VIA EMAIL

Edward Blazel
Assembly Chief Clerk
17 West Main Street, Room 401
Madison, WI 53703
ted.blazel@legis.wisconsin.gov

Representative Robin Vos
Speaker, Wisconsin State Assembly
State Capitol, Room 217 West
P.O. Box 8923
Madison, WI 53708
Rep.Vos@legis.wisconsin.gov

Re: Public Records Law Request

Dear Chief Clerk Blazel and Speaker Vos:

Pursuant to Wisconsin’s public records law, Wis. Stat. §§ 19.31–19.39, American Oversight makes the following request for copies of records.

On May 26, 2021, Wisconsin State Assembly Speaker Robin Vos indicated that the legislature would hire three former law enforcement officers and a supervising attorney to investigate the November 2020 election. Since the time of this announcement, Speaker Vos has expanded the scope of the investigation, appointing former Wisconsin Supreme Court justice Michael Gableman as “special counsel,” and gaining Assembly approval to spend at least $676,000 in public funds, including budgeting for five investigators and $325,000 for a data analysis contractor. With Speaker Vos’s approval, Gableman has issued a number of demands for records to municipal and county clerks and summoned local officials for interviews.

American Oversight seeks records with the potential to shed light on the Wisconsin Assembly's investigation of the November 2020 election.

**Requested Records**

American Oversight requests that Speaker Vos and the Wisconsin Assembly produce the following records "as soon as practicable and without delay":

Please provide all responsive records described below from September 15, 2021, through the date the search is conducted:

A. All electronic communications (including emails, email attachments, text messages, or messages on messaging platforms, such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp) between (i) the Wisconsin Assembly's investigators, including any investigators engaged by the Office of Special Counsel, as well as overseeing attorney and Special Counsel Michael Gabler; and (ii) any other contractor or agent of the Wisconsin Assembly charged with investigating the November 2020 election, including but not limited to, investigators or attorneys directly employed by the Wisconsin Assembly, or subcontractors, assistants, consultants, counsel, formal or informal advisors, temporary workers, unpaid volunteers, or external funders.

B. All calendars or calendar entries regarding the legislature's investigation of the November 2020 election and maintained by or on behalf of the Wisconsin Assembly's investigators, including any investigators engaged by the Office of Special Counsel, as well as overseeing attorney and Special Counsel Michael Gabler.

American Oversight requests that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars; we request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used to track or coordinate how these individuals allocate their time related to the investigation of the November 2020 election.

This request seeks records in addition to, and not duplicative of, records previously sought by American Oversight. In all cases, responsive records include records that were "produced or collected" under any contract entered by the Speaker Vos and/or the Wisconsin Assembly.

---

* Wis. Stat. Ann. § 19.36(3) (“Each authority shall make available for inspection and copying under s. 19.35(1) any record produced or collected under a contract entered into by the authority with a person other than an authority to the same extent as if the record were maintained by the authority.”).
To be clear, this request seeks the records substantively described in Parts B and C of American Oversight’s request identified as W-REP-21-1201, directed to Speaker Vos and the Assembly from the period after that request was submitted — i.e., from September 15, 2021, through the date of the search— with modifications to account for recent events. See https://www.americanoversight.org/document/records-request-to-wisconsin-assembly-seeking-additional-communications-regarding-elections-investigation

Fee Waiver Request

In accordance with Wis. Stat. § 19.35(3)(e), American Oversight respectfully requests that the records be produced without charge. Providing American Oversight with a waiver of fees is in the “public interest” because American Oversight will, in accordance with its organizational mission, make the records available to the public without charge. These disclosures will likely contribute to a better understanding of relevant government procedures by the general public.

American Oversight’s work is aimed solely at serving the public interest. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. Rather, American Oversight’s mission is to serve the public by promoting transparency in government, educating the public about government activities, and ensuring the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.

The public has a significant interest in the Wisconsin Assembly’s investigation of the November 2020 election. Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including the role of contractors in conducting the Assembly’s investigation. American Oversight is committed to transparency and makes the responses agencies provide to

---


9 See supra, notes 1 & 2.
public records requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

American Oversight asks that if its request for a fee waiver is denied in whole or in part, that you contact us prior to incurring any costs.

**Guidance Regarding the Search & Processing of Requested Records**

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

Please search all locations and systems likely to have responsive records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails conducting government business sent or received on the personal account of the authority’s officer or employee constitutes a record for purposes of Wisconsin's public records laws.\(^\text{10}\)

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.\(^\text{11}\) If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

American Oversight expects that you have ensured all responsive records and records relevant to this request and your compliance with it are retained as required by Wisconsin law. Please take all appropriate steps to ensure that no such records are deleted by the agency before the completion of processing for this request. If records potentially responsive or relevant to this request, or your compliance with it, are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

---


\(^{11}\) Wis. Stat. § 19.36(6).
Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1050 15th Street NW, Suite B265, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Sarah Colombo at records@americanoversight.org or (202) 589-5244. Also, if American Oversight’s request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Sarah Colombo
Sarah Colombo
on behalf of
American Oversight
VIA EMAIL

Michael Gableman
Office of Special Counsel
200 South Executive Drive, Suite 101
Brookfield, WI 53005
couns@wispecialcounsel.org

Re: Public Records Law Request

Dear Special Counsel Michael Gableman:

Pursuant to Wisconsin's public records law, Wis. Stat. §§ 19.31–19.39, American Oversight makes the following request for copies of records.

On May 26, 2021, Wisconsin State Assembly Speaker Robin Vos indicated that the legislature would hire three former law enforcement officers and a supervising attorney to investigate the November 2020 election. Since the time of this announcement, Speaker Vos has expanded the scope of the investigation, appointing former Wisconsin Supreme Court justice Michael Gableman as "special counsel," and gaining Assembly approval to spend at least $676,000 in public funds, including budgeting for five investigators and $325,000 for a data analysis contractor. With Speaker Vos's approval, Gableman has issued a number of demands for records to municipal and county clerks and summoned local officials for interviews.

American Oversight seeks records with the potential to shed light on the Wisconsin Assembly's investigation of the November 2020 election.

Requested Records

American Oversight requests that your office produce the following records "as soon as practicable and without delay":

Please provide all responsive records described below from September 15, 2021, through the date the search is conducted:

A. All electronic communications (including emails, email attachments, text messages, or messages on messaging platforms, such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp) between (i) Michael Gableman or anyone communicating on his or the Office of Special Counsel's behalf; and (ii) any other contractor or agent of the Wisconsin Assembly charged with investigating the November 2020 election, including but not limited to, investigators or attorneys directly employed by the Wisconsin Assembly, or subcontractors, assistants, consultants, counsel, formal or informal advisors, temporary workers, unpaid volunteers, or external funders.

B. All calendars or calendar entries regarding the legislature's investigation of the November 2020 election and maintained by or on behalf of the Wisconsin Assembly's investigators, including any investigators engaged by the Office of Special Counsel, as well as overseeing attorney and Special Counsel Michael Gableman.

American Oversight requests that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars; we request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used to track or coordinate how these individuals allocate their time related to the investigation of the November 2020 election.

This request seeks records in addition to, and not duplicative of, records previously sought by American Oversight. In all cases, responsive records include records that were "produced or collected under any contract entered by the Speaker Vos and/or the Wisconsin Assembly.

---

* Wis. Stat. Ann. § 19.96(3) ("Each authority shall make available for inspection and copying under s. 19.35(1) any record produced or collected under a contract entered into by the authority with a person other than an authority to the same extent as if the record were maintained by the authority.").
To be clear, this request seeks the records substantively described in Parts B and C of American Oversight's request identified as WI-REP-21-1302, directed to Michael Gableman, from the period after that request was submitted—i.e., from September 15, 2021, through the date of the search—with modifications to account for recent events. For ease of reference, that request is attached here. See Attachment A. In the abundance of caution, American Oversight notes that the request at Attachment A should be interpreted as specifically directed to the Office of Special Counsel in addition to Michael Gableman.

Fee Waiver Request

In accordance with Wis. Stat. § 19.85(3)(e), American Oversight respectfully requests that the records be produced without charge. Providing American Oversight with a waiver of fees is in the “public interest” because American Oversight will, in accordance with its organizational mission, make the records available to the public without charge. These disclosures will likely contribute to a better understanding of relevant government procedures by the general public.

American Oversight’s work is aimed solely at serving the public interest. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. Rather, American Oversight’s mission is to serve the public by promoting transparency in government, educating the public about government activities, and ensuring the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.

The public has a significant interest in the Wisconsin Assembly's investigation of the November 2020 election. Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including the role of contractors in conducting the Assembly’s investigation. American

---


9 See supra, notes 1 & 2.
Oversight is committed to transparency and makes the responses agencies provide to public records requests publicly available, and the public’s understanding of the government’s activities would be enhanced through American Oversight’s analysis and publication of these records.

American Oversight asks that if its request for a fee waiver is denied in whole or in part, that you contact us prior to incurring any costs.

**Guidance Regarding the Search & Processing of Requested Records**

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term “record” in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

Please search all locations and systems likely to have responsive records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails conducting government business sent or received on the personal account of the authority’s officer or employee constitutes a record for purposes of Wisconsin’s public records laws.\(^{10}\)

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.\(^{11}\) If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

American Oversight expects that you have ensured all responsive records and records relevant to this request and your compliance with it are retained as required by Wisconsin law. Please take all appropriate steps to ensure that no such records are deleted by the agency before the completion of processing for this request. If records potentially responsive or relevant to this request, or your compliance with it, are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

---


\(^{11}\) Wis. Stat. § 19.36(6).
Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Sarah Colombo at records@americanoversight.org or (202) 869-6244. Also, if American Oversight’s request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Sarah Colombo
Sarah Colombo
on behalf of
American Oversight
EXHIBIT A
September 15, 2021

VIA EMAIL

Consulate, LLC
c/o Michael Gableman, President
P.O. Box 310161
New Berlin, WI 53151
mgableman@yahoo.com

Re: Public Records Law Request

Dear Michael Gableman:

Pursuant to Wisconsin’s public records law, Wis. Stat. §§ 19.31–19.39, American Oversight makes the following request for copies of records.

On May 26, 2021, Wisconsin State Assembly Speaker Robin Vos indicated that the legislature would hire three former law enforcement officers and a supervising attorney to investigate the November 2020 election.¹ Since the time of this announcement, Speaker Vos has expanded the scope of the investigation, appointing former Wisconsin Supreme Court justice Michael Gableman as “special counsel,” and gaining Assembly approval to spend at least $876,000 in public funds, including budgeting for five investigators and $325,000 for a data analysis contractor.² Speaker Vos also has indicated that he is willing to authorize subpoenas requested by Michael Gableman.³

American Oversight seeks records with the potential to shed light on the Wisconsin Assembly’s investigation of the November 2020 election, including regarding the role and activities of contractors who are performing work in furtherance of that investigation.

Requested Records

American Oversight requests that Speaker Vos and the Wisconsin Assembly produce the following records "as soon as practicable and without delay":*

All records substantively described in items B & C of the request identified as WIEXT-21-1127 from the period after that request was submitted—i.e., from August 12, 2021, through the date of the search. For clarity, the records requested are reproduced, with modifications to account for newly identified information, as follows:

B. All electronic communications (including emails, email attachments, text messages, or messages on messaging platforms, such as Slack, GCChat or Google Hangouts, Lync, Skype, or WhatsApp) between (i) former justice Michael Gableman, or anyone communicating on his behalf, such as an administrative assistant, or any individual designated or engaged as an investigator, including, but not limited to Steven Page, and (ii) any other contractor or agent of the Wisconsin Assembly charged with investigating the November 2020 election, including but not limited to, investigators or attorneys directly employed by the Wisconsin Assembly, or subcontractors, assistants, consultants, counsel, formal or informal advisors, temporary workers, unpaid volunteers, or external funders.

C. All calendars or calendar entries regarding the legislature's investigation of the November 2020 election and maintained by or on behalf of the Wisconsin Assembly's investigators, including former justice Michael Gableman, anyone acting as administrative assistant, or any investigators contracted by the Wisconsin Assembly or by former justice Gableman, including but not limited to Steven Page.

American Oversight requests that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars; we request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used to track or coordinate how these individuals allocate their time related to the investigation of the November 2020 election.

This request seeks records in addition to, and not duplicative of, records previously sought by American Oversight. In all cases, responsive records include records that

---

* To be clear, the August 12, 2021 request referenced above seeks records from the period of July 90, 2021, through the date the search is conducted. This request seeks the same types of records from August 12, 2021, through the date the search is conducted. See https://www.americanoversight.org/document/public-records-request-to-contractor-michael-gableman-seeking-communications-regarding-election-investigation.
were "produced or collected" under any contract entered by the Speaker Vos and/or the Wisconsin Assembly.6

Fee Waiver Request

In accordance with Wis. Stat. § 19.35(3)(e), American Oversight respectfully requests that the records be produced without charge. Providing American Oversight with a waiver of fees is in the "public interest" because American Oversight will, in accordance with its organizational mission, make the records available to the public without charge. These disclosures will likely contribute to a better understanding of relevant government procedures by the general public.

American Oversight’s work is aimed solely at serving the public interest. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. Rather, American Oversight’s mission is to serve the public by promoting transparency in government, educating the public about government activities, and ensuring the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media.7 American Oversight also makes materials it gathers available on its public website8 and promotes their availability on social media platforms, such as Facebook and Twitter.9

The public has a significant interest in the Wisconsin Assembly’s investigation of the November 2020 election.10 Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including the role of contractors in conducting the Assembly’s investigation. American Oversight is committed to transparency and makes the responses agencies provide to public records requests publicly available, and the public’s understanding of the

---

6 Wis. Stat. Ann. § 19.36(3) ("Each authority shall make available for inspection and copying under s. 19.35(1) any record produced or collected under a contract entered into by the authority with a person other than an authority to the same extent as if the record were maintained by the authority.").
10 See supra, notes 1 & 2.
government’s activities would be enhanced through American Oversight’s analysis and publication of these records.

American Oversight asks that if its request for a fee waiver is denied in whole or in part, that you contact us prior to incurring any costs.

**Guidance Regarding the Search & Processing of Requested Records**

American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term “record” in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, faxes, telephones, messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. **No category of material should be omitted from search, collection, and production.**

Please search all locations and systems likely to have responsive records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails conducting government business sent or received on the personal account of the authority’s officer or employee constitutes a record for purposes of Wisconsin’s public records laws.11

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.12 If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

American Oversight expects that you have ensured all responsive records and records relevant to this request and your compliance with it are retained as required by Wisconsin law. Please take all appropriate steps to ensure that no such records are deleted by the agency before the completion of processing for this request. If records potentially responsive or relevant to this request, or your compliance with it, are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

---

12 Wis. Stat. § 19.36(6).
Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B256, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Sarah Colombo at records@americanoversight.org or (202) 869-5244. Also, if American Oversight’s request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Sarah Colombo
Sarah Colombo
on behalf of
American Oversight
November 12, 2021

Michael Gablenu
Office of Special Counsel
200 South Executive Drive, Suite 101
Brookfield, WI 53005
ogs@wispecialcounsel.org

Re: Outstanding Open Records Requests

Dear Special Counsel Gablenu:

American Oversight has seven open records requests pending with the Office of Special Counsel (OSC) but has received no communication whatsoever with respect to six of them, and only an acknowledgement of receipt of the seventh. As you know, the OSC has an obligation to respond to these requests “as soon as practicable and without delay,” Wis. Stat. § 19.35(4), yet recent developments suggest responses to our requests may not be forthcoming. I write today to identify the requests for which we have not received a response and to seek confirmation that you will promptly comply with Wisconsin law.

