

United States Senate

WASHINGTON, DC 20510

COMMITTEES:
APPROPRIATIONS
BUDGET
HEALTH, EDUCATION,
LABOR, AND PENSIONS
HOMELAND SECURITY
AND GOVERNMENTAL AFFAIRS

November 6, 2015

The Honorable Loretta Lynch
United States Attorney General
Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Attorney General Lynch,

I write to bring to your attention letters from two members of the Wisconsin Legislature and several members of the Oneida Tribe of Indians of Wisconsin alleging possible violations of federal law in the handling of loans extended by the Wisconsin Economic Development Corporation (WEDC). Some of the alleged improper activity involves federal funds provided to WEDC through the American Reinvestment and Recovery Act (ARRA).

As ranking member of the Senate Homeland Security and Government Affairs Subcommittee on Federal Spending Oversight and Emergency Management, I am particularly concerned by the suggestion that federal taxpayer dollars may have been utilized in an inappropriate and possibly criminal manner. The actions alleged in these letters are concerning and merit prompt review by the Department of Justice. Please respond in writing to this letter and to these two constituent requests as soon as possible.

Thank you for your attention to this matter.

Sincerely,


Tammy Baldwin
United States Senator

September 21, 2015

The Honorable Loretta Lynch
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Attorney General Lynch,

We, the undersigned enrolled members of the Oneida Tribe of Indians of Wisconsin (OTIW), respectfully and urgently request your attention and action regarding the May 20, 2015, letter to the Department of Justice from Wisconsin State Legislators Peter W. Barca and Julie M. Lassa which asks for a federal investigation of possible violations of law by the Wisconsin Economic Development Corporation (WEDC) and some of the companies to which it has provided funds.

We ask that the USDOJ's investigation also include WEDC's loans to Oneida Seven Generations Corporation (OSGC) and Green Box NA Green Bay, LLC ("Green Box").

OSGC is a Tribally-chartered and wholly-owned corporation of OTIW, and OSGC's Board is appointed and overseen by the nine elected members of the Oneida Business Committee (OBC).

Green Box was recently put into Receivership under Michael S. Polsky, Esq., in Brown County Case #2015CV769, *Dr. Marco Araujo, Clifton Equities Inc. & Wisconsin Economic Development Corporation v. Green Box NA Green Bay, LLC*.

WEDC awarded funds to OSGC and Green Box for projects of a very similar and related nature: the pyrolysis/gasification of waste for energy generation and products based on technology and processes which Green Box Board Chair Ronald Henry Van Den Heuvel has claimed under oath are proprietary and owned by him, and which he must oversee any implementation of in order for him to be able to bestow a company the U.S. Food & Drug Administration's approval for use.

[See the *Supplemental Examination of Ronald H. Van Den Heuvel Before James O'Neil, Court Commissioner, May 8, 2015, 10:00 a.m. to 12:59 p.m. and May 15, 2015, 10:07 a.m. to 11:04 a.m.*, in Brown Co. Case #2015CV769, in which Ron Van Den Heuvel proclaimed: "*I've made 74 people in this town millionaires.*"; All documents cited herein are posted on OneidaEye.com along with related documents, links, and transcripts, audio & video of relevant OTIW meetings.]

Ron Van Den Heuvel showed potential Green Box investors flyers citing a pilot system operated by American Combustion Technologies, Inc. at ACTI's "*Paramount (California) facility to test various feed stocks for their energy properties, while providing system demonstrations.*" [Exhibit B, page 45, *Amended Complaint and Demand for Jury Trial* in Brown Co. Case #2013CV463, *Dr. Marco Araujo v. Ronald H. Van Den Heuvel & Green Box NA Green Bay, LLC*]

At OSGC's request, Latif Mahjoob addressed OTIW's General Tribal Council (GTC; comprised of all OTIW members age 21 and up who attend duly called and noticed meetings) during the April 11, 2011 GTC Special Meeting, wherein Latif Mahjoob vouched for and pitched OSGC's pyrolysis project to GTC in order for OSGC to obtain GTC's approval to seek multi-million dollar financing from BIA-backed guaranteed loans and other funding sources, including WEDC.

