued by the Door County Planning Department. Moreover, having passed a health-and-safety inspection by Wisconsin's Department of Agriculture, Trade and Consumer Protection, that mobile restaurant is licensed by the state as a "retail food establishment," as defined by Wis. Stat. § 97.30.

6. Christopher Hadraba first began operating White Cottage Red Door's mobile restaurant on August 26, 2017. On that same day, the Town of Gibraltar's constable appeared at 8813 State Highway 42 and told him to stop vending. Upon seeing the mobile restaurant's permits to operate, the constable left. Later that day, Town Chairman Richard Skare also came to 8813 State Highway 42 to investigate, and also left after seeing the mobile restaurant's permits.

7. Without notifying Claimants, the Gibraltar Town Board discussed a ban on White Cottage Red Door's mobile restaurant at multiple meetings. And on September 19, 2017, the Board sent the Door County Planning Department a letter demanding that it retract the mobile restaurant's zoning permit, incorrectly stating that the mobile restaurant violated a 1982 Town of Gibraltar ordinance. On October 2, 2017, the Door County Planning Department responded to the Town of Gibraltar's demand by confirming that White Cottage Red Door's mobile restaurant was legal and refusing to rescind the mobile restaurant's zoning permit.

8. Stymied in this demand to stop White Cottage Red Door's mobile restaurant, the Town of Gibraltar's next step was to prohibit mobile vending entirely. On January 13, 2018, the Town of Gibraltar published its "Amended and Restated Ordinance No. 1982-05," which replaced its 1982 vending ordinance. Amended and Restated Ordinance No. 1982-05 (the "Vending Ban") provides that:

It shall be unlawful for any person to vend, sell or offer for sale any goods, products, merchandise, wares, tokens, food (including without limitation popcorn, hot-dogs, ice cream, desserts, pizza, sandwiches and tacos) or any other thing (collectively, “Goods”) from a vehicle, truck, trailer, cart, pushcart or handcart at any place whatsoever in the Town of Gibraltar.

The Vending Ban also authorizes fines of up to \$500 per day.

9. The Vending Ban is a total ban on mobile restaurants. It applies to all goods, even safe and healthy ones. It applies to all vendors, even state-licensed ones. And it applies to all locations, even private property.

10. The Vending Ban violates Claimants’ right to earn an honest living guaranteed by the Wisconsin Constitution. Its sole (and illegitimate) purpose is to protect brick-and-mortar restaurants from competition. Indeed, the town’s chairman Dick Skare owns a brick-and-mortar restaurant in Fish Creek. The board member who formally moved the town’s board to revoke White Cottage Red Door’s zoning permit for its mobile restaurant—Brian Hackbarth—works for a brick-and-mortar restaurant. And a third board member—Steve Sohns—has publicly said that restaurants “should be up in arms” over food-truck competition.

11. The Vending Ban is also preempted by Wisconsin law. Wisconsin has a comprehensive scheme for regulating and licensing mobile restaurants, which White Cottage Red Door’s mobile restaurant has satisfied. Because the Town of Gibraltar’s Vending Ban frustrates that comprehensive scheme by prohibiting what the State of Wisconsin has licensed, it is invalid.

Event Giving Rise to this Claim

12. The Vending Ban itself is an ongoing injury to Claimants. Because of the ban, White Cottage Red Door’s mobile restaurant is currently closed. Were it not for the ban, White Cottage Red Door, LLC, and its member Christopher Hadraba, would operate a mobile

restaurant, and Cherry Creek Investments, LLC would allow White Cottage Red Door's mobile restaurant to operate on its property.

13. On February 2, 2018, Claimants' attorney Randall Nesbitt inquired whether the Vending Ban encompassed White Cottage Red Door's mobile restaurant given that it was legal before the Vending Ban's enactment

14. On February 13, 2018, an attorney representing the Town of Gibraltar informed Mr. Nesbitt that the Vending Ban included White Cottage Red Door's mobile restaurant.

15. This Notice of Claim and Claim is filed within 120 days of the ongoing injury caused by the Vending Ban and the above-described statement of the Town of Gibraltar attorney made on February 13, 2018. This Notice of Claim therefore conforms with Wis. Stat. § 893.80(1d)(a).

Itemized Statement of Relief Sought

16. Pursuant to Wis. Stat. § 893.80(1d)(b), Claimants demand that the Town of Gibraltar repeal the Vending Ban, and allow vendors who satisfy applicable county-level and state-level laws and regulations, including White Cottage Red Door, LLC, to sell goods in the Town of Gibraltar from mobile vehicles, including on property owned by Cherry Creek Investments, LLC. If the Town of Gibraltar fails to do so, Claimants will seek declaratory and injunctive relief, as well as attorneys' fees, in a court of competent jurisdiction.

17. Claimants also demand nominal damages in the amount of one dollar.

Name and Address of Claimants

18. Pursuant to Wis. Stat. § 893.80(1d)(b) the Town of Gibraltar is hereby notified that the names and addresses of the Claimants are:

White Cottage Red Door, LLC
8813 State Highway 42
Fish Creek, WI 54212-9721

Cherry Creek Investments, LLC
8813 State Highway 42
Fish Creek, WI 54212-9721

Dated: May 9, 2018

Respectfully submitted by Attorneys for Claimants,


Lee U. McGrath (Wis. Bar No. 1077218)
INSTITUTE FOR JUSTICE
520 Nicollet Mall, Suite 550
Minneapolis, MN 55402
Tel: (612) 435-3451
Fax: (612) 435-5875
Email: lmcgrath@ij.org


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Robert P. Frommer (Va. Bar No. 70086)*
Milad Emam (Va. Bar No. 83861)*
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901 N. Glebe Rd., Suite 900
Arlington, VA 22203
Tel: (703) 682-9320
Fax: (703) 682-9321
E-mail: rfrommer@ij.org; memam@ij.org
**Not licensed in the State of Wisconsin*