

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE,
425 Second Street NE
Washington, DC 20002,

and

REPUBLICAN PARTY OF WISCONSIN,
148 East Johnson Street
Madison, WI 53703

Plaintiffs,

Case No.: 22-CV-_____

Case Code No.: 30952
30701

v.

CAVALIER JOHNSON,
In his official capacity as Mayor of
The City of Milwaukee
200 E. Wells Street, Room 201
Milwaukee, WI 53202,

OFFICE OF THE MAYOR OF
THE CITY OF MILWAUKEE,
200 E. Wells Street, Room 201
Milwaukee, WI 53202,

CLAIRE WOODALL-VOGG,
In her official capacity as Executive Director
of the Milwaukee Election Commission
200 E. Wells Street, Room 501
Milwaukee, WI 53202,

and

MILWAUKEE ELECTION COMMISSION
200 E. Wells Street, Room 501
Milwaukee, Wisconsin 53202,

Defendants.

COMPLAINT FOR MANDAMUS

NOW COME the above-named Plaintiffs, National Republican Senatorial Committee and the Republican Party of Wisconsin, by their attorneys, the Law Firm of Conway, Olejniczak & Jerry, S.C., who complain and allege against the above-named Defendants as follows:

NATURE OF THIS ACTION

1. Plaintiffs bring this action for mandamus under Wis. Stat. § 19.37(1)(a), requesting that this Court order Defendants to release public records that Plaintiffs requested and that directly relate to the administration of the November 8, 2022 election by Defendants, which Defendants have thus far failed to release or delayed in releasing, under the public records law, Wis. Stat. §§ 19.31 et seq., and assess appropriate damages, Wis. Stat. §§ 19.31-.39.

PARTIES

2. Plaintiff, National Republican Senatorial Committee (“NRSC”), is the principal national political party committee focused on electing Republican candidates to the U.S. Senate and is located at 425 Second Street NE, Washington, DC 20002. The NRSC is registered with the Federal Election Commission (“FEC”) as a “political committee,” and is recognized by the FEC as a national political party committee.

3. Plaintiff, Republican Party of Wisconsin (“RPW”), is the principal state party committee for the Republican Party located at 148 E. Johnson Street, Madison, Wisconsin 53703. The RPW has thousands of members, including state and federal legislators, local government officials serving at the county and municipal levels, and hundreds of thousands of constituents across all of Wisconsin’s seventy-two counties.

4. Plaintiffs are “requesters” as that term is defined in Wis. Stat. § 19.32(3) and as used throughout Wisconsin's public records law, Wis. Stat. § 19.31-19.39.

5. Defendant, Cavalier Johnson, is the Mayor for the City of Milwaukee, an elected local office, and maintains an office located at 200 E. Wells Street, Room 201, Milwaukee, WI 53202.

6. Mayor Johnson is an “authority” as that term is defined in Wis. Stat. § 19.32(1) and as that term is used in the Open Records law, Wis. Stat. § 19.31 *et seq.*

7. Defendant, Office of the Mayor of the City of Milwaukee, is the formal office of the Mayor of the City of Milwaukee, and maintains an office located at 200 E. Wells Street, Room 201, Milwaukee, WI 53202.

8. The Office of the Mayor of the City of Milwaukee (the “Office”) is an “authority” as that term is defined in Wis. Stat. § 19.32(1) and as that term is used in the Open Records law, Wis. Stat. § 19.31 *et seq.*

9. Defendant, Claire Woodall-Vogg, is the Executive Director of the Milwaukee Election Commission, as set forth in Wis. Stat. § 7.21(2), and maintains an office located at 200 E. Wells Street, Room 501, Milwaukee, WI, 53202.

10. Executive Director Woodall-Vogg is an “authority” as that term is defined in Wis. Stat. § 19.32(1) and as that term is used in the Open Records law, Wis. Stat. § 19.31 *et seq.*

11. Defendant, Milwaukee Election Commission, carries out all powers and duties under chs. 5 to 12, Wis. Stats., pursuant to Wis. Stats. §§ 7.20 and 7.21, and maintains an office located at 200 E. Wells Street, Room 501, Milwaukee, WI, 53202.

12. The Milwaukee Election Commission (“MEC”) is an “authority” as that term is defined in Wis. Stat. § 19.32(1) and as that term is used in the Open Records law, Wis. Stat. § 19.31 *et seq.*

BACKGROUND FACTS

13. On or about May 24, 2022, Mayor Johnson and Executive Director Woodall-Vogg announced a new effort called “Milwaukee Votes” and generally described it as a plan to invite more eligible voters to participate and was described as a plan to share “non-partisan information with eligible voters.” (**Exhibit A**).

14. On or about September 12, 2022, Mayor Johnson publicly announced that he is “going to be embracing outreach and engagement through what we’re calling ‘Milwaukee Votes 2022.’ As part of that, you will soon see a new website widget on many Milwaukee.gov website pages.” (**Exhibit B**).

15. Unlike the announcement in May 2022, Mayor Johnson explained on September 12 that “Milwaukee Votes 2022 will also have door-to-door canvassers that will be underway, funded by the private sector. Dozens of canvassers will be face to face with eligible voters, encouraging them to exercise their right to vote for the November election.” *Id.*

16. Mayor Johnson and his Office also communicated that the door-to-door canvassing that will take place in the City of Milwaukee will be funded by a private grant. (**Exhibit C**).

17. The public statements and communications made by Mayor Johnson and his office on September 12, 2022 provided new information to the public, different from the limited information in May 2022, which raised significant concerns related to the administration of Milwaukee Votes 2022 and Milwaukee’s partnership with a partisan organization to conduct get out the vote efforts or other election administration functions.

18. Upon information and belief, Mayor Johnson or his Office initially directed further questions to “Melissa Baldauff.”

19. According to her LinkedIn profile, Melissa Baldauff appears to be a “principal” of an organization known as GPS Impact. **(Exhibit D and Exhibit E)**

20. GPS Impact is a partisan organization that states that it specializes in “providing customized targeted communications programs for all mediums” and advertises that “[a]s your partner we’ll work with you to craft integrated solutions for the modern media landscape.” **(Exhibit F).**

21. GPS Impact’s home webpage, located at www.gpsimpact.com, touts its prior success partnering with Democrats:

Winning in tough territory is part of our DNA. We’ve helped Democrats, progressive organizations and initiatives, and elected officials win in red states, including Kansas, Michigan, Pennsylvania, Wisconsin, North Carolina, Louisiana and Ohio.