[See *Transcript of April 11, 2011 GTC Special Meeting* and Green Box flyer.]

At that same meeting, OSGC CEO, OEI CEO & GBRE President Kevin Cornelius stated that OSGC executives and Board members – along with OBC member and OSGC Liaison Brandon Stevens – had visited California to tour a pyrolysis energy plant which was tested with real 'Wisconsin-style' garbage in order to prove its safe, energy-generating viability for the region.

Currently, Latif Mahjoob and ACTI are facing claims of fraud in U.S. District Court in Nevada, Las Vegas Office Case #2:2015cv00694, *CH2E Nevada, LLC v. American Combustion Technologies of California, Inc. & Latif Mahjoob*.

We therefore ask the USDOJ to investigate whether Ron Van Den Heuvel & Green Box and Latif Mahjoob & ACTI engaged in fraud against OTIW, GTC, OBC, and/or OSGC and its subsidiaries, which has resulted in OSGC seeking and becoming the recipient and guarantor for \$4 million in combined loans for pursuing pyrolysis energy projects in the State of Wisconsin:

- \$2 million in May 2010 from the Wisconsin Dept. of Commerce (WDoC) via Contract #LEG FY10-19812; plus
- \$2 million in November 2011 from American Recovery & Reinvestment Act (ARRA) funds on behalf of subsidiary Oneida Energy, Inc., (OEI) via WEDC Contract #SEP FY10-20265.

In 2003, Nature's Way Tissue Corporation, LLC, ("Nature's Way") was formed with 11% owned by OTIW member Artley Skenandore's company, Swakweko, LLC; 20% owned by OSGC; and 20% owned by Spirit Lake Corporation, with the remaining 49% owned by Custom Tissue, LLC – whose principal owner and operator was Ron Van Den Heuvel.

Custom Tissue, LLC, was administratively dissolved in 2012. That same year, Nature's Way was administratively dissolved by the Wisconsin Department of Financial Institutions (WDFI) after its operations were shuttered following multiple delinquent state tax warrants, many still unpaid.

[See January 27, 2013, *Decision & Order* of the Wisconsin Tax Appeals Commission in *Steven Peters, Ronald Van Den Heuvel & Artley Skenandore v. Wisconsin Dept. of Revenue* outlines Nature's Way's ownership percentages and its principals' failure to pay state taxes.]

Nature's Way's collapse resulted in a \$4 million loss to OTIW/OSGC. Also, Ron Van Den Heuvel's Tissue Technology, LLC, still owes \$1.2 million to OSGC-subsiary Glory, LLC, in Brown Co. Case #2009CV439, *Glory LLC v. Ron Van Den Heuvel & Tissue Technology LLC*.

WDFI.org lists Artley Skenandore as being Nature's Way's last 'Registered Agent' and lists its last physical address as 2107 American Blvd., De Pere, WI, which is a part of the Green Box estate being managed by Receiver Michael S. Polsky, Esq., in Brown County Case #15CV769.

In November 2009, the WDoC awarded OSGC \$2 million for its stated plan of providing “*waste disposal and energy recovery through the use of technology that harnesses the energy of waste and other economically suitable materials and inverts the energy to electricity. The by-product of this material is a carbon char that can be sold as a value added product,*” as described in WDoC Contract #LEG FY10-19812 which also states that the OSGC “*reached agreements with several vendors for their placement of proprietary systems for gasification of metropolitan solid waste,*” and that OSGC's project was to be located within Brown County, Wisconsin; the same county in which Ron Van Den Heuvel lives and where Green Box NA Green Bay, LLC, is located.

According to Contract #SEP FY10-2026, WEDC awarded OEI \$2 million in loans from the American Reinvestment & Recovery Act (ARRA) on May 19, 2010, although the loan contract documents were not signed until November 16, 2011, perhaps due to the fact that – according to WDFI.org – OEI wasn't even incorporated/registered in Wisconsin until June 22, 2010.

