Sent: Wednesday, December 1, 2021 5:52 PM

To: Coms

Subject: Open Records PDF's from Carol - #1

See attached.



Sent: Wednesday, December 1, 2021 5:53 PM

To: Coms

Subject: Open Records PDF's from Carol - email #3

See attached.



Sent: Wednesday, December 1, 2021 5:56 PM

To: Coms

Subject: Open Records PDF's from Carol - #4 Last Email



Sent: Wednesday, December 1, 2021 5:54 PM

To: Coms

Subject: PDF's from Carol for Open Records - #3



Re: EXTERNAL: Re: Scheduling of PMK Deposition/City of Kenosha

3 <3@wispecialcounsel.org>

Tue 10/19/2021 4:08 PM

To: Matthew Knight <mknight@kenosha.org

Cc: Bryan Charbogian speharbogia

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 < mknight@kenosha.org>

Sent: Tuesday, October 19, 2021 4:02 PM

To: 3 <3@wispecialcounsel.org>

Cc: Bryan Charbogian bcharbogian@kenosha.org; 6 < 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. Charbogian 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)653-4170 Fax (262)925-5933



From: "3" <3@wispecialcounsel.org>

To: "Matthew Knight" < mknight@kenosha.org>



Cc: "Bryan Charbogian" <bcharbogian@kenosha.org>, "6" <6@wispecialcounsel.org>

Sent: Tuesday, October 19, 2021 3:40:43 PM

Subject: Scheduling of PMK Deposition/City of Kenosha

With the same of the same

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 <3@wispecialcounsel.org>

WisconsinEye

You are subscribed to the Basic subscription level.

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

Thank you!

<u>WisconsinEye</u>

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

 charbogian@kenosha.org>

Tue 11/2/2021 4:33 PM

To: 3 <3@wispecialcounsel.org>; 6 <6@wispecialcounsel.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
262-653-4170

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.

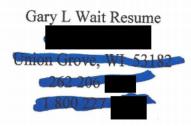
We have subpoenas issued and would like to take statements under oath. 1-6 subpoenas.

Thank you,

Carol

Wisconsin Special Counsel Michael J. Gableman





EDUCATION:

Washington Sate 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 1973
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 EXPIRENCE:

Police Officer; City of Highland Park, Illinois, June 1993 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. Responsablity included the security underwriting for the UNAUTHROIZED ACCESS POLICY, (First computer policy underwritten by Lloyds of London.



Edward E. Chaim

, Milwaukee, WI 53220



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:

1995 to 1996: Milwaukee Police Academy, Basic Recruit Training Certificate, May 3, 1996.

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

References:

Furnished upon request.





Clinton W. Lancaster

ATTORNEY AT LAW

THE LANCASTER LAW FIRM, PLLC

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 (32 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).

Jones v. Jones (2019 Ark. App. 593) (created new case law affecting the best interest of the child standard in child custody cases).

Johnson v. State, (2015 Ark. App. 677) (conviction overturned and client released from department of corrections for violation of Sixth Amendment rights.

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.

Sep. 2011— Present.

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 Law Clerk LITTLE ROCK, ARK.

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

Complied comprehensive research. Drafted appellate briefs for submission to the Arkansas Court of Appeals.

UNIV. OF CENTRAL ARK. POLICE DEPT.

Senior Officer, Field Training Officer

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

Named a "Rising Star" by Super Lawyer's Magazine for Excellence in Practice 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 (Gaansbai, 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

Clinton W. Lancaster, Note, The Recreational Navigation Doctrine—The Use of the Recreational Navigation Doctrine To Increase Public Access To Waterways and Its Effect On Riparian Owners, 33 U. ARK. LITTLE ROCK L. REV. 161 (2011).

Clinton W. Lancaster, Chiodini v. Lock, 2010 Ark. App. 340, ARK. REAL ESTATE REV. (2010-11).

Clinton W. Lancaster, Crum v. Craig, 2010 Ark. App. 531, ARK. REAL ESTATE REV. (2010-11).

Clinton W. Lancaster, Thought for the Future in VOICE OF THE FUTURE 13, 13 (Elder & Leemaur, 2007).

October 31, 2021

Mr. Gableman,

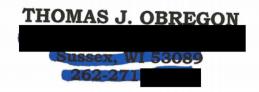
Per your request, I have enclosed a copy of my resume. As you will see, I have significant experience in initiating and overseeing criminal investigations from start to finish. I excel at working on my own, as well as in a team environment.

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,

Thomas 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)
- Detective Project Safe Neighborhoods Initiative (5/2016 1/2017)
- Detective Criminal Investigation Bureau South Investigations (3/2013 5/2016)
- Detective Intelligence Fusion Division (6/2009 3/2013)
- Detective Homicide Division (6/2008 6/2009)
- Detective Criminal Investigation Bureau Robbery Division (8/2007 6/2008)
- Promotion to Detective (8/2007)
- Police Officer Intelligence Division South Side Gangs (5/2004 8/2007)
- Police Officer District Two Special Division Anti-Gang Unit (10/2001 5/2004)
- Police Officer District Three Weed and Seed Initiative (2/1995 10/2001)
- Recruit officer at Police Academy (9/1994 2/1995)

Prieto Pediatrics (1993 - 9/1994)

Medical Assistant at Dr. Prieto's Pediatric Clinic – Milwaukee.

