

This case has been designated as an eFiling case. To review a copy of the Notice of Mandatory eFiling visit www.oakgov.com/efiling.

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

KAROL MILLER, individually, and
THE 06 LEGACY, a Michigan nonprofit
organization;

2021-187192-AA

JUDGE VICTORIA VALENTINE

21- AA

Plaintiffs,

v.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES,
a Michigan Governmental Agency

Defendant.

E. Powell Miller (P39487)
Lauren G. Northrop (P69035)
The Miller Law Firm, P.C.
950 West University Drive, Suite 300
Rochester, MI 48307
(248) 841-2200
epm@miller.law
www.miller.law

COMPLAINT

Plaintiffs Karol Miller and The 06 Legacy, by their attorneys, The Miller Law Firm, P.C., and for their Complaint against Defendant the Michigan Department of Natural Resources, states as follows:

PARTIES AND JURISDICTION

1. Karol Miller is an individual residing in Oakland County, Michigan. Mrs. Miller is an advocate for wolf conservation and applied to the Michigan Department of Natural Resources to serve on the Wolf Management Advisory Council.
2. The 06 Legacy is a nonprofit conservation organization located in Oakland County,

Michigan. Karol Miller, president and founder of The 06 Legacy, resides in Rochester, Michigan.

3. The Michigan Department of Natural Resources (“DNR”) is a Michigan governmental agency responsible for maintaining natural resources including state parks, state forests, recreation areas and wild animal management. The DNR is governed by a director appointed by the Governor of Michigan and accepted by the Natural Resources Commission.

4. Daniel Eichinger is the director appointed to the DNR by Governor Gretchen Whitmer.

5. Mr. Eichinger (the “Director”) is responsible for, among other things, appointing members to serve on the Michigan Wolf Management Advisory Council (the “Council”).

6. This Court has jurisdiction pursuant to MCL § 600.631 because Plaintiff is appealing the Director’s decision to appoint members to the Council in violation of the governing statutory authority.

7. Venue is proper as Plaintiffs reside in Oakland County.

8. This Complaint is timely under MCR 7.104(A)(1).

9. A copy of the appealed decision is attached as Exhibit 1, pursuant to MCR 7.104(D)(1).

10. A request for a certified copy of the Council decision by the Director pursuant to MCR 7.104(D)(3) is attached as Exhibit 2.

FACTUAL BACKGROUND AND GENERAL ALLEGATIONS

11. The Director is tasked with appointing members to the Michigan Wolf Management Advisory Council, which meets and makes nonbinding recommendations as to the proper management of wolves in Michigan.

12. The Director, however, does not have discretion as to the types of organizations

who may provide candidates to fill the Council seats.

13. Because wolf management is such a contested issue, and has proven to be important to Michigan citizens and voters, the Michigan legislature took deliberate action to ensure that various interests have an equal voice on the Council.

14. The Council is carefully designed so that the advice provided will be fair and balanced.

15. Despite the clear statutory directive, the Director has violated the statute in a transparent attempt to stack the deck in favor of wolf hunting.

16. MCL § 324.43540e closely prescribes who is eligible to serve on each seat of the Council:

(1) The wolf management advisory council is created within the department.

(2) The council shall consist of at least the following members:

(a) The director of the department or his or her designee.

(b) One member representing an organization that promotes conservation in this state appointed by the director or his or her designee.

(c) One member representing organizations that promote hunting or fishing in this state appointed by the director or his or her designee.

(d) One member representing a tribal government appointed by the director or his or her designee.

(e) One member representing agricultural interests appointed by the director or his or her designee.

(f) One member representing an animal advocacy organization appointed by the director or his or her designee. (MCL § 324.43540e)

17. This statute is intentionally and carefully crafted to ensure fairness and transparency in the management of Michigan's wolves.

18. For example, the statute requires that Council business shall be conducted at a public meeting held in compliance with the open meetings act, and that any documentation shall be subject to the freedom of information act. MCL § 324.43540e(5), (6).

19. The specific criteria of the statute speak to the importance of wolf management to

Michigan voters, who, in 2014 overwhelmingly voted against wolf hunting.

20. That year, there were two wolf hunting bills, Proposal 1, which would have established a hunting season for wolves and authorized an annual wolf hunt, and Proposal 2, which would have granted the Natural Resources Commission the power to designate wolves as game animals without legislative action.

21. In response to these ballot proposals, 64% of Michigan voters said “NO” to wolf hunting. In fact, voters cast 1.8 million votes against Proposal 2, which was more votes than any other candidate for statewide office received in their winning campaigns.

22. Despite the clear language of MCL § 324.43540e, on March 10, 2021, the Director appointed a Council overwhelmingly favoring wolf hunting and ignoring the requirement to appoint diverse voices to the Council. (Exhibit 1.)

23. This decision is in clear violation of the statutory requirements, and in disregard of the millions of Michigan citizens who voted against wolf hunting.

I. The Director’s Appointments to the Council Reveal a Pro-Hunting Agenda and Violate the Statute

24. The Director’s appointments are clearly calculated to ensure a pro-hunting agenda on the Council.

25. There is also evidence of improper calculated bias in the selection process.

26. In 2015, the Wolf Management Advisory Council submitted an update to the 2008 Wolf Management Plan. The final pages of this Plan update contain the signed certification of 20 Council members. (Exhibit 3.)

27. As shown by these signatures, the Council consisted of approximately 20 agencies and organizations that represented the diversity of Michigan interests in wolves. Each organization was selected to ensure the views of all Michigan residents would be represented in a fair, balanced,

and effective manner. Representatives from hunting organizations, conservation organizations, agricultural organizations, and tribal organizations served on the Council.

28. The signatures to the 2015 update of the 2008 Plan reflect an adequately staffed and balanced Council. (Exhibit 3.)

29. In 2013, the Council submitted its perspectives on potential consequences of the public harvest of wolves. The final page of this submission illustrates the diverse organizations represented on the Council, which included nineteen organizations representing distinct and balanced viewpoints. (Exhibit 4). Again, this document reflected a fair and balanced Council.

30. Despite the clear precedent, and the statutory directive, the Director has abandoned a balanced Council in favor of one that overwhelmingly supports wolf hunting.

31. For example, the Director's appointment of Mike Thorman for the hunting/fishing is illustrative of the Director's intent to favor wolf hunting, as Mike Thorman represents the Dog Hunting Federation, one of the most violent and bloody ways to hunt wolves.

32. Indeed, dog hunting resulted in a national embarrassment in Wisconsin where approximately 90% of the hunters used dogs and killed nearly 100 wolves above the target number, resulting in a curtailed hunt and public outcry. (Exhibit 5.)

33. A hunting/fishing organization is entitled to a seat on the Council, but the Director's selection of Mr. Thorman clearly indicates an intent to initiate a wolf hunt in Michigan, even in the most unnecessarily violent and damaging manner.

34. For the agricultural interest category, the Director appointed Dick Pershinske of the Farm Bureau. Mr. Pershinske is an avid hunter, and has publicly voiced his desire to hold a wolf hunt in Michigan, stating "'I'm an avid hunter, so this is an opportunity that doesn't come along very often," he said. "It may be the last hunt, too, if the environmentalists get their way." (Exhibit

6.)

35. Mr. Pershinske would perhaps be an appropriate choice for the hunting/fishing category on the Council, but his selection as the agricultural interest seat severely skews the Council, and is in direct violation of the intent of the statute to ensure a fair and balanced advisory board for wolf management.

36. Mr. Pershinske should be removed and replaced with someone whose focus is not on wolf hunting, but on science-based wolf management as it pertains to agricultural issues.

37. The Director appointed Miles Falck to represent tribal government, which does not appear to comport with the posted application process on the DNR website, as the DNR's response to a Freedom of Information Act (FOIA) request revealed that Mr. Falck did not apply for the position. (Exhibit 7.)

38. It may be that Mr. Falck is an appropriate choice, but it is impossible to ascertain at this point because the DNR has not yet provided any details on his credentials or the selection process.

39. In addition, the FOIA record neglects to include applicant Marvin Roberson of the Sierra Club, who previously served on the Council and applied again for the 2021 Council but was neither selected nor included on the FOIA list of applicants. Similarly, Jeff Towner who applied on behalf of the Upper Peninsula Environmental Coalition (UPEC), is also excluded. (Exhibits 7, 8, and 9.)

40. Instead of maintaining a diverse and balanced Council, the Director has shrunk the Council and severely tipped the scales in favor of wolf hunting.

II. The Director Has Eliminated the Conservation Appointment In Violation of MCL § 324.43540e

41. Finally, the most palpable and egregious violation of MCL § 324.43540e is the

Director's appointment of Amy Trotter of the Michigan United Conservation Clubs (MUCC) for the conservation organization seat on the Council.

42. Ms. Trotter's appointment is in direct violation of the statute.

43. Simply placing the word "conservation" in the title of an organization does not qualify Ms. Trotter to serve on this seat. In fact, the MUCC is a pro-hunting organization who purports to have "the foremost power in Michigan protecting the rights to hunt, fish, and trap." (Exhibit 10).

44. The MUCC is a hunting organization, which Director Daniel Eichinger well knows, as he served as the MUCC's executive director prior to his current appointment.

45. In fact, the MUCC has twenty-eight affiliated clubs, all of which are hunting clubs. (Exhibit 11.)

46. With regard to wolves, Ms. Trotter is unequivocally pro-hunting.

47. Ms. Trotter is an advocate for delisting of wolves from the Endangered Species List and a known advocate for wolf hunting: "MUCC has advocated for a durable wolf delisting, long-term management goals and the use of hunting and trapping as a primary management tool for almost a decade," MUCC Executive Director Amy Trotter said. (Exhibit 12).

48. Indeed, MUCC's Facebook page heralds Ms. Trotter as someone who will advocate for a wolf hunt. (Exhibit 13).

49. Here again, Ms. Trotter would be an appropriate choice for the hunting/fishing category of the Council, but certainly not for the conservation seat.

50. The term "conservation" is not explicitly defined in MCL § 324.43540e. The Merriam-Webster definition provides:

a careful preservation and protection of something
especially: planned management of a natural resource to prevent exploitation,

destruction, or neglect

51. Moreover, the legislature clearly defined “conservation” as distinct from hunting because it created one seat for a hunting organization, and a separate seat for a conservation organization. MCL § 324.43540e.