On October 5, 2011, former Green Bay Mayor Paul Jadin, acting as WEDC's CEO, signed Contract #WEDC FY-12-21010 awarding Green Box a \$1.116 million loan for its operations in the City of De Pere, WI, to “*recycle food-contaminated waste to create tissue products, oil, diesel, ethanol compressed syngas, synthetic fuels, sugars, biochar soil enhancement material, paper cups, and electricity*” using “*pyrolysis,*” which is also referred to as “*thermal conversion.*” [See www.greenboxna.com/about-us]

On March 19, 2012, Green Box later received an additional \$191,231 from WEDC via Contract #WEDC FY12-21248 for the same pyrolysis project.

Based on Ron Van Den Heuvel's involvement with Artley Skenandore's Swakweko, LLC, and OSGC via the ill-fated Nature's Way, we believe that the “*proprietary systems for gasification*” which OSGC, OEI, and GBRE sought to construct – and OSGC-subsiary IEP Development, LLC, said it had “*exclusivity to market*” to tribes, counties, and municipalities – are presumably the same technology and processes which Ron Van Den Heuvel has claimed are his to bestow to companies, especially given that OSGC's and Green Box's energy projects involved participation by Mr. Latif Mahjoob of American Combustion Technologies (of California) Inc. (ACTI)

It should be noted that, while both OEI and Green Box claim that their systems will allow them to create and sell electricity, the only mention of the primary equipment necessary to generate electricity is the collateral described as a “*Cummins model C1750N6C engine generator with 4,160 VAC 3 phase, 4 wire, 60 hertz output for operation on low BTU gaseous fuel. Production Number A030V695*” in WEDC Contract #SEP FY10-20205 where it’s listed as belonging to OSGC, and nowhere is the ownership of any generator attributed Ron Van Den Heuvel.

Any pyrolysis project that makes claims regarding the ability to put electricity on the grid would necessarily include a means for generating electricity. However, while Van Den Heuvel’s project cites electricity generation numerous times, no documents cite any generator that he owns nor owned, raising the possibility that the generator attributed to OSGC was perhaps intended for use by Ron Van Den Heuvel and Green Box. The actual physical location and current operational status of OSGC’s generator remains undisclosed to GTC by OBC and OSGC.

Interestingly, court documents in Brown Co. Case #2015CV769 suggest that Ron Van Den Heuvel has used the same “*tire or pellet liquefaction thermal degradations units*” as collateral for more than one business deal simultaneously, therefore we ask the USDOJ to also investigate who actually owns the Cummins model generator OSGC used as collateral for its WEDC award; where it’s located; if it’s being currently being used; if so, by whom, and what for; and whether it is also being used as collateral in any other deals involving OSGC or Ron Van Den Heuvel.

OSGC/OEI’s and OSGC-subsiary Green Bay Renewable Energy (GBRE)’s pursuit of pyrolysis energy projects also resulted in a contentious court battle between the City of Green Bay and OSGC & GBRE regarding the Green Bay Common Council’s right to rescind OSGC/GBRE’s Conditional Use Permit to build a municipal waste energy system in Green Bay due to feeling misled by OSGC which has been needlessly costly to all parties, and to the State of Wisconsin.

In Wisconsin Supreme Court Case #2013AP591, the court “*conclude[d] that the City’s decision to rescind [OSGC’s] conditional use permit was not based on substantial evidence,*” yet WSC Chief Justice Patience Roggensack’s dissenting opinion states that, in addition to the majority ignoring “*long-established legal principles that apply to certiorari review,*” the evidence clearly shows that OSGC/GBRE did, in fact, mislead the City of Green Bay’s elected officials.

[See May 29, 2015 Wisconsin Supreme Court Majority & Dissenting Opinions in Case #2013AP491, *Oneida Seven Generations Corporation & Green Bay Renewable Energy, LLC v. City of Green Bay.*]

We agree with Chief Justice Roggensack and we can only conclude that, not only did OSGC and its subsidiaries mislead GTC and the City of Green Bay, OSGC’s entire energy plan seems to be based on frauds perpetrated by Ron Van Den Heuvel & Green Box, and Latif Mahjoob & ACTI.