United States Army (1988 - 1992)

- 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)

Sports Novelties, Inc. (1985-1987)

Warehouse Worker – Sports Novelties Inc., Duncanville, Texas

AWARDS AND COMMENDATIONS

- <u>Black Medallion of the Order of St. George</u> (September 2021). From the US Cavalry and Armor Association for outstanding record as a trooper and leader of Cavalry and Armor.
- <u>Milwaukee Police Department's Distinguished Service Award</u> (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.
- <u>Milwaukee Police Department Meritorious Service Award</u> (May 2019). Negotiated with a subject wanted on several felony wants who was suicidal and holding a knife to his throat. After five hours of negotiations, the subject dropped his weapon and surrendered.
- <u>Milwaukee Police Department Meritorious Service Award</u> (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.
- <u>Department OF Homeland Security, Immigration and Customs Enforcement (ICE)</u>, (2010). Honored in recognition of assisting Homeland Security in active arrests and assisting in the apprehension of several Illegal Immigrant Gang Members.
- <u>Milwaukee Police Department's Meritorious Service Award</u> (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.
- <u>Department of the Army Commendation Medal</u> (August 1993). For exceptional meritorious service while assigned to Headquarters and Headquarters Company, 2nd Battalion, 12th Infantry.
- <u>Department of the Army Good Conduct Medal</u> (August 1992). For exemplary behavior, efficiency, and fidelity in active federal military service.
- <u>Army Achievement Medal</u> (January 1992). For meritorious achievement during Task Force 2-12 Infantry's National Training Center Rotation 92-04.
- <u>Army Achievement Medal</u> (October 1991). For meritorious achievement during the 2-12 Infantry train up and evaluation at Pinion Canyon maneuver site.
- <u>Army Commendation Medal</u> (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.
- <u>United States Army Combat Medical Badge</u> (June 1991). For service during combat operations during Operation Desert Storm and, more specifically, The Battle Of 73 Easting.
- <u>Army Achievement Medal Medic of the Quarter</u> (September 1990). For demonstrating devotion to mission and accomplishment and improvement in all areas of leadership.
- <u>3rd Infantry Division- Marne Medic Award</u> (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 Emergency Vehicle Operations 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 Medic (August 1987)
- United States Army- Vehicle Operations-M-113 A1, M-998, Humvee, M-35 A, 2 ½
 Ton Truck (1987)

RELATED MEDIA FEATURES/MENTIONS

- WISN Channel 12 (7/11/2019) Jordan Fricke to Testify at Trial in Death of Matthew Rittner. https://www.wisn.com/article/this-day-in-history-disneyland-opens-in-1955/28416075
- Telemundo Pari Cruz (5/22/19). Detective de la policia de Milwaukee honrado por su valentia y trabajo con department.
 honrado-por-su-valentia-y-trabajo-con-departamento
- Milwaukee Journal Sentinel Ashley Luthern (5/15/19). A Year of Loss After Three On- Duty Deaths.
 https://www.jsonline.com/story/news/crime/2019/05/15/milwaukee-police-year-loss-after-3-line-duty-deaths/1169261001/
- WISN Channel 12 Christina Pallodina (11/3/2014). Officers Come Together to Help Lieutenant Fighting Jaw Cancer. https://www.wisn.com/article/officers-come-together-to-help-lieutenant-fighting-jaw-cancer/6324004
- Milwaukee Magazine Mario Quadracci (5/4/2013). The Watchmen. https://www.milwaukeemag.com/thewatchmen/
- Milwaukee Journal Sentinel Georgia Pabst (11/27/2010). 21 Arrested in Milwaukee in Nationwide Gang Investigation.
 http://archive.jsonline.com/news/crime/82802157.html/



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.



NEIL E SAXTON



E-mail: neil.e.saxton@gmail.com Telephone: (414) 840

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 greivances on behalf of union members and enforce all provisions of the International Unions Constitution and Bylaws

Protective Security Officer

Centerra LLC Triple Canopy Inc March 2018 - Present

Herndon, VA Herndon, VA

Perform interior and exterior patrols of Federal Buildings. Monitor building cameras and alarm systems. Perform physical screening at building entrances. Reporting incidents to proper officials 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 tenets 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

Southeastern Wisconsin Threat Analysis Center (STAC), Milwaukee Police Department

August 2010 – March 2016 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. I



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 material) to support public and private sector CI/KR 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



- 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 canvass 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

March 1991 – September 2006 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),
 - Department Of Homeland Security Infrastructure Gateway (Overview And Methodology Of Infrastructure Surveys And Assessments, Understanding Dependencies, Understanding Significant Asset Areas, Surveying Perimeter Security & Barriers, Surveying Illumination, Parking, & Building Envelope, Surveying Security Activity History & Background, And Security Management Profile, Surveying Resilience Management Profile & Security Force Profile, Surveying Entry Controls And Electronic Security Systems,
 - Narcoterrorism And The Islamic Terrorist Threat,
 - o Principles Of Intelligence Writing And Briefing Course (PIWB),
 - o 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
 - o Enhanced Threat And Risk Assessment (MGT-315),
 - Introduction To The National Infrastructure Protection Plan (IS-00860),
 - o Prevention And Response To Suicide Bombing Incidents (PER-231),
 - o Incident Response To Terrorist Bombings (PER-230),
 - o Operational WMD Response For Law Enforcement,
 - WMD Threat And Risk Assessment (MGT-310),
 - o Special Event Contingency Planning For Public Safety Agencies (IS-00015.A),
 - o Introduction To The National Infrastructure Protection Plan (IS-00860).
 - o Islamic Fundamentalism History
 - o Law Enforcement Prevention And Deterrence Of Terrorist Acts (AWR-122-1),
 - WMD/Terrorism Incident Defensive Operations For Emergency Responders (PER-212),
 - o 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,
 - o 28 CFR Part 23 (Criminal Intelligence Systems Operating Policies)
 - o Fundamental Intelligence Analysis Training
 - Critical Infrastructure Support Annex (IS-821.A)
 - National Incident Management System (IS-00700)
 - o 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 todays 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 a significant area of inquiry 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 n 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 < ronheuer@gmail.com>

