FILED
11-05-2026
Anna Maria Hodges
Clerk of Circuit Court
2026CF005340
Honorable Rebecca A. Kiefer-29
Branch 29

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN,

Plaintiff,

v. Case No.

CAPRICE MATHIES-HILL
A/K/A CAPRICE MATHIES
CAPRICE LAVETTE HILL
1625 W FIEBRANTZ AVE.
MILWAUKEE, WI 53209
DOB: 7/5/1973,

Defendant.

CRIMINAL COMPLAINT

The Wisconsin Department of Justice, pursuant to its authority under Wis. Stat. § 49.846(2), files this criminal complaint against Caprice Mathies-Hill (DOB: 7/5/1973).

The State alleges that Defendant, Caprice Mathies-Hill, engaged in a scheme to defraud Wisconsin Medicaid ("Medicaid") by submitting claims for services not rendered, submitting claims for non-covered services, upcoding the duration of services, and enticing Medicaid members to provide their personal and Medicaid information through illegal kickbacks such as diapers, baby wipes, and other items. Defendant submitted more than $1,000,000 in fraudulent claims to the Medicaid program. As a result, Defendant was paid more than $470,000 to which she was not

entitled. Defendant also electronically submitted the fraudulent claims to Medicaid using the online ForwardHealth portal for the purpose of receiving the fraudulent funds in violation of Wisconsin's Wire Fraud statute.

COUNT 1: Theft by Fraud

On or between approximately November 16, 2020, and October 27, 2023, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Caprice Mathies-Hill, did obtain title to property of another person by intentionally deceiving the person with a false representation which was known to be false, made with intent to defraud, which did defraud the person to whom it was made, the value of which property exceeded $100,000, belonged to the same owner, and was obtained pursuant to a single intent and design and in execution of a single deceptive scheme, contrary to Wis. Stat. §§ 943.20(1)(d), 943.20(3)(cm), 943.20(5) and 971.36(3)(a).

Pursuant to Wis. Stat. § 939.50(3)(f), upon conviction for this offense, a Class F felony, the defendant may be fined not more than $25,000, or imprisoned not more than 12 years and 6 months, or both.

COUNT 2: Public Assistance Fraud
(Offering a Kickback)

On or about May 16, 2021, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Caprice Mathies-Hill, offered goods or anything of value to any person to induce such person to order, or arrange for, goods or services for which public assistance payment may be made, contrary to Wis. Stat. § 946.93(5)(b).

Pursuant to Wis. Stat. §§ 946.93(5)(b) and 939.50(3)(h), upon conviction for this offense, a Class H felony, the defendant may be fined not more than $25,000, or imprisoned not more than six years, or both.

COUNT 3: Public Assistance Fraud, as a Party to the Crime (Providing a Kickback)

In or around June 2021, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Caprice Mathies-Hill, as a party to the crime, provided goods or anything of value to Member 3 to induce Member 3 to order, or arrange for, goods or services for which public assistance payment may be made, contrary to Wis. Stat. §§ 946.93(5)(b) and 939.05.

Pursuant to Wis. Stat. §§ 946.93(5)(b) and 939.50(3)(h), upon conviction for this offense, a Class H felony, the defendant may be fined not more than $25,000, or imprisoned not more than six years, or both.

COUNT 4: WIRE FRAUD, as a Party to the Crime

On or about December 23, 2022, in the city of Milwaukee, Milwaukee County, Wisconsin, the defendant, Caprice Mathies-Hill, did, as a party to the crime, transmit or cause to be transmitted electrically, electromagnetically, or by light any signal, writing, image, sound, or data for the purpose of committing a financial crime, contrary to Wis. Stat. §§ 943.90 and 939.05.

Pursuant to Wis. Stat. § 939.50(3)(h), upon conviction for this offense, a Class H felony, the defendant may be fined not more than $10,000, or imprisoned not more than six years, or both.

Facts Constituting the Charged Offenses

I, the Complainant, am an Investigator with the Wisconsin Department of Justice, Medicaid Fraud Control and Elder Abuse Unit (MFCEAU). MFCEAU investigates and prosecutes civil and criminal offenses related to Medicaid providers, Medicaid recipients, and facilities that receive Medicaid funding.

I base this complaint upon my investigation, my training and experience, my review of business and state records, and my interviews with witnesses. I have found business and state records to be reliable in the past.

