

From: [Adam Templer](#)
To: [All Alders](#)
Subject: Bear Development - Response to Claims made by WRCC
Date: Tuesday, March 10, 2026 3:41:45 PM
Attachments: [image001.png](#)
[Letter to Mayor Council Exhibits 2026.03.10.pdf](#)
[Bear Media Statement Intersect - Final.pdf](#)

Some people who received this message don't often get email from adam@bearreg.com. [Learn why this is important](#)

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Good afternoon-

We were made aware of a letter sent to the Madison City Council by WRCC, and vehemently deny the allegations made against Bear Development. Please find our formal response attached, along with a press release that was provided by us today in response to media inquires. I am hopeful the summary and supporting documents provide a clear rebuttal to these false claims.

We continue to make a significant investment in Madison to develop quality, affordable housing and do not want this to be disrupted by false allegations.

Thank you,

Adam

Adam Templer
SVP- Development
Bear Real Estate Group
Mobile: 312.405.3277
Adam@BearREG.com
www.BearREG.com



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March 10, 2026

Via Email

Mayor Satya Rhodes-Conway and Members of the Common Council
210 Martin Luther King Jr Blvd, Room 403
Madison, WI 53703

Re: Bear Development, LLC ("Bear") and Allegations of Wisconsin Responsible Contracting Coalition, Inc. ("WRCC")
808 Melvin, a/k/a The Intersect (the "Project")

Dear Honorable Mayor Satya Rhodes-Conway and Alders of the City of Madison:

We were made aware of the attached email from the WRCC dated March 2, 2026 (Exhibit A), and feel compelled to provide a response. Bear is proud of the high quality affordable housing we developed in Madison and across the state of Wisconsin. We have worked hard to establish strong working relationships with elected officials, City of Madison staff, and local sub-contractors. WRCC's baseless letter unfairly questions our business practices and damages our reputation.

First and foremost, Bear takes great exception to the allegations that we have a track record of exploiting and harming workers or that our job site conditions are "dangerous and demeaning." WRCC makes these reckless allegations without any evidence or support, and without any attempt to contact us to review its concerns. To the contrary, Bear and its related general contracting firm, Construction Management Associates, Inc. ("CMA"), the prime contractor on the Project, has constructed over 4,000 units of Affordable Housing over the last 15 years across the state of Wisconsin and numerous other states. We have been in business for over 100 years and are proud of the company we have built which has a strong track record of delivering on promises, while operating sites safely and responsibly. Any allegations to the contrary are unfounded and appear designed to prevent us from continuing to develop quality affordable housing, specifically in the City of Madison.

The allegations in WRCC's correspondence stem from two different circumstances surrounding the Project, each of which is grossly mischaracterized by WRCC. The first of such circumstances surrounds CMA's Worker's Compensation Insurance and a workplace injury. WRCC makes an egregious allegation that we do not carry Worker's Compensation Insurance. To clear the record, both Bear and CMA have at all times maintained Worker's Compensation Insurance and any allegation to the contrary is defamatory. With respect to the eye injury referenced in the WRCC email, the injury was never reported to Bear or CMA, until we received Attorney David Robles letter dated February 2, 2026. We immediately provided notice of the claim to our insurance carrier and placed CMA's subcontractor (SCS Building Supply) on notice as the Claimant was a second-tier worker under SCS. Our insurance agent also immediately placed SCS's carrier on notice of the claim. Further, our carrier immediately provided Attorney David Robles (Claimant's Attorney) with evidence of our Workers' Compensation coverage. Attorney Robles thanked our agent for the prompt response and confirmed that no further documentation was required from us at that time. Copies of relevant correspondence have been attached as Exhibit B. Evidence of our Worker's Compensation coverage is attached as Exhibit C. It is also important to note that no one, to our knowledge, has alleged that the Project job site conditions are in any way related to the cause of the injury. In fact, the initial correspondence from Attorney Robles noted that prior to the Claimant being allowed to work on the Project site, the Claimant attended a mandatory safety meeting as required by CMA.

With respect to the “wage theft” claim of \$75,000.00 made by WRCC, the alleged conduct stems from employees of Raramuri Construction, Inc. (“Raramuri”), which is of no relation to Bear or CMA. On the Project, SCS is a sub-contractor to CMA. Raramuri was then a sub-contractor to SCS hired to perform a portion of its scope of work. Each claimant that we are aware of is also represented by Attorney David Robles, has confirmed in writing that the claimants were or are employees of Raramuri, and have made no claims against Bear or CMA for unpaid wages. Four of the workers issued lien claims against the Project which CMA’s subcontractor, SCS, promptly paid at Bear and CMA’s request. An amount equal to 125% of those wage claims (\$46,200.00) is currently held in escrow with the Dane County Clerk of Courts to satisfy the four claims. Until we spoke directly with Attorney Robles on March 9, we had received no detail or support behind the alleged wage claims. Again, neither Attorney Robles nor his clients have alleged that Bear or CMA has engaged in any “wage theft” or that we have any responsibility for those claims whatsoever. We assume this wage claim with Raramuri will eventually be settled satisfactorily by Attorney Robles. However, although neither Bear nor CMA are a party to this dispute with Raramuri, we have made arrangements with Attorney Robles to pay the remaining \$38,500.000 of claims into his trust account. As such, all of the outstanding wage claims will be paid to the respective workers; regardless of whether Raramuri or any other party are deemed responsible for these wages. Copies of correspondence related to the wage claims and the payments referenced above have been attached as Exhibit D.