Mon 10/18/2021 5:09 PM

To: Coms < Coms@wispecialcounsel.org>

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 mike@mypillow.com

To: mgableman@yahoo.com

Date: Tuesday, August 24, 2021, 01:10 PM CDT

https://www.dropbox.com/sh/y4kbfikjz6fumnq/AABHXT79VIfUPQxBxo0OWVGMa?dl=0

Mike Lindell CEO My Pillow, Inc



County	Target Count
Adams	5,
Ashland	13
Barron	9
Bayfield	49
Brown	8
Buffalo	56
Burnett	35
Calumet	43
Chippewa	50
Clark	1
CRAWFORD	2
Dane	20
Dodge	7
Door	6
Douglas	45
Dunn	5
Eau Claire	22
Florence	2
Forest	25
Grant	14
Green	32
Green Lake	13
Iron	5
Jackson	2
Juneau	10
Kenosha	45
La Crosse	31
LaCrosse	1
Lafayette	31
Langlade	7
Ozaukee	16
St. Croix	21
Grand Total	631



StateCountWISCONSIN72Grand Total72

Flipped...

State	Count	Total Bdiff
WISCONSIN	72	136,285



Certified...

State	Bcert	Tcert	MoV	Win
WISCONSIN	1,630,866	1,610,184	20,682	В

Actual...
State
WISCONSIN

Bactual	Tactual	MoV	Win
1,494,581	1,746,469	(251,888)	T



Wisconsin Affidavits

From: Mike Lindell (mike@mypillow.com)

To: mgableman@yahoo.com

Date: Tuesday, August 24, 2021, 01:27 PM CDT

 $\underline{https://www.dropbox.com/sh/y4kbfikjz6fumnq/AABHXT79VIfUPQxBxo0OWVGMa?dI=0}$

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



Phone	Count
(262)994-9050	23,227
Grand Total	23,227



Fwd: Dominion EMAILS Green County

From: I(glwfishs@aol.com)

To: dan@attorneyeastman.com; mgableman@yahoo.com

Date: Thursday, July 22, 2021, 12:28 PM CDT

-----Original Message-----To: I <glwfishs@aol.com> Sent: Wed, Jul 21, 2021 12:40 pm

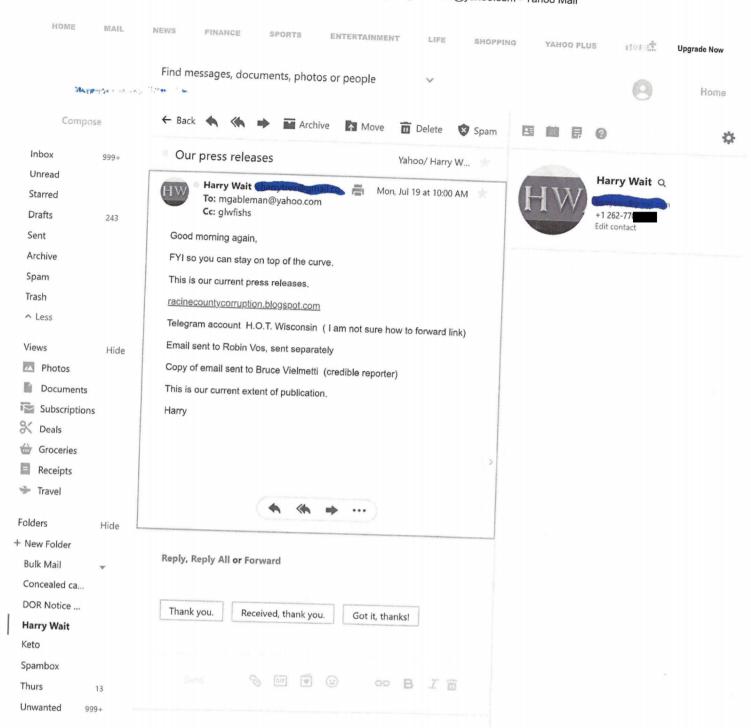
Subject: Dominion EMAILS Green County

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



 ${\color{blue} {\sf DOMINION} green countyWIOpen\ Records\ Request\ -\ Peter\ Bernegger\ -\ 7-20-2021.pdf} \\ {\color{blue} {\sf 1.7MB}}$





AMERICAN
https://mail.yahoo.com/d/folders/35/messages/144687

MANNET !

Fwd: Have you set up Michael Gableman for failure?

From: Harry Wait (harrytrex@gmail.com)

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 >

Cc: janel Brandtjen < Rep.Brandtjen@legis.wisconsin.gov >, < cd4.chairman@wisgop.info >

. . 4 200000

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-

Harry Wait



Fwd: Drop box

From: Harry Wait (harrytrex@gmail.com)

To: mgableman@yahoo.com; glwfishs@aol.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

From: Harry Wait Date: Thu, Jul 22, 2021, 5:10 PM

Subject: Drop box

To: Marley, Patrick patrick.marley@jrn.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/puohk88ylk7v4w0/AACZcPRkOyZBaRom3qx4zld6a?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 municipalies 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 (harrytrex@gmail.com)

To: mgableman@yahoo.com

Date: Friday, July 23, 2021, 10:31 AM CDT

Mike, I was contacted by Tim Ramthum'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:

Tristan.johannes@legis.wi.gov

Tim Ramthun's cell:

Email:

Timothy.ramthun@legis.wi.gov

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:

<u>@hotmail.com</u>

My personal email:

I Johannesagency@gmail.com



9/21/21, 6:07 PM

More correspondence

From: Harry Wait (harrytrex@gmail.com)

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 you tube 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 (harrytrex@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.