The identities of the witnesses are known to me, but they are identified in this complaint by pseudonyms.

This complaint contains a summary of facts necessary to establish probable cause; it does not contain all facts related to this investigation.

Based upon information and belief, I state:

Background

Medicaid is a joint federal and state program that provides medical coverage to indigent Wisconsin residents and is administered by the Wisconsin Department of Health Services (DHS).

To participate in the Medicaid program, a provider must enter into a written Medicaid Provider Agreement with DHS in which the provider certifies, among other things, that every claim submitted is truthful and that the services billed have been furnished in accordance with state and federal law.

Medicaid created Prenatal Care Coordination (PNCC) and Childcare Coordination (CCC) programs to improve maternal and child health outcomes in Milwaukee and Racine counties. The PNCC benefit is intended to improve birth outcomes among women who are deemed at high risk for poor birth outcomes. PNCC services are referral-based services meant to connect high risk pregnant women with medical, social, and educational services to improve birth outcomes. To accomplish these goals, PNCC providers analyze the needs of the member, develop a plan, and connect the member with the appropriate services. A PNCC agent, referred to as a "care coordinator," provides continuing services through check-ins with the mother to ensure their needs are being met. If needed, the care coordinator would refer to, or connect the mother with, new or additional services. PNCC services are available to eligible members who are pregnant until about 60 days postpartum, but there is a maximum reimbursement rate per pregnancy.

The CCC benefit is an extension of the PNCC benefit available to parents of eligible children until they are two years of age (in Racine County) or seven years of age (in Milwaukee County). The CCC service connects families, usually the mother, with educational and health services to improve health outcomes. Like its PNCC counterpart, CCC providers accomplish the program's goals by analyzing the needs of the member, developing a plan, and connecting the member with the appropriate services. A CCC care coordinator also provides continuing services through check-ins and connecting the member with, or referring the member to, additional services as

needed. CCC ongoing care services are maxed out at forty units (ten hours) per month per member.

Because both the PNCC and CCC programs are referral services, providing items, such as diapers, baby wipes, clothes, and car seats, are not a covered service. *See* Wis. Admin. Code DHS §§ 107.34(3)(h), 107.345(3)(a).

Depending on the service claim and when it was submitted, a claim would be submitted using either the mother or child's Medicaid ID number. Up until March 1, 2022, PNCC and CCC providers submitted claims using the mother's Medicaid ID number. However, beginning March 1, 2022, providers were required to submit CCC claims using the child's Medicaid ID number. This change allowed for greater billing because providers could submit claims for each child within a family, despite the service being for the benefit of the parent.

History of Abby's Clubhouse

Defendant served as the sole owner and manager of Abby's Clubhouse. On or about October 29, 2020, Defendant enrolled Abby's Clubhouse, located at the time at 2640 W. Fond Du Lac Avenue in Milwaukee, as a Medicaid Provider Agency by signing and submitting the Provider Agreement. While Abby's Clubhouse changed locations at times (for example, it subsequently moved to a location on N. 26th Street in Milwaukee), at all times relevant to this complaint it remained located in Milwaukee County, Wisconsin.

Abby's Clubhouse submitted PNCC or CCC claims for services from about November 16, 2020, until about October 27, 2023. Defendant submitted fraudulent

PNCC and CCC claims for reimbursement totaling about $1,050,000. Of that, Medicaid paid Defendant about $470,000.

Payment from Medicaid to Defendant

To receive compensation from Medicaid, Abby's Clubhouse submitted claims for reimbursement to DHS via the online ForwardHealth Portal. A claim for reimbursement may seek reimbursement for multiple services to multiple members across multiple days, but each individual service must be denoted by its own individual "detail line." Each detail line contains the member's Medicaid identification number, the date of service, the procedure code, the number of units (each unit amounting to 15 minutes of service), and the charge amount.

On or about April 12, 2021, Defendant elected to have reimbursed Medicaid funds electronically deposited into her personal Navy Federal Credit Union checking account ending in 3655. The account records show that it was in Defendant's name, and Defendant was the sole signatory on the account. On or about May 17, 2021, Defendant began receiving all Medicaid funds into that account.

