

In the  
**United States District Court**  
For the  
Western District of Wisconsin

---

Mikayla Marie LeRette,

Plaintiff,

v.

Case No. 25-cv-183

The City of Superior, Wisconsin, and,  
In Their Individual Capacities,  
Thomas Champaigne, John Kiel,  
Jeffrey Harriman and Michelle Pope,

Defendants.

---

**Declaration of Jeff Scott Olson**

---

The undersigned Jeff Scott Olson, under penalty of perjury, pursuant to 28 U.S.C. § 1746, states:

1. In the Plaintiff's Requests for Production of Documents we made the following request and received the following response:

REQUEST FOR PRODUCTION NO. 11: Produce all documents showing assignments and restrictions for each sworn officer placed on light duty from January 1, 2017, to present, including duty status forms, internal memos, email communications, and any documents describing limits on firearm carriage, vehicle use, or leaving the station.

RESPONSE NO. 11: Objection. This Interrogatory is overly broad, unduly burdensome, and not likely to lead to the discovery of admissible evidence, as a list of sworn officers who were placed on temporary "light duty" status over a period of nine years is irrelevant to the parties' claims and defenses in this lawsuit and unduly burdensome to the Defendants. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000721-CITY000747.

(Olson Declaration, Exhibit 501, at p. 6.)

2. None of the documents produced showed any other officer on light duty being prohibited from carrying a firearm, driving a department vehicle, or leaving the station during work hours. (Exhibit 503 attached hereto.)

3. In our interrogatories we asked the City to identify all sworn officers who were placed on temporary "light duty" status for the period January 1, 2017, to the present, and for each such officer we asked (d) their assignment while on light duty; (e) whether they were permitted to carry a firearm; (f) whether they were permitted to drive a City vehicle; (g) whether they were permitted to leave the station during work hours; and (h) the identity of the supervisor(s) who made or approved these decisions. The City's response identified 14 officers including Plaintiff LeRette. The responses contained the following information about whether these officers were restricted from carrying firearms, driving city vehicles or leaving the station:

Officer	Restricted from Carrying Gun	Restricted from Driving City Vehicle	Restricted from Leaving Station
Darst	No Restriction Identified	No Restriction Identified	No Restriction Identified
Noll	No Restriction Identified	No Restriction Identified	No Restriction Identified
B. Davis	Didn't Carry a Gun	No Restriction Identified	No Restriction Identified
K. Davis	No Restriction Identified	No Restriction Identified	No Restriction Identified
LeRette	No Restriction Identified	No Restriction Identified	No Restriction Identified
Mundell	No Restriction Identified	No Restriction Identified	No Restriction Identified
Lear	No Restriction Identified	No Restriction Identified	No Restriction Identified
Pfistner	No Restriction Identified	No Restriction Identified	No Restriction Identified
Gard	No Restriction Identified	No Restriction Identified	No Restriction Identified
Eastman	No Restriction Identified	No Restriction Identified	No Restriction Identified
Kiel	Did not Carry until 2024	Did not Drive until 2024	No Restriction Identified
Monte	No Restriction Identified	No Restriction Identified	No Restriction Identified
DePuma	No Restriction Identified	No Restriction Identified	No Restriction Identified
Robinson	No Restriction Identified	No Restriction Identified	No Restriction Identified

(Ex, 502, attached hereto, pp. 4-6.)

4. Although the City states that "it was the department's practice that officers on light-duty were not permitted to carry a firearm, operate a city vehicle, or

leave the station” (Ex, 502, attached hereto, p. 7), the only documentation of this “policy” makes these restrictions a discretionary call of the Chief of Police or designee, except for leaving the station, which is not mentioned. (Exhibit 513, attached hereto, at p. 3.) (“ The Chief of Police or the authorized designee may restrict employees working in temporary modified-duty assignments from wearing a uniform, displaying a badge, carrying a firearm, operating an emergency vehicle, engaging in outside employment, or being otherwise limited in employing their peace officer powers.”)

5. The exhibits filed as attachments to this Declaration are known to me to be genuine since they were produced in discovery by the defense.

6. Exhibit 501 is the Defendants’ responses to the Plaintiff’s request for production of documents.

7. Exhibit 502 is the Defendant City of Superior’s Answers to the Plaintiff’s interrogatories.

8. Exhibit 503 is the set of documents produced in response to the Plaintiff’s Request for Documents, request number 11.

9. Exhibit 504 is Plaintiff LeRette’s performance evaluation issued in the year 2018.

10. Exhibit 505 is a 2019 email exchange between City of Superior Human Resources Director Cammi Koneczny and City of Superior Health Officer Kathy

Ronchi regarding making a room available for a nursing mother employed by the City, but not the Police Department, to express breast milk upon her return from maternity leave.