Bear takes these allegations very seriously and we would welcome a meeting with you to answer any questions, either as part of the public meeting process for developments currently under review with the City, or in a separate meeting. We stand behind our business practices and safety procedures. There has been no attempt by WRCC to reach out to us before or after issuing their letter. Furthermore, WRCC has not replied to our written response to its letter. We remain unclear as to why WRCC has made these verifiably false statements, and we have taken the appropriate steps to protect our interests in this regard.

We are very proud of the reputation Bear has built over our 100-year history. It is exceedingly frustrating that WRCC has called it into question. We hope this letter helps to clarify the issues at hand, and we look forward to furthering discussions with you and continuing to develop the critically important affordable housing in the City of Madison.

Sincerely,

A handwritten signature in blue ink, appearing to read "A T", with a horizontal line extending to the right.

Adam Templer
Senior Vice President of Development
Bear Real Estate Group

Exhibit A

(see attached hereto)

From: admin@wisconsinrcc.org <admin@wisconsinrcc.org>

Sent: Monday, March 2, 2026 11:36 AM

To: All Alders <allalders@cityofmadison.com>

Subject: Hold Bear Development Accountable During March 10 Council Meeting

[You don't often get email from admin@wisconsinrcc.org. Learn why this is important at

<https://urldefense.proofpoint.com/v2/url?u=https->

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Dear Madison Common Council Alders,

Bear Development, which is constructing the Intersect Apartments on the east side of Madison, is seeking approval from the Madison Common Council on March 10 for a land use merger for their project. The Wisconsin Responsible Contracting Coalition's sole purpose is to shine a light on bad faith actors and the practices contractors use on job sites across Wisconsin that exploit workers, and we are deeply concerned about the dangerous and demeaning working conditions at the job site of the Intersect Apartments.

Bear Development has a track record of exploiting and harming workers, and unfortunately, this has been no different in the construction of the Intersect Apartments. Bear Development is exploiting workers and cutting corners to improve its bottom line. We have heard stories directly from hard-working Wisconsinites who have experienced wage theft of at least \$75,000 on this project. Bear Development is also placing vulnerable workers at risk. In one instance, a worker lost his vision on the job.

These are just two of the reported stories. To make matters worse, Bear Development does not have worker's compensation.

In Wisconsin, we believe in the dignity of work and respecting workers.

Bear Development does not share these values – they are clearly only focused on their own profits, no matter the cost to workers.

As representatives of the Madison community, you have an opportunity on March 10 to ask Bear Development about these incidents and hold them accountable to the workers in our community. These jarring stories from workers is proof that this project deserves further investigation, and the hearing on March 10 is an opportunity to do that.

We urge you to listen to the workers. This isn't just a labor issue; this is a human rights issue happening in our community.

Sincerely,

Mike Rosen

Michael Walsh

Jeff Arnold

The Wisconsin Responsible Contracting Coalition

Exhibit B

(see attached hereto)

John Hotvedt

From: Joelle Rothen
Sent: Wednesday, February 4, 2026 11:35 AM
To: Phil Hausmann
Cc: Luke Porath; John Hotvedt; Kevin Kaiser; Sara Trongeau
Subject: FW: Attorney David Robles-Worker compensation claim - Bear Dev & CMA
Attachments: WORKER COMPENSATION CLAIM.pdf

Phil:

Attached is a notice we have received regarding a third tier subcontractor on one of our projects. John asked me to send over since we have been put on notice.

Let me know what the next steps are.

Thanks!

Joelle Rothen
Vice President Accounting
Bear Real Estate Group
Phone: 262.942.3500 Ext: 179
jrothen@bearreg.com
www.BearREG.com



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From: Lisa Arizola <LArizola@bearreg.com>
Sent: Wednesday, February 4, 2026 10:57 AM
To: HR <HR@bearreg.com>; Joelle Rothen <JRothen@bearreg.com>
Subject: Attorney David Robles-Worker compensation claim - Bear Dev & CMA

Hello,

This certified mail was received today. There were two copies, the same letter, one addressed to Development and the other to CMA. Please let me know if I should forward it elsewhere.