1

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 preform 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 charry

Date: Sat, Jul 24, 2021 at 10:00 AM

Subject: 2020 elections

To: < Ramthun@hotmail.com >, < Tjohannesagency@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

but bind 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.



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

Harry Wait 262-770-

Harry Wait



Mike Gableman < mgableman(

Sat, Jul 24 at 10:15 AM

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

Sent from Yahoo Mail on Android

Show original message



Harry Wait harry trex@gmail...
To: Mike Gableman

Sat, Jul 24 at 10:26 AM

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

Show original message

Harry Wait



Mike Gableman <mgableman(
To:harrytrex@gmail.com

Sat, Jul 24 at 10:29 AM

Thanks

Sent from Yahoo Mail on Android

Show original message



Harry Wait charrytrex@gmail.

To: Mike Gableman

Sat, Jul 24 at 10:30 AM

Our pleasure.

AMER\$how original message

https://mail.yahoo.com/d/folders/35/messages/145034

Harry Wait

Reply, Reply All or Forward

The the contraction was

Thank you.

(No Subject)

From: Harry Wait (harrytrex@gmail.com)

To: mgableman@yahoo.com

Date: Monday, July 26, 2021, 08:17 AM CDT

 $\underline{https://www.jsonline.com/story/news/politics/2021/07/26/robin-vos-caught-middle-over-scrutiny-2020-election-wisconsin/8060045002/?utm_source=jsonline-$

Daily%20Briefing&utm_medium=email&utm_campaign=daily_briefing_greeting&utm_term=newsletter_greeting&utm_co_ntent=1258MJ-E-NLETTER65



Mike Gableman's phone contact

From: Harry Wait (harrytrex@gmail.com)

To: tjohannesagency@gmail.com; ramthun@hotmail.com

Cc: (jspodick1212@gmail.com; leslie.maj@hotmail.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 # so we can move this audit forward.

Michael Gableman cell # 715 371

We should talk further on Monday morning.

Thanks for reaching out to our organization and feel free to call upon us for support,

Harry Wait

262-//0-

2

Definition of Forensic Audit Derived 7-19-2021.pdf 119.1kB



Upfront interview

From: Harry Wait (harrytrex@gmail.com)

To: mgableman@yahoo.com

Date: Sunday, August 1, 2021, 02:40 PM CDT

FYI

https://youtu.be/q7wnbHzBUBw



Well- barrens

Future Amicus brief to include Mike?

From: Harry Wait (harrytrex@gmail.com)

To: glwfishs@aol.com; pmbmap123@gmail.com; mgableman@yahoo.com

Date: Friday, July 30, 2021, 11:52 AM CDT

FYI

https://wisconsinexaminer.com/2021/07/29/the-organized-takeover-of-wisconsin-courts/



Robin.

It is unfathomable to me that you are holding up Janel's efforts to move forward with supeona's and depositions concerning the 2020 elections. Even a blind and deaf person could not be so oblivious to your constituent's roar of 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 truley 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
To: harrytrex@gmail.com
Harry Wait,
robin.vos@legis.wisconsin.gov
Cc: janel Brandtjen

Tue, Aug 17 at 9:54 AM

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 insofar as planning 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.

I apologize I was not able to speak with you yesterday, but my time on the road and the work I've been doing there has taken a little bit of a 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 To: Mike Gableman

Tue, Aug 17 at 10:56 AM

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 (harrytrex@gmail.com)

To: mgableman@yahoo.com

Date: Saturday, September 11, 2021, 10:45 AM CDT

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

"nist cause, and and

If you would like to share your thoughts about the Vos "audit" with Gableman, it is my understanding Gableman can be reached at (715) 371-6541)

Dearest 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 date.

(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 aquainted 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 vindicative Vos can again use against them, fund RINO campaigns, etc.

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

Sept. 14 / 4:00 PM Fundraiser

Tuesday, Campaign 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]

Sept. 14 /

A Fundraiser for Representative Jessie Rodriguez With 5:30 PM Fundraiser 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. jessie@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

Sep AM 27 Fundraiser

Mon, 11:00 Campaign Representative Kevin Petersen's 1st Annual Golf Scramble

> Representative Kevin Petersen'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: Petersen -Republican for 40th Assembly P.O. Box 227 Waupaca, WI 54981 RSVP to representative40@gmail.com or (920)636-

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

Tue. 5:30 Campaign Oct PM5

Please Join for a concert to honor America with Representative Warren Fundraiser Petryk

Google Calendar iCal/Outlook

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 person or couple) General Concert



Admission: \$25 per person Max
Contribution: \$1000/individual or
\$2000/couple Minimum Contribution:
\$25/individual or \$50/couple Please RSVP
by September 20th at
warren@warrenpetryk4assembly.com
Credit cards accepted at
www.warrenpetryk4assembly.com
Florian Gardens Conference Center [Map]

Wed, 5:00 Campaign Nov PM / 17 Fundraiser

Republican Party of Wisconsin – Wisconsin Night in DC

Wednesday, November 17, 2021 Republican Party of Wisconsin -Wisconsin Night in DC With Special Guests (Invited): Sen. Ron Johnson: Rep. Scott Fitzgerald; Rep. Mike Gallagher; Rep. Glenn Grothman; Rep. Bryan Steil; and Rep. Tom Tiffany Hosted by: Senate Majority Leader Devin LeMahieu: Speaker Robin Vos; Senate President Chris Kapenga; Majority Leader Rep. Jim Steineke, and Joint Finance Co-Chairs Sen. Howard Marklein and Rep. Mark 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 vbusch@wisgop.org or 608-257- Melanie Hubbard mhubbard@wisgop.org or 608-279-1 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 [Map]





Google Maps

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



Fwd: Gableman talking to conspiracy theorist Shiva.....