52. Instead of complying with the difference between hunting and conservation as evidenced by the statute, the Director has appointed a hunting representative to the conservation seat.

53. Ms. Trotter and the MUCC’s stated intent is to organize a wolf hunt in Michigan, which is contrary to the directive of the statute that a member representing careful preservation of wolves have a seat on the Council.

54. The conservation organization seat should be appointed to a representative from a conservation organization.

55. Instead, those applicants from actual conservation organizations were rejected, and, in the case of the Sierra Club and UPEC, not even included in the list of applicants. (Exhibit 7.)

56. As a result of the Director’s statutory violations, pro-hunting organizations now have at least three seats on the Wolf Management Advisory Council.

57. The Director’s overwhelming appointment of pro-hunting representatives to the Council are wholly inappropriate and in violation of MCL § 324.43540e.

58. This statute is very clear and specific. If the Legislature had intended for pro-hunting organizations to have three seats on the Council, they would have drafted the statute to include those specifications.

59. It is also abundantly clear that the Legislature saw a difference between hunting and conservation, because it designated two separate seats for these two separate interests.

60. Appointing a pro-hunter to the conservation organization seat is therefore in clear violation of MCL § 324.43540e.

COUNT I – INJUNCTIVE RELIEF

61. Plaintiffs re-allege all of the preceding allegations.

62. The Director’s decisions regarding appointments to the Wolf Management Advisory Council are strictly prescribed by MCL § 324.43540e.

63. The Director has improperly ignored the statute and reduced and reconstituted the Council to ensure an extremely biased pro-hunting agenda.

64. The Director’s appointment of Amy Trotter for the conservation organization seat is in violation of the statute, as Ms. Trotter represents a hunting/fishing organization.

65. The Director’s appointment of Dick Pershinske for the agricultural interest seat is in violation of the statute because Mr. Pershinske is an advocate for wolf hunting and does not represent unbiased agricultural interests.

66. The Director’s actions in stacking the Council in favor of wolf hunting are in violation of MCL § 324.43540e.

67. Plaintiff hereby requests that appointees to the Council detailed above be correctly categorized as representing hunting/fishing organizations.

68. Plaintiff hereby requests that the Director engage in a fair and transparent evaluation of conservation and agricultural organizations and select representatives that fit the statutory criteria under MCL § 324.43540e.

69. Plaintiff hereby requests that the Council be reconstituted to comply with MCL § 324.43540e.

WHEREFORE, Plaintiff requests entry of a judgment for injunctive relief as described

herein, and all other relief as this Court may deem just, equitable, or appropriate under the circumstances.

Respectfully submitted,

THE MILLER LAW FIRM, P.C.
Attorneys for Plaintiffs

/s/ E. Powell Miller
E. Powell Miller (P39487)
Lauren Northrop (P69035)
950 W. University Dr., Ste. 300
Rochester, MI 48307
(248) 841-2200

Dated: March 30, 2021

EXHIBIT 1

From: **Pepin, John (DNR)** <PepinJ@michigan.gov>
Date: Tue, Mar 23, 2021 at 11:31 AM
Subject: Wolf Management Advisory Council
To: karol@the06legacy.com <karol@the06legacy.com>
CC: Kesson, Kenneth (DNR) <KessonK1@michigan.gov>

Hello Karol,

Here is a link to the news release on the wolf advisory council. The members were recently announced at a meeting of the Michigan Natural Resources Commission. I have included that roster and other information below. Thanks very much.

https://www.michigan.gov/dnr/0,4570,7-350-79137_79770_79780-550562--,00.html

On March 11, DNR Director Dan Eichinger announced appointees to the DNR's Wolf Management Advisory Council, who will work with each other to submit a report each year to the Michigan Natural Resources Commission and the Michigan Legislature. The report will make nonbinding recommendations for the proper management of wolves in Michigan.

The council, whose membership and actions are dictated by state law, is not responsible for writing or updating the Michigan Wolf Management Plan. That is done by the DNR, aided by public input. State statute also dictates which public factions are represented on the advisory council.

Council appointments include Dan Kennedy of the DNR's Wildlife Division, who is the DNR director's designee, Miles Falk, representing tribal governments, Beatrice Friedlander, representing animal

advocacy organizations, Richard Pershinske, representing agricultural interests, Mike Thorman, for hunting and fishing organizations and Amy Trotter, representing conservation organizations.

During an April orientation meeting, the council membership will discuss meeting dates, a decision-making process and other important logistical issues.

John Pepin

Deputy Public Information Officer

Michigan Department of Natural Resources

1990 U.S. 41 South

Marquette, Michigan 49855

Direct Line: 906-226-1352

--

Karol Miller

President

The O6 Legacy

<https://the06legacy.com/>

Like us on Facebook | Follow us on Instagram

EXHIBIT 2



ROCHESTER
950 WEST UNIVERSITY DR., SUITE 300
ROCHESTER, MI 48307
248-841-2200 | WWW.MILLER.LAW

E. Powell Miller
epm@miller.law

March 30, 2021

Via U.S. Mail

Mr. Daniel Eichinger, Director
Department of Natural Resources
Executive Division
P.O. Box 30028
Lansing, MI 48909

Re: *Request for certified copy of Wolf Management Advisory Council Appointment Record to be provided to the Court in Miller v. Michigan Department of Natural Resources*

Dear Mr. Eichinger,

Plaintiffs Karol Miller and The 06 Legacy have filed a lawsuit, as referenced above, concerning your appointments to the Wolf Management Advisory Council (the "Council") under MCL § 324.43540e.

In compliance with MCR 7.104(D)(3), please provide a certified copy of the Council appointment to the Court in the above referenced case. Please contact The Miller Law Firm and we will provide you with a Case Number as soon as it has been assigned by the Court.

Very Truly Yours,

The Miller Law Firm, P.C.

A handwritten signature in black ink, appearing to read 'E. Powell Miller', written over a horizontal line.

E. Powell Miller


EXHIBIT 3

MICHIGAN WOLF MANAGEMENT PLAN UPDATED 2015



Michigan Department of Natural Resources
Wildlife Division Report No. 3604
June 11, 2015

Printed by Authority of: PA 451 of 1994
Total Number of Copies Printed.....
Cost Per Copy:
Total Cost: \$
Michigan Department of Natural Resources



CERTIFICATION


We, the members of the Michigan Wolf Management Roundtable, as the designated representatives of our respective organizations and agencies, reached consensus on all of the preceding guiding principles and hereby certify we support the recommendations set forth in this report.


Gaylord Alexander
Michigan Resource Stewards

11-2-06
Date


Benjamin Bartlett
Michigan State University Extension


11-2-06
Date


Thomas Courchaine
Michigan DNR Law Enforcement Division


11/2/06
Date


David Cromell
Michigan Sheriffs' Association

11/2/06
Date


James Dabb
Safari Club International, Michigan Chapters

11-2-06
Date


Jason Dinsmore
Michigan United Conservation Clubs

11/2/2006
Date

Douglas Erickson

Douglas Erickson
Central Upper Peninsula Planning and Development Commission

11-2-2006

Date

Miles Falck

Miles Falck
Great Lakes Indian Fish and Wildlife Commission

11/2/06

Date

John M. Hongisto

John Hongisto
Upper Peninsula Sportsmen's Alliance

11/2/06

Date

Patrick Lederle

Patrick Lederle
Michigan DNR Wildlife Division

11/2/2006

Date

Jimmie Mitchell

Jimmie Mitchell
Chippewa Ottawa Resource Authority

11-2-06

Date

Gary Modlin

Gary Modlin
Upper Peninsula Whitetails Association

11/2/2006

Date

Kerry Mullin

Kerry Mullin
Michigan Humane Society

11.2.2006

Date

Cynthia Radcliffe
Cynthia Radcliffe
National Wildlife Federation

11/2/06
Date

Marvin Roberson
Marvin Roberson
Sierra Club

11/2/06
Date

Steven Schaub
Steven Schaub
Timber Wolf Alliance

11-2-06
Date

John J. Talsma
John Talsma
Michigan Farm Bureau

11-2-06
Date

Michael Thorman
Michael Thorman
Michigan Hunting Dog Federation

11-2-06
Date

John A. Vucetich
John Vucetich
The Wildlife Society

11/6/06
Date

Nancy Warren
Nancy Warren
Defenders of Wildlife

11/2/06
Date

EXHIBIT 4

Wolf Management Advisory Council

2013 Recommendations

For 2013, the Wolf Management Advisory Council (WMAC) was asked to submit as its recommendation, their perspectives on the potential consequences should the recommendation for the public harvest of wolves (attached) be implemented. The WMAC were asked to categorize these consequences into 4 categories described below. The WMAC was asked only to comment on the Department of Natural Resource's recommendation and were not asked if they supported or opposed the public harvest of wolves. This recommendation is not meant to endorse or oppose the public harvest of wolves.

The WMAC recommends that the Natural Resources Commission (NRC) Wildlife Committee and the NRC Committee of the Whole consider these potential consequences when developing their recommendation and when considering their decision on the topic of the public harvest of wolves. The potential consequences below are listed in the order they were provided by the members of the WMAC that were in attendance at the April 24, 2013 meeting. This list is a complete list, not a consensus list. Each WMAC member was able to add as many or as few potential consequences as they desired.

After listing potential consequences, the WMAC had a limited, facilitated discussion to clarify the consequences listed. A summary of the discussion, as captured by the DNR, is available in the minutes of the WMAC meeting (attached) but are not to be considered as part of the recommendation since they are not the exact wording of the discussion. The WMAC was then asked to prioritize this list by voting for the potential consequences they felt were most important. Each of the 14 WMAC members in attendance were given five votes to distribute as they wished among all of the potential consequences (no more than two votes to any given item – WMAC members could spend one vote on five items, two on one and three on three more, or two on two each and one on a third). The number of votes each potential consequence received is listed after each potential consequence in parentheses.

The WMAC makes up a diverse group of stakeholder groups from many different perspectives. Most, if not all, public perspectives on wolves are represented by the WMAC and, as a result, the public perception of likely consequences of implementing the DNR's recommendation for the public harvest of wolves (both positive and negative) are represented here. The WMAC strongly encourages the NRC to consider these potential consequences before their May 9, 2013 decision regarding the public harvest of wolves.

What are the POSSIBLE BARRIERS to successful implementation of the draft regulation as you have heard it presented?

