BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of ERIC N. PAGE, RACHEL CONNET, and BCP MDG, LLC, Respondents.	SUMMARY ORDER TO CEASE AND DESIST AND PROPOSED ORDERS FOR RESTITUTION, CIVIL PENALTIES AND COSTS No. S-238197 (EX)

I.

The Administrator of the State of Wisconsin, Department of Financial Institutions, Division of Securities (the "Division"), having legal authority and jurisdiction to administer and enforce Wisconsin Statutes Chapter 551 and the rules and forms adopted under this chapter (together the "Wisconsin Uniform Securities Law"), and having determined that this action is necessary and appropriate in the public interest and for the protection of investors, hereby enters this Summary Order as follows:

II.

Division staff have presented evidence sufficient for the Administrator to make the following findings of fact and conclusions of law:

A. Findings of Fact

<u>Respondents</u>

1. ERIC N. PAGE ("Page") is an adult male with the last known address of 68274 Columbia Ridge, Converse, TX 78109. Presently, Page is confined at Dane County Jail located in the Public Safety Building, 115 W. Doty Street, Madison, Wisconsin 53703.

2. RACHEL CONNET ("Connet") is an adult female with the last known address of 8321 W. Lorraine Place, Milwaukee, Wisconsin 53222.

3. BCP MDG LLC is a limited liability company organized under the laws of the State of Wisconsin effective December 14, 2014, with a last known business address of 2256 W Fond Du Lac Ave, Milwaukee, WI 53206-1520. BCP is an abbreviation of Connet's company, Brew City Properties, LLC, and MDG is an abbreviation of Page's company, Milwaukee Development Group, LLC. Page and Connet are equal co-owners and the controlling persons of BCP MDG LLC.

Conduct

4. Page, Connet, and BCP MDG LLC have never been registered with the Division in any capacity.

5. On or about September 22, 2009, the Division issued an Order of Prohibition and Revocation (Summary) for DFI Case No. S-09018 (EX) against Page (the "2009 Order") for violations of Ch. 551 involving the sale of promissory notes, including violations of Wis. Stat. § 551.41(2) (2009). A true and accurate copy of the 2009 Order and the 2009 Petition for Order are attached as Exhibit A.

6. The 2009 Petition for Order states as follows: Page was engaged in the business of buying and selling real estate at a profit with no participation by the investors in the management of the business. To raise capital for the business, Page offered and sold promissory notes to Wisconsin investors promising repayment of principal with interest payments at a specific date in the future, and in some cases secured by a mortgage on real estate. However, during the offer and sale of the promissory notes, Page failed to disclose to investors the existence of a prior Chapter 7 bankruptcy, prior foreclosure actions, and his failure to repay notes to previous investors when due. The promissory notes Page offered and sold to Wisconsin investors were securities under applicable law. Wis. Stat. § 551.02(13)(a) (2009).

7. The 2009 Order prohibited Page from making or causing to be made any further offers or sales of securities unless and until the securities qualify as covered securities or are registered under Ch. 551 or successor statute, prohibited violations of Wis. Stat. § 551.502(2), and revoked exemptions from registration under Ch. 551.

8. On or about March 29, 2013, in Dane County Case Number 12CF1888, Page was convicted of: (1) seven felony counts of making a false statement in the sale of securities in violation of the Wisconsin Uniform Securities Law and (2) one felony count of theft of an amount greater than $10,000. The court withheld sentence and placed him on probation for 11 years with the possibility of early discharge after 5 years if he made full restitution and complied with conditions including that he: "Not work with clients, mortgages or in any client advisory role that deal with financial matter."

9. At all times material, Connet was aware of the Division's 2009 Order and the 2013 felony convictions against Page.

10. According to Page, BCP MDG LLC is a "real estate wholesaler." Essentially, BCP MDG LLC buys and rehabs properties, and then flips them for a profit. The properties are typically low-income starter homes in need of repair. BCP MDG LLC finances the purchases with HUD loans or private lender loans, and repays the loans with interest after the properties are refinanced or resold.

Investor SK

11. At all times material, Investors SK and KK were residents of Brookfield, Wisconsin. They own and operate KSK Solutions, LLC, which is a Wisconsin real estate business that buys, rehabs, and sells real estate properties.

12. On or about November 23, 2015, Investors SK and KK through KSK Solutions, LLC paid $40,000 to BCP MDG LLC via cashier's check for the purpose of rehabbing two properties located in Milwaukee that BCP MDG LLC had recently acquired. SK and KK expected to make a profit on their investment once the two rehabbed properties were resold or refinanced by Page and Connet.

13. SK and KK were passive investors, relying on Page, Connet, and BCP MDG LLC to manage all aspects of the enterprise and having no role other than to provide the funding for the real estate project.