Best Regards,

Lisa Arizola
Administrative Assistant
Bear Real Estate Group
Office: 262.942.3500 x164
larizola@bearreg.com



Sara Trongeau

From: John Hotvedt
Sent: Thursday, February 5, 2026 12:52 PM
To: Andrew M. Lorenz; Joelle Rothen
Cc: Sara Trongeau; Luke Porath; Kevin Kaiser
Subject: FW: Attorney David Robles-Worker compensation claim - Bear Dev & CMA
Attachments: WORKER COMPENSATION CLAIM.pdf

Good afternoon Andrew:

From the looks of the attachment, it appears you likely have received a copy, but sending along to make sure this has crossed your desk. Please let me know if there is anything you and I need to discuss once you have had a chance to review and discuss with your client. Otherwise, we'd simply be looking for confirmation that either SCS or Rarmuri's carrier is addressing the claim.

Hope you've been well otherwise and looking forward to hearing from you.

Talk soon.

JEH

John Hotvedt
Vice President – General Counsel
Bear Real Estate Group
direct: 262.842.0575
jeh@BearREG.com
www.BearREG.com



From: Joelle Rothen <JRothen@bearreg.com>
Sent: Wednesday, February 4, 2026 11:07 AM
To: John Hotvedt <jeh@bearreg.com>
Cc: HR <HR@bearreg.com>; Kevin Kaiser <kkaiser@cmaofwi.com>
Subject: FW: Attorney David Robles-Worker compensation claim - Bear Dev & CMA

John:

Attached is a letter we received by Certified mail with regards to an employee of Raramuri at the Melvin jobsite. As you already are aware – this is a third tier sub to CMA and our contract is with SCS. This is notice of workers compensation claim.

Please let us know the appropriate path forward on this.

Thank you.

Joelle Rothen
Vice President Accounting
Bear Real Estate Group
Phone: 262.942.3500 Ext: 179
jrothen@bearreg.com
www.BearREG.com



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From: Lisa Arizola <LArizola@bearreg.com>
Sent: Wednesday, February 4, 2026 10:57 AM
To: HR <HR@bearreg.com>; Joelle Rothen <JRothen@bearreg.com>
Subject: Attorney David Robles-Worker compensation claim - Bear Dev & CMA

Hello,

This certified mail was received today. There were two copies, the same letter, one addressed to Development and the other to CMA. Please let me know if I should forward it elsewhere.

Best Regards,

Lisa Arizola
Administrative Assistant
Bear Real Estate Group
Office: 262.942.3500 x164
larizola@bearreg.com
www.BearREG.com



Attorney David Robles
2122 N. 93rd St.
Wauwatosa, Wi. 53226
414-610-6813

February 2, 2026

Bear Development
4011 80th St.,
Kenosha, Wi. 53142

Construction Management Associates (CMA)
4015 80th St., Suite F.
Kenosha, WI. 53142

Attorney Andrew M. Lorenz
402 Graham Ave.
Eau Claire, WI. 54702-0187
representing
SC Swiderski
401 Ranger St.
Mosinee, WI. 54455

Alfredo Chavira / Raramuri Construction Inc.
9526 County Road 1109
Princeton, TX 75407-5018

WHEDA
General Counsel
908 East Main Street, Suite 501
Madison, Wisconsin 53703

VIA U.S. MAIL

NOTICE OF EMPLOYEE INJURY - [NAME REDACTED] -- NOTICE OF
REPRESENTATION -- [NAME REDACTED] -- NOTICE OF WORKERS COMPENSATION CLAIM --
WORKERS COMPENSATION COVERAGE REQUEST -- DEMAND LETTER REGARDING
PRESERVATION OF EVIDENCE.

By this letter, I am providing notice of representation on behalf of [NAME REDACTED] in a
worker's compensation claim. This notice is about the injury he incurred in the timeframe of January
18, 2025 at the Intersect Apartment jobsite located at 808 Melvin Court, Madison, WI. 53704. It is
unknown whom (by law) is his actual employer based upon the information presently available, due
to the circumstances of his employment and potential misclassification of the nature of his
employment or employer -- a consequence of the individual/entity involved in Mr. [NAME REDACTED] hiring is

believed to be a labor-broker. It is also unknown if the injury was reported to the DWD after he notified the superiors on the site of the injury at the jobsite.

Attached is the notice of injury that has been sent by mail and email to the DWD. I am the point of contact and attorney for Mr. [NAME REDACTED] related to this worker's compensation claim. All communications should be directed to my attention as he is a represented party.

DEMAND FOR PRESERVATION OF EVIDENCE – INFORMATION REGARDING WORKER'S COMPENSATION COVERAGE.

Accordingly, in anticipation of potential litigation and filings related to this injury claim, I ask that you instruct the respective principals, agents, employees, subcontractors, and others controlled, directed or supervised by the above entities to preserve and retain all of the following materials in whatever format (hard copy or electronic) related to work at the above-described project, and in particular the injury of my client while performing work (framing) at the above project.