- Political/legislative/legal activity that distracts from science/biology
- Presentation of non-factual information by those against policy (3)
- Ballot referendum
- Lack of funding for non-lethal approaches
- Hunter/trapper understanding of the process, which is unique in Michigan
- Speed of process
- Failure to properly consult with 1836 treaty tribes

- MDNR- Resources to administer hunt (5)
- New legislature to change the future process
- Conflicts are not clearly defined by the department, they are not clearly presented, and the trends in those conflicts are not clearly presented (1)
- Lack of apparent evaluation of efficacy of plan and possible one-year vs. multi-year implementation
- Can hunters/trappers access the public wolf areas?
- Conflicts need to be addressed immediately and directly, still need Wildlife Services, hunting is additive mortality
- Tribal conflicts with a hunting season (1)
- Complete/proper tribal consultation
- Insufficient public input from the Detroit metro area
- Insufficient time for survey to be analyzed and included pre-draft
- Lack of support for hunting and trapping wolves by large percentage of Michigan Population (2)

What are the RESOURCE AND POLICY IMPLICATIONS/CONSEQUENCES of implementation of the draft regulation as you have heard it presented?

- Funding required for wolf specialists to provide prompt, effective assistance to public (7)
- Opportunity for conservationists (WMAC members) to demonstrate we can manage/conservate a contentious species without political/legislative meddling (7)
- Geographic areas to not effectively impact the wolf population
- Need to include non-lethal approaches, where they are needed, what has been tried, what works, etc. on a map with access to public
- Lethal control NOT be based as preventative
- Backlash from both sides (2)
- Public attitudes towards wolves improves (2)
- Human conflict is addressed outside the designated hunting area (1)
- Still have illegal kills despite hunting
- Violation of 2007 inland consent decree (1)
- State law requiring use of science in management actions by MDNR. There might not be evidence that this will address the issues.
- Reduction in complaints from hunt will lead to fewer resources required to address complaints
- More success on private lands could shift more conflicts to public lands
- Need to better establish pack boundaries and population estimates
- Farmers are bearing the cost of non-lethal control methods – even when they are not necessarily successful – are not a planned cost of business (2)
- Alternative sources of funding for DNR to carry out mission (1)
- What changes have been made regarding penalizations for illegal harvest of wolves?

What might be some UNFORSEEN OR UNINTENDED CONSEQUENCES of implementation of the draft regulation as you have heard it presented?

- Disruption of pack dynamics could increase depredation especially with smaller packs: if an alpha is killed, pups are inexperienced (3)
- More people in the woods in Nov/Dec (deer/firearm season, public land user conflicts?) (1)
- Season may be too limited to achieve goal of conflict reduction
- Estimated harvest number may be too low to achieve desired populations (2)
- Increased social carrying capacity for betterment of wolf conservation (9)
- Potential over-harvest – via legal and un-legal harvest
- Targeting wolves is not responsible (1)
- Downward (continued) trend in overall wolf population
- Zones are too large
- Increasing fear of wolves by public (1)
- Increased depredation issues
- Resentment/mistrust of MDNR if management goals are not addressed by the hunt
- Movement away from other management tools (we may become dependent on lethal controls even though some non-lethal controls may work) (1)

What further INFORMATIONAL QUESTIONS do you have which need answers or INFORMATIONAL CITATIONS/WEBSITES/RESOURCES which you believe are important to share?

- Has any consideration been given to possible need for a mandatory education/training session prior to the hunt- similar to elk hunting? Since wolves haven't been hunted or trapped legally for several decades, should training be provided to ensure a safe/clean kill as humanely as possible? (1)
- How was lethal evaluated? Was lethal un-effective because other wolves moved in – how will the hunt resolve this specifically?
- What specifically is being done to reduce deer numbers in ironwood?
- Does the management of wolves from a negative perspective have long-term negative consequences? (1)
- How will the mandatory call in be enforced? Can it be verified to insure no unreported take? (1)
- Are there any stats on the illegal take of wolves?
- Explain why the DNR uses pack territories as zone determinates when DNR has “no confidence in them? Educated guesses are not sufficient.
- How much money was spend bringing MT biologist to MI and why was that state chosen?
- Need to clearly demonstrate how hunting will address management/conflict issues – scientifically. (2)
- How will success be determined? Need properly structure and fund evaluation

- How will conflict be used in future to authorize future hunts? Need to quantify and define what constitutes conflict and when hunting should be used to address.
- What plans does the DNR have to provide funding for wolf specialists to assist public conflict resolution? (4)
- Reduce wolf conflict, not “eliminate” wolf conflict – very purposeful wording
- Little education being done, DNR is reactive, not proactive
- Why wasn’t the MN model considered? MN uses citizen trappers to resolve these issues.
- Will livestock producers be required to open up their land to hunting and trapping to receive compensation? (1)
- *See other informational resource suggestions attached*

Wolf Management Advisory Council (WMAC) Members in Attendance at the April 24, 2013 meeting (listed according to seating arrangement):

Timber Wolf Alliance (Steve Schaub)
 Michigan Department of Natural Resources (Russ Mason)
 USDA- Wildlife Services (Pete Butchko)
 National Wolfwatcher Coalition (Nancy Warren)
 Michigan Trappers and Predator Caller’s Association (Tom Oakey)
 The Wildlife Society (Gary Roloff)
 UP Whitetails (Al Ettenhofer)
 Farm Bureau (Dick Pershinski)
 Chippewa Ottawa Resource Authority (Doug Craven)
 Michigan United Conservation Clubs (Amy Trotter)
 Michigan Hunting Dog Federation (Mike Thorman)
 UP Sportsman’s Alliance (Dale McNamee)
 Michigan Humane Society (Linda Reider)
 Great Lakes Indian Fish and Wildlife Commission (Roger LaBine)

WMAC Member Organizations Not in Attendance:

National Wildlife Federation
 Michigan Sheriff’s Association
 Michigan State University Extension
 Safari Club International
 Resource Stewards

EXHIBIT 5

Geox Plie Leather Ballet Flat

Free Shipping. Free Returns. All the Time. A classic ballet flat is perfect for school or special events with an easy-to-put-on elastic strap and a nonmarking rubber sole. Geox's signature perforated sole contains a breathable, water-repellent membrane that keeps feet dry and comfortable all day long.

Shop Now

Ad • Nordstrom

Wisconsin hunters exceed wolf target by nearly 100 animals

TODD RICHMOND February 25, 2021 · 5 min read

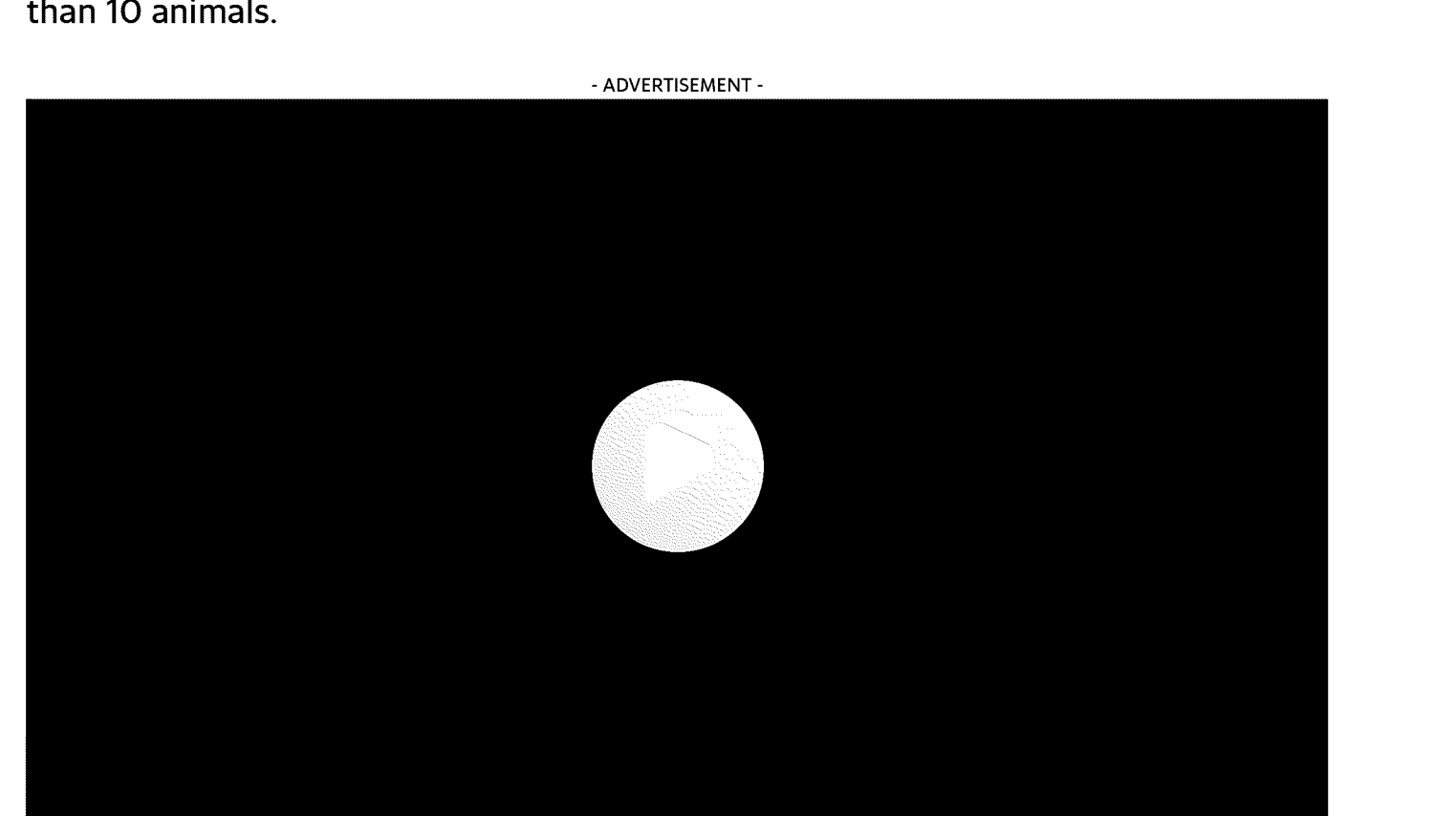


FILE - This July 16, 2004, file photo, shows a gray wolf at the Wildlife Science Center in Forest Lake, Minn. Wisconsin wildlife officials opened an abbreviated wolf season Monday, Feb. 22, 2021, complying with a court order to start the hunt immediately rather than wait until November. The hunt will run through Sunday, Feb. 28 across six management zones. (AP Photo/Dawn More)

MADISON, Wis. (AP) — Wisconsin hunters and trappers killed nearly double the number of wolves that the state allotted for a weeklong season, and they did it so quickly that officials ended the hunt after less than three days, according to figures released Thursday.