14. In exchange for their investment, SK and KK through KSK Solutions, LLC received a promissory note dated November 24, 2015 signed by Connet. The promissory note was for the principal amount of $40,000 and a flat interest amount of $7,500. The principal and interest were due in one installment on March 24, 2016. As security for repayment of the loan,

the promissory note offered a "2nd position" lien on the two Milwaukee properties to be rehabbed using SK and KK's funds.

15. Page, Connet, and BCP MDG LLC made no payments by the maturity due date, and as a result, the promissory note defaulted on or about March 24, 2016. The parties then agreed to a modified promissory note that called for the payment of late fees and penalties. As of the date of this Order, Investors SK and KK have been paid $20,000 of the amount due on the promissory note—the remaining principal and interest are in default and outstanding.

16. Page, Connet, and BCP MDG LLC never disclosed to Investors SK and KK the existence of the 2009 Order or the 2013 felony convictions prior to the offer of the promissory notes, which information was material and necessary to make the statements made, in light of the circumstances under which they were made, not misleading.

17. The promissory notes have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.

B. Conclusions of Law

Legal Authority and Jurisdiction

18. The Administrator has legal authority and jurisdiction over the conduct described above, pursuant to Wis. Stats. Ch. 551 and the rules and orders promulgated thereunder.

19. The promissory notes offered and sold by Respondents to Investors SK, KK and KSK Solutions, LLC were investment contract securities as defined under Wis. Stat. § 551.102(28).

20. Pursuant to Wis. Stat. § 551.301, it is unlawful for a person to offer or sell a security in this state unless it is a federal covered security, the security, transaction or offer is exempt from registration under Ch. 551, or the security is registered under Ch. 551.

21. Pursuant to Wis. Stat. § 551.501(2), it is unlawful for a person, in connection with the offer, sale or purchase of a security, to make an untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

Violations

22. Through the conduct described above, the Respondents violated Wis. Stat. § 551.501(2), in connection with the offer and sale of securities, by omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading to the above investors.

23. Through the conduct described above, Page violated Wis. Stat. § 551.301 by offering and selling unregistered securities to persons in Wisconsin.

24. Through the conduct described above, Page willfully violated Wis. Stat. § 551.508 by offering and selling unregistered securities to persons in Wisconsin and by omitting to state material facts in connection with such offer and sale, in violation of the Division's 2009 Order issued against Page.

III.

In view of the above findings of fact and conclusions of law, the Administrator deems it necessary and appropriate in the public interest and for the protection of investors, and pursuant to its legal authority and jurisdiction under Ch. 551, to wit Wis. Stat. § 551.604, to issue the following orders and notices:

A. Summary Orders issued pursuant to Wis. Stat. § 551.604(2)

25. IT IS ORDERED summarily that RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, shall cease and desist from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities qualify as covered securities or are registered under Ch. 551 or successor statute, pursuant to Wis. Stat. §§ 551.604(1)(a) and (2).

26. IT IS FURTHER ORDERED summarily that all exemptions from registration set forth at Ch. 551 or successor statute that might otherwise apply to any offer or sale of any security of or by any of the RESPONDENTS, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any RESPONDENT, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(b) and (2).

27. IT IS FURTHER ORDERED summarily that RESPONDENTS, their successors, affiliates, controlling persons, officers, agents, servants, employees and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of any RESPONDENT, are prohibited from violating Wis. Stat. § 551.501 or successor statute.

28. PLEASE TAKE NOTICE that the above summary orders are effective on the issuance and effective date below, pursuant to Wis. Stat. § 551.604(2).

B. Notice of Proposed Orders

29. IT IS PROPOSED that an order be issued against Respondent Page to pay a civil penalty in the form of an administrative assessment of $5,000, pursuant to Wis. Stat. § 551.604(4).

30. IT IS PROPOSED that an order be issued against Respondent Connet to pay a civil penalty in the form of an administrative assessment of $2,500, pursuant to Wis. Stat. § 551.604(4).

31. IT IS FURTHER PROPOSED that an order be issued against Respondents jointly and severally, to pay restitution to Investors SK and KK in the amount of $20,000 with interest on such amount at the legal rate under Wis. Stat. § 138.04 ($5 upon the $100 for one year) starting from the date of each violation and through the date of satisfaction, pursuant to Wis. Stat. § 551.604(4m).

32. IT IS FURTHER PROPOSED that an order be issued against Respondents jointly and severally to pay the actual costs of the investigation or proceeding as determined at the conclusion of the proceedings, pursuant to Wis. Stat. § 551.604(5).