Defendant's Scheme to Defraud Medicaid

An analysis of Abby's Clubhouse's claims for reimbursement and witness interviews shows that Defendant committed widespread fraud against Medicaid by submitting claims for services never provided, submitting claims for non-covered services like giving out diapers and baby wipes, and upcoding the number of units to two hours for nearly all continuing care services, which constituted most of the Defendant's billing. In sum, Defendant's scheme was to enroll members at the cost of

a few dollars' worth of diapers, baby wipes, or other items and then bill hundreds of thousands of dollars' worth of two-hour care services that never occurred.

For example, from October 16, 2020, through December 31, 2021, Defendant submitted about 1,000 continuing care detail lines, resulting in about $73,000 in payments. About 72 percent of these detail lines were for two hours each.

Defendant's continuing care claims substantially increased in 2022 and 2023. From January 1, 2022, through October 23, 2023, Defendant submitted about 4,300 continuing care detail lines and was paid about $380,000. All but fourteen, or more than 99 percent, of these detail lines were for two hours of service.

As recounted below, during this investigation, I interviewed numerous members to whom Defendant claimed to have provided services. Contrary to the claims submitted by Defendant, none of the members I interviewed said that Defendant provided them with any services.

Member Interviews

Member 1

On November 1, 2024, I spoke with Member 1, who was the mother of three children. Member 1 stated that she signed up for services with Abby's Clubhouse, but that the agency never helped her. Member 1 stated that the only services she received from them were diapers being dropped off at her home a couple of times. I displayed claims records detailing the purported services Member 1 was provided from January 7, 2023, through April 28, 2023. Member 1 stated that she did not receive any of the services and did not recognize any of the individuals purporting to have

provided them. In total, Medicaid paid Defendant about $4,350 for services purportedly provided to Member 1 that Member 1 said she did not receive.

Member 2

On November 1, 2024, I spoke with Member 2, who had three children and was pregnant at the time with her fourth. Member 2 identified Abby's Clubhouse as the second PNCC/CCC agency she had worked with. Member 2 identified the Defendant as her care coordinator but stated that she had worked with other care coordinators as well. Member 2 stated that about once a month someone from Abby's Clubhouse would call to see if she needed anything. She stated that she received Pampers diapers, baby wipes, coats, and hats. She stated the Defendant told her of a place where she could get car seats and Pack 'n Plays, and Defendant helped her get a bed. Member 2 stated that neither Defendant nor anyone else from Abby's Clubhouse provided resources related to child health. Member 2 stated she did not need this information, because she was already obtaining it from other sources. During our meeting, I displayed claims records to Member 2, explaining that Abby's Clubhouse had submitted claims for services they purportedly provided her multiple times per month, each lasting two hours, from about September 2022 through July 2023. Member 2 indicated these services did not occur. Member 2 stated that she never had a conversation with anyone from Abby's Clubhouse lasting two hours. She stated that they would drop off diapers, and that that would last, at most, five minutes. In total, Medicaid paid Defendant about $23,600 for services purportedly provided to Member 2 that Member 2 said she did not receive.

Member 3

On November 14, 2024, I contacted Member 3. Member 3 was a mother of four children. Member 3 indicated that in the summer of 2021, when she was about eight months pregnant with her daughter, Abby's Clubhouse held a giveaway event where free baby items were handed out. Based on her daughter's birthdate in July 2021, Member 3 said this event would have occurred around June 2021. Member 3 stated this event was advertised on Facebook. She stated while at the event, she was handed paperwork by the person running it. She filled out the paperwork, received a free car seat, and never heard from Abby's Clubhouse again, except for being sent email appointment reminders for things she never scheduled. Member 3 stated she contacted Abby's Clubhouse about the emails, and she was told to just ignore them. During my conversation with Member 3, I displayed claims records to her. I explained that Abby's Clubhouse had submitted claims for services they purportedly provided her multiple times per month from about December 2022 through July 2023. Member 3 stated she never received any services other than the free car seat. In total, Medicaid paid Defendant about $12,160 for services purportedly provided to Member 3 that Member 3 said she did not receive.