Since the constitution of the OSC at the end of August, American Oversight has submitted open records requests (the “Requests”) as follows:

- WI-REP-21-1296, submitted September 15, 2021
- WI-REP-21-1299, submitted September 15, 2021
- WI-REP-21-1302, submitted September 15, 2021
- WI-EXT-21-1438, submitted October 15, 2021
- WI-EXT-21-1494, submitted October 26, 2021
- WI-EXT-21-1496, submitted October 26, 2021
- WI-EXT-21-1498, submitted October 26, 2021

The October 26 Requests seek the records substantively described in the September 15 Requests, but for the additional time period of September 15 through the date of the search. The October 26 Requests attached the corresponding September 15 Requests, which American Oversight sent to you directly, and note that, like the October 15 and
Special Counsel O'Malley
Page 2 of 3

28 Requests, the September 15 Requests should be treated as also submitted to the OSC (which we understand you were overseeing at that time).¹

To date, the OSC has acknowledged only one of these Requests. In response to the request identified as WI-EXT-21-1438, submitted on October 15, American Oversight received an email from Zakory Niemierowicz the same day stating in full: "We have received your latest open records request sent on October 15th, we acknowledge this request and will send a response letter once our personal [sic] in charge of open records responses [sic] returns to the office." It has now been four weeks since Mr. Niemierowicz’s email and American Oversight has received no further communications about WI-EXT-21-1438 or any of its other Requests.

Notably, during your November 10, 2021 testimony before the Assembly Committee on Campaigns and Elections, you refused to share basic information about the investigation such as the names of OSC personnel, stating such information "shouldn’t be shared in real time."² Your efforts to cloak your investigation in secrecy raise serious concerns regarding whether the OSC will comply with Wisconsin’s open records law.

American Oversight is committed to working cooperatively with your office, but we cannot wait indefinitely for a response to our Requests, particularly when it appears that substantive responses may not forthcoming, let alone "as soon as practicable and without delay." As you may be aware, on November 5, 2021, Judge Bailey-Rihn of the Dane County Circuit Court stated that records responsive to open records requests that were created after the constitution of the OSC "should be produced by the subunit at that time."³ Unwarranted delays in releasing public records thwart the core purposes of the open records law, as the United States Court of Appeals for the District of Columbia wrote regarding the federal Freedom of Information Act, "stale information is of little value." Payne Enters., Inc. v. United States, 837 F.2d 486, 494 (D.C. Cir. 1988).

Judge Bailey-Rihn also stated:

³ There is a presumption of openness. Wisconsin public records law declares it is "an essential function of the representative government to provide public records." That’s Wis. Stat. Section 19.31. This is "one of the strongest declarations of policy to be found in the Wisconsin

¹ On October 7, 2021, we received several letter acknowledgements from the OSC stating that "[T]he Office of Special Counsel (OSC) received" requests from American Oversight dated July 19, July 20, and August 12, 2021. As the OSC did not exist at the time of those requests, we assume the acknowledgement letters refer to the requests that we submitted directly to you on those dates. In any event, despite the letters indicating that the OSC would respond "more substantively... in all prudent speed," the OSC has not made any further response.


³ Transcript of Motion Hearing ("Tr.") at 26:12–13, American Oversight v. Fox, No. 21-CV-9440 (Nov. 5, 2021).
Special Counsel Gableman
Page 3 of 3

Statutes," Zellner versus Cedarburg School District, 2007 WI 63. To that
end it's stated, "The denial of public access generally is contrary to the
public interest, and only in an exceptional case may access be denied."

Accordingly, American Oversight requests that the OSC either fulfill the Requests or
notify American Oversight of any denials as soon as practicable and without delay. If
your office continues to violate its obligations under Wisconsin’s open records law,
American Oversight may resort to legal action to enforce our rights. Wis. Stat.
§ 19.37(1)(a).

Finally, as stated in each of the Requests, we expect that you and the OSC are taking all
appropriate steps to ensure no responsive records or records relevant to the Requests or
your compliance with them are deleted, including by instituting a litigation hold. See
Wis. Stat. § 19.85(5); Am. Family Mut. Ins. Co. v. Gelbe, 2009 WI 81, ¶ 21, 319 Wis. 2d
597, 411, 768 N.W.2d 799, 735 ("Every party or potential litigant is duty-bound to
preserve evidence essential to a claim that will likely be litigated.").

Thank you for your prompt attention to this matter.

Sincerely,

Sarah Colombo
Counsel
American Oversight

CC (via email):

Christa Westerberg
Pines Bach LLP
Cwesterberg@pinesbach.com

* Tr. at 25.
Subject: Open Records Request through December 1st
Date: Saturday, December 4, 2021 at 3:03:06 PM Eastern Standard Time
From: Coms
To: Patrick.marley@jrn.com, AO Records, bspahn@gklaw.com
CC: Coms

EXTERNAL SENDER
Coms has shared OneDrive for Business files with you. To view them, click the links below.
➡️ open records part 2.pdf  ➡️ open records part 3.pdf  ➡️ Open records request.pdf

Good Afternoon,

Attached are the open records for the Office of Special Counsel up until December 1st, 2021. Some documents that contain strategic information to our investigation will continue to be held until the conclusion of our investigation. If you have any questions or concerns please feel free to contact our office at coms@wispecialcounsel.org

Very Respectfully,

Zakory Niemierowicz
WI Special Counsel
From: 3
Sent: Wednesday, December 1, 2021 5:52 PM
To: Cons
Subject: Open Records PDF's from Carol - #1

See attached.
From: 3
Sent: Wednesday, December 1, 2021 5:53 PM
To: Coms
Subject: Open Records PDF's from Carol - email #3

See attached.
From: 3
Sent: Wednesday, December 1, 2021 5:56 PM
To: Coms
Subject: Open Records PDF's from Carol - #4 Last Email
Re: EXTERNAL : Re: Scheduling of PMK Deposition/City of Kenosha

3 <3@wispecialcounsel.org>
Tue 10/19/2021 4:08 PM
To: Matthew Knight <matthew.knight@kenosha.gov>
Cc: Bryan Charboigian <bcharboigian@cityofkenosha.com>

You are correct: two subpoenas, one for the Mayor, one for PMK. Right now, we've rescheduled both for 11/9 at 0930. No one need appear this Friday.

We will discuss the particulars in the next week or two regarding the actual depositions that have been rescheduled.

Thank you,
Carol

From: Matthew Knight <matthew.knight@kenosha.gov>
Sent: Tuesday, October 19, 2021 4:02 PM
To: 3 <3@wispecialcounsel.org>
Cc: Bryan Charboigian <bcharboigian@cityofkenosha.com> <6@wispecialcounsel.org>
Subject: EXTERNAL : Re: Scheduling of PMK Deposition/City of Kenosha

Carol:

Just to confirm my understanding, there are no depositions scheduled for this Friday, November 22nd.

Atty. Charboigian just advised me that originally there were 2 subpoenas served for this Friday, one for the PMK and one for the City of Kenosha Mayor. I had thought the subpoena for the City's Mayor was for the 15th and had previously been resolved and would be rescheduled if necessary.

Could you please confirm that the Mayor need not appear on Friday the 22nd.

Matthew A. Knight
Deputy City Attorney
City of Kenosha
625 - 52nd Street, Rm 201
Kenosha, WI 53140
Ph. (262)693-4170
Fax (262)925-5933
Confirming our conversation of today, we have rescheduled the deposition of the PMK for the City of Kenosha to November 9, 2021 at 0930. We anticipate a discussion prior to that date to discern who may best be produced to respond to the deposition subpoena.

Thank you,
Carol

Office of the Wisconsin Special Counsel

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: WisconsinEye Basic Activation

WisconsinEye <info@wiseye.org>
Tue 11/30/2021 6:15 PM
To: 3 <@wispecialcounsel.org>

You are subscribed to the Basic subscription level.

If you have any questions, please email info@wiseye.org.

Thank you!

WisconsinEye

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: Subpoena Return Date

Bryan Charbogian <bcharbogian@kenosha.org>
Tue 11/2/2021 4:33 PM
To: 3 <j@wisppecialcounsel.org>; 6 <b@wispicialcounsel.org>
Cc: Matthew Knight <mknight@kenosha.org>

Carol and Andrew,

Please see the attached letter.

Best,
Bryan Charbogian

Bryan A. Charbogian
Assistant City Attorney
Office of the City Attorney
625 52nd Street
Kenosha, Wisconsin 53140-3480
262-653-4270

The City of Kenosha is subject to Wisconsin Statutes related to public records. Unless otherwise exempted from the public records law, senders and receivers of City email should presume that the email are subject to release.

Pursuant to the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2522, the contents of this e-mail and the attachments hereto are confidential and privileged, and are intended only for disclosure to and use by the intended recipient of this message. If you are not the intended recipient of this message, the receipt of this message is not intended to and does not waive any applicable confidentiality or privilege and you are hereby notified that any dissemination, distribution, printing or copying of such contents is strictly prohibited. If you are not the intended recipient, please notify us by telephone or e-mail and delete this e-mail from your system.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Court Reporter Request

3 <3@wispecialcounsel.org>
Tue 10/12/2021 12:04 PM
To: stenosue@gmail.com

Hello: I spoke to you this morning regarding a court reporter for Friday, October 15 at 0900, location 200 S. Executive Drive, Brookfield, WI. Tel. 262-259-2899.

We have subpoenas issued and would like to take statements under oath. 1-6 subpoenas.

Thank you,

Carol

Wisconsin Special Counsel
Michael J. Gableman
EDUCATION:

Washington State University Graduated 1977, BS CRIMINAL JUSTICE/Police Science & Administration

Columbia Basin College Graduated, 1971, Associated Arts & Sciences

University of Illinois, 1973 Graduated from Basic Law Enforcement Training

TRAINING:

Basic Law Enforcement Training, University of Illinois, July 1972
Forensic Investigations, Washington State University 1971-1973
Numerous Continuing Education training courses as required by Minnesota Licensing for Investigators from 1998 through 2009
Advanced Ergonomics Application: University of Michigan 1996

Additional extensive training seminars for various investigative needs to numerous list here can be provided upon request.

WORK EXPERIENCE:

Police Officer, City of Highland Park, Illinois, June 1973 through March of 1979 Duties included uniform work responding to all calls. Violent Crime investigations and service as Tactical Officer (SWAT)

Founded Kimberly Security 79 to 80, developed Computer disaster planning and policy's

Underwriter: October 1980 to 1983 SHAND MOREHAN & CO. Evanston Illinois, Responsability included the security underwriting for the UNAUTHROIZED ACCESS POLICY, (First computer policy underwritten by Lloyds of London.
Edward E. Chaim

Objective:

Retired Milwaukee Police Detective with over 25 years of law enforcement experience, looking to obtain a position as an Investigator for the Wisconsin Office of Special Counsel.

Employment:

August 2021 to Present: Process Investigator (Part Time), Milwaukee County District Attorney's Office.

- Responsible for locating victims and witnesses and serving them with state subpoenas for courts.
- Establishing good relationships with victims and witnesses to ensure their cooperation during current and future court proceedings.
- Effecting arrests of absconding witnesses as ordered by the courts.
- Researching different databases and inquiring with multiple agencies to obtain information on victims and witnesses, in an effort to locate them.

June 2007 to March 2021: Detective, Milwaukee Police Department, Criminal Investigation Bureau.

- Responsible for investigating different types of felony crimes, with a focus on robberies to financial institutions, business robberies and crimes against persons.
- Lead investigator in thousands of investigations, taking over investigations from start to finish; interviewing victims and witnesses; and also interrogating suspects, with an emphasis on building solid cases for prosecution.
- Prepared police reports, search warrants, subpoenas for records and affidavits for courts relating to my investigations.
- Presented cases to the Milwaukee County District Attorney's Office for criminal prosecution.
- Prepared case files for discovery and turned over evidence for courts.
- Testified as a credible witness in both court and administrative proceedings.
• Chaired criminal trials alongside Milwaukee County Assistant District Attorneys and an Assistant Attorney General from the State of Wisconsin.

• Worked alongside other police departments, federal government agencies and other private entities, exchanging information and coordinating activities to conduct thorough and complete investigations.

• Fully bilingual. Can speak, read and write in both English and Spanish.

• Spanish Interpreter/Translator for the Milwaukee Police Department.

May 1996 to June 2007: Police Officer, Milwaukee Police Department, District #2.

• Patrolled the streets of the southside of Milwaukee, enforcing the Wisconsin State Statutes and city of Milwaukee Ordinances, preserving the public peace and order; and preventing and detecting crime.

• Responded to all types of calls for services, including high stress and unpredictable situations, which required critical thinking and problem solving.

• Defused numerous situations involving hostile and combative subjects, using verbal techniques and other de-escalating methods.

• Certified in OWI detection and Standard Field Sobriety Testing, Radar and Laser Speed Detection Devices and Electronic Control Devices (Taser).

• Worked as a Field Training Officer.

Awards:

• Investigative Achievement Award, United States Attorney’s Office, Eastern District of Wisconsin.

• Distinguished Service Award, Milwaukee Police Department, Milwaukee, Wisconsin.

Education:

1991 to 1995: Inter American University, Bachelor of Arts, Criminal Justice; May 29, 1995.

References:

Furnished upon request.
### Core Competencies
- Excellent writing and research skills (WestlawNext)
- In depth understanding of legal concepts.
- Extensive litigation experience.
- Extensive contract drafting and litigation prevention.
- Core ethical theory recognition and application.
- Implement, apply, and advise others on application of rules of ethics for attorneys.
- Quickly process, organize, and use new or developing information.

### Notable Cases
- **Lunden Roberts v. Robert Hunter Biden** (DR-19-187) (obtained substantial child support award from the President Joe Biden’s child for the support of President Biden’s grandchild).
- **Donald Trump, et. al. vs. Joseph Biden, et. al.** (2020 WI 91) (represented President Trump at Dane County recount, in Wisconsin state court, and on a petition for certiorari to the United States Supreme Court).
- **People vs. Aguilar** (Colo.) (admitted pro hac vice as lead counsel and obtained a jury acquittal of Army veteran.)
- **Bennett v. City of Haskell, Arkansas** (Ark.) (obtained federal jury verdict for woman sexually assaulted by on-duty police officer).
- Attorney for twenty reported cases from the Arkansas Supreme Court and Arkansas Court of Appeals, including:
  - **Clark v. Clark** (2017 Ark. 612) (constitutional due process issue in an adoption case).