Due to the long-standing business relationship between Ronald Van Den Heuvel, Artley Skenandore, and OSGC, and given the WEDC’s unwarranted and ill-advised funding of their

near simultaneous developments of similar pyrolysis-based waste energy projects that both appear to hinge on the claims, representations, and promises of both Ron Van Den Heuvel and Latif Mahjoob, which not only seem to be scientifically false but also appear to constitute criminal fraud based on the evidence uncovered in the WEDC's lawsuit seeking receivership of Green Box NA Green Bay LLC, we hereby request that the U.S. Department of Justice investigate WEDC's awarding of taxpayer funds to OSGC/OEI and to Green Box, especially given the ARRA source of funding for the OSGC/OEI proposal, and any illegal means that may have been used by Ron Van Den Heuvel & Green Box and/or OSGC/OEI to obtain funds.

As OTIW members we are also very concerned that past & present OTIW & OSGC employees and officials, including Artley Skenandore; past & present OBC members, including current OBC Chair Tina Danforth; and past & present employees of the Oneida Law Office (OLO), including current Chief Counsel Jo Anne House (WI State Bar License #1021514), may have believed or known that Ron Van Den Heuvel has been perpetrating fraudulent schemes against OTIW; GTC; OBC; OSGC; and the State of Wisconsin; and/or that they may have participated in furthering and/or defending Ron Van Den Heuvel's schemes with the expectation of personal or familial financial gain through private side-deals, kickbacks, investments in or ownership of shares of Ron Van Den Heuvel's various companies, including Environmental Advanced Reclamation Technology HQ, LLC, which Ron Van Den Heuvel refers to as E.A.R.T.H.

Ron Van Den Heuvel claims in court documents that E.A.R.T.H. has over 100,000,000 outstanding shares which he says were independently appraised at \$3/per share on the basis of the value of his intellectual property regarding proprietary energy conversion processes, but which Ron Van Den Heuvel claims will one day be worth much more to lucky shareholders.

[See *Supplemental Examination of Ronald H. Van Den Heuvel Before James O'Neil, Court Commissioner, May 8, 2015, 10:00 a.m. to 12:59 p.m.*, and *May 15, 2015, 10:07 a.m. to 11:04 a.m.*, from Brown Co. Case #2015CV769.]

To us, all of this sounds strikingly similar to the Mantria Corporation / EternaGreen Global Corporation / Speed of Wealth, LLC, pyrolysis 'Ponzi' scheme, the principals of which the USDOJ filed indictments alleging conspiracy and fraud against on Thursday, September 4, 2015, in the U.S. District Court for the Eastern District of Pennsylvania, Case #2:15-cf-00398-JHS, *United States of America v. Troy Wragg, Amanda Knorr & Wayde McKelvy*.

We therefore ask the USDOJ investigate whether Ron Van Den Heuvel and/or Latif Mahjoob, or anyone involved in OSGC's energy projects, were also involved in the Mantria 'Ponzi' scheme.

On May 5, 2013, OTIW's GTC voted to direct the OBC to prohibit OSGC and its subsidiaries from engaging in "pyrolysis" or "waste-to-energy" anywhere on the OTIW Reservation, yet in November 2013 it was discovered that OSGC's property was being used for those purposes in conjunction with Generation Clean Fuels (GCF; formerly known as Arland Clean Fuels/ACF).

Due to that discovery, and the litigation involving the City of Green Bay, plus GTC members' belief that OSGC and OBC are hiding important information from GTC, on December 15, 2013, GTC voted to direct the OBC to dissolve OSGC. However, the OBC has refused to do so citing OSGC/GBRE's litigation against the City of Green Bay (which is now concluded), as well as the \$397.5 million lawsuit filed in Cook County, Illinois Case #2014-L-002768, *ACF Leasing, LLC, ACF Services, LLC & Generation Clean Fuels, LLC v. Oneida Seven Generations Corporation, Green Bay Renewable Energy, LLC & the Oneida Tribe of Indians of Wisconsin*.