33. IT IS FURTHER PROPOSED that the above proposed orders become final by operation of law, pursuant to Wis. Stat. §§ 551.604(2), (4),(4m) and (5), with respect to each Respondent that does not request a hearing within 30 days after the date of service of this order and if no hearing is ordered by the Administrator.

C. Service of Order

34. IT IS ORDERED that this order shall be sent promptly by certified mail to each party named in the order at his or her last known address or to the party's attorney of record, or shall be personally served upon the party or the party's attorney of record, pursuant to Wis.

Admin. Code § DFI-Sec 8.06. This order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.

35. PLEASE TAKE NOTICE the date of the service of this order is the date it is placed in the mail (which is also the issue and effective date below). If the order is served personally, the date of service of this order is the date of personal service. You are advised that any willful violation of an order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

D. Notice of Hearing Rights

36. PLEASE TAKE NOTICE that you have the right to request a hearing. Every request for a hearing shall be in the form of a petition filed with the Division, pursuant to Wis. Admin. Code § DFI-Sec 8.01. A petition for a hearing to review an order shall:

(1) Plainly admit or deny each specific allegation, finding or conclusion in the order and incorporated papers. However, if the petitioner lacks sufficient knowledge or information to permit an admission or denial, the petition shall so state, and that statement shall have the effect of a denial; and

(2) State all affirmative defenses. Affirmative defenses not raised in the request for hearing may be deemed waived.

37. PLEASE TAKE FURTHER NOTICE that within 15 days after receipt of a request in a record from you, the matter will be scheduled for a hearing or other public administrative proceeding, pursuant to Wis. Stats. §§ 551.604(2) and (3).

38. PLEASE TAKE FURTHER NOTICE that if you do not request a hearing and none is ordered by the Administrator within 30 days after the date of service of this order, the findings of fact, conclusions of law, and summary orders and proposed final orders, including the imposition of a civil penalty, requirement for payment of restitution and interest, and the costs of investigation sought in a statement in the order, become final by operation of law, pursuant to Wis. Stat. § 551.604(2).

EXECUTED at Madison, Wisconsin and effective this 16th day of October, 2018.

Leslie M. Van Buskirk.

Leslie M. Van Buskirk
Administrator

State of Wisconsin
Department of Financial Institutions
Division of Securities
4822 Madison Yards
P.O. Box 1768
Madison, WI 53701-1768

Exhibit A

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of ERIC PAGE,	ORDER OF PROHIBITION AND REVOCATION (SUMMARY)
Respondent.	File No. S-09018(EX)

Based upon the attached Petition for Order of Prohibition and Revocation I have reason to believe that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

a. Eric Page, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities qualify as covered securities or are registered under Ch. 551, Wis. Stats., or successor statute.

b. Eric Page, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.501(2), Wis. Stats., or successor statute.

c. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Eric Page, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are hereby revoked.

EXECUTED at Madison, Wisconsin, this 22nd day of September, 2009.

(SEAL)

Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any willful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of

PETITION FOR ORDER

ERIC PAGE, INC.,
INVESTOR'S RESOURCE CENTER, LLC,
L & E PROPERTIES OF KENOSHA, LLC, and
ERIC N. PAGE,

File No. S-09018(EX)

Respondents,

The staff of the State of Wisconsin, Department of Financial Institutions, Division of Securities, Bureau of Enforcement ("the Division") has conducted an investigation in this matter pursuant to § 551.56, Wis. Stats., and as a result thereof alleges as follows:

1. Eric Page, Inc. ("EPI") is a Wisconsin close corporation with a last known principal office address of 5024 Green Bay Road, Suite 100, Kenosha, Wisconsin 53144;

2. Investor's Resource Center, LLC ("IRC") is a Wisconsin limited liability company with a last known principal office address of 5024 Green Bay Road, Suite 100, Kenosha, Wisconsin 53144;

3. L & E Properties of Kenosha, LLC ("L & E") is a Wisconsin limited liability company that is registered with the Wisconsin Department of Financial Institutions, with a last known principal office address of 5024 Green Bay Road, Suite 100, Kenosha, Wisconsin 53144;

4. Eric N. Page ("Page") is an individual born in February, 1971, who was formerly licensed as a loan originator with the Wisconsin Department of Financial Institutions, Division of Banking, from February 9, 2004 to February 1, 2008, and a last known business address at that of 5024 Green Bay Road, Suite 100, Kenosha, WI 53144;

5. At all times material hereto, Page has been an owner, officer and/or a controlling person of EPI, IRC, and L & E (collectively, the "Page entities");