### Certifications, Admissions, Licenses
- Admitted, Arkansas Bar in 2011
- Admitted, United States District Court for the Eastern and Western Districts of Arkansas, 2011
- Admitted, United States Bankruptcy Courts for the Eastern and Western Districts of Arkansas, 2011

### Education
- **Univ. of Ark. at Little Rock, William H. Bowen School of Law**  
  - Juris Doctor, May 2011
  - UALR Law Review, Associate Editor, Volume Thirty-Three (2010-11)
  - UALR Law Review, Apprentice, Volume Thirty-Two (2009-10)
  - Reasoning, Writing, and Advocacy: Top Paper, Appellate Court Brief (Spring 2009)
  - Law and Economics: Top Paper (Spring 2011)

- **University of Arkansas at Little Rock**  
  - B.A., Philosophy, May 2008
Professional Experience

Aug. 2021—Present.  
SALINE COUNTY, ARKANSAS, BOARD OF ELECTION COMMISSIONERS  
Commissioner and Board Member, Republican Party Designee  
Republican member of county election commission. Currently oversee all elections and election related issues in Saline County, Arkansas. Acts as decision maker and finder of fact for issues during an election dispute. In charge of redistricting of county justice of the peace and school board districts.

* * * * *

LANCASTER & LANCASTER LAW FIRM, PLLC  
Managing Partner, COO  
Founded law firm with spouse’s MBA student loan money and no additional outside assistance the next day after passing the bar exam. Serve as the lead attorney for all courtroom litigation and appellate matters. Develop, control, and implements all litigation strategies. Responsible for matters in all State courts and all federal trial courts. Have tried over 1500 cases in a courtroom setting. Courtroom litigation strategies helped to push the firm over the one-million-dollar mark in profits.

* * * * *

2010—2011  
SOUTHWEST POWER POOL REGIONAL ENTITY  
LITTLE ROCK, ARK.  
Law Clerk/Attorney  
Managed legal claims against electrical generation facilities for violations of NERC Reliability Standards. Settled claims or initiated litigation against registered entities relating to their violations. Drafted the SPP RE proposed changes to the NERC Rules of Procedure.

* * * * *

2010  
JAMES LAW FIRM, P.A.  
LITTLE ROCK, ARK.  
Law Clerk  
Assisted in the defense of major crimes including capital murder, murder, and drug offenses.

* * * * *

2010  
MITCHELL, WILLIAMS, SELIG, GATES, & WOODYARD, PLLC  
LITTLE ROCK, ARK.  
Law Clerk  
Performed legal research on regulatory matters.

* * * * *

2009  
WRIGHT, LINDSEY, & JENNINGS LLP  
LITTLE ROCK, ARK.  
Law Clerk  
Performed legal research on litigation matters.

* * * * *

2009  
THE HENRY FIRM, P.A.  
LITTLE ROCK, ARK.  
Law Clerk  
Compiled comprehensive research. Drafted appellate briefs for submission to the Arkansas Court of Appeals.

* * * * *

2001—2006  
UNIV. OF CENTRAL ARK. POLICE DEPT.  
Conway, ARK.
Sworn and certified law enforcement officer in the patrol division for both UCA and the Faulkner County Sheriff's Department. Responded to calls service. Supervised lower ranking officers. Trained new recruits both pre and post law enforcement academy attendance in patrol tactics, traffic stops, active shooter response, and general patrol.

**Personal and Professional Recognitions**

2014 Nationally Ranked Top 10 Attorneys Under 40 by the National Association of Family Law Attorneys

2015 Nationally Ranked Top 10 Attorneys Under 40 by the National Association of Family Law Attorneys

2016 Nationally Ranked Top 10 Attorneys Under 40 by the National Association of Family Law Attorneys

Ranked as One of the Ten Best Law Firm’s in Client Satisfaction by American Institute of Family Law Attorneys for 2014.

Ranked as One of the Ten Best Law Firm’s in Client Satisfaction by American Institute of Family Law Attorneys for 2015.

Ranked as One of the Ten Best Law Firm’s in Client Satisfaction by American Institute of Personal Injury Attorneys for 2016.

Named of the “Top Attorneys” by Arkansas Life Magazine (2016 and 2018)

2017 Best of the Best Reader’s Choice Award by the Saline Courier (attorney and law firm)

The National Trial Lawyers Top 100 Attorneys in Criminal Defense for 2016


America’s Top 100 Attorney’s Lifetime Achievement Award

National Academy of Jurisprudence Premier 100 Attorneys for 2016

“Superb” Rating by AVVO.

Seen on ABC’s 20/20

Completed Great White Shark Dive (Gaansbaai, South Africa—Shark Alley), 2011

Finisher, IronMan 70.3 (San Juan, Puerto Rico, 2017).

Finisher, IronMan 70.3 (OSCHNER, New Orleans, 2016).

Founder, The Lancaster Animal Project, Inc. (501(C)(3)

Former United States Marine.

Father of two children (girls)

Former Professional Bull Rider.

**Publications**


October 31, 2021

Mr. Gableman,

Per your request, I have enclosed a copy of my resume. As you will see, I have significant experience in initiating and overseeing criminal investigations from start to finish. I excel at working on my own, as well as in a team environment.

Based on my qualifications, professional achievements, and the responsibilities of this role, I am seeking a salary of between $40 - $50 per hour. Note that we can still negotiate based on your budget and requirements.

Thank you,

[Signature]

Thomas Obregon
THOMAS J. OBREGON

PROFESSIONAL EXPERIENCE

Milwaukee Police Department (9/1994 – 11/2019)

- Retired from Milwaukee Police Department after 25 years and two months of service.
- Detective – Special Investigations Division (1/2017 – 11/2019)
- Promotion to Detective (8/2007)


- Medical Assistant at Dr. Pietro's Pediatric Clinic – Milwaukee.


- PCS to 4th Infantry Division, 2/12th Infantry Division, Fort Carson, Colorado (1991-1992)
- Deployment to Saudi Arabia/Iraq for Operation Desert Storm (1990-1991)
- Deployment to Vilseck, West Germany, 1st Armored Division 1-37 Armor Battalion, assigned to Delta Company 1-37 AR. Canadian Armor Trophy Team (1988)
- United States Army – Basic Training (1987)


- Warehouse Worker – Sports Novelties Inc., Duncanville, Texas

AWARDS AND COMMENDATIONS

- Black Medallion of the Order of St. George (September 2021). From the US Cavalry and Armor Association for outstanding record as a trooper and leader of Cavalry and Armor.
- Milwaukee Police Department's Distinguished Service Award (November 2019). For dedicated and loyal service to the City of Milwaukee.
• Milwaukee Police Association 25 Year Service Certificate (September 2019). For twenty-five years of satisfactory and honorable police service with the Milwaukee Police Department.

• Milwaukee Police Department Meritorious Service Award (May 2019). Negotiated with a subject wanted on several felony warrants who was suicidal and holding a knife to his throat. After five hours of negotiations, the subject dropped his weapon and surrendered.

• Milwaukee Police Department Meritorious Service Award (May 2018). Investigated a sexual assault/kidnapping incident of a nurse in downtown Milwaukee and identified, located, and arrested the suspects. Suspects were travelling contractors who were tracked to Kentucky.


• Milwaukee Police Department’s Meritorious Service Award (May 2009). While assigned to the Homicide Division, assisted in achieving a 94 percent clearance rate, one of the highest clearance rates in the nation.

• Department of the Army Commendation Medal (August 1993). For exceptional meritorious service while assigned to Headquarters and Headquarters Company, 2nd Battalion, 12th Infantry.

• Department of the Army Good Conduct Medal (August 1992). For exemplary behavior, efficiency, and fidelity in active federal military service.

• Army Achievement Medal (January 1992). For meritorious achievement during Task Force 2-12 Infantry’s National Training Center Rotation 92-04.

• Army Achievement Medal (October 1991). For meritorious achievement during the 2-12 Infantry train up and evaluation at Pinion Canyon maneuver site.

• Army Commendation Medal (February 1991). For meritorious achievement in combat operations during the period 17 January 1991 to 28 February 1991 while serving with HHC, 1st Battalion, 37th Armor, 3rd Brigade, 1st Armored Division, deployed to Southwest Asia during Operation Desert Storm. Assisted the United Nations Coalition in liberating the Republic of Kuwait from Iraqi Armed aggression.

• United States Army Combat Medical Badge (June 1991). For service during combat operations during Operation Desert Storm and, more specifically, The Battle Of 73 Easting.

• Army Achievement Medal - Medic of the Quarter (September 1990). For demonstrating devotion to mission and accomplishment and improvement in all areas of leadership.

• 3rd Infantry Division- Marne Medic Award (March 1990). For superior demonstration of abilities and knowledge in the areas of field medical functions, soldier skills, physical fitness, and leadership.
TRAINING/CERTIFICATION HIGHLIGHTS

- Crisis Negotiator Certification (2007-2019)
- State of Wisconsin Firearms Instructor (2001)
- State of Wisconsin Certified Law Enforcement Officer (1994)
- United States Army - Medical Proficiency Training, 98th General Hospital, Nuremberg West Germany (September 1988)
- United States Army Basic Training, and Advanced Individual Training, Academy of Health Sciences – Ft. Sam Houston (1987)
- United States Army – Basic Training, (Bootcamp) Ft. Bliss Texas (June 1987)
- United States Army- Advanced Individual Training Medics (August 1987)

RELATED MEDIA FEATURES/MENTIONS

- Telemundo – Pari Cruz (5/22/19). Detective de la policía de Milwaukee honrado por su valentía y trabajo con departamento. [https://www.telemundowi.com/news/detective-de-la-policia-de-milwaukee-honrado-por-su-valentia-y-trabajo-con-departamento]
HIGHLIGHTS OF INVESTIGATIONS/INITIATIVES

**La Familia Gang Investigation - Violent Crime Initiative**
I initiated this project due to an increase in gang violence and resulting homicides on the south side of Milwaukee. This was made more difficult due to the reluctance on the part of victims and witnesses to cooperate with any of the investigations in fear of retaliation by rival gang members. A collaborative effort between the Milwaukee Police Department District Two, Community Prosecutors, Neighborhood Task Force, and Criminal Investigation Bureau, along with the Wisconsin Department of Corrections, and the High Intensity Drug Trafficking Area was initiated. This strategy identified the main offenders responsible for the violent crime who were taken into custody resulting in a reduction of crime in the area.

**Mexican Fiesta**
Mexican Fiesta is an annual festival that takes place on the Summerfest grounds. It historically drew large numbers of Hispanic gang members who caused fights and displayed other antisocial behavior that made it unsafe for families who were there to enjoy the celebration. A collaborative effort was initiated between the Milwaukee Police Department's Intelligence Fusion Center, District Two, Office of Management, Analysis and Planning, Neighborhood Task Force, along with the Mexican Fiesta security team to identify known gang members attempting to enter the park. These gang members were stopped at the entrance gate and informed that they were unable to enter the park by Mexican Fiesta security. Patrons enjoyed a peaceful celebration.

**Immigration and Customs Enforcement Round Up**
While assigned to the Intelligence Fusion Center, assisted Immigration and Customs Enforcement (ICE) and Milwaukee Police Department's District Two with 'Operation Community Shield', identifying and arresting known undocumented immigrant gang members.

**Asian Gang Homicide Investigation - Sheboygan Police Department**
I provided analytical support and intelligence that assisted the Sheboygan Police Department with an influx of violent crimes, to include homicides, involving Asian gangs.

**Operation Violent Surenos SUR-13**
While assigned to the Intelligence Fusion Center, assisted ICE and Milwaukee Police Department's District Two to develop and deploy a strategy of identifying the most prolific gang offenders on the south side of Milwaukee. We collected intelligence and deployed several federal agents, detectives, and officers to affect arrests, serve search warrants, and recover firearms from these violent gang members. This resulted in the issuance of local, state, and federal charges.
Guns, Gang and Drug Suppression Initiative – District Three
This initiative was designed to prevent the commission of violent criminal acts, specifically robberies, aggravated assaults, shootings, homicides, and gun related offenses in District Three, located on the north side of Milwaukee. There are various Hybrid Neighborhood Groups, or HNGs, that operate in the target areas. This initiative was built on the frame of the Cornerstone project used in Milwaukee Police Department’s District Two in 2010. In addition to identifying violent subjects, we assisted newer officers with investigatory techniques and the proper interviewing of prisoners.

Operation Summer Storm
I was involved in this joint operation with federal agents from ICE, the US Marshalls, HIDTA, as well as Milwaukee Police Department’s District Two, Criminal Investigation Bureau, and Intelligence Fusion Center. This operation focused on transnational gang members and resulted in the arrest of 27 known gang members for federal, state, and local charges.

Operation Spring Clean Up
Milwaukee Police Department’s Intelligence Fusion Center, along with ICE, led a transnational gang round up of 15 undocumented gang members who were arrested, charged with violent felonies, and deported.

Operation Corner Stone
The SARA model was used to develop a strategy to identify suspects in several shootings involving shotguns that took place in a six-block radius on the south side of Milwaukee. The problem was identified as a gang war. This resulted in the clearance of several violent crimes and the recovery of weapons and drugs tied to the gangs. Significant reductions in violent crime followed the initiative with a 70% overall crime reduction in six weeks.

Operation Clantones C-14
I was involved in this joint operation with federal agents from ICE, Milwaukee Police Department’s District Two and Intelligence Fusion Center. The operation concluded with the arrest of six known Sureno gang members for federal, state, and local charges to include pending immigration violations.

Operation Big Freeze
I was involved in this operation which was a collaborative effort that involved the nationwide gang operation ‘Community Shield’. This operation arrested 476 gang members nationwide in 83 cities and as a result, 47 firearms were seized. In Milwaukee alone, 21 individuals were arrested.
SUMMARY

Retired Law Enforcement professional with twenty-five years diverse experience in the field including intelligence, investigations, patrol, tactical and strategic threat assessments. Subject matter expert on Homeland Security, with robust knowledge of special investigative procedures, counterterrorism, infrastructure protection and surveillance. Seasoned public speaker. Security Clearance Held: Top Secret (Department of Defense Level 5 Investigation)

PROFESSIONAL EXPERIENCE

President Local 203  Security, Police and Fire Professionals of America  December 2019 – Present
Roseville, MI

As Union President I preside over Local 203 meetings and conduct contract negotiations. Sign all orders on the treasury and countersign all checks issued by the Financial Secretary. File grievances on behalf of union members and enforce all provisions of the International Union's Constitution and Bylaws

Protective Security Officer  March 2018 – Present
Centerra LLC  Herndon, VA
Triple Canopy Inc  Herndon, VA

Perform interior and exterior patrols of Federal Buildings. Monitor building cameras and alarm systems. Perform physical checks at building entrances. Reporting incidents to proper officials and writing reports on said incidents.