11. Exhibit 506 is Plaintiff LeRette's performance evaluation issued in the year 2019.

12. Exhibit 507 is an email dated November 9, 2022, regarding Plaintiff LeRette's return to work after her first maternity leave.

13. Exhibit 508 is an email dated November 21, 2022, from then Chief Alexander to Champaign, Pope and Kiel about the need to assign Plaintiff LeRette work away from property, patrol or narcotics.

14. Exhibit 509 is a memorandum dated September 18, 2023, by then Captain Champaign about a meeting on that date that included Champaign, Pope, Plaintiff LeRette and Investigator Custer, in which Champaign and Pope were very critical of the performance of Plaintiff LeRette and Investigator Custer in their narcotics investigation assignments.

15. Exhibit 510 is an email dated February 26, 2024, from Captain Harriman memorializing a shift change for Plaintiff LeRette to 8-hour work-days.

16. Exhibit 511 is the Report of Daniel Hardman, conveying the results of his investigation into the allegations of misconduct lodged against Plaintiff LeRette

by Assistant Chief Kiel and Captain Jeffery Harriman. Although it is dated on the cover July 29, 2024, that date is obviously wildly inaccurate, as the report itself indicates that Harman was carrying out interviews as late as October 7, 2024. (*Id.*, p. 25, Interview of Investigator Monte.)

17. Exhibit 512 is an email from City HR Director Cammi Janigo dated September 16, 2024, indicating that Plaintiff LeRette will be returning to work from her second maternity leave the following day, September 17, 2024.

18. Exhibit 513 is an email exchange dated September 19, 2024, among HR Director Janigo, Kiel, Harriman, and Pope, regarding Plaintiff LeRette's light duty restrictions on her first and second maternity leaves.

19. Exhibit 514 is an email exchange on November 18-19, 2024, among Pope, Harriman, Chief of Police Winterscheidt, City Attorney Frog Prell, and Douglas County District Attorney Mark Fruehauf.

20. Exhibit 515 is an email dated January 27, 2025, confirming Plaintiff LeRette's return to 12-hour shifts.

21. Exhibit 516 is an undated message from Mayor Paine to Plaintiff LeRette responding to her request for clarification of the warning letter he had issued in early January, 2025.

22. Exhibit 517 is a memorandum dated April 1, 2025, from Chief of Police Paul Winterscheidt to Plaintiff LeRette explaining that the internal investigation had been concluded.

23. Exhibit 518 is a formal grievance dated June 30, 2025, submitted to city officials by the WPPA Local #27 Grievance and Discipline Committee.

24. Exhibit 519 is a July 17, 2025, email from HR Director Janigo to Plaintiff LeRette and city officials stating that the grievance would not be on the agenda of the July 21, 2025, Human Resources Committee meeting since Mayor Paine had referred it to Chief Winterscheidt for handling at the first level.

25. Exhibit 520 is a July 21, 2025 email from Mayor Paine to Plaintiff LeRette and union officials informing them that because of Chief Winterscheidt's obvious conflict of interest, Chief Winterscheidt and Mayor Paine had agreed that Mayor Paine would attempt to resolve the grievance in the first instance.

26. Exhibit 521 is a message sent to Plaintiff LeRette by Mayor Paine after their meeting with union officials about the union grievance filed on Ms. LeRette's behalf, ostensibly to clarify Mayor Paine's January, 2025, written warning to Plaintiff LeRette.

27. Exhibit 522 is an exchange of emails among Plaintiff LeRette, Chief Winterscheidt, Human Resources, and City Attorney Frog Prell in which Plaintiff LeRette announced her intention to resign from the Superior Police Department.

28. Exhibit 523 is a memorandum dated September 29, 2025, to a number of addressees announcing Plaintiff LeRette's resignation effective that day.

29. Exhibit 524 is an email dated October 10, 2025, from Michelle Pope to Michael Gennaco and Stephen Connolly of the OIR group.

30. Exhibit 525 is the January, 2026, OIR Group report entitled "Independent Investigation into Allegations of Misconduct Involving the Superior Police Department: Collateral and Systemic Issues."

31. Exhibit 526 is the January, 2026, OIR Group report entitled "Independent Investigation into Allegations of Misconduct Involving Superior Police Department Member Jeff Harriman."

32. Exhibit 527 is the January, 2026, OIR Group report entitled "Independent Investigation into Allegations of Misconduct Involving Superior Police Department Member Michelle Pope."

33. Exhibit 528 is an undated Letter of Commendation issued to LeRette and Monte for their work on the Thompson Brothers investigation beginning in 2023.

### DECLARANT'S CERTIFICATION

Jeff Scott Olson hereby declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I wrote the foregoing declaration.
2. I declare, under penalty of perjury, that the foregoing statements are true and correct.
3. I have executed this Declaration on Monday, May 11, 2026.

/s/ Jeff Scott Olson

---

Jeff Scott Olson