From: Harry Wait (harrytrex@gmail.com)

To: mgableman@yahoo.com; glwfishs@aol.com

Date: Wednesday, September 15, 2021, 08:46 AM CDT

FYI

Date: Wed, Sep 15, 2021 at 8:40 AM

Subject: Gableman talking to conspiracy theorist Shiva.....

To: Marley, Patrick patrick.marley@jrn.com

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, Ayyadurai 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.

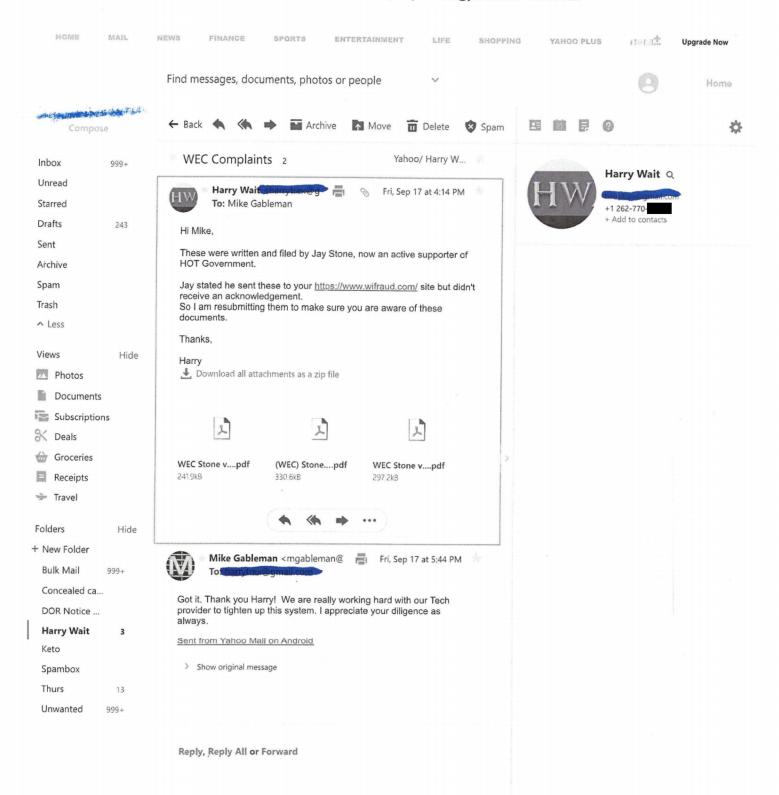


Respectfully,

Harry 262-770-

See Table 1 1 1





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.

mination of the con-

Thank you.

Patrick Marley State Capitol reporter

journal sentinel

Mobile: 608.235.7686 Office: 608.258.2262 patrick.marley@jrn.com @patrickdmarley www.jsonline.com



EXTERNAL: Walworth County GOP Membership Meeting Dec 2

Ron Heuer <wiscjustice@outlook.com>

Thu 11/11/2021 5:33 PM

To: Coms < Coms@wispecialcounsel.org>

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 Elkorn, 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: Coms < Coms@wispecialcounsel.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@citvofmadison.com

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EXTERNAL: Subpoenas to the City of Green Bay and City officials

Jeffrey Mandell < JMandell@staffordlaw.com>

Thu 10/7/2021 11:12 AM

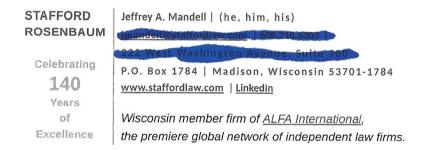
To: Coms <Coms@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>

Cc: Mel Barnes (mbarnes@lawforward.org) <mbarnes@lawforward.org>; Christine Sun (christine@statesuniteddemocracy.org) <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.



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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: Coms < Coms@wispecialcounsel.org>

Mr. Niemierowicz,

Thank you for the 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: Coms < Coms@wispecialcounsel.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.

EXTERNAL: Fwd: Gableman Investigation

RHH <ronheuer@gmail.com>

Fri 10/8/2021 5:02 PM

To: Coms < Coms@wispecialcounsel.org>

FYI feedback from the LaCrosse GOP Chairman

----- Forwarded message ------

From: Bill Feehan billfeehan2@g

Date: Fri, Oct 8, 2021, 10:43 AM Subject: Re: Gableman Investigation To: RHH <ronheuer@gmail.com>

Hi Ron.

The press is always against us. Sickening 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://lacrossegop.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

Company of the company of the contract of the

EXTERNAL: Good job

RHH <ronheuer@gmail.com>

Sun 10/10/2021 10:53 AM

To: Coms < Coms@wispecialcounsel.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. State of the Alemann .