Operations Officer  September 2011 – March 2016
Southeastern Wisconsin Threat Analysis Center (STAC), Milwaukee Police Department  Milwaukee, WI

As Operations Officer for the STAC I was responsible for ensuring the guidance, direction and intent of the center's Director was conducted and adhered to.

- Managed the conduct of all STAC operations; including, adherence to the terms contained in the National Criminal Intelligence Sharing Plan (NCISP) and other sector-specific information sharing plans.
- Created a collaborative environment for the sharing of intelligence and information among local, state, tribal, and federal law enforcement agencies, public safety agencies, and the private sector by maintaining a diverse fusion center membership; utilizing the Memoranda of Understanding as the foundation for a collaborative initiative, founded on trust, with the intent to share and exchange information.
- Educated and consulted legal advisors in the fusion center development process, utilizing Non-Disclosure Agreements for fusion center personnel and participants to aid in the security of proprietary information.
- Ensured compliance with local, state, and federal public records laws as they relate to Non-Disclosure Agreements, including the Freedom of Information Act (FOIA).
- Project manager for the Homeland Security Grant Program
- Fulfilled the duties and obligations of the Security Liaison Officer for STAC.
- Fulfilled the duties and obligations of the Intelligence Officer for STAC.
- Fulfilled the duties and obligations of Infrastructure Protection Officer.

Security Liaison Officer  August 2010 – March 2016
Southeastern Wisconsin Threat Analysis Center (STAC), Milwaukee Police Department  Milwaukee, WI

As Security Liaison for the STAC I was primarily responsible for ensuring that Federal classified national security information was handled, safeguarded, and disseminated in accordance with Federal government standards.
functioned as the primary point of contact with the U.S. Department of Homeland Security (DHS) Office of Security, and the DHS Office of Intelligence and Analysis.

- Responsible for the management of a multi-disciplined security program designed to ensure that Federal classified national security information held and processed within the fusion center is properly safeguarded and protected.
- Ensure that the secure room within the fusion center where classified information is handled, stored, or discussed meet required Federal security standards and have been appropriately certified by DHS SLTPS/SMD or a sponsoring Federal agency.
- Ensure that State, Local, and Tribal officials, Federal officials, contractors and other persons with whom classified information will be discussed or disseminated have been granted the appropriate level security clearance and require access to the information in the performance of their official duties.
- Maintain a master list of State, Local, Tribal, Federal, and contractor personnel who have been granted a security clearance by DHS, or another Federal agency, and who are assigned, detailed or attached to the fusion center.
- Assist in the development and delivery of security training and education to State, Local and Tribal personnel who will be granted a security clearance and access to classified information and ensure a SF 312 is executed for each SLT person under the purview of the SL.
- Ensure compliance with security training requirements of State, Local and Tribal personnel under the purview of the Security Liaison and that training records are maintained.
- Ensure that classified national security information is appropriately safeguarded and that approved procedures are followed for the facility’s secure operations and classified capabilities.
- Immediately notify the DHS SLTPS/SMD of any infractions or violations involving the handling, storage, safeguarding or dissemination of classified information. Report behavior and/or incidents that are inconsistent with access to classified information. Take immediate steps to appropriately secure classified information that is not properly protected.

Infrastructure Protection Officer March 2008 – March 2016
Southeastern Wisconsin Threat Analysis Center (STAC), Milwaukee Police Department Milwaukee, WI

As Infrastructure Protection Officer I was responsible for reducing the risks to critical infrastructure posed by acts of terrorism and to strengthen region preparedness, timely response, and rapid recovery in the event of an attack, natural disaster, or other emergency.

- Identified and analyzed threats and vulnerabilities to infrastructure; coordinated nationally and locally through partnerships with both government and private sector entities that share information and resources.
- Educated facility owners, risk managers, site managers and security personnel regarding the availability of technical assistance programs (including information sharing portals, assessment tools and instructional materials) to support public and private sector CIKR protection.
- Educated facility owners about all hazards and especially terrorist threats that could interrupt functioning, damage, or destroy the facility.
- Partnered with site security personnel to conduct the infrastructure assessments, reinforcing the benefits of participating in the Infrastructure Protection Program, provided information on specific vulnerabilities and protections, including target hardening.
- One of two statewide administrators for the Department of Homeland Security Infrastructure Gateway.

Intelligence Officer September 2006 – March 2016
Southeastern Wisconsin Threat Analysis Center (STAC), Milwaukee Police Department Milwaukee, WI

- Synchronized intelligence operations for the fusion center. Provided intelligence support to multiple special events ensuring flawless execution, to including a VIP visit by a Senator’s visit, NASCAR and IndyCar races, Summerfest, the National Governor’s Association, the National Guard Association of the United States, the JCC Maccabi Games, the Air National Guard Safety Summit, Harley-Davidson.
Neil E Saxton

Anniversary Events, the Milwaukee Air and Water Show, multiple local exercises, and numerous area festivals.
• Provided national-level intelligence that effectively neutralized a terrorist threat by identifying a local individual with terrorism related ties leveraging federal partners to coordinate the revocation of the individual’s visa and removal from U.S. territory.
• Enabled law enforcement partners to more effectively execute their mission by identifying the need for increased reporting on locally available terrorism-related activities, gathering the necessary intelligence, and assist in the production of Intelligence Information Reports, concerning violent extremism and regional cyber intrusions.
• Coordinated and assisted in the development of a Fusion Liaison Outreach (FLO) policy and training program to improve the implementation of intelligence operations in the local area.
• Produced or edited numerous local Intelligence products, and conducted countless briefings and Intelligence training events increasing the quality of locally published and disseminated products and resulting in stakeholders’ increased awareness of the local threat environment.

Investigator

December 2004 – September 2006

Intelligence Division – Special Investigations Unit, Milwaukee Police Department
Milwaukee, WI

• Conducted criminal investigations involving individuals who violate the public trust. The subjects of these investigations included both elected and appointed officials from all levels of local government, encompassing a wide variety of criminal offenses including bribery, extortion, embezzlement, illegal kickbacks, and money laundering with special emphasis on election fraud investigations in cooperation with other federal, state, and local law enforcement agencies.
• Member of a Task Force that was formed following errors identified in the 2004 General Election in the City of Milwaukee. Conducted a canvess of all electors in the 2004 Presidential Election leading to state and federal charges of election fraud.
• Member of the Department’s Dignitary Protection Unit. Responsible for all aspects of executive protection including planning of event sites which include security arrangements, intelligence gathering and coordination with Local, State, and Federal agencies; provided guidance on the placement of officers and detectives necessary to provide a secure environment for dignitaries; Investigated any direct or indirect threats made towards the dignitaries.

Patrol Officer


Milwaukee Police Department
Milwaukee, WI

• Patrolled designated areas of Milwaukee to preserve law and order, discover and prevent the commission of crimes, and enforce traffic and other laws and ordinances; protect real and personal; maintained awareness of wanted suspects, known criminals, stolen vehicles, missing persons, traffic violators, and crimes in progress.
• Responded to calls for service, including those involving automobile accidents, traffic hazards, misdemeanor and felony incidents, domestic disturbances, property control, civil complaints, and related incidents.
• Conducted investigations at scenes of incidents to determine what, if any, crime has been committed; identify, collect, preserve, process, and inventory evidence; locate and interview victims and witnesses; identify and interrogate suspects.
• Worked in partnership with the Milwaukee County District Attorney’s Office to obtain and file criminal complaints on arrested subjects. Testified in court and at hearings.
• Assigned to a gang taskforce to gather knowledge about individuals and groups who were involved in criminal activity in order to understand how they function, describe their current activities, forecast future action they may undertake, and provide intelligence and participate in multi-jurisdictional intelligence gathering and suppression operations.
**EXPERTISE**

- Law Enforcement & Public Safety,
- Safeguarding National Security Information,
- Counterterrorism Investigations and Strategies,
- Critical Infrastructure Protection,
- Intelligence Analysis & Operations,
- Emergency Planning & Response,
- Security/Surveillance Operations,

- Criminal Investigations,
- Traffic Patrol,
- Evidence Collection,
- Defensive Tactics,
- Firearms Safety & Handling,
- Interviews & Interrogations,
- Crime Scene Management,
SPECIALIZED TRAINING AND CERTIFICATION

- Derivative Classifications and Marking
- Agency Administrator -- RISSnet (Mid-States Organized Crime Information Center)
- Agency Administrator -- Accurint
- Agency Administrator -- CLEAR
- Statewide Administrator -- DHS Infrastructure Protection Gateway
- Agency Administrator -- DHS Homeland Security Information Network (HSIN)
- Moderator -- HSIN Community of Interest
- Moderator -- Special Interest Group on the Federal Bureau of Investigation's Law Enforcement Online
- Agency Administrator -- FBI eGuardian
- Protected Critical Infrastructure Information Certification
- Chemical-Terrorism Vulnerability Information Certification
- Terrorism/Fusion Liaison Officer
- LESB Handgun Qualification
- Over 30 specialized intelligence, counterterrorism, and infrastructure protection courses to include:
  - Preparing The Whole Community For A Complex Coordinated Attack (L-912),
  - Narcoterrorism And The Islamic Terrorist Threat,
  - Principles Of Intelligence Writing And Briefing Course (PWB),
  - Critical Thinking And Analytic Methods (CTAM),
  - National Fusion Center Security Liaison,
  - National Suspicious Activity Reporting Initiative,
  - Critical Infrastructure/Key Resource Asset Protection,
  - Penlink -- Call Analysis
  - Enhanced Threat And Risk Assessment (MGT-315),
  - Introduction To The National Infrastructure Protection Plan (IS-00860),
  - Prevention And Response To Suicide Bombing Incidents (PER-231),
  - Incident Response To Terrorist Bombings (PER-230),
  - Operational WMD Response For Law Enforcement,
  - WMD Threat And Risk Assessment (MGT-310),
  - Special Event Contingency Planning For Public Safety Agencies (IS-00015-A),
  - Introduction To The National Infrastructure Protection Plan (IS-00860),
  - Islamic Fundamentalism History
  - Law Enforcement Prevention And Deterrence Of Terrorist Acts (AWR-122-1),
  - WMD/Terrorism Incident Defensive Operations For Emergency Responders (PER-212),
  - ICS For Single Resources And Initial Action Incidents,
  - Principals Of Preparedness For Agro-Terrorism And Food System Disasters,
  - OPSEC For Public Safety Agencies Counterterrorism Program,
  - Physical Security Training Program,
  - Internet Telecommunications Exploitation Program,
  - Surveillance Detection,
  - Anti-Terrorism Awareness Training Program,
  - 28 CFR Part 23 (Criminal Intelligence Systems Operating Policies)
  - Fundamental Intelligence Analysis Training
  - Critical Infrastructure Support Annex (IS-821.1A)
  - National Incident Management System (IS-00700)
  - Introduction To The Incident Command System (IS-00100),
REMARKS OF THE HON. MICHAEL J. GABLEMAN BEFORE THE WISCONSIN ASSEMBLY COMMITTEE ON ELECTIONS AND CAMPAIGNS, THE HON. JANELLE BRANDTJEN, CHAIR

Wednesday, December 1, 2021

Chairman Brandtjen and Members of the Committee,

I am delighted to be back before you. I would like to take some time to update you on the latest news relative to my investigation and then take whatever questions you may have, with the understanding that I have been allotted one hour for today’s meeting that my schedule today requires me to adhere to that time limit.

I. Subpoenas Issued & Lawsuits Filed

Not long ago, my office drafted a series of subpoenas demanding certain documents and testimony from government officials who helped administer the November 2020 election. The Speaker of the Assembly signed those subpoenas and they were duly served.

Those subpoenas were issued to the Wisconsin Election Commission, the Mayors of Green Bay, Milwaukee, Kenosha, Racine, and Madison—that is, the five cities that together took an aggregate of around $9 million from the Zuckerberg Foundation in exchange for ceding some of their authority to administer that election. I issued similar subpoenas for the municipal clerks of those five cities.

In response, I received straightforward cooperation from the City of Kenosha and little or no cooperation from Madison, Milwaukee, Racine, and Green Bay. After those subpoenas were served, Josh Kaul, the current attorney general of our state filed a lawsuit against Speaker Vos, Chairman Brandtjen and my office in which he has asked the court to prohibit me from asking any questions of Meghan Wolf, the
administrator of WEC. In response to this lawsuit, Speaker Vos has had to hire attorneys, as has Chairman Brandtjen and me. Like Josh Kaul and his hundreds of lawyers, all of our lawyers are being paid by the taxpayers. Oral argument is set on that matter before the court in Madison on December 23.

On this past Monday, November 29, I filed two Petitions for Writs of Attachment in the Circuit Court for Waukesha County against the mayors of Green Bay and Madison: Eric Genrich and Satya Rhodes-Conway. I did so because of all the clerks and all the mayors, those two simply failed without reason or excuse to appear for their depositions and answer questions about how and to what extent they allowed Mark Zuckerberg’s employees to plan and administer their cities’ election in November 2020. This is significant because undisputed news reports tell us that Mr. Zuckerberg and his wife, Priscilla Chan, spent a total of roughly $500 million to defeat the incumbent President Donald Trump and elect the current President, Joe Biden.

Reasonable minds might wonder whether the millions of dollars each of these mayors received from the Zuckerbergs may have induced them to do something other than treat all candidates fairly and impartially and whether those mayors used the Zuckerberg money to get out the vote for Joe Biden. These questions have been left unasked by a suddenly incurious press. Rather, the state’s largest and once-respected but now rapidly failing newspaper has taken up the partisan cause of unlawful electioneering by shielding from accountability potential wrongdoing by government officials.

Eric Genrich and Satya Rhodes-Conway have chosen to ignore the subpoenas issued by the Wisconsin Assembly because they have no intention of answering uncomfortable questions about how they ran their elections and what they did with the millions of dollars of Zuckerberg money they took. The court date for the hearing on my petitions is
December 22, 2021. Rather than be held accountable for his partisan efforts, Mayor Genrich has chosen to hire three law firms who— it is reported— have donated their services. All three law firms who are donating thousands and thousands of dollars worth of free legal services to Eric Genrich share his partisanship. Whatever costs are borne of this cover up will, again, be paid for by the taxpayers.

Let’s talk about cover-ups because that is exactly what the Wisconsin Election Commission, its administrator Meaghan Wolf, and Mayors Genrich and Rhodes-Conway are engaging in. They are trying to run and hide from accountability to the citizens they are supposed to serve. Why go through all this legal evasion, maneuvering, and expense unless they do not want the public to know what they have done.

You know, the last time I was here, the only questions I received from Eric Genrich and Satya Rhodes-Conway’s advocates on this committee were in regard to the identities of the personnel who work with me. I must note that in keeping my pledge to reach out to all members of this committee, I called Representative Spreitzer (even after he tweeted that in his opinion I am not worth a phone call) to ask to sit down and meet with him. He refused my offer, which tells me everything I need to know about whose side he’s on and it isn’t the side of the average citizen. At least he was upfront. In contrast to Representative Subeck who accepted my offer to visit but then simply absented not just herself from her office at the appointed hour, but also her entire staff as well. I waited in the hallway for twenty minutes. Representative Emerson said she’d think about my offer and I am still waiting to hear back.

