

Oneida Appeals Commission  
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AUG 26 2013

Leah Sue Dodge, Petitioner

RECEIVED BY KD  
**ORIGINAL COMPLAINT**  
**Request for Injunctive Relief**

v.

Docket # 13-TC-126

Oneida Land Commission,  
Respondents

Date 8-26-13

**Petitioner:**

Leah Sue Dodge  
N7345 County Road U  
Oneida, WI 54155  
920-328-3979

**Respondent:**

Oneida Land Commission  
Box 365  
Oneida, WI 54155  
920-869-1690

**Instructions:** Please attach your responses to the questions listed below to this form. List all responses in short, clear and plainly written statements. All statements of the complaint should be set forth in separate paragraphs and should be numbered. Each paragraph should address a single occurrence, event, circumstance or issue. Please use 8.5 X 11 inch paper and type with 1.5 or double spacing, leaving at least a one inch margin on all sides. Include any written exhibits or attachments that you may have with this form and complaint. Also, it is advised that parties refer to the Oneida Appeals Commission Rules of Civil Procedure for further information.

1. **Jurisdiction** Establish who you are, who the respondent is, and the authority of the O.A.C. trial court to hear the case.
2. **What happened?** Give the facts surrounding your claim. Describe what happened, who did it, where it took place and when it occurred. List each statement in a separate, numbered paragraph.
3. **What laws apply?** Explain, in short numbered paragraphs which rule(s), law(s), regulations (s), etc. apply to your facts and exactly how each was violated.
4. **How were you harmed by the violation(s)?** Explain the causal link between the violation(s) and damages that you suffered.
5. **What damages did you suffer?** Explain how you were harmed and describe your damages in detail. What do you want?

Petitioner's Signature and Date Leah Sue Dodge 8-26-2013

**SPECIAL NOTICE:** The Petitioner is required to file an original plus seven copies of this form - and all attachments for use by the Appeals Commission. In addition, a filing fee of \$25.00 must accompany the complaint. This fee may be waived upon a showing that the petitioner is unable to pay the fee.

## **I. Jurisdiction**

I, Leah Sue Dodge, am an Oneida Tribal member residing at N7345 County Road U, Oneida, WI 54155 which location is within 1,200 feet of parcel #HB-1339 at 112 Riverdale Drive, Oneida WI 54155, a parcel held in trust by the United States of America for individual Oneida Indian Tribal member Brian A. Doxtator. Mr. Doxtator recently requested several zoning variances regarding the use of this parcel and was so granted by the Oneida Land Commission on August 12, 2013.

The Oneida Appeals Commission has the authority to hear this case by virtue of the Oneida Tribe's Chapter 69, Zoning and Shoreland Protection Act, 69.15-3, which states "Any party of interest may appeal a decision of the Land Commission to the Oneida Appeals Commission. Upon appeal, the Oneida Appeals Commission may decide any question involving the interpretation of a provision of this law, including the location of a district boundary if there is uncertainty with respect thereto."

Therefore, I Leah Sue Dodge, as Petitioner, am hereby requesting injunctive relief of the improper decision of the Respondents, the Oneida Land Commission, on August 12, 2013 by granting Mr. Doxtator's request for variances outside of its proper authority as contained in Chapter 69. In light of the lack of evidence supplied by Mr. Doxtator in his request to support the approval of his variance requests, I am requesting a reversal of this decision and rescission of the building permit subsequently issued by the Oneida Zoning Department based on the Oneida Land Commission's improper decision.

## **II. Facts Surrounding Claim**

1. On August 5, 2013 I signed for a certified mailing from the Oneida Tribe's Development Administration which included an Oneida Land Commission Notification of a Public Hearing scheduled for Monday, August 12, 2013 at 4:00 pm at the Division of Land Management Conference Room at 470 Airport Drive, Oneida, WI 54155 (Attachment A). The purpose of this public hearing was a request for an issuance of a variance for the Individual Trust Property (Parcel #HB-1339) located at 112 Riverdale Drive, Oneida, WI 54155. The variances requested by the property occupant (Brian A. Doxtator) was for