Those materials include emails, text messages (including all messages exchanged on any messaging platform, audio recordings, video recordings (or combination thereof), voice mails, drafts, notes, all communications (in whatever format), documents (including but not limited to contracts, work orders, purchase orders, supply orders, invoices, payroll records, checks, receipts), related to said work. The other documentation is relevant to the determination of his actual employer for purposes of a worker's compensation claim.

The demand for the preservation of the above items includes communicating to those with authority to preserve said materials so that every reasonable step is taken to preserve the materials until the resolution of this matter. In particular, since electronic information is easily deleted, modified, or corrupted, this would include the preservation of those materials, discontinuation of all data destruction, preservation of any backup data or information, and suspension of any recycling policy or procedure that would result in the destruction of relevant materials.

By this letter, I request all records / reports / information provided to DWD related to his injury at the Intersect Apartments as described above.

By this letter I am requesting information related to worker's compensation / injury coverage for purposes of a worker's compensation claim for my client's injury at 808 Melvin Court, Madison, WI. 53704 as described in this and the attached letter.

Notice is also provided to WHEDA who was involved in the financing of this project.

Sincerely,



Attorney David Robles / DXR LLC
2122 N. 93rd St.
Wauwatosa, Wi. 53226
Wisconsin Bar. No. 01009608

Attorney David Robles
2122 N. 93rd St.
Wauwatosa, Wi. 53226
414-610-6813

February 2, 2026

Department of Workforce Development
WORKER'S COMPENSATION DIVISION
201 E. Washington Ave.
P.O. Box 7901
Madison, Wisconsin 53707

VIA EMAIL AND U.S. MAIL

NOTICE OF EMPLOYEE INJURY - [NAME REDACTED] – NOTICE OF
REPRESENTATION – [NAME REDACTED] NOTICE OF WORKERS COMPENSATION CLAIM
- OPEN RECORDS REQUEST

Dear DWD:

By this letter, I [NAME REDACTED] is providing notice to DWD related to an injury that occurred in the timeframe of January 18, 2025 at the Intersect Apartment jobsite located at 808 Melvin Court, Madison, WI. 53704. It is unknown if his employer (to be determined) provided notice of this injury as required by statute. I am the point of contact and attorney for Mr. [NAME REDACTED] related to this worker's compensation claim. All communications should be directed to my attention as he is a represented party.

Based upon the nature of his employment, it is unclear whom was his actual employer as a consequence of the potential misclassification of the nature of his employment or employer as the individual/entity involved in Mr. [NAME REDACTED] hiring is believed to be a labor-broker.

Accordingly, notice is provided for the following entities:

Bear Development (Owner); 4011 80th St., Kenosha, WI. 53142

Construction Management Associates (CMA), 4015 80th St. Suite F. Kenosha, WI. 53142

Alfredo Chavira / Raramuri Construction Inc., 9526 County Road 1109, Princeton, TX 75407-5018

SC Swiderski – 401 Ranger St., Mosinee, WI. 54455

Worker's Compensation Insurance coverage information can be obtained from the respective entities involved in the contract for the construction at the above site.

Mr. [NAME REDACTED] began his employment at the Intersect Apartments in January 2025. A safety meeting was conducted at the jobsite. The meeting for Mr. [NAME REDACTED] and his co-workers was conducted by CMA. A safety number / designation was provided to Mr. [NAME REDACTED] with his helmet at that time –

see below:



While at work he suffered the injury on or about January 24 - 25, 2025 while removing some wood from the floor with a hammer. A piece of metal hit his left eye that immediately evidenced the injury. Notice was provided to individuals supervising the location of the injury. Mr. [NAME REDACTED] left the jobsite due to the nature of the injury.

On or about January 28, 2025 he received treatment at U.W. Hospital and Clinics for the injury, which shortly thereafter required surgery. Mr. [NAME REDACTED] continues to have eyesight issues because of the injury.

OPEN RECORDS REQUEST

By this letter, I request all records / reports / information provided to DWD related to his injury at the Intersect Apartments as described above.

By copy of this letter, notice is provided for purposes of a worker's compensation claim to the respective entities involved in the construction project at 808 Melvin Court, Madison, WI. 53704.

Notice is also provided to WHEDA who was involved in the financing of this project.

Sincerely,



Attorney David Robles / DXR LLC
2122 N. 93rd St.
Wauwatosa, Wi. 53226
Wisconsin Bar. No. 01009608

Sara Trongeau

From: Jason Hiller <jhiller@myhaus.com>
Sent: Tuesday, February 10, 2026 1:31 PM
To: Elizabeth Giuntoli; Joelle Rothen
Cc: Kevin Kaiser; John Hotvedt; Sara Trongeau; Phil Hausmann
Subject: RE: Attorney David Robles-Worker compensation claim - Bear Dev & CMA

All,
Based on my conversations with John Hotvedt I connected with Attorney Robles and got him the certificate of insurance demonstrating SCS' work comp coverage. I asked him to confirm if anything further was needed at this time and he provided the response below. Can you please confirm if Bear/CMA have had any direct discussion with SCS on this claim, and their intent to afford coverage?