This is worth mentioning because the commonality of Eric Genrich, Satya Rhodes-Conway, Mark Spreitzer, Lisa Subeck, and Jody Emerson is that in November 2020, they all wanted Donald trump to lose and Joe Biden to win. And they have no interest in exposing themselves or each other’s wrongdoing to public accountability.
My office has continued to investigate cases of elder abuse throughout the state which resulted from WEC’s self-admitted illegal conduct of exposing our most vulnerable citizens—residents of nursing homes and continuing care facilities—to abuse and manipulation for partisan gain. Understandably, this issue has generated much public interest and although once again the state’s largest and once well respected but now failing newspaper has disparaged investigation efforts into this story, neither I nor anyone in my office will be deterred from continuing to meet with victims of this insidious abuse. And we will hold those government officials responsible for this grotesque abuse accountable to the public they are supposed to serve.

II. The Attacks on my Office

The attacks on my office that have come mainly from one cowardly, dishonest, partisan reporter for our state’s largest and once respected but now rapidly failing newspaper as well as Mark Spreitzer and other partisans is that my office has lacked transparency. Yes, after being given proof that the Wisconsin Election Commission has been committing on a longstanding basis systematic illegalities, Mark Spreitzer’s first question to me concerned the identities of the people I work with. The cowardly, dishonest, and partisan reporter’s articles appear on the front page of his newspaper every time I meet with someone he doesn’t agree with and makes up lies about my lack of understanding of elections and lies about nonexistent meetings with conservative billionaires.

III. My Response

A. The following individuals work or have worked for my office:

Mike Gableman- July 1 thru present with a salary of $11,000 per month

Former Wisconsin Supreme Court Judge from New Berlin Wisconsin. In charge of staffing and overseeing the employees during the investigation into the November 2020 election.
Zakory Niemierowicz- September 1 thru present with a salary of $4,000 per month Graduate of the University of Wisconsin-Milwaukee with a degree in Human Resources. Handles office administration tasks such as scheduling, note taking, buying equipment, and reimbursement claims.

Andrew Kloster- September 1 thru present with a salary of $5,000 per month Currently practising law in the Washington DC area. Currently serving as Chief of Staff for the Wisconsin Special Counsel. Provides legal work for the office.

Carol Matheis- September 1 thru present with a salary of $5,000 per month Currently practising law in the state of California. Provides legal services and oversight for the office while assisting the investigator team with legal document assistance.

Gary Wait- September 1 thru November 1 with a salary of $3250 per month Worked as an investigator for the Wisconsin Special Counsel, conducting interviews, sorting information, and tracking leads.

Ron Heuer- October 1 thru present with a salary of $3250 per month Currently the President of the Wisconsin Voters Alliance. Working as an investigator for the Wisconsin Special Counsel specializing in the nursing home and elder abuse leads.

Clint Lancaster- November 1 thru present with a salary of $10,000 per month Currently practising law in the state of Arkansas. Provides legal assistance and document review for the Wisconsin Special Counsel. Assists the office with planning and strategy.

Thomas Obregon- November 1 thru present with an hourly wage of $40 per hour Retired Milwaukee Police Department detective. Currently serving as the lead investigator for the Wisconsin Special Counsel, providing directives and oversight to other investigators.

Neil Saxton- November 1 thru November 21 with an hourly wage of $40 per hour Former Milwaukee Police Department detective. Assisted with
witness interviews and interview reports. Sorted through open records received from the Wisconsin 5 cities.

Edward Chaim- November 27 thru present with an hourly wage of $40 per hour Retired Milwaukee Police Department detective. Assists with witness interviews and interview reports. Helps schedule meeting times with witnesses and follow reported leads.

Classified Person- November 1 thru present with an hourly wage of $40 per hour Identity to be kept confidential at this time to protect his best interests with his full time employer. Currently the data expert for the investigation team creating timelines and information webs as needed.

B. Subleases

A couple of weeks ago, I reported to the Chief Clerk of the Assembly that I had entered into sublease agreements with the Thomas More Society and the law firm who represents the Wisconsin Voters Alliance.

The purpose of the sublease is to save taxpayer money. Finding temporary office space for an unknown period of time in order to accommodate an unpredictable number of staff is difficult and expensive.

I found the least expensive office space with the maximum flexibility so that if this investigation were forced to shut down prior to the conclusion of the one-year lease, taxpayers would not be stuck with the bill.

C. Money Spent

On August 30, 2021, the Assembly appropriated a budget for this office of $376,000, a number based on a projected operational lifespan of roughly three or four months. So far, we have spent the following amounts:

July-September 30th Mike Gableman Salary $33,000
Office Staff Salary $17,250
Office rent $4,351  
Office Supplies $2,567  
Hotel costs $3,861  
Milage and transportation $3,540  
Flight costs $630  
Travel Meals $400  
Total $65,000  
October  
Mike Gableman Salary $11,000  
Office Staff Salary $21,000  
Office rent $2,500  
Office Supplies $3,250  
Hotel costs $2,355  
Flight costs $1,045  
Milage and transportation $2,251  
Travel Meals $142  
Total $43,500  
November  
Mike Gableman Salary $11,000  
Office Staff Salary $36,000  
Office rent $2,500  
Office Supplies $7,000  
estimate Hotel costs $5,000
estimate Flight costs $2,500  
estimate Milage and transportation $2,000  
estimate Travel Meals $400  
estimate Total $67,000  

Grand Total $175,500 out of $676,000.

D. Open Records Requests

I am now in the process of locating and reviewing each potentially responsive record correlative to the corporations that have been requesting certain records.

Those records will be posted by the close of business this coming Friday, December 3, 2021. I will wait until the conclusion of this investigation, when my final report is delivered to the Assembly, before I disclose any record whose disclosure might reasonably compromise the integrity of this investigation if released prior to its conclusion.

IV. Concluding Remarks

With all of that concluded, I have eliminated any reasonable criticism over any purported lack of transparency.

I am ready now to move forward with my demand that every government official and every person who took part in administering public elections with Zuckerberg money and Zuckerberg employees now be held to a similar level of transparency so that they maybe held accountable for any wrongdoing they engaged in.

I am now happy to take your questions.
EXTERNAL: Heuer Consulting Agreement

RHH@heuerconsulting.com
Mon 10/18/2021 8:09 PM
To: Coms <Coms@wispecialcounsel.org>

Mike,
Attached you will find my Heuer Consulting Agreement. Page 2 of the document defines the type of work I will be doing for the Special Investigation. This is a draft document.

Ron Heuer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Election Fraud

From: Mike Lindell
To: mgabieman@yahoo.com
Date: Tuesday, August 24, 2021, 01:10 PM CDT

https://www.dropbox.com/shv4bdfkjidflumnp/AA8HPTJzNMVjBQoEBxGzx5QWGMe?dl=0

Mike Lindell
CEO My Pillow, Inc
<table>
<thead>
<tr>
<th>County</th>
<th>Target Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adams</td>
<td>5</td>
</tr>
<tr>
<td>Ashland</td>
<td>13</td>
</tr>
<tr>
<td>Barron</td>
<td>9</td>
</tr>
<tr>
<td>Bayfield</td>
<td>49</td>
</tr>
<tr>
<td>Brown</td>
<td>8</td>
</tr>
<tr>
<td>Buffalo</td>
<td>56</td>
</tr>
<tr>
<td>Burnett</td>
<td>35</td>
</tr>
<tr>
<td>Calumet</td>
<td>43</td>
</tr>
<tr>
<td>Chippewa</td>
<td>50</td>
</tr>
<tr>
<td>Clark</td>
<td>1</td>
</tr>
<tr>
<td>CRAWFORD</td>
<td>2</td>
</tr>
<tr>
<td>Dane</td>
<td>20</td>
</tr>
<tr>
<td>Dodge</td>
<td>7</td>
</tr>
<tr>
<td>Door</td>
<td>6</td>
</tr>
<tr>
<td>Douglas</td>
<td>45</td>
</tr>
<tr>
<td>Dunn</td>
<td>5</td>
</tr>
<tr>
<td>Eau Claire</td>
<td>22</td>
</tr>
<tr>
<td>Florence</td>
<td>2</td>
</tr>
<tr>
<td>Forest</td>
<td>25</td>
</tr>
<tr>
<td>Grant</td>
<td>14</td>
</tr>
<tr>
<td>Green</td>
<td>32</td>
</tr>
<tr>
<td>Green Lake</td>
<td>13</td>
</tr>
<tr>
<td>Iron</td>
<td>5</td>
</tr>
<tr>
<td>Jackson</td>
<td>2</td>
</tr>
<tr>
<td>Juneau</td>
<td>10</td>
</tr>
<tr>
<td>Kenosha</td>
<td>45</td>
</tr>
<tr>
<td>La Crosse</td>
<td>31</td>
</tr>
<tr>
<td>LaCrosse</td>
<td>1</td>
</tr>
<tr>
<td>Lafayette</td>
<td>31</td>
</tr>
<tr>
<td>Langlade</td>
<td>7</td>
</tr>
<tr>
<td>Ozaukee</td>
<td>16</td>
</tr>
<tr>
<td>St. Croix</td>
<td>21</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>631</strong></td>
</tr>
<tr>
<td>State</td>
<td>Count</td>
</tr>
<tr>
<td>----------</td>
<td>-------</td>
</tr>
<tr>
<td>WISCONSIN</td>
<td>72</td>
</tr>
<tr>
<td>Grand Total</td>
<td>72</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Flipped...</th>
</tr>
</thead>
<tbody>
<tr>
<td>State</td>
</tr>
<tr>
<td>WISCONSIN</td>
</tr>
<tr>
<td>State</td>
</tr>
<tr>
<td>----------</td>
</tr>
<tr>
<td>WISCONSIN</td>
</tr>
</tbody>
</table>

**Actual...**

<table>
<thead>
<tr>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>WISCONSIN</td>
</tr>
<tr>
<td>Bactual</td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>1,494,581</td>
</tr>
</tbody>
</table>
Wisconsin Affidavits

From: Mike Lindell
To: mgableman@yahoo.com
Date: Tuesday, August 24, 2021, 01:27 PM CDT

https://www.dropbox.com/s/v34kld4lq8ml5n/a9AB4hxt7VrhUP0yzw0/QWG5ka7d=0

Sent from my iPad
mike Lindell Wisconsin

From: Mike Lindell (mike@mypillow.com)
To: mgableman@yahoo.com
Date: Saturday, August 28, 2021, 06:08 PM CDT

Hello Michael
Here is the full list....

Mike Lindell
CEO My Pillow, Inc

5757_Compiled.xlsx
5.3MB
<table>
<thead>
<tr>
<th>Phone</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>(262)994-9050</td>
<td>23,227</td>
</tr>
<tr>
<td>Grand Total</td>
<td>23,227</td>
</tr>
</tbody>
</table>
Fwd: Dominion EMAILS Green County

From: [Redacted]
To: dan@attorneyeastman.com; mgableman@yahoo.com
Date: Thursday, July 22, 2021, 12:28 PM CDT

---Original Message-----
To: lg.wifiusa@aol.com
Sent: Wed, Jul 21, 2021 12:40 pm
Subject: Dominion EMAILS Green County

Dominion unty Clerk - problems with folded ballots. The ones dated around August 13-14th 2020.

DOMINIONgreencountyWI/Open Records Request - Peter Bernegger - 7-20-2021.pdf
1.7MB
Good morning again,

PIY so you can stay on top of the curve.

This is our current press releases.

[link to press release]

Telegram account: H.O.T. Wisconsin (I am not sure how to forward link)

Email sent to Robin Vos, sent separately

Copy of email sent to Bruce Vielmetti (credibility reporter)

This is our current extent of publication.

Harry

---

Thank you. | Received, thank you. | Got it, thanks!
Fwd: Have you set up Michael Gableman for failure?

From: Harry Wait
To: mgableman@yahoo.com
Date: Monday, July 19, 2021, 10:00 AM CDT

FYI

------------- Forwarded message -------------
From: Harry Wait
Date: Sun, Jul 18, 2021 at 9:25 PM
Subject: Have you set up Michael Gableman for failure?
To: <Robin.Vos@legis.wisconsin.gov>, <cd4.chairman@wisconsin.gov>
Cc: janel.brandtjen@legis.wisconsin.gov, <cd4.chairman@wisconsin.gov>

Rep. Vos,

Two of the "detectives" that you personally hired have already quit and the third officer appears to have limited investigative training.

If you truly wish to have a credible look into the 2020 elections you will have to do better than that.

Real investigations take time and effort to sift out facts and fraud.

I suggest you extend the timeline allotted to Mr. Gableman and provide additional support to him for a real look at the 2020 elections.

Anything less will be viewed as a false effort on your part.

The success or failure of a proper investigation is upon you.

Keep this in mind, if Mr. Gableman fails then so do you.

Harry Wait
262-770-3

---

Harry Wait
Fwd: Drop box

From: Harry Wait <harry_wait@yahoo.com>
To: mgableman@yahoo.com; mgableman@yahoo.com
Date: Thursday, July 22, 2021, 06:11 PM CDT

FYI

It appears the monkey is on my back. We will determine who put this thread and shut it down.

---------- Forwarded message ----------
From: Harry Wait <harry_wait@yahoo.com>
Date: Thu, Jul 22, 2021, 5:10 PM
Subject: Drop box
To: Marley, Patrick <patrick.marley@ym.com>

Patrick,

I will confirm yesterday that an invitation was extended to Michael Gableman as our next HOT Government guest speaker, he has yet to respond to our request.

Word does travel fast.

In pursuit of the truth concerning the 2020 elections.

The below is one of many expected responses from our open records efforts.

https://www.dropbox.com/sh/hvulxk76lzyj7v4v0/AACTvizoPvZB0Rm3qy4x4zH5a7d4l?dl=0

You may also view at hotgovernment.com or find us on Telegram @ H.O.T. Wisconsin.

We have opened our response files for public scrutiny.

We expect thousands of additional documents to be added in short order.

Of the several smoking guns concerning 2020 election irregularities by city of Racine officials is the manufactured shortage of poll workers.

Consider this, every municipality in the county of Racine with the exception of city of Racine had sufficiently trained staff on hand for the 2020 national election.
Most if not all municipalities in the county of Racine had turned down experienced volunteer poll workers being their positions were already filled.

Should we believe that all city of Racine residents lack awareness and duties to public service?

The truth is in public records.

Stay tuned to the future announcement of "The Worst Politician Rally Ever" to be held at the State Capital Building.

We know how to have fun and be serious at the same time.

More later.

