



## WISCONSIN LEGISLATIVE COUNCIL ACT MEMO

**2015 Wisconsin Act 13**  
[2015 Assembly Bill 4]

**Incorporation of  
the Town of Ledgeview**

### **BACKGROUND**

Wisconsin law allows all or part of a town, or more than one town, to incorporate as a city or village by a number of methods. The 2007 Biennial Budget Act, 2007 Wisconsin Act 20, provides that, notwithstanding the available procedures for incorporation of a town as a city or a village, the Town of Ledgeview in Brown County may incorporate as a village if approved by a referendum.

In *State ex rel. Kuehne v. Burdette*, the Wisconsin Court of Appeals held that the statute providing the special procedure for the incorporation of the Town of Ledgeview violates a provision of the Wisconsin Constitution that prohibits the Legislature from enacting any special or private law for incorporating any city, town or village. [*State ex rel. Kuehne v. Burdette*, 320 Wis. 2d 784 (2009); Wis. Const. art. IV, s. 31 (9).]

### **2015 WISCONSIN ACT 13**

2015 Wisconsin Act 13 repeals the statutory provision that provides the Town of Ledgeview a special procedure for incorporation as a village.

*Effective date:* April 10, 2015

*Prepared by:* Michael Queensland, Staff Attorney

April 28, 2015

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This memo provides a brief description of the Act. For more detailed information, consult the text of the law and related legislative documents at the Legislature's Web site at: <http://www.legis.wisconsin.gov>.