That litigation is based on contracts which OSGC CEO, OEI CEO & GBRE President Kevin Cornelius signed on May 6, 2013, the day after he had attended a GTC Meeting on behalf of OSGC, OEI & GBRE, wherein GTC resoundingly voted to prohibit OSGC and its subsidiaries from engaging in any form of "pyrolysis" or "gasification" anywhere on the Oneida Reservation.

As members, we wonder what OTIW's real liabilities will now be and are concerned that OBC, OLO, and OSGC attorneys might not be mounting a defense based on the best interests of GTC, but is instead designed to protect their own investments, although OTIW members do know that Article IV of the Oneida Tribal Constitution grants GTC the right to veto any encumbrances.

Information regarding the GCF/ACF lawsuit and related lawsuits won by individual investors against GCF/ACF can be found at OneidaEye.com, along with related information regarding court cases involving Todd Parczick and Mark H. Verhaagh of Alliance Construction & Design, Inc.; Alliance GC [Global Conservation], LLC; and P2O Technologies, LLC, all of which are connected to GCF/ACF as seen in documents from the following Wisconsin court cases:

- Jefferson Co. Case #2012CV906, *David J. Wolf v. Arland Clean Fuels, LLC*;
- Jefferson Co. Case #2013CV297, *JWR, Inc., v. Alliance Construction & Design, Inc.*
- Jefferson Co. Case #2013CV321, *JWR, Inc. v. Arland Clean Fuels, Generation Clean Fuels, LLC, & Eric Decator*;
- Jefferson Co. Case #2013CV322, *David J. Wolf v. Arland Clean Fuels, LLC & Generation Clean Fuels, LLC*;
- Brown Co. Case #2013CV1065, *Tina Fritsch v. Generation Clean Fuels, LLC*;
- Brown Co. Case #2014SC509, *Davis & Kuelthau, SC v. Arland Clean Fuels, LLC*.

Principals of Alliance Construction & Design, Inc. & Alliance GC, LLC, own 49% of OSGC-subsidary Oneida-Kodiak Construction, LLC, and Alliance was working on OSGC/GBRE's pyrolysis waste energy project on Hurlbut Street in the City of Green Bay, but is now refusing to allow OSGC or OBC to have access to Oneida-Kodiak Construction's financial records due to an ongoing "dispute," according to what OTIW CFO Larry Barton has told OTIW members.

OTIW members are concerned as to why the OBC, OLO and OSGC aren't aggressively seeking access to Oneida-Kodiak's corporate financial records by pursuing legal action against Alliance Construction & Design, Inc./Alliance GC, LLC, just like OBC, OLO, and OSGC seem unaware of or disinterested in obtaining Glory, LLC's \$1.2 million judgment from Ron Van Den Heuvel.

We therefore ask that the USDOJ also investigate whether fraud against OTIW, GTC, OBC, or OSGC and its subsidiaries has been perpetrated by those businesses and related individuals, including Atty. Eric R. Decator and Atty. Joseph A. Camilli of Evanston, IL-based GCF/ACF.

Both OTIW and OSGC have been dismissed from the Illinois lawsuit on the basis of their claims of 'Sovereign immunity,' but Plaintiffs have appealed their dismissal. OBC and OLO continue to withhold information about OSGC/GBRE from GTC, seemingly to protect OSGC from GTC, which only causes OTIW members to further wonder if OBC, OLO, OSGC board members, officers and executives, and/or their families, have bought or been given shares of Ron Van Den Heuvel's E.A.R.T.H. or his wide array of seemingly fraudulent shell companies with unproven claims and empty promises of future wealth on which people believe their personal fortunes rely. Yet it's all at the expense of everyone and everything else.

Sincerely,



Leah Sue Dodge
Publisher, OneidaEye.com

...and the undersigned enrolled members of the Oneida Tribe of Indians of Wisconsin.