Harry
Full forensic audit

From: Harry Wait
To: mgableman@yahoo.com
Date: Friday, July 23, 2021, 10:31 AM CDT

Mike, I was contacted by Tim Ramthun's office. He wishes to make direct contact to aid your efforts for a full election investigation. I told them I would forward their information to you and see where it goes from there.

We identified our leak and it has been sealed. It was one of ours attending the meeting.

Here is the contact info:

It was a pleasure speaking to you today.

My email is:

Tim Ramthun's cell:

We are very excited to hear from you. If we get the green light from Gableman, we can move this forward, but it is critical that we connect these two so they can discuss this.

The sooner the better.

God bless you Harry. It's time to get things done.

Tim's Personal email:

My personal email:
More correspondence

From: Harry Watt
To: mgableman@yahoo.com
Date: Friday, July 23, 2021, 02:24 PM CDT

So Tim didn’t get a committee chair because he didn’t play along with vos... and Tim is wanting this to happen as soon as possible. He’s a little frustrated because he feels we have waited long enough for this, and it needs to get done.

He’s trying to make contact because he’s fighting for the people and transparency.

We started a youtube channel called “the Ramthun report” back in February to create transparency and keep people informed about what happens in Madison.

He’s got to work the food stand at the fair at 5 so I highly recommend mike call him so Tim can ask him if he cannot do the type of audit the people and the nation needs to see,

Then we can move forward to try to make that happen as soon as possible.
Further correspondence from

From: Harry Wait (harrywa1@gmail.com)
To: mgableman@yahoo.com
Date: Friday, July 23, 2021, 02:02 PM CDT

Mike, I received the following additional correspondence from Ramthun's office:

Very good. Let Mike know that all we are looking for is for him to say something like "he doesn't have the resources to do a forensic audit." Or something along those lines,

We've got the cyber ninja team on hold, and we can move to get things done if we can get Tim and Mike talking.

No finger pointing, just a public statement that we have the team ready, whose on board, who's not. Before all the people so it's transparent.

We want to show that we are not trying to step on Mike's toes... just trying to help.

It gives us the green light to move forward.

Tell Mike that all we need is for him to say he doesn't have the resources/capabilities to perform that kind of audit.

It won't put any pressure on him, and

Also that we are not really knowing what happened between him and Brandtjen... but we have a very serious action plan to help him.
Good Morning Mike,
The invitation is extended to you as well.

-------- Forwarded message --------
From: Harry Wait
Date: Sat, Jul 24, 2021 at 10:00 AM
Subject: 2020 elections
To: <Rand@un@hotmail.com>, <Tjohannes@agency@gmail.com>, CSCWC Info <info@cscwc.com>

Good morning Gentlemen,

Leading off with the following:

Extract from Thomas Jefferson’s Fair Copy of the Kentucky Resolutions of 1798
"What the government is, if it be not a tyranny, which the men of our choice have ............... but blind him down from mischief by the chains of the constitution."
Thomas Jefferson”, circa 1798
You may learn more here: https://en.wikipedia.org/wiki/Kentucky_and_Virginia_Resolutions

We at H.O.T. Government appreciate your office reaching out to us and we wish to learn more.
We extend an invitation to be our guest at today’s BBQ where you can meet some of our brightest and best public activists in a casual and fun environment.
I understand this is short notice but so are the upcoming elections, We need to fix the elections ASAP.
Bring a friend if you like.

---

**BBQ Time**

When: July 24, 2021
Where: Sandhill Home
Time: 6:00pm

BBQ Ribs & Chicken  Food & Fun  Friends
& all the Fixings  Grilling and Cheese
Beer & Soft Drinks  Come Hungry

Address is
5440 River Hills Rd.
Racine, Wi. 53402

Harry Wait
262-270
Good morning Harry,

Thank you for the invitation!

I see the start time is 5. I can't be there until 6 but I'd like to come.

Thank you again,

Mike

Harry Wait

Great, we look forward to you joining us as our guest.

---

Mike Gableman

Thanks

Harry Wait

Our pleasure.
Harry Wain

Reply, Reply All or Forward

Thank you.
(No Subject)

From: Harry [redacted]
To: mgableman@yahoo.com
Date: Monday, July 26, 2021, 08:17 AM CDT

Mike Gableman's phone contact

From: Harry Walte
To: gableman@howard.org
Cc: gableman@yahoo.com
Bcc: mgableman@yahoo.com
Date: Sunday, July 25, 2021, 09:31 AM CDT

Good morning gentlemen,

Your efforts for a full forensic audit of the 2020 elections have caught the attention of several of our supporters and now our supporters are posting your video on our Telegram account. Kudos to your efforts!
I like what I hear in your video so I wish to get to know the two of you better and learn more about your model to conduct an audit.
I have attached a document written by one of our supporters to help define and navigate an election audit.
Hopefully you have found the time to read or at least skim our briefs that we have before the Wisconsin Supreme Court concerning the right to audit the ballot, our success in the Wisconsin Supreme court is critical to a successful audit of the 2020 national elections.

Our house is divided concerning working with Vos or a future of "Toss the Vos". I personally do not believe Vos is really interested in conducting a full forensic audit, which is why I am interested to learn more about your plans and efforts.
You come well recommended by Bernie which carries a lot of weight with me.

Pursuant to earlier conversations and with the approval of Mike, I have Bcc'd Mike with this email and I am providing you with Mike's phone if so we can move this audit forward.

Michael Gableman cell [redacted]

We should talk further on Monday morning.
Thanks for reaching out to our organization and feel free to call upon us for support.

Harry Walte

Upfront interview

From: Harry Walters
To: mgableman@yahoo.com
Date: Sunday, August 1, 2021, 02:40 PM CDT

FYI

https://youtu.be/h7wnJHzBv5w
Future Amicus brief to include Mike?

From: Harry Wait (HarryWait@gmail.com)
To: dwightwa.com, rthomazita@gmail.com, ngabieman@yahoo.com
Date: Friday, July 30, 2021, 11:52 AM CDT

FYI

Robin,

It is unfathomable to me that you are holding up Jane's efforts to move forward with subpoena's and deposition concerning the 2020 elections. Even a blind and deaf person could not be so oblivious to your constituent's need for election accountability.

I am absolutely in awe of what possible reason could exist as to why you haven't acted upon her request for your signature.

If you truly wish to alienate your remaining supporters, then continue to obstruct election accountability and learn how that will work for you.

Being a reasonable man, I will be calling your office tomorrow morning seeking any reasonable excuse as to why WE THE PEOPLE are being ignored.

Respectfully submitted,

Harry Wait

---

Mike Gableman <mgableman> Tue, Aug 17 at 9:54 AM
To: [redacted]
Harry Wait,
robin.vos@legis.wisconsin.gov
Cc: janel.brandtjen

Nobody has asked for my input but since I was cc'd, I feel compelled to respond lest my silence be interpreted as agreement.

Harry, when you called me yesterday, I asked if we could speak today as I am currently under the weather. If we had spoken I would have told you that I am making progress toward a study of the machines including a step-by-step review using the most cost and time efficient methods possible. If those methods can be used to eliminate doubt about how the machines functioned, let's do that. If, however, further investigation turns out to be warranted I would certainly recommend that.

During my time in Sioux Falls last week, I was disappointed and surprised by the "all or nothing" approach being sold by Mike Lindell. He and his colleagues constantly harped on the need for us all to go back to our home states and demand a "full, Arizona-style forensic audit." Unfortunately, no one who knows is telling us anything about that audit other than it has cost (so far) around $6 million.

Why the rush to copy a method whose value as opposed to cost is currently unknown? I have been researching other methods and interviewing experts in the field who say they can provide us with the info everyone was hoping for from AZ.

I believe efforts are currently underway in the Assembly to allocate the resources I have requested in order to do this and have reason to hope that an announcement to that effect will be forthcoming.
toll. My doc is optimistic that I will be back to speed in a day or two.

Thanks,

Mike

Sent from Yahoo Mail on Android

Show original message

Harry Wait

Tue, Aug 17 at 10:56 AM

To: Mike Gableman
Cc: robin.vos@legis.wisconsin.gov, Janel Brandtjen

Thanks Mike,
Get well soon!

Show original message

Harry Wait
Fwd: IMPORTANT DATES - LEMAHIEU & KAPENGA EVENT IN JOHNSON CREEK - Tuesday, September 14 - Hi-Way Harrys

From: Harry Wait <harrywait@.*>.com
To: mgableman@yahoo.com
Date: Saturday, September 11, 2021, 10:45 AM CDT

This was sent to us to disseminate to the public on our Telegram channel. We removed your contact info before we posted the contents.

If you would like to share your thoughts about the Vos “audit” with Gableman, it is my understanding Gableman can be reached at (715) 371-8581

Dear Audit Folks,

LeMahieu (Senate Majority Leader) and Kapenga (Senate President) are up for Re-Election next year.... Both of them have the authority to sign the Audit subpoenas but have REFUSED to do so.

(Disappointingly, Kapenga was elected as a TEA Party candidate but has grown progressively more arrogant the longer he stays in office. Both of these guys have joined The Swamp in Madison.)

The GOP is counting on all of you to be silent and get tired so discussion of a Full Forensic Audit will just go away the longer they can drag this out. Senator Steve Nass made this pretty clear last night at a Patriot mtg.

If you care about the value of your vote, You Can't Be Silent.

Serious Patriots Must Force this Audit Discussion Statewide.

Below is a list of Upcoming GOP Fundraisers that Patriots should attend, picket and/or litdrop to wake up our fellow Wisconsinites.

Also, folks should become acquainted with CERS and RACC - see below.

Many folks do not realize that party leadership puts an "Assessment" on their members to cough up cash that goes into a collective pot and then the party Bosses dole it out as they like-- Often to the detriment of Conservative legislators. Legislators are expected to fork over $1,000s of dollars collected locally which vindictive Vos can again use against them, fund RINO
Be sure to Note the item at the bottom of this list about Wisconsin GOP Night in D.C.

CERS - Committee to Elect a Republican Senate
RACC - Republican Assembly Campaign Committee

For those that might not be aware, CERS had their annual golf outing in Oconomowoc yesterday....this is a BIG $$$ Event.

Again, it cannot be stressed enough how serious it is for you all to Force The Conversation Statewide....Many Grassroots Taxpayers and Patriots have NO CLUE what is taking place at this time....Educate them

Tuesday, Campaign
Sept. 14 / 4:00 PM Fundraiser

Political Update with Senator Chris Kapenga

Political Update with Senator Chris Kapenga
With Special Guest: Senate Majority Leader Devin LeMahieu
4:00 p.m. – 6:00 p.m. Hi-Way Harry’s 710
Glover Lane Johnson Creek, WI 53038
Donation Levels: $2,000 – Platinum | $1,000 – Gold | $500 – Silver PAC Accepted
RSVP to Jen at 608-212-
Checks payable to: Taxpayers for Kapenga, P.O. Box 33, Hartland, WI 53019
Hi-Way Harry’s, 710 Glover Ln., Johnson Creek [Map]
A Fundraiser for Representative Jessie Rodriguez With Special Guest Congressman Mike Gallagher Tuesday, September 14th 5:30PM The Cellar Pub & Grill 812 W Oakwood Road Oak Creek, WI 53154 Host Levels Available Gold: $1000 Silver: $500 Bronze: $250 Suggested Contribution: $50/person or $75/couple  Please make checks payable to: Friends for Jessie WI 53154 Please RSVP to Jessie at 414.559.2328 or jessia@jessieforassembly.com

The Cellar Pub & Grill, 812 W. Oakwood Rd., Oak Creek [Map]

Saturday, September 18 - 1st District GOP Fall Fest
Racine Fairgrounds - 19805 15th Ave. Union Grove
Noon - 3 p.m.
Vos' District - Those taxpayers need Serious Re-Education

Mon, 11:00 Campaign
Sep AM / Fundraiser
27
Representative Kevin Peterson’s 1st Annual Golf Scramble

Representative Kevin Peterson’s 1st Annual Golf Scramble
With Special Guest Wisconsin Assembly Speaker Pro Tempore Tyler August Monday, September 27th Registration Opens at 11:00AM with Shotgun Start at 12:00PM Waupaca Country Club 1330 Ware Street Waupaca, WI $1000 for two golfers, hole sponsorship, and reception $500 per individual golfer and reception $500 hole sponsorship and reception (no golf) $250 steak kabob reception only Conduit contributions accepted. Checks payable to: Peterson - Republican for 40th Assembly P.O. Box 227 Waupaca, WI 54986 RSVP to representative66@gmail.com or (920)896-3636 [Map]

Waupaca Country Club, 1330 Ware St., Waupaca [Map]

Tue, 5:30 Campaign
Oct PM / Fundraiser
5
Please Join for a concert to honor America with Representative Warren Petryk

Tuesday, October 5th 5:30pm – Social Hour/Desserts 6:30pm – Concert Florian Gardens Conference Center 2340 Lorch Avenue Eau Claire, WI 54701 Sponsorship opportunities for the event are still available Platinum Plus Level: $2,000 (couple)
Platinum Plus Level: $1,000 (individual)
Platinum Level: $1,000- $1,999 (couple)
Platinum Level: $500- $999 (individual)
Gold Level: $500- $999 (per couple)
Gold Level: $350- $499 (per person)
Silver Level: $250- $349 (per

Google Calendar [Calendar]
Admission: $25 per person Max
Contribution: $1000/individual or
$2000/couple Minimum Contribution:
$25/individual or $50/couple Please RSVP
by September 20th at
warrenpety4assembly.com
Credit cards accepted at
www.warrenpety4assembly.com
Florian Gardens Conference Center (Map)

Wed, 5:00 Campaign
Nov 17 PM / Fundraiser

Republican Party of Wisconsin –
Wisconsin Night in DC

Wednesday, November 17, 2021
Republican Party of Wisconsin –
Wisconsin Night in DC With Special
Scott Fitzgerald; Rep. Mike Gallagher;
and Rep. Tom Tiffany Hosted by: Senate
Majority Leader Lenih LeMahieu; Speaker
Robin Vos; Senate President Chris
Kaperke; Majority Leader Rep. Jim
Steineke, and Joint Finance Co-Chairs

Born 5:00 p.m. – 6:00 p.m. Host Reception
6:00 p.m. – 7:00 p.m. General Reception
Office of BGR Group, The Homer Building,
Eleventh Floor South 601 13th Street NW,
Washington, DC 20005 Parking available
in garage on G Street Donation Levels:
$5,000 – Host; up to 4 attendees for Host
& General Reception $2,500 – Sponsor;
up to 2 attendees for Host & General
Reception $1,000 per person to attend
PAC and Individual donations accepted
RSVP to the Republican Party of WI:
Victoria Busch vbush@wisc.org or
608-267-44 Matanie Hubbard
mhubbard@wisc.org or 608-279-6
Checks payable to: Republican Party of
Wisconsin, 148 East Johnson St.,
Madison, WI 53703
Office of BGR Group, The Homer Building,
Eleventh Floor South, 601 13th St. NW
The Home Building, Washington DC (Mail)
Google Maps

Find local businesses, view maps and get driving directions in Google Maps.
Forwarded message

From: Harry Waite
To: mgableman@yahoo.com
Date: Wed, Sep 15, 2021 at 8:40 AM
Subject: Gableman talking to conspiracy theorist Shiva

Good morning Patrick,

Election integrity must be absolute.