* * *

We tell stories that persuade, mobilize and win.

(Exhibit G).

22. As a result of the foregoing, and significant concerns as to whether the City of Milwaukee is or will be administering the upcoming November 8, 2022 election in accordance with Wisconsin law, Plaintiffs submitted separate open records requests to Defendants related to “Milwaukee Votes 2022 and “Milwaukee Votes.”

23. On September 13, 2022, Plaintiffs sent a request under the Open Records law to Mayor Johnson and his Office stating, in relevant part:

Pursuant to Wisconsin’s Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records: . . . All communications between the Office of the Mayor (including all staff, Mayor Cavalier Johnson, and anyone communicating on the Mayor’s behalf) and individuals and groups affiliated with the get-out-the-vote organizations relating to “Milwaukee Votes 2022 (specifically, the initiative announced by the City at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>). This includes, but is not limited to, communications with the following persons and organizations:

- Groups and individuals associated with the “Milwaukee Votes 2022” initiative; . . . [listing additional organizations]

* * *

Please provide all response records from April 1, 2022 through the date the search is conducted.

(Exhibit H).

24. Plaintiffs also submitted two separate requests under the Open Records law to Executive Director Woodall-Vogg and MEC on September 13, 2022: (i) the first was substantially similar to the request sent to Mayor Johnson and his Office, except specifically requesting communications between MEC and individuals and groups affiliated with get-out-the vote relating to “Milwaukee Votes 2022” (**Exhibit I**); and (ii) the second stating, in relevant part:

Pursuant to Wisconsin’s Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records:

All communications between the Milwaukee Elections Commission (including all staff and commission members) and the Office of Mayor (including all staff, Mayor Cavalier Johnson, and anyone communicating on the Mayors behalf) relating to “Milwaukee Votes 2022” (specifically, the initiative announced by the city at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>).

This request includes, but is not limited to:

- All communications . . . discussing the “Milwaukee Votes 2022” initiative; and
- All records related to the May 24, 2022 press conference . . .

Please provide all response records from April 1, 2022 through the date the search is conducted.

(Exhibit J).

25. On September 15, 2022, an assistant to Mayor Johnson acknowledged receipt of the open records request, but did not respond to a request later on the same day for an estimate on when the Mayor and his Office may have a response and responsive records.

26. On September 16, 2022, Plaintiffs sent correspondence to the Mayor and his Office (**Exhibit K**) and correspondence to MEC and Executive Director Woodall-Vogg (**Exhibit**

L), explaining the vital need for the records that are the subject of the prior open record requests since they are related to the “administration of the upcoming election in Milwaukee” and noting that “the deadline to send absentee ballots to electors with valid requests on file is next Thursday, September 22, 2022” and, as a result, requesting a response “to each of the open records requests by or before Wednesday, September 21, 2022.”

27. On September 19, 2022, Assistant City Attorney Peter Block sent a correspondence on behalf of Defendants indicating that they are working to process the requests and noted that “19 requests” have been filed regarding Milwaukee Votes 2022 and that some of the requests “look like they are going to be closed out in the next 24 hours,” but ultimately could not “gauge whether all records responsive to [Plaintiffs’] requests will be able to be provided . . . within five working days of your requests.” (**Exhibit M**).

28. Thereafter, the City indicated that the Mayor and his office should be able to produce at least some of the records requested by the Plaintiffs on or before Friday, September 23, 2022 or Monday, September 26, 2022. (**Exhibit N**)

29. As of the filing of this complaint, Defendants have failed to provide any responsive records to Plaintiffs’ requests for records set forth in the September 13, 2022 open records requests.

CLAIM FOR MANDAMUS

30. Plaintiffs incorporate by reference all allegations set forth in the proceeding paragraphs.

31. As the Wisconsin Supreme Court recently explained, “elections are one of the most important features of our Republic, and upholding the rules and procedures prescribed for elections, according to the laws enacted by the Legislature, reinforces the sanctity of the rule of

law and reassures all Americans of the integrity of our elections.” *Teigen v. Wisconsin Elections Commission*, 2022 WI 64, ¶ 21.

32. Furthermore, candidates and political organizations must act promptly, and before an election occurs, when confronted with information suggesting that violations of Wisconsin’s election laws have or may take place. *Trump v. Biden*, 2020 WI 91, ¶¶ 10-31 (applying laches to delay in raising the claim).

33. As the Wisconsin Supreme Court has recently stated in *Trump v. Biden*, “laches has particular import in the election context. As one noted treatise explains:

Extreme diligence and promptness are required in election-related matters, particularly where actionable election practices are discovered prior to the election. Therefore, laches is available in election challenges. In fact, in election contests, a court especially considers the application of laches. Such doctrine is applied because the efficient use of public resources demands that a court not allow persons to gamble on the outcome of an election contest and then challenge it when dissatisfied with the results, especially when the same challenge could have been made before the public is put through the time and expense of the entire election process. Thus if a party seeking extraordinary relief in an election-related matter fails to exercise the requisite diligence, laches will bar the action.

Id. ¶ 11.

34. The public interest in open and transparent elections is particularly compelling in the present political climate, and the public has an overriding interest in ensuring the integrity of our elections. *See EU v. S.F. Cnty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989) (there is a “compelling interest in preserving the integrity of [a State’s] electoral process”) (Goehre 2nd Aff. Ex. CC); *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 197 (2008) (“public confidence in the integrity of the electoral process has independent significance”) (Goehre 2nd Aff. Ex. Y); *Milwaukee Branch of NAACP v. Walker*, 2014 WI 98, ¶¶ 72-73, 357 Wis. 2d 469, 851 N.W.2d 262 (there is a “significant and compelling interest in protecting the integrity and reliability of the electoral process, as well as promoting the public’s confidence in elections”).

35. Under Wis. Stat. § 19.31, it is the declared public policy of this State that every citizen is entitled to the greatest possible information regarding the affairs of government and the official acts of government officers and employees. Wis. Stat. § 19.31 thus provides that the Open Records law “shall be construed in every instance with a presumption of complete public access, consistent with the conduct of governmental business,” and further, that “[t]he denial of public access generally is contrary to the public interest, and only in an exceptional case may access be denied.”

36. The Open Records law provides that a requester has the right to inspect any record except as otherwise provided by law. Wis. Stat. § 19.35(1). Responses to Open Records requests must be provided “as soon as practicable and without delay.” Wis. Stat. § 19.35(4)(a).