Thank you for the prompt response. This response is to confirm that there is no present need for the production of additional documents as requested in the letter dated February 2, 2026. However, as noted in the letter and during our conversation, there is the need to preserve documents as related to the project as it may impact any subsequent litigation regarding responsibility for coverage under workers compensation for the injury. I ask that this be communicated to your client(s). If this claim is disputed, information related to CMA and Bear Development and WC coverage will be needed.

Have you had any direct contact with SC SWiderski LLC or SCS Building Supply for responsibility for the claim?

Please let me know if you have any questions, and advise on the remaining question about SCS' responsibility for the claim.

Best,
Jason

Jason Hiller, WCLS

Senior Claims Resolution Strategist, Workers' Compensation
Hausmann Group
608-252-9648 | Meet with Me

From: Elizabeth Giuntoli <EGiuntoli@bearreg.com>
Sent: Thursday, February 5, 2026 1:05 PM
To: Joelle Rothen <JRothen@bearreg.com>
Cc: Kevin Kaiser <kkaiser@cmaofwi.com>; John Hotvedt <jeh@bearreg.com>; Sara Trongeau <strongeau@beardevelopment.com>; Jason Hiller <jhiller@myhaus.com>; Phil Hausmann <phausmann@myhaus.com>
Subject: RE: Attorney David Robles-Worker compensation claim - Bear Dev & CMA

Some people who received this message don't often get email from egiuntoli@bearreg.com. [Learn why this is important](#)

Hi Jason,

Attached please find our subcontract with SCS and their current COI.

Thank you,

Exhibit C

(see attached hereto)



CONSMAN-02

TMUNROE

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
3/10/2026

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Hausmann Group, Inc. 740 Regent Street 4th Floor PO Box 259408 Madison, WI 53725-9408		CONTACT NAME: PHONE (A/C, No, Ext): (608) 257-3795 E-MAIL ADDRESS: commercial@myhaus.com FAX (A/C, No): (608) 257-4324	
INSURED Construction Management Associates, Inc. Bear Development LLC Bear Homes 4015 80th St Ste F Kenosha, WI 53142		INSURER(S) AFFORDING COVERAGE INSURER A: The Cincinnati Insurance Company NAIC # 10677 INSURER B: Hiscox Insurance Company Inc. 10200 INSURER C: INSURER D: INSURER E: INSURER F:	

COVERAGES **CERTIFICATE NUMBER: 2022** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL SUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A X	COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR		ENP0509586	10/1/2024	10/1/2025	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 500,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COM/POP AGG \$ 2,000,000
GEN'L AGGREGATE LIMIT APPLIES PER: POLICY <input checked="" type="checkbox"/> PROJECT <input checked="" type="checkbox"/> LOC						
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input checked="" type="checkbox"/> HIRED AUTOS ONLY	<input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY	EBA0509586	10/1/2024	10/1/2025	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
A X	UMBRELLA LIAB EXCESS LIAB DED <input checked="" type="checkbox"/> RETENTION \$	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS-MADE	ENP0509586	10/1/2024	10/1/2025	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N/A	EWC0727054	10/6/2024	10/1/2025	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
B	Pollution Liability		ANE5487613	10/1/2024	10/1/2025	Occurrence \$ 1,000,000
B	Pollution Liability		ANE5487613	10/1/2024	10/1/2025	Aggregate \$ 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
RE: 808 Melvin Court Apartments (The Intersect), 808 Melvin Court, Madison, WI 53704

Excess Policy:
Carrier: Westfield Specialty Insurance Company Policy Number: XSL444440Y00
Effective Dates: 10/01/2024 - 10/01/2025
Occurrence Limit: 5,000,000
Aggregate Limit: 5,000,000

CERTIFICATE HOLDER Master Certificate	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE

Exhibit D

(see attached hereto)

John Hotvedt

From: David Robles <dxrobles@outlook.com>
Sent: Monday, March 9, 2026 12:50 PM
To: John Hotvedt
Subject: Re: 808 Melvin Ct - Intersect Apartments project

Sounds good, thank you.

Sent via the Samsung Galaxy S24 FE, an AT&T 5G smartphone
[Get Outlook for Android](#)

From: John Hotvedt <jeh@bearreg.com>
Sent: Monday, March 9, 2026 12:10:57 PM
To: David Robles <dxrobles@outlook.com>
Subject: RE: 808 Melvin Ct - Intersect Apartments project

Thank you David:

I will reach out to accounting and have this processed. We can talk details on the assignments and releases shortly. Thanks again and will be back in touch shortly.

