

November 29, 2017

RECEIVED
12/4/17

Diane Fremgen, Clerk of the Supreme Court
110 East Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

RE: **Voters with Facts, et al. v. City of Eau Claire, et al.**
Case No. 2015AP1858

Dear Ms. Fremgen:

Enclosed please find an original and nine (9) copies of the Motion of Eau Claire Area Chamber of Commerce, Inc. for Leave to File an Amicus Curiae Brief in this matter. Copies of the same are being served on attorneys of record. Should you have any questions regarding this, please let me know.

Very truly yours,

WELD RILEY, S.C.



Ryan J. Steffes

RJS/jml

Enclosures

cc: Thomas C. Kemenick (w/enc.)
Douglas Hoffer (w/enc.)
Remzy Bitar (w/enc.)
Scott Rogers (w/enc.)(via email)

\\wrrlacy\PMDOcs\31080.0006\Clerk-SC Ltr1_20171128.wpd

STATE OF WISCONSIN
SUPREME COURT
Appeal No.: 2015AP1858

Voters with Facts, Pure Savage Enterprises, LLC, Wisconsin Three, LLC
215 Farwell, LLC, Dewloc, LLC, Leah Anderson, J. Peter Bartl, Cynthia Burton,
Corinne Charlson, Maryjo Cohen, Jo Ann Hoepfner Cruz, Rachel Mantic,
Judy Olson, Janeway Riley, Christine Webster, Dorothy Westermann,
Janice Wnukowski, David Wood, and Paul Zank,

Plaintiffs-Appellants-Petitioners,

v.

City of Eau Claire and City of Eau Claire Joint Review Board,

Defendants-Respondents.

**MOTION OF EAU CLAIRE AREA CHAMBER OF COMMERCE, INC.
FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF**

Non-Party Eau Claire Area Chamber of Commerce, Inc. (“the Chamber”) hereby moves the court for an order granting it permission to file an *amicus curiae* brief in the above-captioned appeal. This motion is made pursuant to Wis. Stat. §§ 809.19(7)(a) and 809.63. The basis for the motion is set forth below.

The Chamber is a non-stock corporation founded in 1915. It strives to further business and community development in Eau Claire and the surrounding area. It has over 1,200 members and is accredited by the United States Chamber of Commerce.

The Chamber and the members it represents have a strong interest in the above-captioned appeal. Eau Claire is in the midst of a cultural and economic revival. See <https://www.jsonline.com/story/news/2017/07/01/eau-claire-cultural-renaissance/409782001/>. The

development project at issue in this case, broadly referred to as the Confluence Project, is an important piece of that revival. The Chamber has supported and continues to support the project.

The Chamber can help the court better understand the issues in dispute by providing a broader perspective on: 1) the history of the Confluence Project and the TIF districts at issue in this case; 2) their role in Eau Claire's ongoing revival; and 3) the negative consequences of subjecting the political decisions at issue to the type of judicial review Petitioners seek.

Accordingly, the Chamber respectfully requests this court grant its motion and give it the opportunity to further explain its interests and views in an *amicus curiae* brief.

Dated this 29 day of November, 2017.

WELD RILEY, S.C.

By: 

Ryan J. Steffes
State Bar No. 1049698
Attorneys for Eau Claire Area
Chamber of Commerce, Inc.

ADDRESS

3624 Oakwood Hills Parkway
PO Box 1030
Eau Claire, WI 54702-1030
(715) 839-7786
(715) 839-8609 Fax

\\wrprlacy\PMDOcs\31080.0006\Motion for Leave to File Amicus_20171128.wpd