- a. A variance to allow a commercial business to be operated at a personal residence;
  - b. Building setbacks, front, side, rear;
  - c. Build garage without an overhead door;
  - d. Not require parking lot to be paved or concrete;
  - e. Not require a storm water system.
2. Upon arriving at the notified time and location, I was informed that the public hearing had been "double booked" by the Oneida Land Commission (OLC) and was redirected to the "blue room," which was a conference table in an open area down the hallway from the usual Land Commission Conference Room. Once the public hearing began, others present besides myself were Troy Parr, Zoning Administrator; Patrick Pelky, Interim Land Management Division Director; Mary Jo Nash; and several others.
3. For oral testimony I presented the statement (Attachment B) and the supporting documentation (Attachment C). Discussion ensued which included the Interim DOLM director and Zoning Administrator's assurances that they had been previously unaware of the information I presented. I pointed out that the parcel appeared to be listed to "Kenneth and Delores Hill" per the Brown County, WI online land database, but according to Mary Jo Nash the parcel was an individual Trust property deeded to Brian A. Doxtator, and she further stated that "we (DOLM) don't report any information to Brown County."
4. At this same meeting, in regards to the evidence that a business named "Strateglobe, LLC" owned by Internal Services Division Director Joanie Buckley had been claiming the same address as its business home office, I asked Mary Jo Nash whether a business lease had been recorded at the BIA office for this parcel, as there are Federal laws governing the usage of both tribal and individual tribal member trust properties. She did not provide an answer to this question, stating that she only dealt in land acquisition. I was also informed that I should present my information and testimony once again to the OLC directly following the 4:00 pm meeting.
5. At approximately 5:15pm, the OLC opened their conference room to attendees. I personally handed a copy of Attachment C to Council member David Jordan who was present for the OLC meeting.

6. Attachment D was made available at the 5:15 pm meeting. This was the agenda request by Brian A. Doxtator for a variance to build a "garage" without an overhead door, on his property zoned as Agricultural, for a "home based business for accounting services and tax preparation," a variance for a parking lot (presumably for the parking lot to remain unpaved although his request did not specifically state it as such), and to not be required to construct a storm water system. His attachment cited his "home-based business" as "requiring appointments...on average, no more than 4 customers per 60 minutes which averages to 3 cars per hour. The exception occurs on April 15 of each year whereas the tax business does not require appointments." It also noted that "the construction of the garage will comply with code requirements for a small business. This includes spacial requirements as well as handicap accessible requirements in accordance with applicable laws."

7. Upon the request for oral testimony once the OLC reached its agenda item regarding the variance request (Attachment D), I again presented oral testimony (incorporated by reference to this complaint as Attachment B) and a copy of Attachment C (also incorporated by reference to this complaint) was handed out to the Land Commissioners in attendance.

8. At one point in the discussion, Brian A. Doxtator stated that he had leased part of his property to Strateglobe, LLC in the past. When asked whether Brian's activities on the parcel were in accordance with Federal laws regarding individual Trust land, none of the Land Commissioners present nor the Senior Staff Attorney from the Oneida Law Office, Rebecca Webster, nor any other Division of Land Management or other Tribal staff ever responded with any answer or indicated any knowledge whatsoever regarding Federal laws regulating the use and disposition of Tribal or Individual trust land.

9. Further, despite the serious issues raised in my oral testimony, the subsequent line of questioning, the supporting documentation submitted, and the fact that there was still a ten-day public commenting period following the date of this meeting regarding the variance requests, the Oneida Land Commission acted illegally by moving to approve Brian A. Doxtator's requests for variances at that same public meeting on Monday, August 12, 2013, as is indicated by the email dated August 21, 2013 from Zoning Administrator Troy Parr (Attachment E).

10. Zoning Administrator Troy Parr also indicated in his August 21, 2013 email that the Oneida Zoning Department subsequently issued the building permit to Mr. Doxtator on August 13, 2013, the very next day after the illegal and premature motion by the OLC to approve his requests for variances. To grant the permit thusly seems to be based on a violation of Tribal law.

11. As of the date of the writing of this injunction, the Oneida Land Commission has so far refused to provide any meeting transcript, meeting minutes, or oral recordings made of the August 12, 2013 public hearing and meeting. No further response from any staff or agent of the Division of Land Management or OLC has been received other than the email from Lori Elm, DOLM Office Manager dated August 21, 2013 (Attachment F).

12. In order to ensure that my written and oral testimony presented at the 4:00 pm and 5:15 pm hearings/meetings on August 12, 2013 were registered as part of the record as required of the OLC by Chapter 69.10-3, I also emailed copies of both to DOLM Office Manager Lori Elm on August 23, 2013 (Attachment G), well within the 10 business days for submission of testimony and documentation as noticed on Attachment A.