John Hotvedt
Vice President – General Counsel
Bear Real Estate Group
direct: 262.842.0575
jeh@BearREG.com
www.BearREG.com



From: David Robles <dxrobles@outlook.com>
Sent: Monday, March 9, 2026 12:09 PM
To: John Hotvedt <jeh@bearreg.com>
Subject: RE: 808 Melvin Ct - Intersect Apartments project

Good Morning:

Yes, if the claims are paid (to my client trust account), I can forward releases from the workers as well as an assignment of any claim for those wages due from SKS / Raramuri. Please have any check issued to DXR LLC – Client Trust Account with the note that it is for Intersect Apartment wage claims (9 workers). It may be overnighted to my address at 2122 N. 93rd St., Wauwatosa, Wi. 53226

David Robles
(414) 610-6813 (cell)

From: John Hotvedt <jeh@bearreg.com>
Sent: Monday, March 9, 2026 11:33 AM
To: David Robles <dxrobles@outlook.com>
Subject: RE: 808 Melvin Ct - Intersect Apartments project

Good afternoon David:

Thank you for your time this morning and for sending this through. I spoke with ownership and my colleague who heads up our affordable housing development projects after you and I spoke.

While we do not see any legal theory that would require us to do so, we are happy to pay the outstanding balance over to your trust account to resolve the claims in favor of your clients and get their wages paid.

Perhaps you and I can discuss some sort of assignment of the claims against Raramuri and/or SCS, but again, we are happy to work with you quickly to get your clients claims resolved.

If this is agreeable to you, we can have our general contracting entity, Construction Management Associates, Inc. ("CMA"), issue a check to your account by tomorrow and have the same overnighted to your office. From there, you and I can get on the phone and work through any administrative details. Let me know if you have any questions or if that sounds agreeable on your end and we can get this in the works.

Thanks again David and look forward to hearing from you.

John Hotvedt
Vice President – General Counsel
Bear Real Estate Group
direct: 262.842.0575
jeh@BearREG.com
www.BearREG.com



From: David Robles <dxrobles@outlook.com>
Sent: Monday, March 9, 2026 11:22 AM
To: John Hotvedt <jeh@bearreg.com>
Subject: RE: 808 Melvin Ct - Intersect Apartments project

Good Morning John:

Thank you for the call this morning. I believe it was very helpful and constructive in moving forward towards a resolution.

The table below represents the wages due and outstanding the workers listed from the Intersect Apartments project. This is premised on the lien claim amounts for the other workers being paid (with surplusage returned to SKS) if the claim of the paid amounts is not disputed (by SKS.) The total due those workers is \$36,531.25 from the amounts paid to the Dane County court.

[NAME REDACTED]	4,943.75
[NAME REDACTED]	3,237.50
[NAME REDACTED]	3,238.00
[NAME REDACTED]	3,350.00
[NAME REDACTED]	4,418.75
[NAME REDACTED]	5,256.25

[NAME REDACTED]	4,331.25
[NAME REDACTED]	5,193.75
[NAME REDACTED]	4,531.25
	38,500.50

David Robles, Attorney
Wisconsin Bar No. 01009608
(414) 610-6813 (cell)

From: John Hotvedt <jeh@bearreg.com>
Sent: Friday, March 6, 2026 4:22 PM
To: dxrobles@outlook.com
Cc: Sara Trongeau <strongeau@beardevelopment.com>
Subject: 808 Melvin Ct

Good afternoon David:

I am in house counsel for Bear Development and Construction Management Associates, Inc. I have received your contact information on correspondence received from SCS's counsel (Andrew Lorenz) pertaining to two different matters related to our project referenced above, including the attached correspondence. I know that SCS (at our urging) paid the funds associated with the four lien claims into court. Your attached letter makes reference to potentially more claims. I write to inquire into the status of those claims and whether you have had any further discussions or communications with Attorney Lorenz surrounding the same. We are trying to get to the bottom of whether there are other claims associated with the project, the basis for those claims, and depending upon those answers, what the status would be.

I will follow up with a phone call on Monday morning but wanted to drop you a line and give you some context. I look forward to speaking with you. Thank you and have a nice weekend.

John Hotvedt
Vice President-General Counsel
Bear Real Estate Group
direct: 262.842.0575
jeh@BearREG.com
www.BearREG.com



Vendor
DXR0001

Vendor Name
DXR, LLC-Client Trust Account

Check Date
03/09/2026

Check No.
040010

Invoice No.
001

Invoice Date
Mar 9, 2026

Reference
24 009, 808 Melvin Court

Invoice Amount
38,500.50

Payment Amount
38,500.50

TRUE WATERMARK PAPER. HOLD TO LIGHT TO VIEW. HEAT SENSITIVE PINK IMAGE DISAPPEARS WITH HEAT.