37. In light of the fact that the records requested directly concern the administration of the upcoming election in the City of Milwaukee, and that the deadline for municipalities to send absentee ballots to electors with valid requests on file is September 22, 2022, Defendants have violated the Wisconsin Open Records law and Wis. Stat. § 19.37(1) by failing to provide the requested records and delaying granting access to the requested records.

38. Specifically, here, the Defendants’ failure to swiftly respond to the requests and produce the requested records, at the very least, casts a dark cloud over the City’s administration of the election and its election-related efforts, which only risks proliferating public concerns about the upcoming election by withholding or delaying records pertinent to an extremely time-sensitive issue.

39. Defendants’ actions have caused and will continue to cause injury to the Plaintiffs by depriving them and the public of their rights under the Open Records law.

REQUESTED RELIEF

WHEREFORE, Plaintiffs request an order for mandamus directing each of the Defendants as follows and granting the following relief pursuant to Wis. Stat. §§ 19.31-19.39 and Wis. Stat. § 806.04:

- A. Order Defendants to provide copies of the requested records to Plaintiffs;
- B. Award Plaintiffs their actual costs and damages under Wis. Stats. § 19.37(2)(a);
- C. Assess whether Defendants acted in a willful or intentional manner, and arbitrarily and capriciously denied or delayed responses to the requests from Plaintiffs, and assess appropriate damages under Wis. Stats. §§ 19.37(2)(b) and (3), and;
- D. Order other such relief as the Court deems appropriate.

Dated this 26th day of September, 2022.

THE LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.
Attorneys for the Plaintiffs.

By: Electronically signed by Kurt A. Goehre
Attorney Kurt A. Goehre, State Bar No. 1068003
Attorney Bryant M. Dorsey, State Bar No. 1089949

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MILWAUKEE (CBS 58) -- Business, social service and government leaders are linking arms, hoping to get more Milwaukeeans to the polls this year.

The effort, launched by Mayor Johnson Tuesday morning, is called Milwaukee Votes.

The plan is to use various methods, including online voter registration information and an increase in the numbers of early voting sites, to invite more eligible voters to participate.

"We are hoping to connect with new voters, which we will be able to track registrations and actually voting of people who necessarily weren't engaged in democracy previously," said Claire Woodall-Vogg, Milwaukee Election Commission. "And if we can use the tools that are being presented here to help employees register, find out where they can vote and actually vote, that's one of the strongest things that employers can do."

Milwaukee Votes promises to share non-partisan information with eligible voters.

EXHIBIT A

Milwaukee's mayor backs door-to-door election push

By Jason Calvi Published September 12, 2022 Politics FOX6 News Milwaukee

Milwaukee's mayor backs door-to-door election push

Milwaukee's mayor backs door-to-door election push

MILWAUKEE - Milwaukee Mayor Cavalier Johnson announced plans in the city for door-to-door efforts to encourage people to vote in the battleground state of Wisconsin's largest city. After initial confusion over whether the city was leading the work, the mayor's office clarified it was not funding the work, not receiving funding for the work, nor doing the door-to-door efforts.

The mayor announced plans for the 2022 election while joining the Wisconsin Disability Vote Coalition in an [event to mark Disability Voting Rights Week](#).

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"We're doing more, and I'm going to be embracing outreach and engagement through what we're calling 'Milwaukee Votes 2022.' As part of that, you will soon see a new website widget on many Milwaukee.gov website pages," he announced.

EXHIBIT B

with eligible voters, encouraging them to exercise their right to vote for the November election," Johnson added. "I'm not asking anybody to cast their ballots for one party or another or one candidate or another. What I'm asking is for people to participate in our process and to make sure that their voice is heard at the ballot box."

In 2020, about 79% of the city voted for Joe Biden and roughly 20% for Donald Trump.

In his report, former Wisconsin Supreme Court justice Michael Gableman, whom Wisconsin Assembly Republicans hired to investigate the 2020 election, criticized municipal leaders for their efforts to get out the vote (shortened "GOTV").

"This is inappropriate, as GOTV is a partisan activity, historically (and currently) engaged in by candidates and their parties. Staff should be apprised that even when described as 'voter education,' encouraging voting by any group is not the duty of a busy and potentially underfunded clerk's office," Gableman wrote.

He continued that getting out the vote "has before 2020 been an exclusively partisan phrase used by partisan campaigns to (1) identify; (2) locate; (3) inform; (4) persuade and (5) facilitate increasing the number of votes for the candidate that they favor..."

After Mayor Johnson finished his time at the event in honor of voters with disabilities, FOX6 asked Johnson about criticism he might face for a new get-out-the-vote effort.

"There's certainly a role for local government to play. Our constituents, my constituents in this city should have the right to have their voice heard at the ballot box. As mayor, that's something I'm going to work feverishly to do every single day

Certainly, local governments have a responsibility to do that, and that's exactly what I'll do as mayor."

FOX6 inquired with the mayor and the elections director about who was awarding the grant and how much money it would send to the city. At the time of our in-person questions, the two city leaders said they were unsure.

Hours later, FOX6 learned that the city was not going to be engaged in door-to-door canvassing as part of "Milwaukee Votes 2022."

"The city is neither receiving nor providing any funds related to the work of 'Milwaukee Votes 2022.' The group is privately funded, not-for-profit and non-partisan," Jeff Fleming, the mayor's spokesman, told FOX6. "The association with 'Milwaukee Votes 2022' is limited to the Mayor voicing support for the work – which include door-to-door canvassing – to encourage all eligible voters to vote in upcoming elections."

Thread

Jason Calvi

@JasonCalvi

Milwaukee Mayor Johnson says city will be using a private grant to conduct door-to-door canvassing to urge people to vote. "I'm not asking anybody to cast their ballots for 1 party or another or 1 candidate or another. What I'm asking is for people to participate in our process."

11:24 AM · Sep 12, 2022 · Twitter Web App

City of Milwaukee Partners with Partisan Democrat Group for GOTV Effort

By Dan O'Donnell

Sep 13, 2022



The City of Milwaukee is partnering with a Democrat organization for its "Milwaukee Votes 2022" initiative, which Mayor Cavalier Johnson said Monday includes "door-to-door canvassing funded by [the] private sector." After questions were raised about the appropriateness of the campaign because of its partisan nature, the Mayor's office walked back Johnson's statement, claiming that "the City is neither receiving nor providing any funds related to the work of 'Milwaukee Votes 2022.'"