6. According to information and documents Page provided to Division staff, between 2004 and 2008, Page, personally and on behalf of the Page entities, offered and sold promissory notes in the Page entities to at least 24 persons in Wisconsin promising repayment of principal with interest payments at a specific date in the future, and in some cases secured by a mortgage on real estate;

7. The notes Page offered and sold to the Wisconsin investors are securities as defined by § 551.02(13)(a), Wis. Stats., and have never been registered under Ch. 551, Wis. Stats., for their offer and sale in Wisconsin;

8. According to information Page provided to Division staff, the Page entities will engage in the business of buying and selling real estate at a profit with no participation by the investors in the management of the business;

9. According to information Page provided to Division staff, during the offer and sale of the securities to the Wisconsin investors, the investors received no information before investing disclosing that Page received discharge of his debts through a Chapter 7 bankruptcy on January 15, 2004;

10. EPI, IRC, L & E, and Page violated § 551.41(2), Wis. Stats., by omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in connection with the offer and sale of securities to a person in Wisconsin;

11. According to information Page provided to Division staff, during the offer and sale of the securities to some Wisconsin investors, the investors received no information disclosing that Page had failed to repay notes to previous investors when due;

12. According to information and documents provided to Division staff by Page and by some of the Wisconsin investors, the first such note Page failed to repay occurred on June 12, 2006, and thereafter Page failed to repay other notes as they became due in 2006, 2007 and 2008;

13. Page violated § 551.41(2), Wis. Stats., by omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in connection with the offer and sale of securities to a person in Wisconsin;

14. According to information Page provided to Division staff, during the offer and sale of the securities to some investors, the investors received no information before investing disclosing that banks had filed foreclosure actions in 2007 and 2008 against Page for mortgage loans to him;

15. Page violated § 551.41(2), Wis. Stats., by omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in connection with the offer and sale of securities to a person in Wisconsin; and

16. Division staff have requested specific information and documents from Page about his securities-related transactions, but to date have received only incomplete responses, despite the due date for the responses having passed.

Therefore, the staff of the Bureau of Enforcement petitions the Administrator of the Division of Securities for the issuance of the attached Order pursuant to Ch. 551, Wis. Stats.

Mark Dorman 9-21-09

Mark E. Dorman Date
Examiner

Leslie M. Van Buskirk 9/22/09

Leslie M. Van Buskirk Date
Attorney Supervisor

State of Wisconsin

Department of Financial Institutions

Scott Walker, **Governor** | Jay Risch, **Secretary**

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.

2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon Respondent Rachel Connet at her last known address of 8321 W. Lorraine Place, Milwaukee, WI 53222:

   i. A copy of the Summary Order to Cease and Desist and Proposed Orders for Restitution, Civil Penalties and Costs, DFI Case No. S-238197 (EX); and

   ii. A copy of this Affidavit of Service.

3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me

This 16th day of October, 2018

Robin Jacob (Notary Seal)

ROBIN S. JACOB NOTARY PUBLIC STATE OF WISCONSIN

Notary Public, State of Wisconsin

My commission is permanent.

Division of Securities
Mail: PO Box 1768 Madison, WI 53701-1768
Courier: 4822 Madison Yards Way, Madison, WI 53705
Voice: (608) 261-9555 Fax: (608) 264-7979 Web: www.wdfi.org

State of Wisconsin

Department of Financial Institutions

Scott Walker, **Governor** | Jay Risch, **Secretary**

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

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1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.

2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon Respondent BCP MDG, LLC at it last known address of 2256 W. Fond Du Lac Ave., Milwaukee, WI 53206-1520:

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3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me

This 16th day of October 2018.

Robin Jacobs (Notary Seal)

ROBIN S. JACOBS NOTARY PUBLIC STATE OF WISCONSIN

Notary Public, State of Wisconsin

My commission is permanent.

State of Wisconsin

Department of Financial Institutions

Scott Walker, **Governor** | Jay Risch, **Secretary**

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

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1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.

2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon the Respondent BCP MDG, LLC's Registered Agent Rachel Connet at her last known address of 8321 W. Lorraine Place, Milwaukee, WI 53222:

   i. A copy of the Summary Order to Cease and Desist and Proposed Orders for Restitution, Civil Penalties and Costs, DFI Case No. S-238197 (EX); and

   ii. A copy of this Affidavit of Service.

3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi
KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

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This 16th day of October 2018

Robin Jacobs (Notary Seal)

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AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

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1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.

2. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have caused to be served copies of the following documents upon the Administrator for the Division of Securities:

   i. A copy of the Summary Order to Cease and Desist and Proposed Orders for Restitution, Civil Penalties and Costs, DFI Case No. S-238197 (EX); and

   ii. A copy of this Affidavit of Service.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

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State of Wisconsin
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This 16th day of October, 2018.

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