Member 4

On November 13, 2024, I contacted Member 4. Member 4 had two children. Member 4 explained that she first enrolled with a PNCC/CCC agency recommended by a health care professional. She stated she switched to Abby's Clubhouse because she heard that they give out free diapers. At first, she did not even realize Abby's

Clubhouse was a PNCC/CCC agency; she thought Abby's Clubhouse's purpose was to give out free diapers. She explained that she submitted forms to Abby's Clubhouse, and she received diapers on four occasions. During my meeting with Member 4, I displayed claims records of services Abby's Clubhouse had purportedly provided her family multiple times per month from about December 2022 through July 2023. Member 4 denied ever receiving the services. She reiterated she only met with Abby's Clubhouse on four occasions to receive diapers. In total, Medicaid paid Defendant about $4,900 for services purportedly provided to Member 4 that Member 4 said she did not receive.

Member 5

On November 13, 2024, I spoke with Member 5. Member 5 had two children. Member 5 stated she enrolled with Abby's Clubhouse after being approached by a female at Urban Air Adventure Park. Member 5 stated she provided her information, and she received diapers and wipes on two or three occasions. She stated that a lady from Abby's Clubhouse would call her every two weeks to see if she needed anything. She stated she tried to reach out to Abby's Clubhouse for services at one point, but the office was closed. During my meeting with her, I displayed Abby's Clubhouse's claims records to Member 5, and I explained that Abby's Clubhouse had billed for multiple services they had purportedly provided her per month from about January 2023 through July 2023. Member 5 stated she did not receive any of the services. In total, Medicaid paid Defendant about $4,700 for services purportedly provided to Member 5 that Member 5 said she did not receive.

Member 6

On November 13, 2024, I spoke with Member 6. Member 6 was the parent of twins. Member 6 stated that she enrolled with a PNCC/CCC agency whose name she could not remember, but that her friend's mother worked for them. Member 6 identified Worker 1 as her friend's mother.[1] Member 6 stated that she signed some paperwork, but she never received any services; Member 6 stated she never even received diapers and wipes, so she enrolled with a different agency. In total, Medicaid paid Defendant about $1,500 for services purportedly provided to Member 6 that Member 6 said she did not receive.

Member 7

On November 13, 2024, I spoke with Member 7, who was the mother of three children. Member 7 stated she was contacted by a woman by phone and signed up with an agency. She did not recall the name of the agency, although Abby's Clubhouse sounded familiar to her. She stated that after signing up, she received diapers on about three occasions. During my conversation with Member 7, I shared claims records explaining that Abby's Clubhouse had billed for numerous services they purportedly provided her each month spanning from December 2022 through June 2023. Member 7 stated she did not receive these services. In total, Medicaid paid Defendant about $3,900 for services purportedly provided to Member 7 that Member 7 said she did not receive.

[1] As noted below, Worker 1 was interviewed and positively identified as a worker for Defendant and Abby's Clubhouse.

After meeting with Member 7, I again reviewed the claims data (which had been submitted under her children's Medicaid IDs). I observed that there were several dates where Abby's Clubhouse submitted claims under more than one child, each for two hours, with the same date of service. For example, on December 23, 2022, Abby's Clubhouse submitted three detail lines totaling six hours of services to Member 7. Two of the three claims were paid and received by Defendant via direct deposit into her checking account. The third claim was denied. All three claims were submitted through the online ForwardHealth Portal. I am aware that the ForwardHealth portal is an online system used to transmit claims electronically to Wisconsin DHS for financial reimbursement.

Member 8

On November 13, 2024, I spoke with Member 8. Member 8 had two children. She stated she enrolled with Abby's Clubhouse using her and her youngest son's information, but never received any services from them. During my conversation with Member 8, I displayed claims records to her and explained that Abby's Clubhouse had claimed they purportedly provided her services multiple times per month from February 2023 through August 2023. Member 8 stated she did not receive any of these services. In total, Medicaid paid Defendant about $3,700 for services purportedly provided to Member 8 that Member 8 said she did not receive.

Member 9

On November 26, 2024, I spoke with Member 9. Member 9 had one child. Member 9 stated she went to Abby's Clubhouse to enroll when her child was about

two months old. She stated Defendant told her that they would get her enrolled and then get her diapers, baby clothes, and other items she may need. Member 9 stated she subsequently received diapers over the course of eight or nine months and that this was the only service she was provided. During my conversation with Member 9, I displayed claims records indicating Abby's Clubhouse had purportedly provided her multiple services per month from December 2022 through August 2023. Member 9 indicated that she only received diapers on approximately eleven occasions and did not receive any of the services claimed. In total, Medicaid paid Defendant about $3,800 for services purportedly provided to Member 9 that Member 9 said she did not receive.