Nontribal hunters and trappers registered 216 wolves as of Thursday afternoon, blowing past the state's kill target of 119. The state Department of Natural Resources estimated before the hunt that there were about 1,000 wolves in the state. Its population goal for the animal is 350.

The wolf season began Monday and was supposed to run through Sunday, but the DNR shut it down Wednesday afternoon as it became clear hunters would exceed the target. Hunters and trappers were given a 24-hour grace period, allowing them to remain in the field until Thursday afternoon. Hunters and trappers also exceeded their kill targets in the three previous wolf seasons but never by more than 10 animals.



"This is a deeply sad and shameful week for Wisconsin," Megan Nicholson, director of the Wisconsin chapter of the Humane Society of the United States, said in a statement. "This week's hunt proves that now, more than ever, gray wolves need federal protections restored to protect them from short-sighted and lethal state management."

DNR officials said nearly 90% of hunters used dogs to chase down wolves, and fresh snow on Monday and Tuesday aided in tracking. The state sold 1,547 permits, which equates to 13 hunters or trappers per wolf in the target number, the highest ratio of any wolf season so far.

DNR Wildlife Management Director Eric Lobner said during a news conference that the large number of hunters was difficult to manage but that staff were monitoring registrations hourly. Randy Johnson, the department's carnivore biologist, said he was checking them every 15 minutes.

At the end of the day Monday, only nine animals had been registered. Lobner said

Our goal is to create a safe and engaging place for users to connect over interests and passions. In order to improve our community experience, we are temporarily suspending article commenting.

Story continues

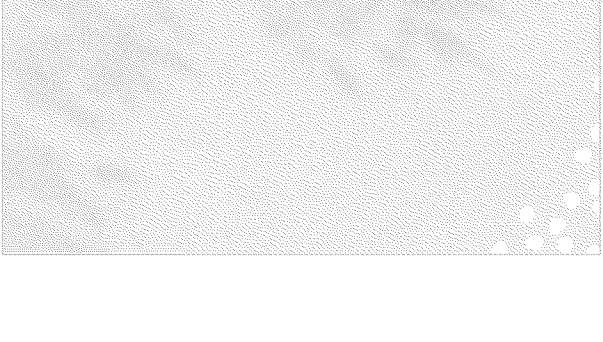
ANTHROPOLOGIE

AnthroLiving
your invitation to inspiration

THE OFFICIAL FANTASY GAME OF MLB

TRENDING

- 2021 NFL draft will be 'large, live, in-person' fan event in Cleveland
- Kraft: Patriots' free agent splurge is 'like investing in the stock market'
- Cade Cunningham, Oklahoma State come up short to Oregon State for Sweet 16 bid
- Missed layups – and missed foul calls? – doom No. 6 Texas Tech vs. 3-seed Arkansas
- Clutch Houston put-back sends 2nd-ranked Cougars past No. 10 Rutgers into Sweet 16



RECOMMENDED STORIES

- NASCAR.com**
All-time NASCAR Cup Series winners
The all-time list of NASCAR Cup Series winners starts with Richard Petty (200 wins) and includes more than 60 drivers who won just a single time at NASCAR's top level. Below is the list of all-time winners, in order, in the NASCAR Cup Series. Last update: After Race 6 of 2021 season (Atlanta Motor Speedway) [...]
21h ago
- Yahoo Sports**
Michael Chandler, Charles Oliveira to meet for vacant lightweight title at UFC 262
The UFC finally accepted Khabib Nurmagomedov's retirement and opted to fill its suddenly vacant lightweight title with a May 15 bout at UFC 262 between Charles Oliveira and former Bellator champion Michael Chandler.
4d ago
- Ad • Dr. Kellyann**
Weight Loss After 40 Comes Down To This
Think all fruit is healthy? America's Top Dietician, Dr. Kellyann, says this one is actually causing you to gain weight
- MMA Weekly**
Khama Worthy is going to do what he's got to do at UFC 260
When UFC lightweight Khama Worthy looks back on 2020, the thing that most comes to mind for him was how fortunate he ended up being. No matter how difficult the year was, he was still able to fight. Though things didn't always go his way, the fact that he was able to compete multiple times put him in a...
4d ago
- NBA.com**
Fred VanVleet with a buzzer beater vs the Utah Jazz
Fred VanVleet (Toronto Raptors) with a buzzer beater vs the Utah Jazz, 03/19/2021
3d ago
- Yahoo Sports**
Changed the Game: Former NBA ref Violet Palmer joined the league at a time when women weren't welcome
The NBA world was a much different place for women in 1997.
4d ago
- Ad • Nordstrom**
Nine 'Pegasus' Flat
Free Shipping. Free Returns. All the Time. A dainty bow tops a glossy patent flat fitted with a comfortable cushioned footbed and a nonslip rubber sole.
- SNY**
Sheldon Rankins on why he joined Jets: 'I needed a team to see me as the player I saw myself as'
Sheldon Rankins opened up on why he chose the Jets and gave an update on his health.
3h ago
- Steelers Wire**
Steelers lose another OLB to the Titans
The Steelers are quickly running out of outside linebackers.
1h ago
- Patriots Wire**
Robert Kraft provides bittersweet response to Tom Brady's Super Bowl victory
The Patriots owner isn't used to watching Tom Brady win Super Bowls elsewhere.
3h ago
- Ad • Empire Financial Research**
The Man Who Bought Amazon at \$48 Says Buy TaaS Now
Wall Street legend Whitney Tilson says there's a huge new tech trend coming – and he's revealing his #1 pick for free.
- USA TODAY Sports**
Rockets coach Stephen Silas has crushing interview after team's 20th consecutive loss
First-year Rockets coach Stephen Silas struggled for words as he tried to describe Houston's franchise-record 20-game losing streak.
5h ago
- MMA Junkie**
Luke Rockhold: Khabib Nurmagomedov wants to coach me, 'be a big part of my comeback'
Khabib Nurmagomedov has offered Luke Rockhold a helping hand ahead of his return.
4h ago
- Detroit Free Press**
Jared Goff finally gives the Detroit Lions a quarterback who knows how to win
Jared Goff arrives to Detroit Lions with a 42-27 record, 3 playoff victories and a quarterback resume unmatched in Detroit over the past 60 years.
8h ago
- Ad • GoToConnect**
14-Day Free Trial
Meet, call, message and more with one unified system that lets you work how you want.
- Warriors Wire**
Report: Warriors have had 'talks' with Orlando Magic about a trade for Aaron Gordon
According to Kevin O'Connor of The Ringer, the Warriors are one of five teams to talk with the Magic about a trade for Aaron Gordon.
13h ago
- Yahoo Sports**
The clever strategy that helped 15th-seeded Oral Roberts make history
Frustrated that his team wasn't getting enough stops on defense, Coach Paul Mills took a bold risk down one with three minutes to go.
14h ago
- Yahoo Sports**
2021 NFL draft will be 'large, live, in-person' fan event in Cleveland
Fans will be back at the draft this year. But there still will be COVID-related restrictions in place for the mostly outdoor event.
3h ago
- Ad • Maternityweek**
After 13 Years Famous Twins Share Heart Felt News
You may have heard of Abby and Brittany Hensel before, either on Oprah, in Time Magazine, or on their TLC TV...
- Yahoo Sports**
Why this may already be the craziest NCAA men's tournament ever
With No. 15 Oral Roberts, No. 12 Oregon St. and No. 11 Syracuse all advancing on one side of the bracket (not to mention Loyola Chicago), this might be the most upset-laden bracket ever.
11h ago
- USA TODAY Sports - Golfweek**
Jack Nicklaus: Honda Classic will be in more favorable spot on PGA Tour schedule next year
Jack Nicklaus thinks the Honda Classic will be in a more favorable spot on the PGA Tour's schedule next year.
18h ago
- Rams Wire**
Grading the Rams' offseason moves
The Rams acquired Matthew Stafford, re-signed Leonard Floyd and added DeSean Jackson. How did each move grade out?
4h ago
- Ad • Purple®**
School is More Fun on a Purple Seat Cushion
Home school meets comfort. Make school at home better with a Purple Seat Cushion.
- NBC Sports Boston**
Jaylen Brown has jokes about Stephen Curry, Marcus Smart after his hot shooting day
Jaylen Brown compared himself to Stephen Curry and took a shot at teammate Marcus Smart after he hit 10 3-pointers against the Orlando Magic.
19h ago
- Yahoo Sports**
Blake Griffin makes debut with Nets, throws down first dunk since 2019
'It felt good to get that out of the way and move on.'
15h ago
- AFP**
Spurs dressing room divided by 'selfish' players, says Mourinho
Jose Mourinho said Tottenham's dressing room is divided by "selfish" players and agents who have their own relationships with the press.
6h ago

EXHIBIT 6



NEWS

Mich. prepares for first wolf hunt

Keith Matheny Detroit Free Press

Published 12:23 a.m. ET Nov. 15, 2013 | Updated 12:32 a.m. ET Nov. 15, 2013

Story Highlights

- Michigan has sold 1,200 licenses for the hunt
- Maximum of 43 wolves to be killed
- State officials say wolves have attacked pets and livestock

MARQUETTE, Mich. -- Engadine Feed & Supply store owner Dick Pershinske said he looks forward to entering the woods Friday for Michigan's historic, first-ever wolf hunt.

"I'm an avid hunter, so this is an opportunity that doesn't come along very often," he said. "It may be the last hunt, too, if the environmentalists get their way."

As hunters excitedly prepared for the hunt Thursday, the mood was far more somber about 300 miles to the south in Mount Pleasant, where the Saginaw Chippewa Tribe planned a candlelight vigil for the animal so iconic in their tribal heritage.

"The gray wolf is significant to our culture," said tribal spokesman Frank Cloutier. "It's a part of our creation story, very significant to who we are and what we believe."

The hunt calls for a maximum of 43 wolves to be harvested in three designated zones of the Upper Peninsula. It is slated to run from dawn Friday through Dec. 31 or whenever the target number is reached. Michigan has sold 1,200 licenses for the hunt.

