

RE: Demand for Immediate Remedial Action Regarding the September 24th Emergency Meeting and Stori Field Land Transfer

Dear Mayor Coppernoll and City Attorney, Common Council may

I am writing on behalf, of concerned citizens of Richland Center and all those others affected, to formally demand that the City take immediate action regarding the September 24 Emergency Common Council Meeting and the approval of the **Stori Field Pre-Development Agreement**

This letter serves as a **ten-day notice** : if the City fails to respond and initiate remedial steps by **October 15th 2025**, we will proceed with the following actions :

- Filing a formal complaint with the **Wisconsin Department of Justice- Office of Open Government**
- Pursue **injunctive relief** to halt development
- Initiate **recall petitions** and /or a **referendum** to reverse any land transfer or development agreement.

I. Abuse of Emergency Meeting Procedure – Wis. Stat. 19.84

The September 24 meeting was called with only 25.5 hours' notice, citing No imminent threat or urgent public need. The agenda item Stori Field Predevelopment Agreement, which included the transfer of public land for \$1.- does not meet the statutory threshold for an emergency.

- No written justification was provided to the residents.
- No housing crisis documentation or deadline was cited.
- The meeting lacked transparency and violated the “good cause “requirement under **Wis. Stat. 19.84**

II. Misleading Public Notice and Procedural Ambush – Wis. Stat. 19.84

The official notice to the public for the September 24 emergency meeting stated that “**no council action will be taken** “ on the agenda item. Yet the council proceeded with a “Motion to approve the Stori Field Pre- development agreement as presented “during that meeting.

That is not a clerical error – it is a deliberate misdirection that deprived residents of their right to participate. It violates **Wis. Stat. 19.84** which requires accurate notice of both subject matter and intended action. Approving an agreement that involves land transfer under **false pretenses** is procedurally indefensible and legally voidable.

III. Abuse of Wisconsin's Public Purpose Doctrine

The City transferring **5.58 acres of public land for \$1** to a private developer citing a housing need. Yet:

- No housing impact study of affordability guarantees were provided.
- The developer is using **private capital** not public investment
- The estimated \$30,000 each for state, school and city, in tax revenue pales in comparison to the projected **\$4-6 million private gain**.
- The transaction fails to demonstrate a legitimate public benefit and violates **Wisconsin's Public Purpose Doctrine** as interpreted .

IV Disregard for Stori Fields Legacy and Intent

Stori Field served generations of children and families. It was deeded to the City by the Richland School District for \$1 with expectations of capital investment and long-term revenue for public education

- The current plan offers no meaningful return to the school or community.
- Members of the Stori Family have expressed disapproval
- The decision dishonors the legacy of one of Richland Centers landmarks and tears at the emotional fabric of the Town.

V Developers Legal Standing and Contract Validity.

The agreement was signed by **Doug Enke** in his personal name, listing himself as Vice President, but no corporation was named.

- Corporate records show **late filings and dissolutions and reinstatements** with corporations he has been associated with. This raises concerns about legal authority and organizational capabilities.
- The City has failed to verify any due diligence

VI Our Demands

We hereby demand that the City of Richland Center:

- 1. Immediately pause all development activity related to Stori Field**
- 2. Disclose all documents** related to the Pre-Development Agreement. developer. qualifications and expenditures
- 3. Hold Properly Noticed Public Hearing**
- 4. Restore Stori Field's public purpose**

VII. Notice of Intent to Escalate

If the City fails to respond or initiate corrective action by **October 15, 2025** we will proceed with:

- A formal complaint to the **Wisconsin DOJ – Office of Open Government**
- A petition for **Injunctive Relief** based on clouded title and unjust enrichment
- A **recall campaign** and/or **referendum** to reverse any action, including the land transfer.

This is not just a legal matter – it's a moral one. The people of Richland Center *deserve fairness , respect and transparency* for our shared history .

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