Member 10

On November 26, 2024, I spoke with Member 10, the parent of three children. Member 10 stated that she enrolled with Abby's Clubhouse. She stated that Abby's Clubhouse provided uniforms, shorts, and socks for her older children, and they were supposed to give her a car seat for her youngest child. Member 10 stated she never received the car seat. Member 10 confirmed that her care coordinator was "Caprice." During my conversation with Member 10, I explained that Abby's Clubhouse had submitted claims for multiple services they purportedly provided her each month from about July 2022 through August 2023. Member 10 stated that she did not receive these services. In total, Medicaid paid Defendant about $9,100 for services purportedly provided to Member 10 that Member 10 said she did not receive.

Member 11

On November 26, 2024, I spoke with Member 11, who had two children. Member 11 stated she was approached by an individual who said her name was "Caprice." Member 11 stated Caprice told her that she was from Abby's Clubhouse, and that they could provide services for her kids. Member 11 stated that Caprice explained that she would give them diapers and wipes, among other services. Member 11 provided Caprice with Member 11's information to enroll in the program but never heard from Caprice or anyone from Abby's Clubhouse again. As a result, Member 11 stated she eventually enrolled with a different agency. During my conversation with Member 11, I displayed claims records and explained that Abby's Clubhouse had submitted claims for services they purportedly provided her multiple times per month between December 2022 and July 2023. Member 11 stated she did not get any of these services. Member 11 indicated she had the phone number for Caprice, which she obtained during her sole meeting with her. I observed the phone number as ending in 8472, and the name of the contact was saved in Member 11's phone as "Caprice Abbysclubhouse." I am aware that this number was provided by Defendant in her Medicaid enrollment documentation for Abby's Clubhouse. In total, Medicaid paid Defendant about $3,300 for services purportedly provided to Member 11 that Member 11 said she did not receive.

Member 12

On December 9, 2024, I spoke with Member 12, who had one child. Member 12 stated she never signed up with a PNCC agency, and had never heard of Abby's

Clubhouse. She stated she has never had a care coordinator. During my conversation with Member 12, I explained that Abby's Clubhouse had submitted claims for services they purportedly provided her multiple times per month from about January 2023 through July 2023. Member 12 stated she did not receive these services. In total, Medicaid paid Defendant about $2,000 for services purportedly provided to Member 12 that Member 12 said she did not receive.

Member 13

On December 11, 2024, I spoke with Member 13, who had three children. Member 13 stated she signed up with Abby's Clubhouse in the fall of 2023. She stated a female named "Caprice" brought diapers, wipes, and maybe a couple of outfits for her three kids, maybe a total of three times. During my conversation with Member 13, I showed her claims records submitted by Abby's Clubhouse detailing multiple services they purportedly provided her per month from December 2022 through August 2023. Member 13 stated that she never received these services. In total, Medicaid paid Defendant about $5,200 for services purportedly provided to Member 13 that Member 13 said she did not receive.

Member 14

On December 11, 2024, I spoke with Member 14, who had four children. Member 14 stated she enrolled with Abby's Clubhouse and was with them for about four or five months. She stated that once a month they would bring her diapers and clothes. She stated she became aware of Abby's Clubhouse through Facebook, and stopped working with them because she knew "something was going on." During my

conversation with Member 14, I explained the claims submitted by Abby's Clubhouse and that they purportedly provided her multiple services each month from December 2022 through June 2023. Member 14 stated she did not receive these services. In total, Medicaid paid Defendant about $4,400 for services purportedly provided to Member 14 that Member 14 said she did not receive.

Member 15

On December 11, 2024, I spoke with Member 15, who had four children. At first, Member 15 could not recall the name of the PNCC/CCC agency she enrolled with, but stated she enrolled through "Caprice." When Member 15 was asked if the name of the agency was Abby's Clubhouse, she stated "yes, that's it." She stated she met Caprice at church and received diapers on one occasion. During my conversation with Member 15, I displayed the claims submitted by Abby's Clubhouse and explained that they billed multiple services they purportedly provided her each month from about November 2022 through June 2023. Member 15 stated she did not receive any of these services, and she did not even know about Abby's Clubhouse in 2022. In total, Medicaid paid Defendant about $10,300 for services purportedly provided to Member 15 that Member 15 said she did not receive.

