

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOWN OF THORNAPPLE, WISCONSIN; ANGELA JOHNSON, RALPH C. KENYON, TOM ZELM, and JACK ZUPAN, in their official capacities as Town Clerk and Town Board Supervisors of the Town of Thornapple, TOWN OF LAWRENCE, WISCONSIN; CHARIDY LUDESCHER, BOB NAWROCKI, STACY ZIMMER, and DUANE BILLER, in their official capacities as Town Clerk and Town Board Supervisors of the Town of Lawrence, and STATE OF WISCONSIN,

Defendants.

Civil Case No.: 3:24-cv-664-jdp

NOTICE OF SETTLEMENT

Plaintiff United States of America provides notice to the parties and the Court that the United States and the Town of Thornapple, Wisconsin (“Thornapple”); Angela Johnson, Ralph C. Kenyon, Tom Zelm, and Jack Zupan, in their official capacities as Town Clerk and Town Board Supervisors of the Town of Thornapple (collectively, “Thornapple Defendants”) have approved and signed a final settlement agreement in this case and the settlement has become effective. The settlement agreement is attached as Exhibit 1.

This agreement resolves the remaining claims asserted in *United States v. Town of Thornapple et al.* (3:24-cv-664-jdp), filed in the United States District Court for the

Western District of Wisconsin on September 20, 2024 to enforce HAVA. The Parties will move jointly for dismissal of the United States' claims against the remaining Defendants by December 19, 2025, per the terms of the settlement agreement in Paragraph 23. The Parties agree that this consideration is adequate and sufficient.

Dated: December 12, 2025

Respectfully submitted,

For Plaintiff United States of America:

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

CHADWICK M. ELGERSMA
Acting United States Attorney
Western District of Wisconsin

/s/Timothy Mellett

ERIC NEFF

TIMOTHY F. MELLETT
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

BARBARA L. OSWALD
Assistant United States Attorney
United States Attorney's Office
Western District of Wisconsin
222 West Washington Ave, Suite 700
Madison, WI 53703

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/Timothy Mellett

Timothy F. Mellett