Hunt opponents' two petition drives, a pending ballot referendum and statewide ad campaign were unable to stop the controversial hunt. But they are as ready to fight it as ever.

"I believe they are doing the wolf hunt for sport," said Tom Merkel, 23, of Iron Mountain, a Northern Michigan University student. "They're not hunting it for meat, they're just hunting it to kill something."

State Department of Natural Resources officials, however, say the hunt is designed to reduce wolf depredation — wolves attacking livestock and pets and having uncomfortably close encounters with humans in some Upper Peninsula communities.

"The intent here is to try to resolve conflicts," said Adam Bump, the DNR's bear and furbearer specialist.

Jeannine Mayo, a council member in the village of Baraga within one of the wolf management units, said she has heard of attacks on livestock and pets in some neighboring communities. She said she reluctantly supports the hunt.

"The wolves are becoming more threatening," she said. "If they start coming into an area like the village limits, I don't think a wolf would hesitate to kill a child outside playing."

Baraga Township Trustee Jerry Dompier said people in his town are matter-of-fact about the hunt and supportive. They give the wolves at least some of the blame for a perceived decline in the local deer population, and some local bear hunters have had expensive hunting dogs killed by wolves, he said.

Dompier said he has had his own close encounters with wolves on his property.

"I've had them right here in the yard — I've had a wolf within probably 35 yards from me, a collared one a couple of years ago," he said. "They're quite bold — at least, that particular one was."

No wolf attacks on humans have been reported. But so far this year, 30 livestock or pets have been attacked or killed by wolves in the Upper Peninsula, including 17 dogs and 11 cattle, DNR officials said.

Keep Michigan Wolves Protected, an offshoot of the Humane Society of the U.S., gathered 255,000 signatures statewide to place the wolf hunt decision before Michigan voters in a referendum. A state law passed in the spring effectively circumvented the petition drive and allowed the hunt to continue with the approval of the state Natural Resources Commission.

Keep Michigan Wolves Protected is now in a second petition drive to put a new referendum before voters.

Wolves were shot and trapped into near-extinction throughout much of the U.S. by the 1930s. But under the federal Endangered Species Act protection beginning in 1973, the wolf population bounced back. Michigan had just three wolves as recently as 1989, but the population has now risen to 658.

Bump said whether a wolf hunt will continue in future years will be evaluated after the results from this hunt.

EXHIBIT 7

Sal	FName	Lname	Organization	City	ST	Zip
Mr.	Anthony	Andary	N/A	Saulte Ste Marie	Michigan	49783
Mr.	Kyle	Ayres	N/A	Mason	Michigan	48854
Mr.	Daniel	Bahrman	Michigan Farm Bureau	Skandia	Michigan	49885
Mr.	Don	Bell	Archery Bear Hunters of Michigan	Grass Lake	Michigan	49240
Mr.	Nathaniel	Bergman	N/A	Midland	Michigan	48642
Ms.	Terri	Bocklund	N/A	Marquette	Michigan	49855
Mr.	David	Bonczyk	N/A	Rapid River	Michigan	49878
Mr.	Charles	Bond	N/A	Maple City	Michigan	49664
Ms.	Roberta	Boyle	Conservation Districts	West Bloomfield	Michigan	48324
Mr.	Thomas	Buckingham Sr.	N/A	Newberry	Michigan	49868
Mr.	David	Cords	N/A	Livonia	Michigan	48154
Ms.	Carrie	Cramer	DeYoung Family Zoo/Pipers Animal Welfair Society	Wallace	Michigan	49893
Mr.	Tom	DeKeyser	N/A	Brighton	Michigan	48116
Ms.	Jade	DeLong	N/A	Silverwood	Michigan	48760
Mr.	Stephen	Dey	Straits Area Sportsmen's Club	Moran	Michigan	49760
Mr.	Jason	Dinsmore	National Wildlife Foundation, Great Lakes	Rochester	Minnesota	55902
Mr.	Tracy	Dulak	N/A	Harbor Springs	Michigan	49740
Mr.	Tim	Dusterwinkle	MI Bear Hunters Association	Wetmore	Michigan	49895
Mr.	Al	Ettenhofer	UP Whitetails Association, Inc.	Escanaba	Michigan	49829
Mr.	Justin	Farmer	N/A	Rapid River	Michigan	49878
Ms.	Jordan	Farmer	N/A	Cooks	Michigan	49817
Mr.	Mark	Fischer	N/A	Warren	Michigan	48092
Mr.	Jay	Fish	N/A	L'Anse	Michigan	49946
Ms.	Beatrice	Friedlander	Attorneys for Animals, Inc.	Canton	Michigan	48187
Mr.	Michael	Glass	N/A	Rapid River	Michigan	49878
Ms.	Heather	Good	Michigan Audubon	Ann Arbor	Michigan	48104
Mr.	Heath	Gorney	N/A	Grand Rapids	Michigan	49508
Mr.	Gary	Gorniak	Upper Peninsula Sportsmen's Alliance	Moran	Michigan	49760
Mr.	Daniel	Green	N/A	Manistee	Michigan	49660
Mr.	Aaron	Gundrum	N/A	Daggett	Michigan	49821
Mr.	John	Haggard	N/A	Charlevoix	Michigan	49720
Mr.	James	Hammill	Safari Club International & Safari Club International Foundation	Crystal Falls	Michigan	49920
Ms.	Ellie	Hartshorn	N/A	Washington	DC	20002
Mr.	Dale	Hendershot	MTPCA	Gladwin	Michigan	48624
Mr.	Michael	Henry	N/A	Mass City	Michigan	49948
Mr.	Bryan	Hill	N/A	Munising	Michigan	49862
Mr.	Sig	Hokens	N/A	Ewin	Michigan	49925
Mr.	Jordan	Hoover	UP Whitetails of Baraga County	L'Anse	Michigan	49946
Ms.	Sarah	Hoy	MI Tech University	Houghton	Michigan	49931
Mr.	Joe	Hudson	UP Bear Houndsmen	Carney	Michigan	49812
Mr.	Raymond	Hutchinson	N/A	Chelsea	Michigan	48118
Mr.	David	Johnson	President, Upper Peninsula Sportsmans Alliance	Quinnesec	Michigan	49876
Mr.	Thomas	Kachelmeyer	N/A	Royal Oak	Michigan	48073
Mr.	Dylan	Kelly	N/A	Kingsley	Michigan	49649
Ms.	Janet	Kudell-Ekstrum	N/A	Negaunee	Michigan	49866
Ms.	Kelley	Labonty	Detroit Animal Welfare	Bruce Township	Michigan	48065
Mr.	Scott	Langeland	N/A	Hudsonville	Michigan	49426
Mr.	Patrick	Lederle	The Wildlife Society	Lapeer	Michigan	48446
Mr.	Michael	Leonard	Safri Club International	Chelsea	Michigan	48118
Mr.	Terry	Lerma	N/A	Skaneec	Michigan	49962
Ms.	Dawn	Levey	N/A	Elsie	Michigan	48831
Mr.	George	Lindquist	UP Whitetails of Marquette County	Negaunee	Michigan	49866
Mr.	Tracy	Lynn	N/A	Kalamazoo	Michigan	49009
Mr.	John	MacFarland	Hiawatha Sportsman's Club	Owosso	Michigan	48867
Mr.	Austin	McGuire	MI Trappers and Predator Callers Association	Lansing	Michigan	48910
Ms.	Dorothy	McLeer	Timber Wolf Alliance	Dearborn	Michigan	48124
Mr.	Douglas	Meyaard	N/A	Holland	Michigan	49424
Ms.	Karol	Miller	The 06 Legacy	Rochester	Michigan	48306
Mr.	Fletch	Monningh	N/A	Crystal Falls	Michigan	49935
Mr.	Roger	Nemeth	N/A	Holland	Michigan	49424
Ms.	Catherine	Neuhoff	Public School Administrator	Harrison Township	Michigan	48045
Mr.	Mitchell	Obrigewitsch	N/A	Gaylord	Michigan	49735
Mr.	David	Oginski	N/A	Manistique	Michigan	49854
Mr.	Timothy	Olsen	N/A	Menominee	Michigan	49858
Mr.	Michael	Parrott	N/A	Rogers City	Michigan	49779
Mr.	Michael	Pavlovich	N/A	Marenisco	Michigan	49947
Mr.	Richard	Pershinske	Farm Bureau	Engadine	Michigan	49827-9541
Ms.	Mary	Peterson	N/A	Marenisco	Michigan	49947
Mr.	Dan	Phalen	N/A	Escanaba	Michigan	49829

Ms.	Natalie	Randall	N/A	Escanaba	Michigan	49829
Mr.	Adam	Reister	N/A	Williamsburg	Michigan	49690
Mr.	John	Rickley	N/A	Saint Ignace	Michigan	49781
Ms.	Katherine	Ross	N/A	East Tawas	Michigan	48730
Ms.	Michelle	Sands	N/A	Kinglsey	Michigan	49649
Mr.	Kevin	Schaumburger	N/A	Gladwin	Michigan	48624
Mr.	Kahler	Schuemann	N/A	Portage	Michigan	49024
Mr.	Carl	Schwartz	N/A	Riverview	Michigan	48193
Mr.	Mark	Spencer	MI Trappers Predator Callers	Moran	Michigan	49760
Mr.	Robert	Stone	Stone Black Bear Guide Service	Hope	Michigan	48628
Mr.	Kevin	Swanson	The Nature Conservancy	Marquette	Michigan	49855
Ms.	Molly	Tamulevich	Humane Society of the United States	Ferndale	Michigan	48220
Mr.	Peter	Tazelaar	N/A	Sanford	Michigan	48657
Mr.	Michael	Thorman	Michigan Hunting Dog Federation	Attica	Michigan	48412
Ms.	Sarah	Topp	MI Chapter of Backcountry Hunters & Anglers	Escanaba	Michigan	49829
Mr.	Robert	Torp	N/A	Barbeau	Michigan	49710
Mr.	Terry	Trepanier	Tahnqamomen Sportsmen's Club	Newberry	Michigan	49868
Ms.	Amy	Trotter	MUCC	Lansing	Michigan	48912
Mr.	Michael	Veine	N/A	Au Gres	Michigan	48703
Ms.	Nancy	Warren	National Wolfwatchers Coalition	Ewen	Michigan	49925
Ms.	Tracey	Weatherwax	N/A	Grand Haven	Michigan	49417
Mr.	Chris	Wetton	N/A	Marquette	Michigan	49855
Dr.	Maria	Zayas	N/A	Iron River	Michigan	49935
Ms.	Gael	Sanchez	Bay Mills Indian Community	Brimley	Michigan	49715

EXHIBIT 8



WOLF MANAGEMENT ADVISORY COUNCIL APPLICATION FOR MEMBERSHIP

Requested by the Michigan Department of Natural Resources.