### **III. Applicable Laws**

#### **Chapter 69, Zoning and Shoreland Protection Law:**

1. In his submission to the OLC regarding his request for several variances (Attachment D), Brian A. Doxtator did not present any written or oral evidence at the 8/12/2013 Hearing(s) to support the claim that the strict application of this law would result in practical difficulties or unnecessary hardships for himself. He presented no statements nor any evidence showing any special circumstances which would result in practical difficulty or unnecessary hardship if his request for variances was not granted.

2. Mr. Doxtator did not present any evidence to support the notion that the granting of the variances was necessary for the preservation and enjoyment of substantial property rights, which is a burden a proof resting upon him required by this law for the authority of the Land Commission in granting variances. This is all required by 69.10-3. Without such evidence or testimony, the Oneida Land Commission acted outside of its authority in arbitrarily granting the variances.

3. Further, Mr. Doxtator presented no evidence nor testimony to support the supposition that the granting of the variance would not materially affect adversely the health or safety of persons residing or working in the neighborhood of the proposed use and would not be materially detrimental to the public welfare or injurious to property or improvements in the neighborhood. This burden of proof is also a requirement per law for the OLC to grant a variance per 69.10-3. Again, without such evidence or testimony as required by law, the Oneida Land Commission acted outside of its authority in arbitrarily granting the requested variances.

4. The structure termed as "garage" is specifically defined in Chapter 69 as a "building used for the storage of motor vehicles." It is highly unlikely that the proper usage of a "garage" would not require an overhead door for the ability of motor vehicles to enter the structure for storage. Mr. Doxtator further admits that the true purpose of this so-called "garage" would be for a "home based business for accounting services and tax preparation," and the variance request notification itself indicates that one of the variance request is for a "commercial business to be operated at a personal residence." This purpose is not specified in the types of businesses allowed for the Agricultural District in Chapter 69.7-10, and as Mr. Doxtator has already operated this commercial business for at least several years, has been in violation of these statutes and others as will be mentioned below.

5. Mr. Doxtator also claimed that the construction of the "garage" "will comply with code requirements for a small business. This includes spatial requirements as well as handicap accessible requirements in accordance with applicable laws." Were this future use to be true, this building would be required to have restroom facilities in accordance with ADA requirements and Chapter 69 requirements for professional offices with clientele by appointments, in addition to properly paved, handicapped accessible walkways, entrances, and paved handicapped-only parking for those confined to wheelchairs and/or requiring the use of walkers. In this case, Mr. Doxtator's claim that this building to be constructed is a "garage" sans overhead door is a thinly disguised attempt to construct a professional office building in the middle of the agricultural district.

6. Mr. Doxtator also requested an exemption from having to build a paved parking lot for his non-agricultural commercial business in a "garage", and presumably, based on his Attachment D submitted to the hearing, on the claims that a paved parking lot is more hazardous to the

environment than a gravel parking lot. Any professional business would be expected to extend employment opportunities and appointments to disabled clients in walkers or wheelchairs, and an unpaved, gravel parking lot would be extremely hazardous for them, especially if they were forced to park on the side of County Road J during the winter season and attempt to ambulate to the so-called "garage" without the benefit of any paved walkway. This too would be against proper commercial building code and would open up the possibility of liabilities should the individual suffer an injury due to the lack of proper off-road parking and paved access to his commercial office building being mislabeled a "garage."

7. According to his owista.com contact page, Owista Oneida Taxes also employs at least one other individual, Tim Houge, who it is presumed also works on-site and per code would require a business to have additional off-road parking space for every individual employed, in addition to one dedicated handicapped parking space (69.6-10).

8. As a commercial business or professional office, Mr. Doxtator is required to provide five (5) off-street parking spaces plus one (1) additional off-street parking space for each three hundred (300) square feet or floor area over one thousand (1,000) square feet [69.6-10(e)(4)]. It was not presented to the OLC as to how many square feet the so-called "garage" would consist of nor how much space in Mr. Doxtator's residential building would be used for his business.

9. Finally, Mr. Doxtator's request for exemption from a storm water system was not supported by his documentation provided with Attachment D. The strategies for mitigating nonpoint source pollution outlined in his attachment were specific to the strictly household residential property, as opposed to the commercial business/professional office with clientele by appointment with periods of high-volume walk-in traffic that his variance sought permission for.

