

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-cv-37

APPLEWOOD of CROSS PLAINS, LLC,
WILLIAM RANGUETTE, and CANDACE
WOOD,

Defendants.

JOINT MOTION FOR ENTRY OF CONSENT DECREE

The parties to the above-captioned action, the United States of America (“United States”), Applewood of Cross Plains, LLC, William Ranguette, and Candace Wood, respectfully move this Court to enter the attached Consent Decree.

The parties have negotiated the terms of the attached Consent Decree that fully resolves the allegations contained in the United States’ complaint. The parties, therefore, respectfully request that the Court approve and enter the proposed Consent Decree.

Dated this 15th day of January, 2016.

ON BEHALF OF THE UNITED STATES

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Attorney General of the United States

/s/ Vanita Gupta
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FOR DEFENDANTS APPLEWOOD OF
CROSS PLAINS, LLC, WILLIAM
RANGUETTE, and CANDACE WOOD

By:

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