APPLICANT INFORMATION

Name of Applicant (Last, First, M.I.) Marvin J Roberson	Telephone (906) 360-0288
Street Address 401 S Lakeshore Blvd #205	Date of Birth 6/5/1961
City, State, ZIP Marquette, MI 49855	E-mail Address gasshomarvin@gmail.com
Name of Agency or Organization, if Applicable Sierra Club	Michigan County of Residence Marquette

Please select which you will be best able to represent:

- An organization that promotes conservation in Michigan.
- An organization that promotes hunting or fishing in Michigan.
- A tribal government.
- An organization that promotes agricultural interests.
- An organization that promotes animal advocacy.
- A federal, state, or local agency.
- An organization that promotes interests other than those listed above.
- I am not affiliated with any agencies or organizations.

Please describe the goals and principles of the organization/agency you represent or if you are not associated with an organization/agency what are your personal goals. (Limit your response to 250 words)

The Sierra Club advocates for viable populations of native species, communities, and ecosystems. We are not an animal rights or welfare organization We neither actively promote nor oppose hunting. We seek and support actions which result in long term sustainability of natural ecosystems, rather than the welfare of individual animals.

I testified on behalf of the Sierra Club in favor of removing wolves from the Michigan ESA List.

Describe your experience working with the organization/agency you identified above or if not affiliated, your personal area of expertise. (Limit your response to 250 words)

I have been a Forest Ecologist with the Sierra Club in Michigan for over 25 years. My area of interest, expertise, and education fall within the fields of forest and wildlife ecology.

Date
Received: _____

Describe your experience working in groups or with individuals with varied interests to reach a cooperative solution.
(Limit your response to 250 words)

I have represented the Sierra Club on issues ranging from forest management to historic preservation to wildlife management. I have been the primary policy point person on those issues for the Sierra Club in all that time. I have workde in legislative, administrative, and policy forums. I have worked well with the DNR, National Forest Service, US Fish & Wildlife Service, Tribal interests, and others.

I have served on the DNR Wolf Management Roundtable, Wolf Forum, Deer Management Roundtable, Part 632 Task Force, all of which were consensus-based. I have served on the DNR Michigan Forest Management Advisory Committee.

I have served on the Friends of the Hiawatha National Forest and the Friends of the Huron-Manistee National Forest

What strengths and expertise can you bring to the Wolf Management Advisory Council? (Limit your response to 250 words)

I have long and deep experience with DNR consensus-based processes. I strongly support consensus-based processes, because it requires everyone to address the concerns of others, even when those concerns are not shared.

CONSENT AND CERTIFICATION

I consent to the release of information concerning my ability and fitness for the position to which I seek to be appointed by my employer(s), schools, law enforcement agencies and other individuals and organizations. I authorize the use of the information provided above to conduct a background search.

I, Marvin Roberson (electronic) (please print name), certify that all statements and representations provide in this statement and on accompanying materials are, to the best of my knowledge, true and accurate.

Signature

Date
2/2/21

Return completed application to:

By Email: DNR-Wildlife@michigan.gov
By Fax: 517- 241- 0015
Questions: Dan Kennedy, 517-896-2602

Date

Received: _____

EXHIBIT 9



WOLF MANAGEMENT ADVISORY COUNCIL APPLICATION FOR MEMBERSHIP

Requested by the Michigan Department of Natural Resources.

APPLICANT INFORMATION	
Name of Applicant (Last, First, M.I.) Jeff Towner	Telephone (701) 214-0496
Street Address 3 Pine Run	Date of Birth 03/14/1949
City, State, ZIP Negaunee, MI 49866	E-mail Address chielenstowner@msn.com
Name of Agency or Organization, if Applicable Upper Peninsula Environmental Coalition	Michigan County of Residence Marquette
<p>Please select which you will be best able to represent:</p> <p><input checked="" type="checkbox"/> An organization that promotes conservation in Michigan.</p> <p><input type="checkbox"/> An organization that promotes hunting or fishing in Michigan.</p> <p><input type="checkbox"/> A tribal government.</p> <p><input type="checkbox"/> An organization that promotes agricultural interests.</p> <p><input type="checkbox"/> An organization that promotes animal advocacy.</p> <p><input type="checkbox"/> A federal, state, or local agency.</p> <p><input type="checkbox"/> An organization that promotes interests other than those listed above.</p> <p><input type="checkbox"/> I am not affiliated with any agencies or organizations.</p>	
<p>Please describe the goals and principles of the organization/agency you represent or if you are not associated with an organization/agency what are your personal goals. (Limit your response to 250 words)</p> <p>As the longest-serving environmental organization in Michigan's U.P., the Upper Peninsula Environmental Coalition strives to preserve and enhance the unique cultural and natural resources of the Upper Peninsula through public education, the promotion of sound land stewardship, science-based decisions and policies, and reasoned dialogue with communities, governments, industries and others with whom we share this land.</p>	
<p>Describe your experience working with the organization/agency you identified above or if not affiliated, your personal area of expertise. (Limit your response to 250 words)</p> <p>I have been a board member of UPEC for the past three years. I have a B.S. in Zoology from Ohio State University, an M.S. in Wildlife Biology from Michigan State University, and am a Certified Wildlife Biologist with The Wildlife Society. I implemented federal laws and regulations in supervisory positions for the U.S. Army Corps of Engineers in Chicago, Detroit, and Alaska Districts, and for the U.S. Fish and Wildlife Service's Ecological Services program in West Virginia and North Dakota for a total of 34 years. One of the species for which I had regulatory authority in North Dakota was the Gray Wolf.</p>	

Date
Received: _____

Describe your experience working in groups or with individuals with varied interests to reach a cooperative solution.

(Limit your response to 250 words)

I had a Peace Corps assignment in West Africa working in a different culture to advance pond fish culture. In a second Peace Corps assignment I worked with local people in and around a national park. In my 34 years in regulatory agencies, including the Corps of Engineers regulatory program, I worked with the general public, project proponents, private business, and local, state, and government officials. The same was true in my positions with the U.S. Fish and Wildlife Service. Implementing these programs takes an ability to listen to all points of view, to explain policies clearly, and to try to resolve differences and arrive at reasoned decisions that are in the public interest.

What strengths and expertise can you bring to the Wolf Management Advisory Council? (Limit your response to 250 words)

I believe that I am a reasonably good communicator and listener. I respect all reasonable opinions, even when they are counter to my own. I am even-tempered. As mentioned, I have direct experience over several years implementing the Endangered Species Act as it then applied to the Gray Wolf. Doing so in a state where there is very little public support for this species demands great patience. I am retired, so I can devote the time necessary to serving on the Council.

CONSENT AND CERTIFICATION

I consent to the release of information concerning my ability and fitness for the position to which I seek to be appointed by my employer(s), schools, law enforcement agencies and other individuals and organizations. I authorize the use of the information provided above to conduct a background search.

I, Jeffrey K. Towner (please print name), certify that all statements and representations provide in this statement and on accompanying materials are, to the best of my knowledge, true and accurate.

Signature

Date

January 28, 2021

Return completed application to:

By Email: DNR-Wildlife@michigan.gov

By Fax: 517- 241- 0015

Questions: Dan Kennedy, 517-896-2602

Date

Received: _____

EXHIBIT 10

[f \(https://www.facebook.com/mucc1937/\)](https://www.facebook.com/mucc1937/) [t \(https://twitter.com/MIOutOfDoors\)](https://twitter.com/MIOutOfDoors) [v \(www.youtube.com\)](http://www.youtube.com)

Donate (<https://michiganunitedconservationclubs.z2systems.com/donation.jsp>) Become a Member (<https://mucc.org/about/>)

Log In (<https://michiganunitedconservationclubs.z2systems.com/login.jsp>)



MICHIGAN UNITED *Since 1937*
CONSERVATION CLUBS

(<https://mucc.org/>)

About

WE ARE
CONSERVATION
MUCC

Michigan United Conservation Clubs is the largest statewide conservation organization in the nation. Founded in 1937, our mission is to unite citizens to conserve, protect and enhance Michigan's natural resources and outdoor heritage. This mission drives everything we do as an organization.

Our strength in is our membership and support: over 40,000 hunters, anglers, trappers and conservationists and over 200 affiliated local clubs around the state. We were founded in 1937 with a simple purpose: harness the combined strength of Michigan's outdoors community to protect conservation from politics. Since then, we have been the foremost power in Michigan protecting the rights to hunt, fish and trap. Our policies are determined by our members through Michigan's most robust grassroots policy-setting process. Our experienced and professional staff carry out the resolutions adopted by our members through a suite of conservation programs ranging from direct advocacy and communications to on-the-ground wildlife habitat conservation and youth outdoor education.

Mission

Uniting citizens to conserve, protect and enhance Michigan's natural resources and outdoor heritage.

Advocacy

We have led significant conservation victories such as the passage of the Bottle Bill and the creation of the Michigan Natural Resources Trust Fund in 1976, protecting the Trust Fund in the Michigan Constitution in 1984, protecting hunting rights from anti-hunters through Proposal G in 1996 and passage of the Scientific Fish and Wildlife Conservation Act in 2014.

Communication

Since 1947, we have published Michigan Out-of-Doors Magazine. Our youth magazine, TRACKS, reaches tens of thousands of upper-elementary school students each year. In 2015, we launched the Michigan Out-of-Doors Podcast to reach a new generation of hunters, anglers and trappers. Our weekly Conservation Insider e-newsletter details the latest conservation news in Michigan, and our daily staff blogs at www.mucc.org ensure that content is always relevant and up-to-date.

Conservation

Our award-winning On the Ground (OTG) wildlife habitat conservation program launched in 2013. As a partnership with the Michigan Department of Natural Resources, it has engaged more than 3,000 volunteers in dozens of fish and wildlife habitat projects on public lands and waters around the state. Additionally, our On the Water program was launched in 2019 and has removed nearly 4,000 pounds of trash from Michigan's lakes, streams and rivers.