Contact: Leah Sue Dodge (OTIW Member #9705)
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cc: WI State Representative Peter W. Barca, WEDC Board member
WI State Senator Julie Lassa, WEDC Board member
Acting U.S. Attorney Gregory J. Haanstad
Michael S. Polsky, Esq.
WI Governor Scott Walker
WI Attorney General Brad Schimel
WI State Senator Robert Cowles, Joint Legislative Audit Committee Co-Chair
WI State Representative Samantha Kerkman, Joint Legislative Audit Comm. Co-Chair
WI State Representative James Steineke
U. S. Representative Reid Ribble
U. S. Senator Tammy Baldwin
U. S. Senator Ron Johnson
Green Bay Mayor Jim Schmitt
De Pere Mayor Mike Walsh
Jason Stein, Milwaukee Journal-Sentinel
Adam Rodewald, Green Bay Press Gazette
Dee J. Hall, Wisconsin Center for Investigative Journalism, Managing Editor

Co-signers for the September 21, 2015 Letter to U.S. Attorney General Loretta Lynch requesting a Federal investigation of Wisconsin Economic Development Corporation, Oneida Seven Generations Corporation, Green Box NA Green Bay, LLC, and ACTI

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Co-signers for the September 21, 2015 Letter to U.S. Attorney General Loretta Lynch requesting a Federal investigation of Wisconsin Economic Development Corporation, Oneida Seven Generations Corporation, Green Box NA Green Bay, LLC, and ACTI

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WISCONSIN LEGISLATURE

P. O. Box 7882 Madison, WI 53707-7882

May 20, 2015

The Honorable Loretta Lynch
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Attorney General Lynch,

We write today to express our concerns with recent issues surrounding the Wisconsin Economic Development Corporation (WEDC) that were contained in the attached series of articles in the Wisconsin State Journal (WSJ) regarding a WEDC loan to the Building Committee, Inc. (BCI), a private business. We are very concerned that several of these allegations may amount to violations of federal law including:

- 52 U.S.C. §30122 – “Contributions in Name of Another Prohibited.”
- 18 U.S.C. §666 – “Theft or Bribery Concerning Programs Receiving Federal Funds.”
- 18 U.S.C. §1341 – “Frauds and Swindles.”
- 18 U.S.C. §1343 – “Fraud by Wire, Radio or Television.”

The WEDC was created in 2011 to replace the Wisconsin Department of Commerce. Governed by a Board of Directors comprised of public and private sector officials and chaired by Governor Walker, WEDC was tasked with overseeing the awarding of millions of dollars in bonds, grants, loans and tax credits aimed at promoting economic development throughout the state. However, since its inception, WEDC has been plagued by mismanagement and allegations of impropriety. In fact, an audit by the Legislative Audit Bureau released this month found that WEDC has not been following state law and its own board approved policies. The reporting on WEDC’s handling of BCI’s loan request is concerning to those of us who have continually attempted to push WEDC officials to follow the letter and spirit of the law.

The WSJ, in reporting this story, requested the documents that WEDC used to underwrite and approve a \$500,000 loan to BCI. However, they report that WEDC indicated they could not locate key documents that were used to make the eventual underwriting decision. We are concerned that officials in the administration of Governor Walker may have willfully erased/destroyed these documents, which would hinder any investigation into their actions surrounding the approval of a WEDC economic development loan to BCI. In addition, WEDC’s response to requests for documents raises the possibility that not all legally required

documentation was prepared for the BCI loan application, and yet WEDC may have disbursed the funding to BCI anyway, in potential violation of both 18 U.S.C. §1341 and 18 U.S.C. §1343.

The WSJ also reported that the Secretary of the Wisconsin Department of Administration (DOA), Mike Huebsch, introduced Mr. William Minahan, BCI's owner, to then-WEDC Chief Executive Officer, Paul Jadin, to discuss a potential loan after Mr. Minahan donated \$10,000, the maximum individual contribution allowed under campaign finance laws, to Mr. Walker's gubernatorial campaign. Keith Gilkes, Governor Walker's 2010 campaign manager and then Chief-of-Staff, met with Mr. Huebsch and Mr. Minahan to discuss the loan in June 2011. In addition, Mr. Minahan's contribution to Governor Walker's campaign was made on November 2nd, 2010, a day after the Wisconsin Department of Revenue (DOR) issued a tax warrant seeking \$15,800 in unpaid taxes for BCI. We are concerned with the timing of the campaign contribution relative to both the scheduling of the meetings among Mr. Minahan, Mr. Huebsch, Mr. Jadin and Mr. Gilkes and the DOR's issuance of a tax warrant for BCI. These possible "pay to play" activities may violate 18 U.S.C. §666, 18 U.S.C. §1341 and 18 U.S.C. §1343.