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

EXTERNAL: FEC Complaints - Jay Stone

James Carlson (carlson@stillwateroffice.net)

Mon 10/11/2021 10:21 AM

To: Coms < Coms@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

EXTERNAL: Jay Stone Complaints

James Carlson < jcarlson@stillwateroffice.net>

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

EXTERNAL: New WEC Complaint Against Meagan Wolfe

James Carlson < carlson@stillwateroffice.net>

Mon 10/11/2021 10:23 AM

To: Coms < Coms@wispecialcounsel.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 election 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

EXTERNAL: WEC Complaints

jay stone {jayjoelstone@gmail.com>

Mon 10/11/2021 10:55 AM

To: Coms < Coms@wispecialcounsel.org>

Hi Mike,

It was good to speak with you and Carol.

Please see attached.

Positive Regards,

EXTERNAL: FW: Memo From Leg. Council

Fawcett, Steve < Steve. Fawcett@legis.wisconsin.gov>

Tue 10/12/2021 12:18 PM

To: Coms < Coms@wispecialcounsel.org>

From: Mautz, Kelly <Kelly.Mautz@legis.wisconsin.gov>

Sent: Monday, October 11, 2021 2:25 PM

To: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov> **Cc:** Hurley, Peggy <Peggy.Hurley@legis.wisconsin.gov>

Subject: Memo From Leg. Council

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 | <u>kelly.mautz@legis.wisconsin.gov</u>
One East Main Street, Suite 401, Madison, WI 53703

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: 608.235.7686
Office: 608.258.2262
patrick.marley@jrn.com
@patrickdmarley
www.jsonline.com

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

Good morning Ted/Janine,

EXTERNAL : Fwd: Complaint_Stone v. Barrett.pdf

RHH <ronheuer@gmail.com>

Fri 10/15/2021 6:00 PM

To: Coms <Coms@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>; 3 <3@wispecialcounsel.org>

1 attachments (4 MB)

Complaint_Stone v. Barrett.pdf;

Mike,

If didn't have this...Here is a copy of the 97 page complaint filed by Jay Stone in August againt the WI-5 players.

Ron Heuer

Sent from my iPhone

EXTERNAL: Green Bay Documents - Supplement

Mel Barnes mbarnes@lawforward.org

Mon 10/18/2021 5:01 PM

To: 6 <6@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>

Cc: Jeffrey Mandell <jmandell@staffordlaw.com>; Christine Sun <christine@statesuniteddemocracy.org>; Victoria Bassetti <victoria@statesuniteddemocracy.org>; Aaron Scherzer <Aaron@statesuniteddemocracy.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

Mbarnes@lawforward.org | 920.74

Law Forward, Inc.

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







@lawfwd

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.

EXTERNAL: Fwd: Fw: Special Counsel Office Analysis

Darlene Lathrop @dlathrop@gottesman-company.com>

Wed 11/10/2021 5:36 PM

To: Coms < Coms@wispecialcounsel.org>

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

: 1

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 Analysist, this 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 worth 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. - <u>Video Conferencing, Cloud Phone, Webinars, Chat, Virtual Events | Zoom</u>

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 262

Sincerely,

Darlene

EXTERNAL: Interim report

Smith, Matt <Matt.Smith@hearst.com>

Wed 11/10/2021 4:42 PM

To: Coms < Coms@wispecialcounsel.org>

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

Thanks-Matt WISN TV

Sent from my iPhone

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@wispecialcounsel.org>

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.

1

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) 608.712.8683 (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: EL DL Administration < ELECDLAdministration@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: 608-261-2028

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 (Cotcor.net)

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: determined)

November 2 - December 1, 2021 (with option for monthly retainer commitment to be

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, TCPR 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)

Expenses: While nothing significant is expected, if expenses should exceed \$500/month, TCPR would ask for permission in advance before incurring those expenses.

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 Zeidler 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

From: Coms

Sent: Thursday, October 21, 2021 11:36 AM

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@wispecialcounsel.org>

Zak,

Here are my expenses for Oct. Let me know if you need anything else.

Ron Heuer

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 Gableman:

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: 608-267-8715

mhaas@cityofmadison.com

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From: Coms

Sent: Thursday, October 21, 2021 11:32 AM

To: Haas, Michael R

Subject: Subpoena of Parties

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

Dear Mr. Haas,

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

EXTERNAL: Re: Gableman Subpoena Testimony

Joseph Santeler **Toesanteler**

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

From: Joseph Santeler < joesanteler@gmail.com > Sent: Wednesday, October 6, 2021 9:35 AM

To: Fawcett, Steve < Steve-Fawcett@legis.wisconsin.gov>

Subject: Gableman Subpoena Testimony

Mr. Fawcett:

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 Gableman to the email that I cc'd here? Thanks!

Best,

Steve Fawcett General Counsel Office of Assembly Speaker Robin Vos 608,266,3387

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EXTERNAL: Question on identity of Carol M. and other employees

Marley, Patrick <patrick.marley@jrn.com>

Wed 10/27/2021 10:09 AM

To: Coms <Coms@wispecialcounsel.org>

Hi Zakorv:

A woman calling herself Carol M. has been contacting cities and the AG's office saying she works for the Office of Special Counsel. Does this person actually work for the special counsel and if so what is her last name? Is she an attorney or does she have some other role with the office?

In addition, can you please tell me who else works for the office? Specifically, who have been assigned the email addresses 2@wispecialcounsel.org, 4@wispecialcounsel.org and 5@wispecialcounsel.org? If you are not disclosing this information, can you tell me the basis for withholding these names, given that everyone is being paid by taxpayers?