Education

The Michigan Out-of-Doors Youth Camp, located at the Cedar Lake Outdoor Center in Chelsea, Michigan, has educated over 58,000 youth since its founding over 70 years ago, introducing generations of Michiganders to the outdoors.

Upcoming Events

Brighton Recreation Area Public Land Clean-Up

04/10/2021

Clinton River Clean-Up

04/17/2021

Tree Planting at Minden City State Game Area

04/24/2021

Michigan United Conservation Clubs, a 501c3 nonprofit conservation organization
 2101 Wood St.
 Lansing, MI 48912
 517.371.1041

© 2021 Michigan United Conservation Clubs



[://ww](#) [://twit](#) [.yout](#)

Website powered by Neon One (<https://neonone.com/products/neon-websites/>)
[w.fac](#) [ter.co](#) [ube.c](#)

[eboo](#) [m/MI](#) [om\)](#)

[k.co](#) [Outof](#)

[m/mu](#) [Door](#)

[cc19](#) [s\)](#)

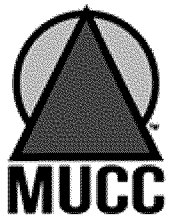
[37/\)](#)

EXHIBIT 11

[f \(https://www.facebook.com/mucc1937/\)](https://www.facebook.com/mucc1937/) [t \(https://twitter.com/MIOutOfDoors\)](https://twitter.com/MIOutOfDoors) [y \(www.youtube.com\)](http://www.youtube.com)

Donate (<https://michiganunitedconservationclubs.z2systems.com/donation.jsp>) Become a Member (<https://mucc.org/about/>)

Log In (<https://michiganunitedconservationclubs.z2systems.com/login.jsp>)

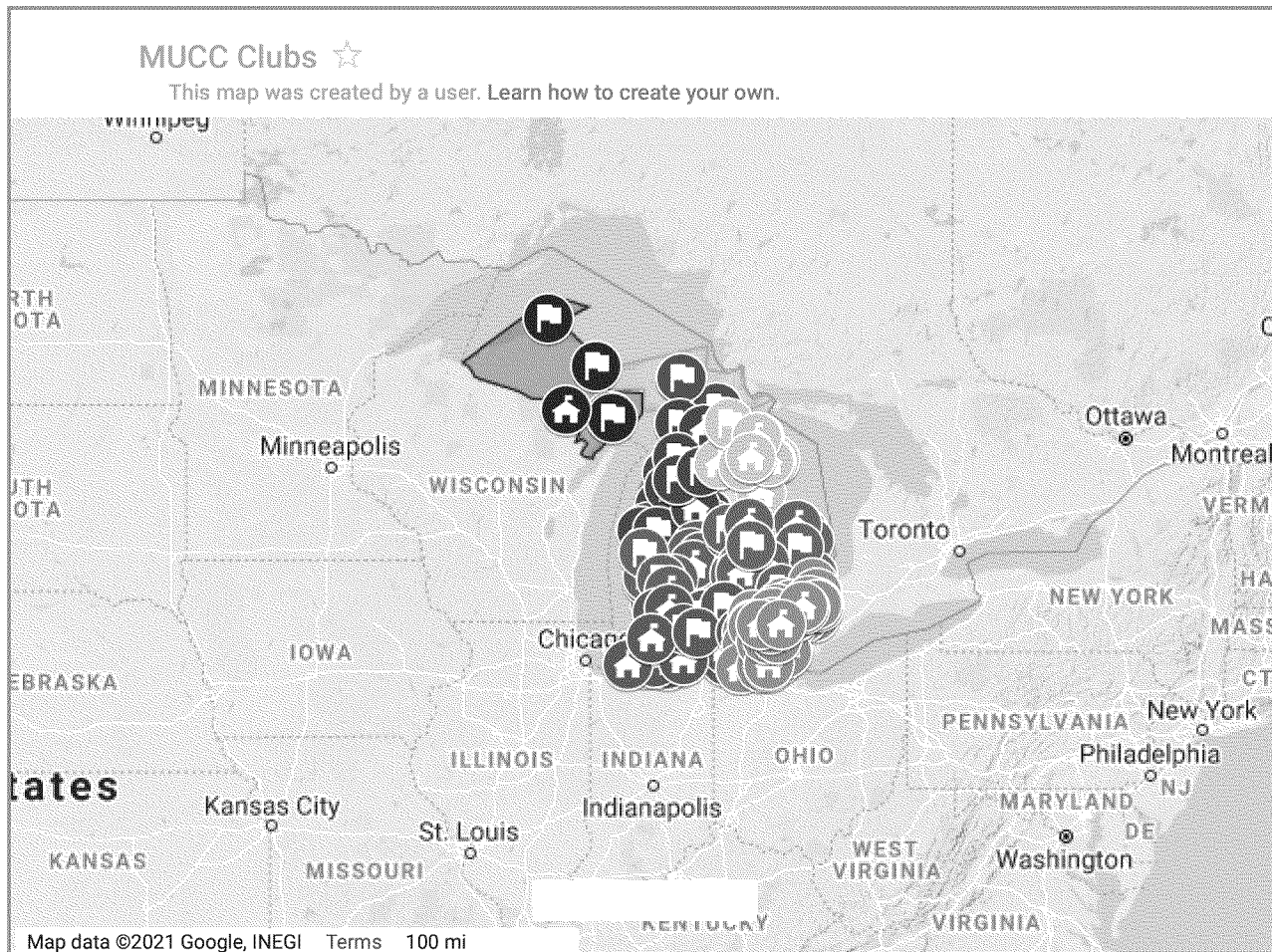


MICHIGAN UNITED *Since 1937* CONSERVATION CLUBS

(<https://mucc.org/>)

Affiliated Clubs

Below you will find a map of the many local conservation clubs who enjoy membership of Michigan United Conservation Clubs. Membership in Michigan United Conservation Clubs shows your commitment to conservation. Your dues support our programs to advocate for the rights to hunt, fish and trap; to communicate about the critical issues you need to know about as a hunter, angler, trapper or conservationist; to conserve and enhance fish and wildlife habitat; and to educate the next generation of conservationists.



List of Statewide clubs

Bowfishing Association Of Michigan
Commemorative Bucks Of Michigan
Fort Detroit German Wirehaired Pointer Club
German Shorthaired Pointer Club of Michigan
MI Deer Hunters Let Em Go Let Em Grow
Michigan Anglers Association
Michigan Bowhunters Association
Michigan- Ducks Unlimited
Michigan Forest Association
Michigan Gun Owners
Michigan Resource Stewards
Michigan State Chapter- NWTF
Michigan State Fox Hunters Association
Michigan State United Coonhunters
Michigan Trappers & Predator Callers Association
Michigan Outdoors Women's Club
Mid-Michigan United Sportsmens Alliance
National Brittany Open Grouse
National Wildlife Federation
Pheasants Forever- MI State Council
Quality Deer Management Association - Michigan State Chapter
Ruffed Grouse Society and American Woodcock Society
Safari Club International- Detroit Chapter
Sci - Michigan Chapter
State Chapter Michigan Wild Turkey Hunters Assoc
Statewide- Michigan Steelhead & Salmon Fishermen's Assoc
The Bass Federation of Michigan
Upper Peninsula Bear Houndsmen Association

If your club information is incorrect, fill out our club update form here.
 (<http://www.123formbuilder.com/form-3471683/club-update-form>)

Michigan United Conservation Clubs, a 501c3 nonprofit conservation organization
 2101 Wood St.
 Lansing, MI 48912
 517.371.1041

© 2021 Michigan United Conservation Clubs



[://ww](#) [://twit](#) [.yout](#)

Website powered by Neon One (<https://neonone.com/products/neon-websites/>)
[w.fac](#) [ter.co](#) [ube.c](#)

eboo m/Mi om)

k.co Outof

m/mu Door

cc19 s)

37/)

EXHIBIT 12

[f \(https://www.facebook.com/mucc1937/\)](https://www.facebook.com/mucc1937/) [t \(https://twitter.com/MIOutOfDoors\)](https://twitter.com/MIOutOfDoors) [v \(www.youtube.com\)](http://www.youtube.com)

[Donate \(https://michiganunitedconservationclubs.z2systems.com/donation.jsp\)](https://michiganunitedconservationclubs.z2systems.com/donation.jsp) [Become a Member \(https://mucc.org/about/\)](https://mucc.org/about/)

[Log In \(https://michiganunitedconservationclubs.z2systems.com/login.jsp\)](https://michiganunitedconservationclubs.z2systems.com/login.jsp)




MICHIGAN UNITED *Since 1937*
CONSERVATION CLUBS

[\(https://mucc.org/\)](https://mucc.org/)



MUCC selected to represent conservationists on new wolf council

By Nick Green (<https://mucc.org/author/ngreen/>) | March 11, 2021 | 0 
(<https://mucc.org/mucc-selected-to-represent-conservationists-on-new-wolf-council/#respond>)

The Michigan Department of Natural Resources (DNR) named members to the newest iteration of the Michigan Wolf Management Advisory Council Thursday.

Michigan United Conservation Clubs (MUCC) Executive Director Amy Trotter was one of five representatives from stakeholder groups to be selected for the council. She was appointed to represent conservation organizations. The others include Mike Thorman (Michigan Hunting Dog Federation) representing hunting organizations, Bee Friedlander (Attorneys for Animals) representing an animal advocacy organization, Dick Pershinske (Upper Peninsula resident) representing agricultural interests and Miles Falck (Great Lakes Indian Fish and Wildlife Commission) representing tribal government.

The council's charge will be to make recommendations to the DNR regarding the management of gray wolves in Michigan.

The DNR announcement comes on the heels of Senate Resolution 15 (<http://www.legislature.mi.gov/documents/2021-2022/resolutionadopted/Senate/pdf/2021-SAR-0015.pdf>), sponsored by Sens. Ed McBroom (R-Vulcan) and Jon Bumstead (R-Newaygo), which calls for "the Natural Resources Commission to authorize, and the Department of Natural Resources to organize, wolf hunting and trapping as part of the state's wolf management efforts beginning in 2021." The resolution passed the Senate Tuesday.

Resolutions are non-binding recommendations made by legislators. They do not carry the effect of law, and the passage of SR 15 does not institute a wolf hunting season.

