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

UNITED STATES OF AMERICA,

Plaintiff and
Counter Defendant,

v.

TOWN OF LAC DU FLAMBEAU,

Case No. 3:23-cv-00355-wmc

Defendant and
Counter Claimant,

and

GORDON ANDERSON et al.,

Intervenor Defendants and
Intervenor Counter Claimants.

DECLARATION OF JOSEPH HUNT

I, Joseph Hunt, declare the following:

1. I am an intervenor defendant and counter claimant Homeowner in this case, and I make this declaration based on my personal knowledge and in support of the Homeowners' Motion to show Cause or, In the Alternative, Clarification of the Amended Preliminary Injunction against the plaintiff United States of America.

2. My wife, Martha Hunt, and I own our residence at the address of 14862 Redpoll Lane ("Hunt Property") in the Town of Lac du Flambeau, WI ("Town"). The only roadway access to and from the Hunt Property is via East Ross Allen Lake Lane.

3. The Hunt Property is located entirely within the boundaries of the Lac du Flambeau Band of Lake Superior Chippewa ("Band") Reservation ("Reservation").

4. The Band is continuing a series of actions that are harassing and intimidating to my wife and me. Most recently the Band has established a policy to issue citations to any non-Tribal member who uses a contested road, including East Ross Allen Lake Lane. In our case, we have to cross 153 feet of Indian land to get out of our subdivision.

5. After collecting $600,000 in monthly use fees from the Town, the Band demanded full payments of a disputed amount in the millions. The Town does not have the money. As a result, the Band threatened to block our road again, this time on January 16, 2025. To underline the threat, the Band brought back the concrete barriers they used to block the road last time.

6. The concrete blocks, which remain in place, proved to be very nerve wracking. Our stress levels jumped every time my wife and I passed the concrete blocks. We rescheduled all of our appointments, medical and otherwise. Friends and family were advised that we were being locked down again. We worked out alternate ways of travel (crossing a frozen lake again) and stockpiled provisions. To this day, the concrete blocks remain in place.

7. On the day before we were to be blockaded again, the Band announced that they would not block our road. However, the very next day, the Band announced that any non-Tribal member using any of the four roads in question would be cited for trespassing. To make sure we knew the Band was serious, two surveillance cameras were installed on East Ross Allen Lake Lane facing our vehicles as we traverse the 153-foot segment at issue.

8. My wife and I started to wonder. Do we hunker down? Do we cover our license plates and go for groceries or medications? Can anyone come and see us? Will they refuse to deliver our mail again? This obviously increases our stress.

9. Yesterday the Band installed "No Trespassing" signs that bluntly state "offenders will be prosecuted." The new signs have caused my wife and I severe anxiety, so much so that we have decided not to use the roads when possible.

10. I am 71 years old and an honorably discharged Marine Veteran. I worked for the Band and was a substitute teacher at the Lac du Flambeau School.

11. I also have some serious health issues that are not helped by the games the Band is playing. The extra stress is not only impacting my health, but it is also impacting the health of my wife, Martha.

12. Due to my chronic obstructive pulmonary disease and heart issues, I have extreme difficulty walking across the lake especially in the extreme cold and need access over East Ross Allen Lake Lane to get to doctor appointments. The recent "No Trespassing" signs are causing me increased anxiety in having no choice but to risk prosecution for using the road.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 30th day of January, 2025.

s/ *Joseph Hunt*
Joseph Hunt