Thank you.

Patrick Marley State Capitol reporter

journal sentinel

Mobile: 608.235.7686 Office: 608.258.2262 patrick.marley@jrn.com @patrickdmarley www.jsonline.com

EXTERNAL : RE: EXTERNAL : Teleconference between Tom, Mike and Me

Thomas Ciesielka <tc@tcpr.net>

Tue 10/26/2021 2:33 PM

To: Erick Kaardal kaardal@mklaw.com; Coms <Coms@wispecialcounsel.org> Thanks for setting this up, Erick.

Thomas Ciesielka

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(0) 312-422-1333



From: Erick Kaardal kaardal@mklaw.com Sent: Tuesday, October 26, 2021 2:11 PM

To: 'Coms' <Coms@wispecialcounsel.org>; Thomas Ciesielka ctc@tcp.ne Subject: RE: EXTERNAL : Teleconference between Tom, Mike and Me

We're confirmed then for 11 a.m. tomorrow. I will initiate call. Thanks.

From: Coms < Coms@wispecialcounsel.org > Sent: Tuesday, October 26, 2021 2:07 PM

To: Erick Kaardal < kaardal@mklaw.com; 'Thomas Ciesielka' < tc@tcpr.net> Subject: RE: EXTERNAL: Teleconference between Tom, Mike and Me

Sounds good!

Mike

Sent from Mail for Windows

From: Erick Kaardal

Sent: Tuesday, October 26, 2021 12:30 PM

To: 'Thomas Ciesielka'

Cc: Coms

Subject: EXTERNAL: Teleconference between Tom, Mike and Me

EXTERNAL: Resume

Clinton W. Lancaster < clint@thelancasterlawfirm.com

Thu 10/21/2021 2:05 PM

To: Coms < Coms@wispecialcounsel.org>

My resume is attached.

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.

Clinton W. Lancaster, Partner, Attorney at Law

and the second

LANCASTER LAW FIRM, PLLC clint@TheLancasterLawFirm.com Tel: (501) 776-2224 Fax: (501) 778-6186

www.TheLancasterLawFirm.com

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A SHIP OF BUILDING

EXTERNAL: WEC and CTCL Election Grant Comparison

jay stone **∢jayjoelstone@gmail.com**

Sun 10/24/2021 3:55 PM

To: Coms < Coms@wispecialcounsel.org>

Hi Mike.

I attached a table with a WEC and CTCL grant comparison. I plan to use the table in my Meagan Wolfe complaint to show that there were enough irregularities between the CTCL and WEC election grants that Wolfe should have investigated my original August 28, 2020 complaint.

I recall Meagan Wolfe testifying before Janel's Committee. I don't recall Wolfe answering specific questions about what was written in the Wisconsin Safe Voting Plan. I believe that the WSVP's first two items were red flags that Wolfe missed (see attached table). The first item is, "Encourage and increase absentee voting by mail or early in-person voting" (This is a GOTV drive) and the second item is,"Dramatically expand strategic voter education and outreach efforts, particularly to historically disenfranchised voters" (This is another GOTV drive).

Positive Regards,

jay stone

EXTERNAL: Re: Checking in

Smith, Matt <Matt.Smith@hearst.com>

Fri 10/22/2021 2:19 PM

To: Coms Coms@wispecialcounsel.org>

Checking in again, any response to the DOJ motion and court hearing set for Monday?

Thanks, Matt

Sent from my iPhone

On Oct 21, 2021, at 1:02 PM, Smith, Matt < Matt.Smith@hearst.com > wrote:

Hey there -

Checking in to confirm no testimony is scheduled with any election officials/mayors tomorrow (Friday 10/22)?

Thanks, Matt

MATT SMITH

WISN-TV | 759 N. 19th St., Milwaukee, WI 53233 (o) 414-937-3360 | (c) 414-651-4845 <u>TWITTER</u> | <u>FACEBOOK</u> | <u>INSTAGRAM</u>

<image001.gif>

EXTERNAL: Resume

Sophia Tjotjos stjotjos@outlook.com>

Thu 10/21/2021 1:07 PM

To: Coms < Coms@wispecialcounsel.org>

Hello Zackory,

Per Mike's request, I have attached my resume to this email for his review before our zoom call today.

Thank you,

Sophia Papandreas Tjotjos, Esq.

(440)781-

EXTERNAL: Fwd: RESUME 2021 CULPEPER.pdf

Megan Frederick < homegrownintegrity@gmail.com

Thu 10/21/2021 12:59 PM

To: Coms < Coms@wispecialcounsel.org>

Zakory,

Attached is my resume. I apologize in advance for the old fashioned style! My vitae doesn't have the same abundance of info and I haven't updated this one yet, so I thought Mike would want this one instead of the slimmed down vitae. Let me know if you need anything else!

Best,

Megan

EXTERNAL: Invoice 20210014781-15 from MW - WISCONSIN

MW - WISCONSIN <corporatebillingsolutions@uslegalsupport.com>

Thu 10/21/2021 4:08 AM

To: Coms < Coms@wispecialcounsel.org >

MW - WISCONSIN

Invoice

Date Due

Balance

20210014781-15

12/04/2021

\$224.50

Click here if you to Pay Nov

Dear Zakory Niemierowicz,

Thank you for choosing U.S. Legal Support.