I read with interest your article concerning Mike Gableman and was wondering what "engineeredmo" means.

"In the film, Ayadurai maintained that voting machines had been engineeredmo to wipe out a third of his votes in the Massachusetts primary race."

Unless otherwise advised, I will consider it scribbler's error.

Having an opinion on a subjective matter contrary to one's own view is not necessarily the same as being an obstructionist or conspiracy theorist, unless of course you are writing for a targeted audience.

I have utmost respect for Dr. Shiva and believe he is a brilliant man, but recognize that even brilliant people do not always get everything right.

I also believe that software should not be in our voting machines, so would that make me a conspiracy theorist as well?

One only has to look at Dieselgate to understand how hidden software can contain nefarious codes to skew results.

My point of this email is this, if there is even a remote possibility of election fraud having occurred, should that not be of the highest priority to our elected officials and of greatest concern to the public?

Should we lose our ability or credibility to have votes counted properly, we will lose our republic.

Within the scheming world we live in; it's not who votes that counts, it's who counts the votes.
Respectfully,

Harry
Hi Mike,

These were written and filed by Jay Stone, now an active supporter of HOT Government.

Jay asked he send these to you, https://www.hotgold.com, but didn't receive an acknowledgement. So I am re-submitting them to make sure you are aware of these documents.

Thanks.

Harry

[Email body]

WEC Stone v...pdf
WEC Stone v...pdf
WEC Stone v...pdf

Got it. Thank you Harry! We are really working hard with our Tach provider to tighten up this system. I appreciate your diligence as always.

Sent from Yahoo Mail on Android

Reply, Reply All or Forward
open records request - unedited video for Office of Special Counsel

From: Marley, Patrick (patrick.marley@jrn.com)
To: mgableman@yahoo.com; wispecialcounsel@gmail.com; ted.blazel@legis.wisconsin.gov
Cc: mabeck@gannett.com
Date: Tuesday, September 21, 2021, 02:36 PM CDT

Dear Justice Gableman, Speaker Vos and Chief Clerk Blazel:

Under the state's open records law, I am requesting the complete, unedited footage that was shot for the video posted Sept. 20, 2021 on the Office of Special Counsel's YouTube page.

Please let me know if you have questions about this request.

Thank you.

Patrick Marley
State Capitol reporter

journal sentinel

Mobile: 608.235.7686
Office: 608.258.2202
patrick.marley@jrn.com
jrn@jrn.com
www.journal-sentinel.com
EXTERNAL: Walworth County GOP Membership Meeting Dec 2

Ron Heuer <wiscjustice@outlook.com>
Thu 11/11/2021 5:33 PM
To: Chris <Com<wisepci@<nse.com>

Mike,
Got a call from the Walworth Co GOP leader, Chris Goebel. He is having his Dec membership meeting on the Thursday, December 2, at Wilson's Whistle Stop in Elkhorn, WI. He asked if you would like to address his group. Chris runs a great meeting and he will have, more than likely 85-100 people there. He didn't give me the time, but it would be after 6PM.

Would you be interested in speaking to them?

Ron Heuer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL : Subpoena

Haas, Michael R <MHaas@cityofmadison.com>
Tue 10/5/2021 2:33 PM
To: Coma <Coma@wispecalcounsel.org>

Hello,

I am writing with regard to the subpoena deuces tecum that was delivered to the Madison City Clerk on October 1, 2021. I would like to contact Justice Gableman to discuss questions that have arisen regarding the scope of the subpoena and am requesting an email address or telephone number for him. Given the significant work that will be required to gather documents in response to the subpoena, time is of the essence, so I would appreciate receiving a response promptly. If there is another individual that should receive and process this request, please forward that individual's name and contact information. Thank you for your assistance.

Michael Haas
City Attorney – City of Madison
210 Martin Luther King Jr. Blvd, – Room 401
Madison, WI 53703
608-266-6598 Direct Line
FAX: 608-267-8715
mhaas@cityofmadison.com

PRIVILEGE AND CONFIDENTIALITY NOTICE

This electronic message is intended only for the designated recipient(s). It may contain privileged or confidential information and should not be disclosed to third parties without our express permission. If you are not the intended recipient, you have received this message in error and review, dissemination or copying of this message is prohibited. If you have received this message in error, please notify the sender immediately, delete the original message and destroy any electronic or printed copies of this message. Thank you.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: Subpoenas to the City of Green Bay and City officials

Jeffrey Mandell
Thu 10/7/2021 11:12 AM
To: Doma <doms@wislunitedcounsel.org>; m6@wislunitedcounsel.org
Cc: Mel Barnes (mbarnes@lawforward.org) <mbarnes@lawforward.org>; Christine Sun <christine@statesuniteddemocracy.org>; Aaron Scherzer <Aaron@statesuniteddemocracy.org>; Victoria Bassetti <victoria@statesuniteddemocracy.org>

This email memorializes a telephone conversation I just had with a member of the Office of Special Counsel. I, along with other lawyers copied here, represent the City of Green Bay in conjunction with the subpoenas issued by the Office of Special Counsel. The City has received several subpoenas: one directed to the City itself, one directed to the Mayor, and one directed to the City Clerk. The last of these has a return date of October 15; the first two have return dates of October 22.

As I indicated by telephone, given the breadth of the subpoenas, those return dates are unreasonably soon, and we need extensions on all three subpoenas. We seek the opportunity to discuss when a reasonable return date would be, as well as to discuss the scope of the subpoenas and some of the instructions they contain. We are aware that other recipients of subpoenas are also seeking dialogue with the Office of Special Counsel, and we would propose that the interests of efficiency would be served by a joint call among the Office of Special Counsel and legal representatives for any city that has received a subpoena and is seeking clarification.

I was assured by the representative in your office who took my call that I would receive a return call later today. My office number is below; my cell number is 773-620-2425. I am traveling today and tomorrow and may be slightly harder to reach than usual.

---

STAFFORD ROSENBAUM

Celebrating 140 Years of Wisconsin membership of ALFA International, the premiere global network of independent law firms.

This is a transmission from the law firm of Stafford Rosenbaum LLP and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify me immediately at the telephone number included above.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: RE: WI Special Counsel Reimbursement for June-October 1st

Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>

Fri 10/8/2021 9:13 AM
To: Coma <Coma@wispccounsel.org>
Mr. Niemierowicz,

Thank you for submitting the expense report to me. I will get working on it right away.

Thanks,
Ted

Ted Blazel
Assembly Chief Clerk
Wisconsin State Assembly

From: Coma <Coma@wispccounsel.org>
Sent: Thursday, October 07, 2021 2:18 PM
To: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>; Hale, Janine <Janine.Hale@legis.wisconsin.gov>
Subject: WI Special Counsel Reimbursement for June-October 1st

Hello Mr. Blazel,

Attached is our expense report for the entire team up until October 1st. The total reimbursement needed for Mike Gableman is $32,587.43 which covers all expenses and the wages for the staff for the month of September. Please let me know if you have any questions.

Very Respectfully,

Zakory Niemierowicz
WI Special Counsel

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Hi Ron,

The press is always against us. Sickenling the way they slander such a good man. Yes, there are people who continue to undermine the credibility of the investigations. I believe they have their own selfish motivations, money and power.

Bill Feehan
https://lacrosserepublican.org/
Chairman La Crosse County Republican Party
Chairman 3rd Congressional District Republican Party of Wisconsin

On Fri, Oct 8, 2021 at 9:08 AM RHH <ronheuer@gmail.com> wrote:

Good Morning,

It seems the left leaning press and certain factions of people who are singularly focused on a "forensic audit" are disseminating misinformation concerning the Gableman investigation.

I just learned Gableman will be on the Dan O'Donnell Show, WISN, AM Radio at 10:06 this morning to brief everyone as to where his investigation really stands at the moment.

Ron Heuer
President, WVA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL : Good job

RHH <ronheuer@gmail.com>
Sun 10/10/2021 10:53 AM
To: Coms <Coms@wtspecialcounsel.org>

Mike,
I watched your video four times this morning and once again, great job. This is your strong suit, explaining the mission and relating the story. Very believable.

One of the criticisms from the right wing folks is that you are granting immunity. Perhaps it would be good in your next video to explain that the immunity issue is not dictated by you, but by laws that have been on the books for a long time.

Just a thought.

Ron Heuer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: FEC Complaints - Jay Stone

James Carlson <jc1025@psu.edu>
Mon 10/11/2021 10:21 AM
To: Coras <Coras@wispecialcounsel.org>

Besides CTCL’s grants, my WEC and FEC complaints challenge the legality of the following:

1. When We All Vote’s (WWAV) gave $5,000 to pay for the prom’s of high schools who registered the most voters.

2. WWAV provided food and swag at its voter registration drive.

3. WWAV provided food, music and entertainment at its early voting celebrations.

4. Campus Democracy Challenge provided awards to colleges, faculty, staff, and students for having the highest percentage of student voters, most registered students, etc.

5. WWAV and Campus Democracy Challenge request or requirement that voters use pledges to vote, plans to vote and voting plans because these strategies to vote depend on psychological harm, cognitive dissonance, and peer pressure to succeed.

I attached my FEC complaints. I will send you my WEC complaints in another email.

Positive Regards,

jay stone

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: Jay Stone Complaints

James Carlson, Chairperson, Milwaukee County
Mon 10/11/2021 10:22 AM
To: Coms <Coms@Wispecialcounsel.org>

This is a tale of two grants. One grant is the Cares Act Election Grant and CTCL election grant is the other. Madison, Milwaukee and Racine common councils had resolutions to apply for the Cares grant before they actually did. I'm unsure about what Green Bay did, though I have copies of emails discussing the Cares Grant. I'm unsure if Kenosha applied for the Cares grant. The Cares grant application was around the time Kenosha's clerk retired.

Of note, Meagan Wolfe sent out notice and application for the Cares Grant on June 17, 2020. At the same time the WI 5 was secretly applying for CTCL's grant, the WI 5 was also publicly applying for the Cares grant.

I attached the relevant documents.

Positive Regards,

jay stone

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: New WEC Complaint Against Meagan Wolfe

James Carlson, carewlaw@att.net
Mon 10/11/2021 10:23 AM
To: Carew <Carew@wispspecialcounsel.org>

I filed a new WEC complaint against Meagan Wolfe for rejection of my August 28, 2020 complaint (see attached). I did not see a time limit or statute of limitations for filing a WEC complaint.

I may have found a smoking gun because Wolfe had one set of rules when she distributed election grants and another set of rules when CTCL distributed election grants. Recall I emailed you Wolfe's Cares Act subgrant announcement in which she offered an equal share of the grant money to all election commissioners, municipal and county clerks (see attached). From my complaint: "Administrator Wolfe offered and distributed equal shares of a $4.1 million grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL offered and awarded a $6.3 million grant to only five Wisconsin cities which Complainant claimed was unequal protection in violation of the U.S. Constitution's First and Fourteenth amendments."

From my complaint: "After Administrator Wolfe rejected Complainant's August 28, 2020 complaint, Complainant filed a Federal Election Commission complaint alleging a similar set of facts and allegations as he did in his WEC complaint (Exhibit 1). Whereas Complainant's WEC complaint focused on the WI 5 clerks and mayors receiving CTCL's election administration grant money, Complainant's FEC complaint concentrated on Mark Zuckerberg, Priscilla Chan (Mark Zuckerberg's wife), and CTCL who provided the grant money to the WI 5 cities."

"If Complainant's FEC complaint with nearly the same facts and allegations as his WEC complaint met the FEC's requirement for review, why wasn't Complainant's WEC complaint good enough for Administrator Wolfe to review?"

In Wolfe's rejection letter to me she wrote I had to be "served by local election officials," and I'm "not a resident of the municipalities." The words and terms Wolfe used to dismiss my complaint are not in Wis. Statute § 5.06(1). Wolfe added her own words of "local election officials" and a "resident of the municipalities" to Wis. statute § 5.06 and then used her fictitious statute that she created to deny me standing in my complaint.

To learn more, see Stone v. Wolfe.

Positive Regards,

jay

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL : WEC Complaints

jay stone
Mon 10/11/2021 10:55 AM
To: Coms <Coms@wisperalounsel.org>

Hi Mike,

It was good to speak with you and Carol.

Please see attached.

Positive Regards,

jay

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Hi Steve,

Peggy Hurley asked me to send you a copy of the attached memo. Please let us know if you have any questions.

Thanks.

Kelly Mautz
Executive Assistant to the Director, Wisconsin Legislative Council
608.504.5704 | kelly.mautz@legis.wisconsin.gov
One East Main Street, Suite 401, Madison, WI 53703

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL : Open records request -- records requested by American Oversight (part 2)

Marley, Patrick <patrick.marley@jrn.com>
Tue 10/12/2021 4:15 PM
To: robin.vos@legis.wisconsin.gov <robin.vos@legis.wisconsin.gov>; Blazel, Ted - LEGIS <Ted.Blazel@legis.wisconsin.gov>; 1
<1@wispecialcounsel.org>
Cc: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>; Coms <Coms@wispecialcounsel.org>

Dear Speaker Vos, Chief Clerk Blazel and Justice Gableman:

Under the state’s open records law, Wis. Stats. 19.31-39, I am requesting copies of all records that have been requested by American Oversight since May 1, 2021, but not yet provided to that organization.

I separately requested records that have already been provided to the organization. Please let me know if you have any questions about this request.

Patrick Marley
State Capitol reporter
journal sentinel

Mobile: 608.236.7686
Office: 608.258.2226
patrick.marley@jrn.com
@RealSkeidmurf
www.journal sentinel.com

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL : RE: EXTERNAL : RE: WI special Counsel Receipts

Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>

Wed 10/13/2021 9:33 AM
To: Coms <Coms@wispecialcounsel.org>

Zak,

I just received the other three.

Thanks,
Ted

Ted Blazel
Assembly Chief Clerk
Wisconsin State Assembly

From: Coms <Coms@wispecialcounsel.org>
Sent: Wednesday, October 13, 2021 9:28 AM
To: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>
Subject: Re: EXTERNAL : RE: WI special Counsel Receipts

Good Morning Ted,

You should have a total of 9 pdf attachment's sent last night at 5:03 pm and this morning around 9:15.

Zak

From: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>
Sent: Wednesday, October 13, 2021 9:23 AM
To: Coms <Coms@wispecialcounsel.org>
Subject: EXTERNAL : RE: WI special Counsel Receipts

Zakory,

I will let you know if we received them.

Thanks,
Ted

Ted Blazel
Assembly Chief Clerk
Wisconsin State Assembly

From: Coms <Coms@wispecialcounsel.org>
Sent: Wednesday, October 13, 2021 9:09 AM
To: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>
Subject: WI special Counsel Receipts
Mike,
If didn't have this...Here is a copy of the 97 page complaint filed by Jay Stone in August against the Wi-5 players.