Member 16

On April 25, 2025, I spoke with Member 16, who had four children. Member 16 stated that she enrolled with Abby's Clubhouse through Defendant, who went to their shared church. Member 16 stated she was pregnant at the time with the oldest of her children. Member 16 explained that Defendant dropped off a half pack of diapers and

some wipes for her newborn once a month for a few months. Member 16 stated Defendant also delivered to her a bed that was donated from the church. During my meeting with Member 16, I explained that claims were submitted for multiple services Abby's Clubhouse purportedly provided her per month from April 2022 through July 2023. Member 16 stated that she only ever received diapers and wipes for her youngest child and never received anything for her other children. She stated she stopped receiving diapers and wipes sometime in 2022, and she has not talked to Defendant since 2022. Member 16 relayed that she never received services or referrals to services which might lead to better health outcomes for her children. In total, Medicaid paid Defendant about $18,200 for services purportedly provided to Member 16 that Member 16 said she did not receive.

Fraud Total for Interviewed Members

In total, Defendant was paid about $114,000 for services not provided or not covered for the 16 interviewed members.

Interviews of Workers

Worker 1

On February 7, 2025, I spoke with Worker 1. Worker 1 confirmed that she worked as a care coordinator for Abby's Clubhouse beginning sometime in 2021 or 2022. She stated that the owner, who she identified as the Defendant, went to the same church as she did. Worker 1 explained that she would call clients, ask them what items they wanted, and arrange delivery of the items. Worker 1 explained that Defendant did all the billing except on three or four occasions that Defendant had

Worker 1 help with billing. On those occasions, Worker 1 indicated that she would enter the information as instructed by Defendant.

I explained to Worker 1 the purpose of PNCC and CCC programs and that items such as diapers and baby wipes were not a covered service. Worker 1 indicated she was not aware of this. When asked why the claims always noted two-hour services, Worker 1 explained that Defendant set up the system to automatically input two hours for each service. Worker 1 stated she asked Defendant about this but could not recall her response.

Worker 2

On January 31, 2025, I spoke with Worker 2. Worker 2 worked as a care coordinator for Abby's Clubhouse beginning sometime in 2021. Worker 2 identified Defendant as the owner. She stated that Defendant would have her call clients to see if they needed clothes, housing, and items for their baby. Worker 2 indicated she was not aware of how the billing process worked and that Defendant did the billing. When I informed Worker 2 that many of the notes indicated services that are not covered PNCC and CCC services, Worker 2 replied that I needed to talk to Defendant about that, because she was just doing what Defendant told her to do. As an example, I asked Worker 2 about a claim submitted for service allegedly provided on March 6, 2023. The claim was for two hours of service. I asked Worker 2 about the note stating, "spoke with client, no issues at this time" and listing Worker 2 as the care coordinator. Worker 2 stated, "Caprice told us how to fill out this paperwork and that it had to be for two hours. This is what I was supposed to write in the notes. I don't

know how it was billed after I did the notes." Worker 2 added that Defendant told her that every visit with a client had to be for two hours because "that is just the way it is."

Facebook Post Offering Kickback
(as to Count 2)

After my interview with Member 3, who had indicated she received a car seat in exchange for signing up with Abby's Clubhouse at a giveaway event, I reviewed the Facebook page of "Abby Boo Books." I observed that on May 16, 2021, the page displayed a status update stating, "Know any pregnant young women or have recently had a newborn and in need of free baby supplies and care packages please pass the flyer along or in box below." The post has a corresponding flyer stating, "Abby's Clubhouse prenatal care program, Monday – Friday 9A-6P." The flyer listed services as, "free infant supplies · prenatal care service · the chambers emergency housing · community resources · covid 19 assistance · mental health and wellness." The flyer provided an address of 2947 N. 26th Street in Milwaukee. Review of Meta Platforms, Inc. records, the parent company of Facebook, revealed Defendant as the operator of this page, and as the author of the post.

Dated this 2nd day of November, 2026.

Rory O'Sullivan
Investigator
Wisconsin Department of Justice

Subscribed and sworn to
before me and approved for filing
this 2nd day of November, 2026.

Daniel R. Hess
Assistant Attorney General
Wisconsin Department of Justice
State Bar No. 1099712