10. Rather than requiring any proof establishing justification for Mr. Doxtator's request for variance, and after having heard oral testimony with supporting documentation as to Mr. Doxtator's apparent disregard for laws and regulations in illegally operating his business without the proper permits for at least a decade as well as possibly illegally leasing to another business without permission from the Bureau of Indian Affairs (or bearing false witness to having had done so), etc, the Oneida Land Commission wrongfully decided to reward his apparent disregard for rule of law

with all variances requested – in clear violation of Chapter 69.

11. Further, the Land Commission acted outside of its authority 69.10-3(i), as it states "The Land Commission shall not have the power to (1) Approve the establishment of a non-conforming use according to the district regulations, and (3) Grant an application that will materially affect adversely the health or safety of person residing or working in the neighborhood of the proposed use and will be materially detrimental to the public welfare or injurious to property or improvements in the neighborhood."

### **25CFR 162, Leases and Permits**

12. Brian A. Doxtator has been illegally operating a commercial business from his home at 112 Riverdale Drive, Oneida, WI without proper permits since possibly 2003 (see copyright at <http://www.owista.com/contact.html>), which is evidenced by the certified mail notification that the request for variance is for allowing a "commercial business to be operated at a personal residence," which was presumably his first ever request for proper legal application for permission to operate a commercial business on the individual Indian trust property given that he provided no evidence of any prior requests or properly obtained permits.

13. Let it be noted that the Division of Land Management's own website acknowledges that Federal laws **do** govern the usage of and activities upon individual Tribal members' land in trust (Attachment H, "Moving Land from Fee Status to Trust Status," <http://www.oneidanation.org/uploadedFiles/2010%20Jan-%2012.1.09Moving%20Land%20From%20Fee%20Status%20to%20Trust%20Status.pdf>).

14. Further, according to Mr. Doxtator's oral admission at the 8/12/2013 meeting, if he indeed had "leased to Strateglobe LLC," he did not provide any evidence that this was a legally binding, properly approved lease as recorded by the Bureau of Indian Affairs. His property rights on individual Trust land are limited to usufructuary rights, which do not allow him nor anyone else to "do whatever they want" with this parcel just because it is in Trust and is not fee land, especially because there is an entire section of United States Federal Code (Title 25) which governs the usage and occupancy of individual Tribe member Trust land (25CFR162, and subparts C&D specific to residential and business leases on Indian trust land).



15. His admission further raises the possibility that he may have entered into an illegal lease with Strateglobe, LLC, owner Joanie Buckley for the property or portions thereof at 112 Riverdale Drive, also as evidenced by Attachment C which contains citations from the Wisconsin Circuit Court Access database listing her home address as 112 Riverdale Dr. Oneida WI as recently as April 2012, and the listing from the Wisconsin Department of Financial Institution's database of corporate records showing that Strateglobe LLC was registered on 1/29/2007 as a "Foreign LLC" by registered agent Joanie Buckley at 112 Riverdale Drive, Oneida, WI 54155.

16. Regardless, at the 8/12/2013 hearing Mr. Doxtator did not present any evidence to the positive that there had ever been any type of BIA-approved and registered business and/or residential lease entered into between himself and Joanie Buckley and/or Strateglobe, LLC for personal and/or commercial business office occupancy at the property of 112 Riverdale Drive, Oneida, WI 54155. In light of the lack of positive evidence, is also entirely possible that his admission of having entered into a lease at the August 12, 2013 hearing was a false statement.

### **Chapter 3, Code of Ethics and Comprehensive Policy Governing Boards, Committees and Commissions**

17. Government officials as defined by section 3.2-1, are "all persons who are elected or appointed to serve on...any board, committee, or commission created by the Oneida Business Committee or Oneida General Tribal Council." The Oneida Land Commission is elected by the General Tribal Council and therefore its members are a body subject to the Code of Ethics. Pursuant to 3.3-3.(a), "A government official shall create and maintain an independent and honorable political system, and shall observe high standards of conduct toward achieving this goal, including, but not limited to...(2) avoid participation in action or decision making (except where participation is in accordance with the traditions of the Tribe) that would present an appearance of conflict of interest or an actual conflict of interest."

18. Given that Brian A. Doxtator has been (illegally) running a "tax preparation and accounting business" at 112 Riverdale Drive, it is entirely possible that any or all of the Land Commissioners present and participating in the vote may have had a previous or current financial relationship with Mr. Doxtator via the financial transaction (as defined in the Comprehensive Policy) of past

utilization of his tax preparation and/or accounting services, and therefore should have recused themselves if that was the case, but they never denied that possibility.