During a press conference Monday, however, Mayor Johnson repeatedly referred to "Milwaukee Votes 2022" as "our" initiative and indicated that it was to be a public-private partnership.

"We're doing more, and I'm going to be embracing outreach and engagement through what we're calling 'Milwaukee Votes 2022,'" he said. "As part of that, you will soon see a new website widget on many Milwaukee.gov website pages."

That, he said, would link to a get-out-the-vote initiative paid for by private donations that the mayor did not detail.

EXHIBIT D

"Milwaukee Votes 2022' will also have door-to-door canvassers that will be underway, funded by the private sector," Johnson explained. "Dozens of canvassers will be face to face with eligible voters, encouraging them to exercise their right to vote for the November election."

When pressed for comment about this, Johnson spokesman Jeff Fleming said he did not know where funding for this effort was coming from and referred all questions to Melissa Baldauff, an employee of **GPS Impact**, a partisan Democrat group that, according to its website, has "helped Democrats, progressive organizations and initiatives, and elected officials win in red states, including Kansas, Michigan, Pennsylvania, Wisconsin, North Carolina, Louisiana and Ohio."

Baldauff confirmed that she was advising various nonprofit organizations involved in "Milwaukee Votes 2022," but denied that GPS Impact was involved.

"Neither I nor GPS Impact are working for the City of Milwaukee, receiving taxpayer dollars from the City of Milwaukee, or running a canvass in Milwaukee," she said in an email.

Baldauff, a longtime Democratic political operative, previously worked for the Democratic Party of Wisconsin and served as a spokeswoman for Wisconsin Governor Tony Evers before joining GPS Impact in early 2021.

Government support for partisan get-out-the-vote efforts has been controversial in Wisconsin over the past two years. In 2020, Joe Biden's presidential campaign advertised for the City of Madison's "Democracy in the Park" effort, which allowed voters in the overwhelmingly Democratic city to return absentee ballots in each one of the city's 206 parks. The move was decried as an unlawful early voting drive outside of the legal early vote period. Madison's clerk contended that the city workers who collected ballots in the parks **were "human drop boxes."**

Madison was one of five cities in Wisconsin--all Democrat strongholds--to accept the lion's share of private grant money from the Center for Tech and Civic Live (CTCL), a group funded by Facebook founder Mark Zuckerberg. The cities used those funds for get-out-the-vote efforts and, in the case of Green Bay, **allowed CTCL workers to essentially take over the city's election operations.**

Representative Janel Brandtjen, chair of the Wisconsin Assembly's Committee on Campaigns and Elections, has launched an investigation into the new "Milwaukee Votes 2022" initiative.

"Using private money is a violation of the 14th Amendment's requirement to treat all voters the same," she said. "Get-out-the-vote is the work of the political parties, not municipalities. Once again, grants in the Milwaukee Mayor's Office have put the 2022 fall election into questions just weeks before the election."



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Melissa Baldauff

Principal at GPS IMPACT

-  GPS IMPACT

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Experience



Principal

GPS IMPACT

Jan 2021 - Present · 1 yr 9 mos

Milwaukee, Wisconsin, United States

EXHIBIT E

What We Do

We are an audience-focused design and integrated media firm. We specialize in providing customized targeted communications programs for all mediums. Unlike most firms, we house all of our creative, development, video services, writing and media buying in-house, saving our clients time and money. As your partner we'll work with you to craft integrated solutions for the modern media landscape.



GPS Influence



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GPS Labs & Development



Direct Response

EXHIBIT F



GPS Impact is different from the ground up – and it shows.

Winning in tough territory is part of our DNA. We've helped Democrats, progressive organizations and initiatives, and elected officials win in red states, including Kansas, Michigan, Pennsylvania, Wisconsin, North Carolina, Louisiana and Ohio.

EXHIBIT G

What We Do

We focus on people, not platforms, and see your story the way the public does. Bringing our diverse set of tools and experience to every project, we see every new challenge as a chance to make an impact.

GPS Influence

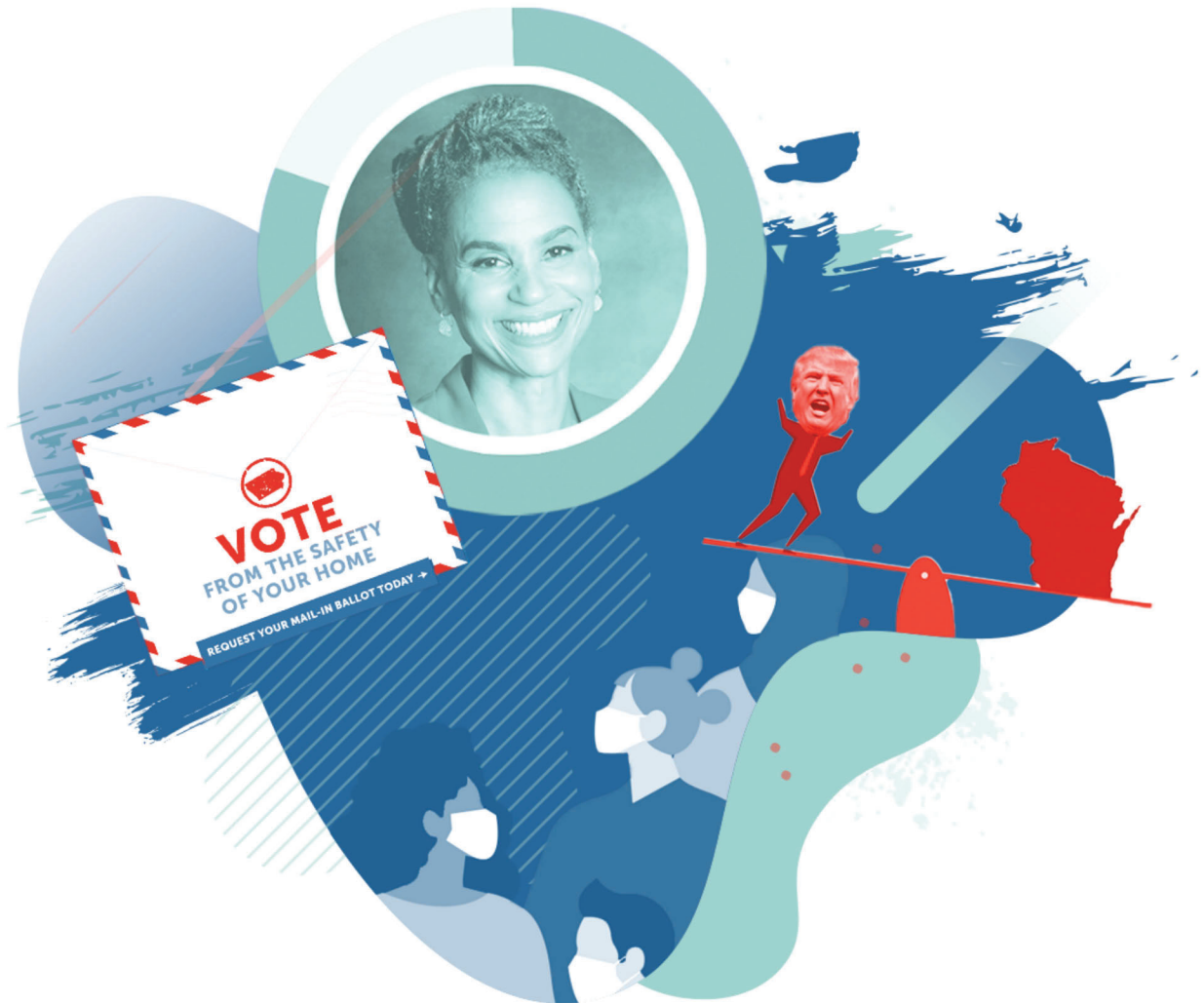
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CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL

Cavalier Johnson
Mayor, City of Milwaukee
200 E Wells Street, Room 201
Milwaukee, WI, 53202

Re: Open Records Request

Dear Mayor Johnson,

Pursuant to Wisconsin's Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records:

All communications between the Office of the Mayor (including all staff, Mayor Cavalier Johnson, and anyone communicating on the Mayor's behalf) and individuals and groups affiliated with get-out-the-vote organizations relating to "Milwaukee Votes 2022" (specifically, the initiative announced by the City at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>). This includes, but is not limited to, communications with the following persons and organizations:

- Groups and individuals associated with the "Milwaukee Votes 2022" initiative;
- ACLU of Wisconsin (including any emails to, from, or containing the domain name "aclu-wi.org");
- Greater Milwaukee Foundation (including any emails to, from, or containing the email domain name "@greatermilwaukeefoundation.org");
- Civic Action of Wisconsin (including any emails to, from, or containing the email domain name "citizenactinwi.org");
- Metropolitan Milwaukee Association of Commerce (MMAC) (including any emails to, from, or containing the email domain name "@mmac.org");
- Voces de la Frontera Action, Inc (including any emails to or from the email domain name "@vdlf.org"); and
- Angela Lang, Member of the Milwaukee Safety and Civic Commission.

Please provide all response records from April 1, 2022 through the date the search is conducted.

EXHIBIT H

Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

Please be aware that the Open Records law defines “record” to include information that is maintained on paper as well as electronically, such as data files and unprinted emails. Wis. Stat. § 19.32(2).

Please also be aware that the Open Records law “shall be construed in every instance with the presumption of complete public access consistent with the conduct of governmental business. The denial of access generally is contrary to the public interest and only in exceptional cases can access be denied.” If you deny my request, the law requires you to do so in writing and state what part of the law you believe entitles you to deny my request. Wis. Stat. § 19.35(4)(a).

The Open Records law states that you may charge for “the actual, necessary and direct cost” of locating records, if this exceeds \$50, and for photocopies. The Wisconsin Department of Justice advises that copying fees under the Open Records law should be “around 15 cents per page and that anything in excess of 25 cents may be suspect.” Please advise me before processing this request if the total cost will exceed \$50. We request that all records related to this request be provided in electronic format, if possible.

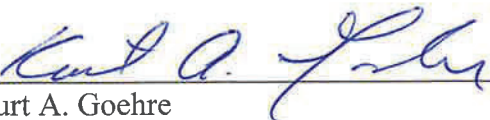
As you know, the law requires you to respond to this request “as soon as practicable and without delay.”

If you are not the records custodian for this information, please forward this request to the appropriate person. Also, please let me know if I can clarify or refine this request.

Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

KAG:bld

832215.034;4345674



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL & E-MAIL

Claire Woodall-Vogg
Executive Director, City of Milwaukee Elections Commission
200 E Wells Street, Room 501
Milwaukee, WI, 53202
E-mail: cwooda@milwaukee.gov

Re: Open Records Request

Dear Ms. Woodall-Vogg,

Pursuant to Wisconsin's Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records:

All communications between the Milwaukee Elections Commission (including all staff and commission members) and individuals and groups affiliated with get-out-the-vote relating to "Milwaukee Votes 2022" (specifically, the initiative announced by the city at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>). This includes, but is not limited to, communications with the following persons and organizations:

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- Civic Action of Wisconsin (including any emails to, from, or containing the email domain name "citizenactinwi.org");
- Metropolitan Milwaukee Association of Commerce (MMAC) (including any emails to, from, or containing the email domain name "@mmac.org");
- Voces de la Frontera Action, Inc (including any emails to or from the email domain name "@vdlf.org"); and
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EXHIBIT I

Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

Please be aware that the Open Records law defines “record” to include information that is maintained on paper as well as electronically, such as data files and unprinted emails. Wis. Stat. § 19.32(2).

Please also be aware that the Open Records law “shall be construed in every instance with the presumption of complete public access consistent with the conduct of governmental business. The denial of access generally is contrary to the public interest and only in exceptional cases can access be denied.” If you deny my request, the law requires you to do so in writing and state what part of the law you believe entitles you to deny my request. Wis. Stat. § 19.35(4)(a).

The Open Records law states that you may charge for “the actual, necessary and direct cost” of locating records, if this exceeds \$50, and for photocopies. The Wisconsin Department of Justice advises that copying fees under the Open Records law should be “around 15 cents per page and that anything in excess of 25 cents may be suspect.” Please advise me before processing this request if the total cost will exceed \$50. We request that all records related to this request be provided in electronic format, if possible.

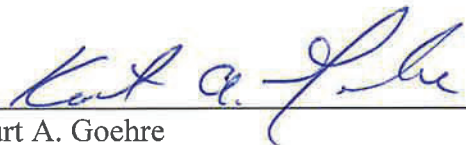
As you know, the law requires you to respond to this request “as soon as practicable and without delay.”