Construction Management Associates, Inc
4015 80th Street, Suite F
Kenosha, WI 53142

First American Bank
Kenosha, WI

040010
03/09/2026

PAY TO THE ORDER OF DXR, LLC-Client Trust Account

\$38,500.50

Thirty Eight Thousand, Five Hundred Dollars and Fifty cents

DXR, LLC-Client Trust Account
2122 N 93rd St
Wauwatosa, WI 53226



Anna Clayton
Authorized Signer(s)

Sara Trongeau

From: Andrew M. Lorenz <alorenz@ruderware.com>
Sent: Friday, January 9, 2026 11:16 AM
To: John Hotvedt
Cc: Sara Trongeau; Nicole Penich; Joelle Rothen
Subject: Lien Updates
Attachments: Ltr to Dane County re Lien 25-CL-113.docx; Ltr to Dane County re Lien 25-CL-115.docx; Ltr to Dane County re Claim 25-CL-112.docx; Ltr to Dane County re Lien 25-CL-114.docx

John:

Attached find the 4 letters to Dane County clerk of courts. SCS is getting the certified funds drawn now, so we will overnight to Madison and hopefully this will all be docketed on Monday.

-Andrew



Andrew M. Lorenz

Ruder Ware, L.L.S.C.

402 Graham Avenue | P.O. Box 187 | Eau Claire, WI 54702-0187

Phone: 715.834.3425 | Toll-Free: 800.477.8050 | Fax: 715.834.9240

alorenz@ruderware.com |    



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Ruder Ware, L.L.S.C.
402 Graham Avenue
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Eau Claire, WI 54702-0187

Tel 715.834.3425
Fax 715.834.2635
alorenz@ruderware.com
www.ruderware.com



VIA OVERNIGHT MAIL

January 9, 2026

Dane County Clerk of Courts
ATTN: Crystal Brumley
215 S Hamilton St, Room 1000
Madison, WI 53703

Re: Dane County Case No. 25-CL-112

Dear Ms. Brumley:

Our office represents SCS Building Supply, LLC (“SCS”), an interested party to the above-identified claim for lien (the “Lien”). In accordance with Wis. Stat. § 779.08, enclosed herein as an undertaking for the Lien is a certified check in par value equal to over 125 percent of the claim for lien.

1. \$11,800 certified check for Case No. 25-CL-112 (claim for lien of \$9,418.75).

The reason for the postings of this undertaking is that counsel for the Lien’s claimants, Attorney David Robles, has refused to provide undersigned counsel with payoff information for the Liens. This refusal to accept payment has no apparent legitimate purpose and, as such, the undersigned requests that the Lien be ordered removed from the judgment and lien docket by the Clerk of Courts at the earliest possible date pursuant to Wis. Stat. § 779.08.

Very truly yours,

RUDER WARE


Andrew M. Lorenz

Enclosures

Ruder Ware, L.L.S.C.
402 Graham Avenue
P.O. Box 187
Eau Claire, WI 54702-0187

Tel 715.834.3425
Fax 715.834.2635
alorenz@ruderware.com
www.ruderware.com



VIA OVERNIGHT MAIL

January 9, 2026

Dane County Clerk of Courts
ATTN: Crystal Brumley
215 S Hamilton St, Room 1000
Madison, WI 53703

Re: Dane County Case No. 25-CL-113

Dear Ms. Brumley:

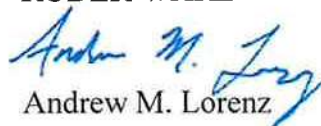
Our office represents SCS Building Supply, LLC (“SCS”), an interested party to the above-identified claim for lien (the “Lien”). In accordance with Wis. Stat. § 779.08, enclosed herein as an undertaking for the Lien is a certified check in par value equal to over 125 percent of the claim for lien.

1. \$18,100 certified check for Case No. 25-CL-113 (claim for lien of \$14,431.25).

The reason for the posting of this undertaking is that counsel for the Lien’s claimants, Attorney David Robles, has refused to provide undersigned counsel with payoff information for the Liens. This refusal to accept payment has no apparent legitimate purpose and, as such, the undersigned requests that the Lien be ordered removed from the judgment and lien docket by the Clerk of Courts at the earliest possible date pursuant to Wis. Stat. § 779.08.

Very truly yours,

RUDER WARE


Andrew M. Lorenz

Enclosures

Ruder Ware, L.L.S.C.
402 Graham Avenue
P.O. Box 187
Eau Claire, WI 54702-0187

Tel 715.834.3425
Fax 715.834.2635
alorenz@ruderware.com
www.ruderware.com



VIA OVERNIGHT MAIL

January 9, 2026

Dane County Clerk of Courts
ATTN: Crystal Brumley
215 S Hamilton St, Room 1000
Madison, WI 53703

Re: **Dane County Case No. 25-CL-114**

Dear Ms. Brumley:

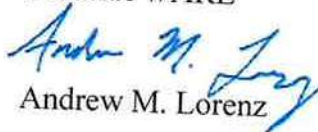
Our office represents SCS Building Supply, LLC ("SCS"), an interested party to the above-identified claim for lien (the "Lien"). In accordance with Wis. Stat. § 779.08, enclosed herein as an undertaking for the Lien is a certified check in par value equal to over 125 percent of the claim for lien.

1. \$8,500 certified check for Case No. 25-CL-114 (claim for lien of \$6,756.25).