Ron Heuer
EXTERNAL: Green Bay Documents - Supplement

Mel Barnes
Mon 10/18/2021 5:01 PM
To: 6@wispecalcounsel.org; Coms@wispecalcounsel.org
Cc: Jeffrey Mandell <jmandell@staffordlaw.com>; Christine Sun <christine@stateuniteddemocracy.org>; Victoria Bassetti <victoria@stateuniteddemocracy.org>; Aaron Scherzer <Aaron@stateuniteddemocracy.org>

Hello Mr. Kloster,

Attached please find copies of the additional requests for records received by Green Bay that we previously noted we would provide as a supplement to Friday’s materials. Note these documents are the requests Green Bay responded to, not the responsive materials themselves, which were included in what we shared on Friday. Please let me know if you have any issues opening the PDF.

We are meeting with our client tomorrow and will be in touch after that discussion.

Thanks,

Mel

Mel Barnes (she, hers)
Staff Counsel

Law Forward, Inc.

P.O. Box 326, Madison, WI, 53703
lawforward.org

Interested in learning more about redistricting in Wisconsin? Check out our new guide.
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Mr. Gableman,

After spending time in the office and with Zak, the following are areas that I feel are in need of upgrading.

I have prioritized them according to what I feel are your most important areas and the areas that will benefit you the most.

1. Security - due to the sensitive nature of your business, the front door should automatically lock. Perhaps there could be an intercom in Zak’s office in order to answer anyone who might need access or an access code for those who frequent the office.

You can purchase wireless doorbell intercom systems from Amazon for $54.99

Automatic locks for glass doors are quite pricey. The only ones I found were from Ozone, located in India and are upwards of $10,000 or more. If you just got the intercom doorbell and kept the door locked at all times, making sure everyone in the office is on board with that protocol and has a key to gain entry, it would be sufficient.

2. Organization for files, letters, subpoena’s, confidentiality agreements, articles, investigative reports as well as speech’s which you may want to refer to at a later date. I showed Zak a few ideas for files for Mr. Gableman’s office, I also put links or pictures below for your ease of reference.
HERMAN MILLER Lateral Files 2H 36W Soft White

HERMAN MILLER Lateral Files 2H 30W Soft White. Great deals on used, new, and refurbished office furniture from A...

You will also need hanging file folders together with manila file folders that can be labeled for content.

Hanging file folders can be purchased through Amazon, and are priced as low as $9.56 for 25 folders.

Manila file folders can be purchased through Amazon, and are priced as low as $11.12 for 100 folders.

3. The office for the Investigators and Analysts is pretty clear, you need three desks, three chairs, and three whiteboards. However, I believe that will become a gathering point when something needs to be discussed and I think a table and chairs that can accommodate up to 6 people should be added together with storage for them. The lateral filing cabinets above would be ideal and priced at only $45 would be financially affordable.

Desks - We discussed renting furniture and I have a few links, but could not get pricing without calling. I am happy to do this on Thursday if needed. I also have a few links to used office furniture that may be useful if renting is too expensive.

Rent Furniture in Brookfield, WI | CORT Furniture Rental
Rent Furniture Online | Brook Furniture Rental
Best 30 Office Furniture Rental in Brookfield, WI | superpages.com

also, you may want to look at the Wauwatosa Habitat for Humanity Restore. They have a lot of inventory to look through. I am not sure if they deliver, but if you find some items there, I have a son with a pickup truck that would be willing to donate his time for a good cause.

4. Communication - A white board calendar would be a helpful tool to know what is happening at a glance. Zak suggested this as an ease of reference. Also, a corkboard for pinning any items as reminders.

A conference call puck. This will ensure a seamless conference call with no dropped calls; no bad reception; volume control better than a cell phone; I highly recommend this! You can purchase one from Amazon for around $100 but it is money well spent.

freeconferencecall.com. Zak says he has this. It is important for Mr. Gableman to be aware of the call in number and code for all his conference call needs. If it is helpful, this can be printed and pinned to the corkboard for ease of reference. Also having the number and code stored into your contacts on your phone for the times you are away from the office is handy.

Zoom conference call capabilities. - Video Conferencing, Cloud Phone, Webinars, Chat, Virtual
sticky notes
toner cartridge for printer (always need 1-2 on hand)
toner drum for printer (always need 1 on hand)
an electric stapler (only if budget allows)
an electric hole punch (I recommend this if you use a hole punch daily)
Business card holder at front reception.

If you have any questions or would like to add additional information, you can reach me at [redacted].

Sincerely,
Darlene

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: Interim report

Smith, Matt <Matt.Smith@hearst.com>
Wed 11/10/2021 4:42 PM
To: Coms <Coms@wispersalcountel.org>

Hi — I'm not personally at the Capitol this PM - can you send me the interim report Justice Gableman is discussing this afternoon?

Thanks-
Matt
WISN TV

Sent from my iPhone
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: FW: WI County and Municipal Clerks Updated 11-8-2021.xlsx

Witecha, James - ELECTIONS <james.witecha@wisconsin.gov>
Mon 11/8/2021 8:30 AM
To: Coms <Coms@wisconsin.gov>
Cc: Wolfe, Meagan - ELECTIONS <meagan.wolfe@wisconsin.gov>; Judnic, Nathan - ELECTIONS <nathan.judnic@wisconsin.gov>

Good morning,

Please find the updated clerk contact list attached for your consideration.

Regards,

Jim Witecha
Staff Attorney
Wisconsin Elections Commission
212 East Washington Avenue, Third Floor
P.O. Box 7984
Madison, WI 53707-7984
608.266.0136 (direct)
608.712.9683 (cell)
608.267.0500 (fax)
james.witecha@wisconsin.gov

From: Hoeth, John M - ELECTIONS <john.hoeth@wisconsin.gov>
Sent: Monday, November 8, 2021 7:48 AM
To: DL Administration <ElectionsAdministration@wisconsin.gov>
Subject: WI County and Municipal Clerks Updated 11-8-2021.xlsx

Thank you,
John Hoeth
Wisconsin Elections Commission
Elections Division
IS Technical Services Professional
Phone: 608-266-2028
Email: john.hoeth@wisconsin.gov
Helpdesk Email: elections@wi.gov

Follow Elections on Facebook and Twitter!
Voter ID law is in Effect. Let's Bring It to the Ballot!
EXTERNAL : Message for Mike RE: Media Relations Proposal

Thomas Ciesielka
Wed 11/3/2021 3:49 PM
To: Coms <Coms@wispecialcounsel.org>
MIKE,

PLEASE LET ME KNOW YOUR THOUGHTS ON THE BRIEF OUTLINE OF MY PROPOSAL? IF YOU LIKE IT AND WANT TO MOVE FORWARD, I CAN FLESH OUT MORE DETAILS.

TOM C.

Mike,

Thanks for making time to chat this morning.

Just so you know, I am somewhat limited with what I can do until I get the report that will be presented on November 8. However, based on what you and Erick shared, I trust that I can get up to speed once I have it.

Before I draft a more detailed proposal, I wanted to get your feedback on the outline of what I will propose:

**Timeframe:** November 2 - December 1, 2021 (with option for monthly retainer commitment to be determined)

**Scope of Work:**
- Scheduled planning meetings and phone calls to prepare messaging
- Develop a unique plan for potential media coverage as is appropriate for specific messages
- Pursue coverage by Wisconsin media and select national media that regularly report on election integrity news
- Schedule media interviews for you, and media training, if necessary
- Plan press conferences, when appropriate
- Social media consulting. This work could include: a Content Strategy Kickstart; audit of current social media and other social media channel opportunities. We would present a holistic view of the various digital marketing initiatives that impact success. These include social media, email marketing, article writing, website updating, capitalizing on public relations opportunities

**Results:**
The nature of public relations does not allow for a guarantee of coverage and/or the quality/value of coverage. However, TCPP will follow best practices for deliverables.

**Fee:**
Monthly retainer $10,000 (with a one-month commitment, agreement extension fee would likely be about the same amount per month)
EXHIBIT P
EXTERNAL : RE: Subpoena of Parties

Carroll, James <jmcarr@milwaukee.gov>

Wed 11/3/2021 1:58 PM
To: Coms <Coms@wispecialcounsel.org>

Good afternoon,

Please see the attached correspondence. Kindly contact the undersigned with any questions or concerns.

Thank you.

Respectfully,
Jim Carroll

James M. Carroll | Assistant City Attorney | Milwaukee City Attorney's Office
Zelikow Municipal Building | 841 North Broadway | Milwaukee, WI 53202
Direct Dial: 414.286.8481 | Fax: 414.286.8550 | Email: jmcarr@milwaukee.gov

From: Coms <Coms@wispecialcounsel.org>
Sent: Thursday, October 21, 2021 11:39 AM
To: Carroll, James <jmcarr@milwaukee.gov>
Subject: Subpoena of Parties

You don't often get email from coms@wispecialcounsel.org. Learn why this is important

Dear Mr. Carroll,

We have been trying to work with you in order to schedule the deposition of the person most knowledgeable as described in the Wisconsin State Assembly's subpoena of October 4, 2021 as well as to coordinate your client's compliance with the Assembly's subpoena duces tecum of that same date.

This office is currently reviewing the documents produced by the City of Milwaukee last Friday, October 15.

In order to provide our office more time to review materials produced last week, as well as to give both parties additional time to reach an understanding of the scope and nature of the topics to be addressed in the deposition, we are continuing the return date from Friday, October 22, 2021 to Thursday, November 18, 2021 at 9:30 a.m.

Thank you,
Mike Gableman
Office of the Special Counsel
Tel. (262) 202-8722
EXTERNAL: RE: EXTERNAL: RE: Reimbursement documents for WI Special Counsel

Hale, Janine <Janine.Hale@legis.wisconsin.gov>

Wed 11/3/2021 11:39 AM
To: Coms <Coms@wispecialcounsel.org>
Cc: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>

Thank you Zak. Let's confirm 1:30 p.m. tomorrow, Nov. 4. Please give me a call at that time.

Janine Hale

Janine L. Hale
Fiscal Clerk
Office of the Assembly Chief Clerk
17 W Main St., Suite 401, Madison, WI 53703
608-237-9616
janine.hale@legis.wi.gov

From: Coms <Coms@wispecialcounsel.org>
Sent: Wednesday, November 3, 2021 11:37 AM
To: Hale, Janine <Janine.Hale@legis.wisconsin.gov>
Subject: Re: EXTERNAL: RE: Reimbursement documents for WI Special Counsel

Good Morning Janine,

Tomorrow, November 4th, at 1:30 works well for me to go over the October documents.

Very Respectfully,

Zakory Niemierowicz
WI Special Counsel

From: Hale, Janine <Janine.Hale@legis.wisconsin.gov>
Sent: Wednesday, November 3, 2021 11:32 AM
To: Coms <Coms@wispecialcounsel.org>
Cc: Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>
Subject: EXTERNAL: RE: Reimbursement documents for WI Special Counsel

Zak,

Thank you for the email. I am in receipt of all the documents. I would prefer to schedule a time tomorrow to review the reimbursement. 11 a.m. or 1:30 p.m. and any time in the afternoon works best for me.
EXTERNAL: Heuer Expense

RHH <ronheuer@gmail.com>
Tue 11/2/2021 12:45 PM
To: Coms <Coms@wiscounsel.org>
Zak,
Here are my expenses for Oct. Let me know if you need anything else.

Ron Heuer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
EXTERNAL: RE: Subpoena of Parties

Haas, Michael R <MHaas@cityofmadison.com>

Tue 11/2/2021 11:56 AM
To: Coms <Coms@wispecialcounsel.org>

I apologize, but I had a typo in two places for the year. Attached please find the corrected letter.

Mike

From: Haas, Michael R
Sent: Tuesday, November 2, 2021 10:38 AM
To: 'Coms@wispecialcounsel.org' <Coms@wispecialcounsel.org>
Subject: Subpoena of Parties

Good Morning Special Counsel Gabieman:

Attached please find our correspondence regarding the November 15th deposition continuance date your office has scheduled. Please feel free to contact me with any questions.

Mike

Michael Haas
City Attorney - City of Madison
210 Martin Luther King Jr. Blvd. - Room 401
Madison, WI 53703
608-266-6598 Direct Line
FAX: 608-266-8715
mhaas@cityofmadison.com

PRIVILEGE AND CONFIDENTIALITY NOTICE

This electronic message is intended only for the designated recipient(s). It may contain privileged or confidential information and should not be disclosed to third parties without our express permission. If you are not the intended recipient, you have received this message in error and review, dissemination or copying of this message is prohibited. If you have received this message in error, please notify the sender immediately, delete the original message and destroy any electronic or printed copies of this message. Thank you.

From: Coms
Sent: Thursday, October 21, 2021 11:32 AM
To: Haas, Michael R
Subject: Subpoena of Parties

Dear Mr. Haas,

We are reaching out to you in order to schedule the deposition of the person most

Michael Haas
City Attorney - City of Madison
210 Martin Luther King Jr. Blvd. - Room 401
Madison, WI 53703
608-266-6598 Direct Line
FAX: 608-266-8715
mhaas@cityofmadison.com
Joseph Santeler
Fri 10/29/2021 5:15 PM
To: Coms <Coms@wispecialcounsel.org>
To The Office of Special Counsel:

I reiterate my question below, the only change being the date of anticipated testimony, which I would also ask that you provide as it becomes available.

I can best be reached at this email address.

Joe Santeler

On Fri, Oct 29, 2021 at 4:13 PM Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov> wrote:

Dear Mr. Santeler,

This question is best addressed to the Office of Special Counsel. I have cc’d them on this email and said address is the best way to contact them.

Sincerely,

Steve Fawcett

General Counsel

Office of Assembly Speaker Robin Vos

608.266.3387
EXTERNAL : RE: EXTERNAL : Copies of Contracts

Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>

Wed 10/27/2021 2:50 PM
To: Coms <Coms@wispecialcounsel.org>; Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Mike,

Here are the two contracts and the amendment to the agreement. Let me know if you need anything else.

Ted

Ted Blazel
Assembly Chief Clerk
Wisconsin State Assembly

From: Coms <Coms@wispecialcounsel.org>
Sent: Wednesday, October 27, 2021 2:10 PM
To: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>; Blazel, Ted <Ted.Blazel@legis.wisconsin.gov>
Subject: RE: EXTERNAL : Copies of Contracts

Thank you both,

Mike

Sent from Mail for Windows

From: Fawcett, Steve
Sent: Wednesday, October 27, 2021 11:46 AM
To: Blazel, Ted
Cc: Coms
Subject: EXTERNAL : Copies of Contracts

Ted,

Can you email a copy of both contracts we have with Justice Gabieman to the email that I cc'd here? Thanks!

Best,

Steve Fawcett
General Counsel
Office of Assembly Speaker Robin Vos
608.266.3387

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.