If you are not the records custodian for this information, please forward this request to the appropriate person. Also, please let me know if I can clarify or refine this request.

Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

KAG:bld
832215.034:4345660



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

*Attorney Kurt A. Goehre
KAG@lcojlaw.com*

VIA REGULAR MAIL & E-MAIL

Claire Woodall-Vogg
Executive Director, City of Milwaukee Elections Commission
200 E Wells Street, Room 501
Milwaukee, WI, 53202
E-mail: cwooda@milwaukee.gov

Re: Open Records Request

Dear Ms. Woodall-Vogg,

Pursuant to Wisconsin's Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records:

All communications between the Milwaukee Elections Commission (including all staff and commission members) and the Office of Mayor (including all staff, Mayor Cavalier Johnson, and anyone communicating on the Mayors behalf) relating to "Milwaukee Votes 2022" (specifically, the initiative announced by the city at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>).

This request includes, but is not limited to:

- All communications (including emails, email attachments, text messages, or messages on messaging platforms, such as Signal, Slack, Google, Lync, Skype, or WhatsApp) discussing the "Milwaukee Votes 2022" initiative; and
- All records related to the May 24, 2022 press conference including but not limited to: agendas, transcripts, and communications related to planning the press conference.

Please provide all response records from April 1, 2022 through the date the search is conducted.

Please be aware that the Open Records law defines "record" to include information that is maintained on paper as well as electronically, such as data files and unprinted emails. Wis. Stat. § 19.32(2).

EXHIBIT J

Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

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As you know, the law requires you to respond to this request “as soon as practicable and without delay.”

If you are not the records custodian for this information, please forward this request to the appropriate person. Also, please let me know if I can clarify or refine this request.

Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

KAG:bld
832215.034: 4345652



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 16, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL & E-MAIL

Cavalier Johnson
Mayor, City of Milwaukee
200 E Wells Street, Room 201
Milwaukee, WI, 53202
E-mail copy to: Alexis.Peterson@milwaukee.gov

Re: Follow-Up to September 13, 2022 Open Records Requests

Dear Mayor Johnson,

I represent the Republican Party of Wisconsin ("RPW") and the National Republican Senatorial Committee ("NRSC"), and I am following up on an open records request I sent to you on their behalf on September 13, 2022. I have enclosed copies of both open records requests for ease of reference.

Yesterday I had an e-mail exchange with the Special Assistant to your office, Alexis Peterson, and I requested an estimate on when we can expect to receive the responsive documents. As of this letter, I have not received a response to my last e-mail or any indication about when we can expect the responsive records. In light of the fact that the open records requests are directly related to the administration of the upcoming election in Milwaukee, and the fact that the deadline to send absentee ballots to electors with valid requests on file is next Thursday, September 22, 2022, we request that you respond to each of the open records requests by or before Wednesday, September 21, 2022. If we do not receive an adequate response by the aforementioned date, we will be forced to pursue all legal remedies available under applicable law.

Very truly yours,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

Enclosure

832215 034" 4352524

EXHIBIT K



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL

Cavalier Johnson
Mayor, City of Milwaukee
200 E Wells Street, Room 201
Milwaukee, WI, 53202

Re: Open Records Request

Dear Mayor Johnson,

Pursuant to Wisconsin's Open Records Law Wis. Stat. §§ 19.31-39, this letter requests the following records:

All communications between the Office of the Mayor (including all staff, Mayor Cavalier Johnson, and anyone communicating on the Mayor's behalf) and individuals and groups affiliated with get-out-the-vote organizations relating to "Milwaukee Votes 2022" (specifically, the initiative announced by the City at the May 24, 2022 press conference referenced here: <https://www.cbs58.com/news/milwaukee-votes-mayor-johnson-announces-effort-to-get-more-residents-to-the-polls>). This includes, but is not limited to, communications with the following persons and organizations:

- Groups and individuals associated with the "Milwaukee Votes 2022" initiative;
- ACLU of Wisconsin (including any emails to, from, or containing the domain name "aclu-wi.org");
- Greater Milwaukee Foundation (including any emails to, from, or containing the email domain name "@greatermilwaukeefoundation.org");
- Civic Action of Wisconsin (including any emails to, from, or containing the email domain name "citizenactinwi.org");
- Metropolitan Milwaukee Association of Commerce (MMAC) (including any emails to, from, or containing the email domain name "@mmac.org");
- Voces de la Frontera Action, Inc (including any emails to or from the email domain name "@vdlf.org"); and
- Angela Lang, Member of the Milwaukee Safety and Civic Commission.

Please provide all response records from April 1, 2022 through the date the search is conducted.

Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

Please be aware that the Open Records law defines "record" to include information that is maintained on paper as well as electronically, such as data files and unprinted emails. Wis. Stat. § 19.32(2).

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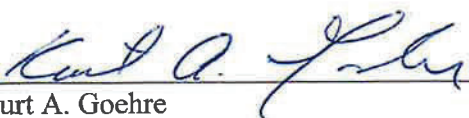
As you know, the law requires you to respond to this request "as soon as practicable and without delay."

If you are not the records custodian for this information, please forward this request to the appropriate person. Also, please let me know if I can clarify or refine this request.

Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

KAG:bld

832215 034: 4345674



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 16, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL & E-MAIL

Claire Woodall-Vogg
Executive Director, City of Milwaukee Elections Commission
200 E Wells Street, Room 501
Milwaukee, WI, 53202
E-mail: cwooda@milwaukee.gov

Re: Follow-Up to September 13, 2022 Open Records Requests

Dear Ms. Woodall-Vogg,

I represent the Republican Party of Wisconsin ("RPW") and the National Republican Senatorial Committee ("NRSC"), and I am following up on two separate open records requests I sent to you on their behalf on September 13, 2022. I have enclosed copies of both open records requests for ease of reference.

As of this letter, I have not received any response to the open records request or confirmation of receipt of the same from your office. In light of the fact that the open records requests are directly related to the administration of the upcoming election in Milwaukee, and the fact that the deadline to send absentee ballots to electors with valid requests on file is next Thursday, September 22, 2022, we request that you respond to each of the open records requests by or before Wednesday, September 21, 2022. If we do not receive an adequate response by the aforementioned date, we will be forced to pursue all legal remedies available under applicable law.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 

Kurt A. Goehre

Enclosures

832215.034: 4352432

EXHIBIT L



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL & E-MAIL

Claire Woodall-Vogg
Executive Director, City of Milwaukee Elections Commission
200 E Wells Street, Room 501
Milwaukee, WI, 53202
E-mail: cwooda@milwaukee.gov

Re: Open Records Request

Dear Ms. Woodall-Vogg,

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Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

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If you are not the records custodian for this information, please forward this request to the appropriate person. Also, please let me know if I can clarify or refine this request.

Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: _____

Kurt A. Goehre

KAG:bld
832215.034: 4345660



Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

Since 1976

September 13, 2022

Attorney Kurt A. Goehre
KAG@lcojlaw.com

VIA REGULAR MAIL & E-MAIL

Claire Woodall-Vogg
Executive Director, City of Milwaukee Elections Commission
200 E Wells Street, Room 501
Milwaukee, WI, 53202
E-mail: cwooda@milwaukee.gov

Re: Open Records Request

Dear Ms. Woodall-Vogg,

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Law Firm of
CONWAY, OLEJNICZAK & JERRY, S.C.

September 13, 2022

Page 2

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Thank you for your time and consideration. Let me know if there are any questions.

Sincerely,

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.

By: 
Kurt A. Goehre

KAG:bld

832215.034: 4345652

TEARMAN SPENCER
City Attorney

ODALO J. OHIKU
ROBIN A. PEDERSON
YOLANDA Y. MCGOWAN
TODD FARRIS
Deputy City Attorneys



Milwaukee City Hall Suite 800 • 200 East Wells Street • Milwaukee, Wisconsin 53202-3551
Telephone: 414.286.2601 • TDD: 414.286.2025 • Fax: 414.286.8550

HEIDI WICK SPOERL
KATHRYN Z. BLOCK
THOMAS D. MILLER
PETER J. BLOCK
ALLISON N. FLANAGAN
PATRICK J. MCCLAIN
HANNAH R. JAHN
JULIE P. WILSON
MEIGHAN M. ANGER
ALEXANDER R. CARSON
ALEX T. MUELLER
ALEXANDER COSSI
LISA A. GILMORE
NICHOLAS R. SINRAM
TAVISS K. SMITH
KATHERINE A. HEADLEY
ANTHONY JACKSON
STACY J. MILLER
MICHAEL RADAVICH
JORDAN SCHETTLE
THERESA MONTAG
TYLER M. HELSEL
NANCY A. DOMINSKI
RYAN J. HARRINGTON
Assistant City Attorneys

(VIA ELECTRONIC MAIL ONLY)

September 19, 2022

Kurt Goehre
Conway, Olejniczak & Jerry, S.C.
231 South Adams St.
Green Bay, WI 54301

Re: Your September 16, 2022, Public Records Requests

Dear Attorney Goehre,

Please accept this correspondence as a response to your September 16, 2022, letters to Milwaukee Mayor Cavalier Johnson and Executive Director of the Milwaukee Election Commission Claire Woodall-Vogg, regarding the public records requests you submitted to both the Mayor's Office and the Milwaukee Election Commission on September 13, 2022.

Both the Mayor's Office and the Milwaukee Election Commission received your requests, have sent you initial receipt emails, and are working in good faith to process your requests. Although each of these authorities will endeavor to accommodate your September 16, 2022, request that any records responsive to your request be provided to you by Wednesday, September 21, 2022, I cannot guarantee that you will receive responsive records by that date.

Although a requester is entitled to a timely response to their public records request, they are not entitled to an immediate one. *Journal Times v. City of Racine Bd. of Police & Fire Comm'rs*, 2015 WI 56, ¶¶ 87, 103. Under Wisconsin's Public Records Law, a request must be responded to "as soon as practical and without delay." Wis. Stat. § 19.35(4)(a). The public records law does not require response within any specific time, such as "three weeks" or "48 hours." Nor is a request considered denied if it is not responded to within an arbitrary time frame set by a requester, such as the September 21, 2022, date that you identified in your last email.

The Attorney General has stated that 10 working days is generally a reasonable time for responding to a simple request for a limited number of easily identifiable records. For requests that are broader in scope, or require location, review or redaction of documents, the Attorney General has stated that a reasonable period of time may be longer. *See* DOJ

EXHIBIT M



Public Records Compliance Outline, October 2019, pg. 15. What's reasonable depends on the totality of the circumstances surrounding a particular request, taking into account the nature of the request, the staff and other resources available to process the request, the extent of the request, and related considerations. *WIREData, Inc. v. Village of Sussex II* (“*WIREData II*”), 2008 WI 69, ¶¶ 57-79, 310 Wis.2d 397.

In this instance, you submitted your requests three working days ago. It is not clear yet whether your requests will be simple requests for a limited number of easily identifiable records, but be advised that your requests are three of 19 requests that have been filed with City of Milwaukee Departments since September 21, 2022, regarding Milwaukee Votes 2022. Departments are attempting to respond to these requests in the order they were received, and requests from Speaker Robin Vos, Senator Duey Strobel and Representative Brandtjen all predated your requests. Some of these requests look like they are going to be closed out in the next 24 hours, but regarding your request specifically, note that an authority doing its due diligence with regard to a request to ensure that nothing is missed, locating and reviewing any responsive records to determine whether anything needs to be redacted pursuant to statute or common law, and performing the public records law balancing test on each individual responsive record, as required by law, takes time. *See Milwaukee Journal Sentinel v. Wis. Dep't of Admin.*, 2009 WI 79, ¶ 56, 319 Wis.2d 439. Also, while responding to public records requests is an important obligation of each department, it is not the only important obligation of the Mayor's Office or the Milwaukee Election Commission, and neither office has a particularly large staff. It is thus difficult to gauge whether all records responsive to your requests will be able to be provided to you within five working days of your requests.

At this time, neither of your requests have been denied. Both the Mayor's Office and the Milwaukee Elections Commission have been, and continue to be, working in good faith to process your requests, and you will receive a final response to your requests as soon as practicable and without delay. If that is an issue for you, you may wish to contact one of the City's two oversight entities, which are the Wisconsin Department of Justice's Office of Open Government, at 608-267-2220, or the Milwaukee County Corporation Counsel, at 414-278-4300.

You also have the ability to file a petition for a writ of *mandamus* in Circuit Court. However, be advised that the Department of Justice has opined that an Authority, such as the Mayor's Office or the Milwaukee Election Commission, should not be subjected to the burden and expense of a premature public records lawsuit while it is attempting in good faith to respond, or to determine how to respond, to a public records request, and the Wisconsin Supreme Court has concurred with that opinion. *See WIREData II*, 2008 WI 69, ¶56, and Wis. Dep't of Justice, Public Records Law Compliance Guide, 16 (Oct. 2019).