The reason for the posting of this undertaking is that counsel for the Lien's claimants, Attorney David Robles, has refused to provide undersigned counsel with payoff information for the Liens. This refusal to accept payment has no apparent legitimate purpose and, as such, the undersigned requests that the Lien be ordered removed from the judgment and lien docket by the Clerk of Courts at the earliest possible date pursuant to Wis. Stat. § 779.08.

Very truly yours,

RUDER WARE


Andrew M. Lorenz

Enclosures

Ruder Ware, L.L.S.C.
402 Graham Avenue
P.O. Box 187
Eau Claire, WI 54702-0187

Tel 715.834.3425

Fax 715.834.2635

alorenz@ruderware.com

www.ruderware.com



VIA OVERNIGHT MAIL

January 9, 2026

Dane County Clerk of Courts
ATTN: Crystal Brumley
215 S Hamilton St, Room 1000
Madison, WI 53703

Re: **Dane County Case No. 25-CL-115**

Dear Ms. Brumley:

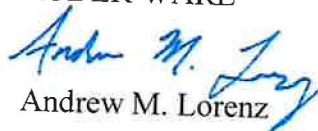
Our office represents SCS Building Supply, LLC ("SCS"), an interested party to the above-identified claim for lien (the "Lien"). In accordance with Wis. Stat. § 779.08, enclosed herein as an undertaking for the Lien is a certified check in par value equal to over 125 percent of the claim for lien.

1. \$7,800 certified check for Case No. 25-CL-115 (claim for lien of \$6,225.00).

The reason for the posting of this undertaking is that counsel for the Lien's claimants, Attorney David Robles, has refused to provide undersigned counsel with payoff information for the Liens. This refusal to accept payment has no apparent legitimate purpose and, as such, the undersigned requests that the Lien be ordered removed from the judgment and lien docket by the Clerk of Courts at the earliest possible date pursuant to Wis. Stat. § 779.08.

Very truly yours,

RUDER WARE


Andrew M. Lorenz

Enclosures

FOR IMMEDIATE RELEASE

March 10, 2026

Bear Development Responds to False Allegations at 808 Melvin (The Intersect) Job Site

Company Calls WRCC Claims Baseless and Defamatory; Cites 100-Year Track Record and 4,000+ Units of High-Quality Affordable Housing Delivered.

MADISON, WI — Bear Development, LLC today issued a formal response to allegations made by the Wisconsin Responsible Contracting Coalition (WRCC) regarding its 808 Melvin affordable housing development, known as The Intersect, categorically denying the claims as baseless, unsupported, and designed to derail the development of critically needed affordable housing in the City of Madison. The WRCC issued its letter without contacting Bear prior to distribution and has not responded to Bear’s written rebuttal.

“Bear and CMA have constructed over 4,000 units of quality, affordable housing across Wisconsin and other states over the last 15 years, and we have been in business for over 100 years. We operate safe job sites; we carry Workers’ Compensation Insurance — as required by law — and we have never engaged in wage theft. WRCC made these reckless allegations without a shred of evidence and without any attempt to contact us beforehand.”

— S.R. Mills, CEO of Bear Development

The WRCC letter raises two specific allegations, both of which Bear characterizes as gross mischaracterizations of fact. With respect to the Workers’ Compensation Insurance allegation, Bear’s carrier immediately provided documentation of coverage to the claimant’s own attorney, David Robles, upon notification of the claim — and Attorney Robles confirmed in writing that no further documentation was required. Regarding the wage claims totaling \$75,000, those claims involve employees of Raramuri Construction, a sub-tier subcontractor with no direct relationship to Bear or CMA. Neither the workers nor their attorney have alleged any wrongdoing by Bear or CMA.

Despite having no legal obligation to do so, Bear has voluntarily arranged to pay the full outstanding balance of wage claims directly into Attorney Robles’ trust account, ensuring every worker will be made whole, regardless of the outcome of the dispute with Raramuri.

“We have voluntarily arranged to pay the full outstanding balance of wage claims directly into Attorney Robles’ trust account so that every worker will be made whole — regardless of the dispute with Raramuri. WRCC has never replied to our written response, and we remain at a loss to explain why they chose to publicly attack a company that is doing everything in its power to protect workers, rather than simply picking up the phone.”

— S.R. Mills, CEO of Bear Development

Bear has invited the Mayor and Common Council to meet directly to address any questions and stands fully behind its business practices and safety procedures. The company has taken appropriate legal steps to protect its interests and reputation.

About Bear Development, LLC

Bear Development and its affiliates are a Wisconsin-based real estate development firm with over 100 years in business. Construction Management Associates, Inc. (CMA), the prime contractor on The Intersect project, is an affiliated general contracting firm under common ownership with Bear. Together, Bear and CMA have delivered more than 4,000 units of high-quality affordable housing across Wisconsin and multiple other states.

Media Contact

S.R. Mills, CEO

Bear Development

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