In 2020, the Trump administration delisted gray wolves in the lower 48 states — effectively handing management of the species back to the states when the final rule took effect on January 4. The announcement triggered lawsuits from animal rights groups almost immediately. After President Biden assumed the presidency, his administration called for a review of the delisting, but no immediate changes to the status have been made.

Trotter has been down this road before, and it is an issue she has worked fervently on since her first day with MUCC, she said.

"MUCC has advocated for a durable wolf delisting, long-term management goals and the use of hunting and trapping as a primary management tool for almost a decade," Trotter said.

"This constant merry-go-round of listing and delisting does a disservice to the species, the state's ability to manage that species and the best available science surrounding Michigan's recovered wolf population."

Background

By 1992, Michigan's wolf population consisted of about 20 wolves. The most recent estimate from the DNR puts Michigan's Upper Peninsula minimum winter wolf population at almost 700.

Federal delisting criteria required Michigan and Wisconsin's combined total to be at least 100 wolves for five consecutive years in order for delisting to occur. According to the DNR, the two states' combined population has totaled more than 100 wolves since 1994 and was nearing 1,900 wolves in 2020.

The 1997 Michigan Wolf Recovery and Management Plan outlined a recovery goal of 200 wolves in the state for five consecutive years in order to initiate a state delisting. The population of wolves has remained above 200 for more than a decade.

In 2009, the Michigan DNR delisted wolves in the state and reclassified them as a protected, nongame species. In 2012, the U.S. Fish and Wildlife Service (USFWS) completed a delisting process for gray wolves and removed them from the Endangered Species Act (ESA) in Michigan, Wisconsin and Minnesota transferring management authority back to the three states.

Under Public Act 21 of 2013 (and subsequently Public Act 281 of 2014 via a citizen-initiated statute creating the Scientific Fish and Wildlife Conservation Act), the NRC used its authority to name wolves a game species and created the first modern-day wolf hunt in 2013.

Michigan's 2013 hunt was a carefully controlled management opportunity in the fall of 2013. 1,200 licenses were sold over the counter for \$100 to residents (\$500 for non-residents), with a target harvest of only 43 wolves across three small management units in the Upper Peninsula. Mandatory registration of harvest was required, as was calling in to verify the season was still open at the beginning of each day.

Much like Michigan's limited sturgeon spearing season on Black Lake, a hunt ended in a unit when the target harvest was reached within it. Only 23 wolves were harvested during the six-week season.

In 2014, however, a federal judge ordered wolves be placed back on the federal Endangered Species List (ESL), trumping both the Michigan Legislature's 2009 decision and the 2012 USFWS rule.

Trotter said gray wolves' recovery in Michigan is a true success story, but more work needs to be done to fix the federal triggers that place species on or remove them from the ESL.

"The recovery of wolves in the Great Lakes Region has proven the effectiveness of the Endangered Species Act and what it was designed for," Trotter said. "However, the process has also shed light on just how hard delisting a recovered population is and the lengths anti-hunters will go to through litigation to keep the species from being managed."

In 2019, Michigan Attorney General Dana Nessel sent a letter (https://www.michigan.gov/documents/ag/AG_Gray_Wolf_Comment_Letter_to_U.S._Fish_and_Wildlife_Service_661311_7.pdf) to then-Secretary of Interior David Bernhardt suggesting that the USFWS delisting of wolves is unlawful and that the species should remain on the ESL. In 2018, Nessel was endorsed by the Humane Society Legislative Fund — a political action committee responsible for funding anti-hunting lobbyists, politicians and supporters.

Contradicting Nessel's opinion, DNR Director Daniel Eichinger submitted comments (<https://www.regulations.gov/comment/FWS-HQ-ES-2018-0097-101969>) on behalf of the department to the USFWS ahead of the recent delisting that "strongly supports the proposed rule to remove federal protections for gray wolves in the lower 48 United States where the population has recovered."

While MUCC has not weighed in on the delisting across other regions of the U.S., we are confident the Great Lakes Region has met every restoration benchmark.

Lawsuits, Public Sentiment and Resolutions

Much of the argument surrounding wolf management in Michigan centers around an anti-hunting agenda from organizations masquerading as conservationists.

The Humane Society of the United States (HSUS) and similar organizations have funneled significant resources from out-of-state donors into Michigan to try and influence public sentiment regarding wolves throughout the last decade.

The current lawsuit challenging the federal delisting was initiated by the Center for Biological Diversity, HSUS, Earthjustice, Sierra Club, National Parks Conservation Association, Oregon Wild and Defenders of Wildlife

Common messaging from these anti-hunting organizations anthropomorphizes wolves, focuses on the perceived cruelty of hunting or trapping instead of their intended use as a management tool, negates the North American Model of Wildlife Conservation and appeals to emotions rather than fact, Trotter said.

“Usage of terms like slaughter and carnage has become commonplace in propaganda pieces disseminated by these organizations,” Trotter said. “Trophy hunters is now a term being used by these organizations to define anyone who ethically harvests any animal in accordance with state and federal laws.”

Sen. Dayna Polehanki (D-Livonia), echoing anti-hunting sentiments, made inaccurate and unsubstantiated comments regarding trapping and wolves on the Senate floor Tuesday during her testimony on SR 15.

“Traps and snares can leave animals struggling and suffering for hours before they either slowly die or escape through self-amputation,” Polehanki said. “And traps can be triggered even if the target is not a wolf, which could leave protected species such as the bald eagle or even pets prone to being snared by a trap.”

Trapping has been an integral part of Michigan’s outdoor heritage prior to statehood and continues to be an effective management tool for conservationists. Trappers are required by law to check their traps regularly.

Polehanki’s claim that “protected” species, such as domestic pets and bald eagles, will fall victim to traps and suffer for hours or escape through self-amputation is not corroborated through science.

MUCC’s members have been clear through the organization’s grassroots-driven resolution process that they want wolves delisted and managed using hunting and trapping as a primary tool. MUCC remains neutral on Sens. McBroom and Bumstead’s resolution calling for a 2021 hunt under the 2015 management plan.

“The issue at hand is the process by which season frameworks are set, which includes a thorough review of the science and an updated management plan from the advisory council,” Trotter said. “The cyclical listing and delisting through litigation is often compounded by

inadequate or incomplete processes. While it could be completed more quickly, we need to adhere to the process to ensure a durable delisting and long-term management.”

Since 1937, MUCC has united citizens to conserve, protect and enhance Michigan’s natural resources and outdoor heritage – and we do so from Lansing to Washington D.C. Please join us today: <http://bit.ly/JoinMUCC> (<https://bit.ly/JoinMUCC?fbclid=IwAR0GISmTYPhaXcuqljq3Rlcie3YyLWfjmNDWqEw28xKiQuzRBjvJURCnDxM>)

Posted in [Policy](https://mucc.org/category/policy/) and tagged [Conservation](https://mucc.org/tag/conservation/), [DNR](https://mucc.org/tag/dnr/), [michigan](https://mucc.org/tag/michigan/), [Michigan natural resources commission](https://mucc.org/tag/michigan-natural-resources-commission/), [NRC](https://mucc.org/tag/nrc/), [Proposal G](https://mucc.org/tag/proposal-g/), [wolf](https://mucc.org/tag/wolf/), [wolf management](https://mucc.org/tag/wolf-management/), [wolves](https://mucc.org/tag/wolves/)

← [On the Ground: Spring Field Season Launches this Weekend](https://mucc.org/on-the-ground-spring-field-season-launches-this-weekend/)

[Happy AmeriCorps Week!](https://mucc.org/happy-ameri-corps-week/) →

About Nick Green

[View all posts by Nick Green](https://mucc.org/author/ngreen/) →

Leave a Comment

Comment

Name (required)

Email (will not be published) (required)

Website

Submit Comment

Michigan United Conservation Clubs, a 501c3 nonprofit conservation organization
2101 Wood St.
Lansing, MI 48912
517.371.1041

© 2021 Michigan United Conservation Clubs



://ww ://twit .yout

Website powered by Neon One (<https://neonone.com/products/neon-websites/>)
w.fac ter.co ube.c

eboo m/MI om)

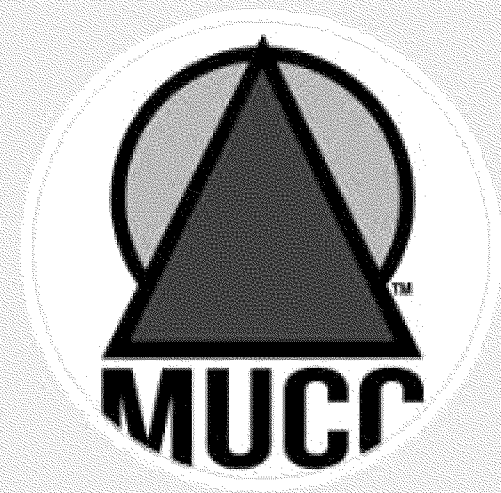
k.co Outof

m/mu Door

cc19 s)

37/)

EXHIBIT 13



Michigan United Conservation Clubs
@mucc1937

- Home
- About
- Events
- Photos
- Videos
- Community

Posts

Create a Page

Like Share

Use App Send Message

3d

Michigan United Conservation Clubs
March 12 at 1:17 PM · 🌐

Anti-hunters are turning out in droves to public meetings regarding Michigan's natural resources.

"After having worked for more than a decade in the conservation arena, it is clear that anti-hunting organizations are becoming more clever with their messaging and more disconnected from reality," Trotter said. "Once they figure out the facts aren't on their side, they quickly turn to emotional pleas and use terms that evoke strong negative connotations."

Join us today to help ensure your rights to hunt, fish and trap are not infringed upon: <http://bit.ly/JoinMUCC>. Enter promo code WOLF to receive 25 percent off your membership.



Visitor Posts

Bruce Kaltz
March 4 at 11:09 AM 🌐
"Two Beauties" Sometimes as a Landscape/wildlife photographer you ar...
See More

Jeffrey Chernach
February 12 at 11:32 AM 🌐
maybe MUCC could file suit like this Wisconsin group get a Michigan wolf hunt?????? [https://www.wsaw.com/.../judge-orders-d.../...](https://www.wsaw.com/.../judge-orders-d.../)

Barry Thornbury
January 15 at 8:48 AM 🌐

See more of Michigan United Conservation Clubs on Facebook

Log In

or

Create New Account