Regardless of what actions you take, my clients will continue to process your requests, and the hope is to get you any records that exist that are responsive to your request in the very near future, if not by the date you specified.

If you have any questions regarding the above, or about the status of any of your requests, please feel free to email me at pblock@milwaukee.gov.

Best regards,

Electronically Signed By Peter J. Block

PETER J. BLOCK

Assistant City Attorney

Kurt A. Goehre

From: Block, Peter J. <pblock@milwaukee.gov>
Sent: Thursday, September 22, 2022 4:52 PM
To: Kurt A. Goehre
Cc: Beckie Derouin
Subject: Re: Your September 13th Public Records Requests

Kurt,

If I'm reading your email correctly, you're asking for the Mayor's Office and the Milwaukee Election Commission to release records piecemeal as they're located and reviewed, instead of waiting for all the records to be located and reviewed. I'll relay that request to my clients. Assuming they agree, I don't think it'll take particularly long for either the Mayor's Office or the Elections Commission to prepare the Milwaukee Votes 2022 records for release, draft a partial response letter, and get the first batch of records over to you. Just note that I believe the individual in the Mayor's Office who handles most of their public records requests is out of the office tomorrow.

Peter J. Block
Assistant City Attorney
City Attorney's Office
200 East Wells Street, Suite 800
Milwaukee, WI 53202
Tele: 414-286-6197
Fax: 414-286-8550
E-Mail: pblock@milwaukee.gov

The information in this message is confidential and may be legally privileged. It is intended solely for the addressee. Access to this message by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying or distribution of the message, or any action or omission taken by you in reliance on it, is prohibited and may be unlawful. Please immediately contact the sender if you have received this message in error.

From: Kurt A. Goehre <kag@lcojlaw.com>
Sent: Thursday, September 22, 2022 11:53 AM
To: Block, Peter J. <pblock@milwaukee.gov>
Cc: Beckie Derouin <beckied@lcojlaw.com>
Subject: RE: Your September 13th Public Records Requests

Peter,

Thank you for your response and the information below. To be clear, yes, we do want the records related to the "Milwaukee Votes" (which was subsequently renamed Wisconsin Votes) that was announced in May 2022. Since neither the Mayor's office or the Commission have begun to search for those records, please relay this to each to start that process. I understand that this process has not yet begun and will likely take a bit longer as a result.

However, from your response below, we are still expecting the records relating to the "Milwaukee Votes 2022" to be produced tomorrow by the Mayor's office. Please confirm that is the case despite the above.

Also, can you give me an estimate as to when the Commission will have the records relating to the “Milwaukee Votes 2022”?

Kindest regards,

KURT A. GOEHRE

Partner/Attorney

Law Firm of Conway, Olejniczak & Jerry, S.C.

231 S. Adams Street | P.O. Box 23200

Green Bay, WI 54305

P: 920-437-0476 F: 920-437-2868

E: KAG@lcojlaw.com | lcojlaw.com

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IMPORTANT CONFIDENTIAL NOTICE

The contents of this message, along with any attachments, are confidential and are subject to the attorney-client and/or attorney work-product privileges. If you are the intended recipient, be aware that forwarding or disclosing this communication to a third party may negatively impact protections afforded under the attorney-client and/or work-product privileges. If you are not the intended recipient, please destroy this message immediately and notify the sender that you received this message in error. No permission is given for persons other than the intended recipient(s) to read or disclose the contents of this message.



From: Block, Peter J. <pblock@milwaukee.gov>

Sent: Wednesday, September 21, 2022 5:31 PM

To: Kurt A. Goehre <kag@lcojlaw.com>

Subject: RE: Your September 13th Public Records Requests

Dear Attorney Geohre,

Please accept this correspondence as an update regarding your September 13, 2022, public records requests to the Milwaukee Mayor's Office and the Milwaukee Elections Commission for records related to "Milwaukee Votes 2022." Email searches have been run for any records that are responsive to your requests. The Mayor's Office has already located and reviewed emails from the time period you referenced, after performing a search for any emails sent to or received by any staff member in the Mayor's Office that included the term "Milwaukee Votes 2022." They are currently in the process of determining if there are any non-email records that would also be responsive to your request. The Milwaukee Elections Commission performed a similar search, and is also on track to have emails reviewed, and any non-email records located, in the next few days.

I'm also reaching out because your request asks for records pertaining to an initiative named "Milwaukee Votes 2022," but also references a press conference from May 24, 2022, involving what I believe is a different, but similar, initiative. It's my understanding that the initiative announced in May was initially named "Milwaukee Votes" (no 2022), and was referred to as such in materials provided to the press prior to the May 24, 2022, press conference. Shortly before the press conference, the initiative was renamed "Wisconsin Votes." This initiative is a non-partisan effort that includes a wide range of participants. "Milwaukee Votes 2022," on the other hand, is a similar initiative being run by a local non-profit. The Mayor supports this initiative, but it does not involve the City of Milwaukee receiving any grants or

funding, no City resources are being expended to support the initiative, and the City is not otherwise involved in running or managing the initiative.

In light of the above, as well as how your request was worded, I'm reaching out for clarification to see if your request was only intended to pertain to Milwaukee Votes 2022, or whether you were also interested in the earlier Milwaukee Votes/Wisconsin Votes initiative. If you are only interested in Milwaukee Votes 2022, the Mayor's Office should be able to get you records that are responsive to your request by tomorrow, and the Elections Commission should be able to follow suit shortly thereafter. If you are interested in records pertaining to the other initiative, please let me know and I can let the Mayor's Office and Milwaukee Elections Commission know that they should have the City's IT department run another search.

If you have any questions regarding the above, please feel free to contact me.

Peter J. Block
Assistant City Attorney
City Attorney's Office
200 East Wells Street, Suite 800
Milwaukee, WI 53202
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From: Block, Peter J.
Sent: Monday, September 19, 2022 5:08 PM
To: KAG@lcojlaw.com
Subject: Re: Your September 13th Public Records Requests

Please see the attached letter.

Peter J. Block
Assistant City Attorney
City Attorney's Office
200 East Wells Street, Suite 800
Milwaukee, WI 53202
Tele: 414-286-6197
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