19. None of the commissioners present during the August 12, 2013 discussion ever stated for the record that they were *not* in conflict of interest by not having utilized Mr. Doxtator's professional services presently nor in the past, and certainly none recused themselves by admitting the potential for a conflict of interest by having been past or present clients of Mr. Doxtator's tax preparation & payroll business. In light of the recent past actions of the Land Commission Chair Amelia Cornelius presiding during meetings and votes in which the Oneida Seven Generations Corporation (for which her son Kevin Cornelius was CEO) received favorable decisions without her having recused herself, and similar situations involving Patricia Cornelius and her son Bart Cornelius who is an independent Tribal vendor for Oneida Seven Generations Corporation, it appears that this particular Land Commission has a history of failure to hold itself to the highest standards as required by the Code of Ethics policy, and therefore *cannot be presumed* to not have a conflict simply by the lack of recusal or self-reporting.

#### **IV. Harm Caused by Violation**

1. As noted previously in this complaint, Mr. Brian A. Doxtator failed to provide testimony or documentation which would prove that denying him the variance requests would cause undue hardship and/or deprive him of the enjoyment of the property "rights" in accordance with the Federal regulations governing the usage and occupancy of individual land in trust, as required by Chapter 69. Nevertheless, the Oneida Land Commission granted the requested variances anyway, which in addition to being a wrongful decision not based on the standard of evidence required by Chapter 69, was also a premature decision given that there was still a subsequent ten day comment period for the public to submit written concerns regarding these requests.

2. Additionally, with regards to the timing of the decision, as of the date of August 12, 2013 public hearing and meeting, there were two Land Commissioners whose terms would be formally over in two days after the meeting, and two new commissioners sworn in on August 14, 2013. A properly timed decision would have occurred on at least after the end of regular business hours on the tenth business day after the initial public hearing, and therefore two new Commissioners would

be rendering the decision without having been present for the initial public hearing.

3. Finally, this shows a contempt by the Oneida Land Commission for the rule of law and Tribal regulations set forth in the Zoning and Shoreland Protection law by rendering a decision outside of the bounds of its authority as established in Chapter 69, which was then continued by the premature granting of the building permit by the Zoning Department as based on this wrongful, premature decision.

4. As its currently stands, the Oneida Land Commission has rewarded a known and admitted violator of existing zoning regulations, failed to investigate the possible existence of possible illegal, unbinding "leases" between the property occupant and other individuals or commercial businesses outside of the bounds of the Federal rules (25CFR162) governing individual Indian trust land, and failed to protect the surrounding neighborhood (of which I am a resident) from potential heavy traffic and unnecessary obstacles in the roadway by not preventing this individual from erecting a commercial professional office building disguised as a "garage" in the middle of an agriculturally zoned historic neighborhood.

5. It is not a case of an individual having first sought the proper permits, authorizations, etc. *before* establishing a commercial business not considered an allowable use in the Agricultural district. It is not a case where his already existing home-based business is one that is permitted in the Agricultural district (agricultural food production and/or marketing, for example). It is not a case wherein this individual's primary occupation and main income is the revenue received from this commercial business, as he is employed full time by the Oneida Nation School System. It is not a case wherein the building to be constructed is to be legitimately used as a proper garage (to be used for motor vehicle storage) or used for a properly allowed "home-based business."

6. Further, this blatant disregard of Chapter 69 on the part of both Mr. Doxtator and the Oneida Land Commission has unfortunately opened the door for anyone in the surrounding neighborhood to set up whatever business they want with no regard to any Tribal, state or Federal laws, then once they are "caught", be rewarded by the Oneida Land Commission with premature favorable decisions outside of the bounds of their authority not meeting the standards with proper evidence and in spite of the actual evidence presented as to why they should be disallowed the

requests for variances. This is clearly against the public interest as a whole [69.10-39(d)], and not just the against interest of the residents of the surrounding neighborhood including myself.