Mr. Jadin stated in the WSJ article that, during these meetings, Mr. Huebsch, a non-voting member of the WEDC board as DOA Secretary, and Mr. Minahan advocated for a \$4.3 million loan for BCI. Mr. Jadin said WEDC could not justify any loan in excess of \$500,000, and approved a loan he called "fairly shaky" due to reported pressure from Mr. Huebsch. WEDC staff approved BCI's request to be given more time to pay back the loan, and both WEDC and Walker administration staff assisted BCI's attempts to secure federally subsidized energy bonding in spite of the fact that BCI was being sued by numerous creditors for unpaid bills. In the end, BCI created no jobs and would not provide specific information about any work that had been done while expending the \$500,000 loan. In addition, BCI gave misleading information about potential partners they claimed were a part of the loan project. To date BCI has not made any payments on the loan and has been sued by WEDC to recover the funds.

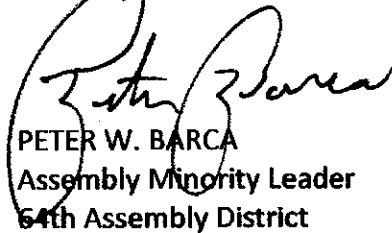
The WSJ also reported that three BCI employees, two named and one unnamed, said they were asked by Mr. Minahan to contribute to political campaigns and were told that they would be reimbursed for their contributions through a BCI expense account. If true, this would appear to be a violation of 52 U.S.C. §30122. However, we are also concerned that the campaign contributions to Governor Walker's campaign, which may have influenced the actions of the various officials from Governor Walker's administration, may also have been given by someone other than the named donor, in potential violation of 18 U.S.C. §666, 18 U.S.C. §1341 and 18 U.S.C. §1343.

Lastly, WEDC requires that an applicant, or any company owner or officer, for economic development loans through WEDC indicate whether they have been sued within the previous five years. This requirement states that those who provide false information in response to that question "will be deemed ineligible and denied based on the falsification of information."

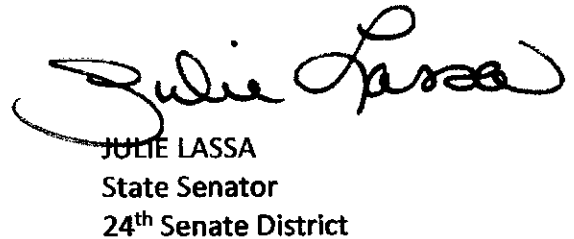
The article indicates that Mr. Minahan checked "no" to that question, in spite of the fact that he had been sued on three separate occasions within that time frame, information that was readily available on public websites. We are concerned not just that Mr. Minahan appears to have falsified his answer, but that officials within the administration of Governor Walker may have willfully ignored this requirement when approving a loan to BCI because of Mr. Minahan's campaign contributions in potential violation of 18 U.S.C. §666, 18 U.S.C. §1341, and 18 U.S.C. §1343.

As elected members of the Wisconsin State Legislature, we have taken an oath to support the constitution of the United States and the state of Wisconsin. Further, as members of the WEDC Board of Directors, we have a fiduciary responsibility to Wisconsin taxpayers. If true as reported, the actions undertaken by officials in Governor Walker's administration in their interactions with BCI both hindered our ability to monitor WEDC's action and potentially violated numerous federal laws. We respectfully request a U.S. Department of Justice investigation into these serious allegations with all due haste.

Sincerely,



PETER W. BARCA
Assembly Minority Leader
64th Assembly District



JULIE LASSA
State Senator
24th Senate District

cc: Raymond Hulser, Acting Chief, Public Integrity Section, U.S. Department of Justice
U.S. Attorney John W. Vaudreuil
U.S. Attorney James L. Santelle