7. Additionally, per Chapter 69.10-3©, should the variance "not continue in conformity with the conditions of the original approval, the variance shall be terminated by the Land Commission." Given that the Oneida Land Commission has shown either a gross disregard for or a stunning ignorance of the Zoning and Shoreland Protection law in its responsibility to protect the public interest and rule of law by allowing this business to operate illegally for more than a decade, it has also now placed the burden on the surrounding neighborhood (including myself) to be forced to protect ourselves by monitoring the activities of Mr. Doxtator with respect to his conformity with the conditions of the original approval. This is creating an undue hardship on surrounding neighbors including myself to have to monitor and report any deviation from the conditions of variances by Mr. Doxtator. Mr. Doxtator's deviation from the conditions can naturally be expected given that he framed his construction of the building as a "garage" (which by definition is for storage of motor vehicles) but admitted that it will eventually be "remodeled" as a commercial professional office building.

8. Unfortunately, this is just another example of the Oneida Land Commission showing disregard for the fundamental protections of the surrounding neighborhood and region in the recent past, the most egregious being its rezoning a wetlands area (Tower Foods area) as an industrial zone and granting a Conditional Use Permit for a commercial incinerator to a corporation headed by the son of the Land Commission Chairperson, potentially endangering residents, Tribal employees and most distressingly children from infancy throughout high school age attending daycares and schools within a one-mile radius of OSGC's proposed incinerator. This decision was also rendered prematurely by the Land Commission earlier in the very same month (February 2013) that the corporation in question (OSGC) publicly admitted that as of that same month it had not conducted its own "due diligence" in seeking to establish its industrial incinerator in that particular location.

9. Then, as now, the Oneida Land Commission negligently failed its duties to protect the public interest and has harmed both the surrounding neighborhood including myself and the very

rule of law in and of itself by its flagrant disregard and/or ignorance of the rule of law.

#### **V. Damages Suffered**

1. As a member of the public and as an individual residing within 1,200 feet of Mr. Doxtator's parcel, I am directly negatively impacted by the arbitrary and capricious decision by the Oneida Land Commission outside of the bounds of its authority as stated in Chapter 69 to grant Mr. Doxtator's request for variances.

2. Therefore, I am seeking an immediate rescission of the building permit issued by the Oneida Zoning Department to Brian A. Doxtator, which was granted based on the improper, arbitrary and capricious decision outside of the bounds of the Oneida Land Commission's authority contained with Chapter 69 and in conflict with BIA Regulations, and I seek injunctive relief against the Oneida Land Commission regarding its improper decision.

3. I request that Mr. Doxtator be denied his requests for variances, especially the request for a commercial business at his personal residence, as there are plenty of commercial business spaces available for him to properly lease within the reservation boundaries, which all have existing infrastructure for the disabled, properly paved parking, in commercially zoned areas, thereby relieving our neighborhood of the burden of additional commercial traffic and of having to monitor Mr. Doxtator constantly for his (expected) future violations incurred by his brick and mortar commercial business with multiple employees and clientele.

4. I request that the Oneida Tribe through the appropriate staff contact the BIA regional office to determine whether Mr. Doxtator has ever had a properly approved and registered residential and/or commercial lease with Joanie Buckley and/or Strateglobe, LLC for his parcel, or if there have been any other approved and recorded leases entered into by him and other parties for residential or business use of his parcel.

5. I request that the Oneida Land Commission be required to take a course on Chapter 69, 25CFR162, and the Code of Ethics, as they have shown a shocking ignorance of, if not flagrant disregard for this body of law.

6. I request an internal audit be conducted of the Oneida Land Commission to determine whether there are other examples beside this clear example of subversion of federal laws by not

contacting nor seeking approval by BIA authorities regarding the usage of individual Tribal trust land.

7. I request that future requests for zoning variances be properly publicly noticed through publication in local newspapers at least two weeks prior to public meetings.

8. I request that the Oneida Appeals Commission verify under oath whether each Oneida Land Commissioner (past and present) involved in the decision to grant Mr. Doxtator's request for variances did ever have a financial relationship with Mr. Doxtator through being past or present clientele of his tax preparation services, and if so, question as to why they did not therefore recuse themselves from this decision.

9. I request an investigation of Mr. Brian A. Doxtator be conducted by contacting the U.S. Internal Revenue Service and the Wisconsin Dept. of Revenue and the Wisconsin Dept. of Motor Vehicles regarding how many other individuals besides Joanie Buckley/Strateglobe LLC he may have allowed to use his address at 112 Riverdale Drive, Oneida, WI 54155 as a residential or commercial address or for registration of a vehicle for the possible purposes of Federal and Wisconsin State income tax evasion or illegal vehicle registration and possible auto insurance fraud.

Dated this 26 day of August, 2013

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Leah Sue Dodge, Petitioner  
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Oneida, WI 54155  
920-328-3979