Attached please find an electronic version of your invoice for Court Reporting services:

Pertaining To:

General

In The Matter Of: In RE: Mark Krauter

Taken On:

10/15/2021

Sold To:

Zakory Niemierowicz (WI Special Counsel)

U.S. Legal Support is going green. No physical copy will be mailed. If you wish to change your preferred method of delivery, please reply to this email and we will gladly accommodate your request.

If you have any questions related to this invoice or any other billing inquiries please contact us at corporatebillingsolutions@uslegalsupport.com

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EXTERNAL: Fwd: Receipt of Complaint - Stone v. Wolfe

jay stone jay stone jay stone jay stone jay stone@gmail.com

Wed 10/20/2021 1:58 PM

To: Coms < Coms@wispecialcounsel.org>

Hi Mike.

Below are more correspondences between WEC attorney Judnic and myself. I threatened to file a WEC complaint in order to get Judnic to provide notification of receipt of my complaints that he should have done weeks earlier.

Positive Regards,

jay stone

----- Forwarded message -----

From: jay stone dayjoelstone@

Date: Mon, Oct 18, 2021 at 8:52 PM

Subject: Re: Receipt of Complaint - Stone v. Wolfe

To: Judnic, Nathan - ELECTIONS < Nathan.Judnic@wisconsin.gov >

Dear Mr Nathan W. Judnic,

Unless the WEC posts the Stone v. Wolfe complaint and exhibits on the WEC's Section §5.06 complaint page and unless the WEC acknowledges the receipt of my Stone v. Obama, et al.; Stone v. Jarrett et al.; and Stone v. Barrett et al. complaints I will file another WEC complaint.

Please respond in two business days by Wednesday, October 20, 2021.

Regards,

jay stone

On Thu, Oct 14, 2021 at 4:45 PM Judnic, Nathan - ELECTIONS < Nathan.Judnic@wisconsin.gov > wrote:

Mr. Stone,

The Wisconsin Elections Commission is in receipt of your complaint filed against Administrator Meagan Wolfe. Per the Commission's procedures, the Respondent is now afforded 10 business days to file a response. Once a response has been received, you are allowed 10 business days to file a reply.

Regards,

Nathan W. Judnic

Staff Attorney

EXTERNAL: Fwd: Please Recuse Yourself from My Four Pending WEC Complaints

jay stone 🖠 ayjoelstone@gmail.com>

Wed 10/20/2021 1:53 PM

To: Coms < Coms@wispecialcounsel.org>

Hi Mike.

Since you are investigating WEC's role in the 2020 election, I am forwarding you an email in which I asked WEC attorney Nathan Judnic to recuse himself from having any involvement in my four pending WEC complaints.

Positive Regards,

jay stone

------ Forwarded message ------

From: jay stone <jayjoelstone@gmail.com> Date: Wed, Oct. 20, 2021 at 11:39 AM

Subject: Please Recuse Yourself from My Four Pending WEC Complaints

To: Judnic, Nathan - ELECTIONS < Nathan. Judnic@wisconsin.gov >

October 20, 2021,

Dear Mr. Judnic,

I asked that you recuse yourself from any involvement in my four pending WEC complaints because of your pattern of improper conduct towards me. The USPS delivered my first complaint to the WEC on August 25, 2021. Nearly two months later, in an October 14, 2021 email from me to you, I asked for notification of receipt of three of my WEC complaints. Instead of explaining why you were not providing notification, you simply did not respond to my email. I called and left you two messages on your WEC voicemail, which you never responded to. I left a message on WEC's general voicemail that was never responded to; I assume you received my message because a WEC operator/employee told me you handle WEC complaints. You tried to protect your friend and colleague Administrator Meagan Wolfe by not posting my complaint against her on WEC's complaint webpage. I should not have had to use a threat of a WEC complaint to make you provide notification of receipt of my three WEC complaints and post my complaint against Meagan Wolfe on WEC's webpage. I believe your behavior towards me is baised and hostile because I dared to file WEC complaints. For these reasons I asked that you recuse yourself from my four pending WEC complaints.

Of note, I have filed four Federal election Commission complaints in the last year and I have had any conflict or problems with the FEC lawyers, investigators, or paralegals.

Mr. Judnic, you have until Friday, October 22, 2021 at 5 PM to send me your recusal notification on WEC stationary or I will take further action.

Regards,

jay stone

CC: WEC Board of Commissioners

EXTERNAL: Fwd: Color Copier Rental

RHH <ronheuer@gmail.com>

Tue 10/19/2021 2:54 PM

To: Coms < Coms@wispecialcounsel.org>

Mike and Zak,

This is the company and deal I would recommend we go with. Craig Woyal has been in business 27 years in the Waukesha area. His pricing on this machine on a lease basis is extremely competitive. For example for us to have this machine for 3.5 months, estimating 30,000 B&W copies and 10,000 color copies would cost us \$2,875. They provide the toner, we provide the paper. They are also close enough that in the event we have a service call required, they would be there quickly.

I've done research on this Copystar which is really Kyocera and it is a highly rated machine on the level of Toshiba. BTW, the next closet quote I received for the service I laid out in paragraph 1 was a Toshiba and that plan came in at \$6,725.

If I let Craig no by tomorrow morning, he can deliver the copier to our office on Thursday afternoon.

Your thoughts?

Ron Heuer

----- Forwarded message -----

From: Craig Woytal < Craig@milwaukeeofficeproducts.com >

Date: Mon, Oct 18, 2021 at 4:22 PM

Subject: Color Copier Rental

To: ronheuer@gmail.com <ronheuer@gmail.com>

Hello Ron,

Thank you for your time today and for this opportunity. We do short term rentals on the regular basis and we have units available. I have attached to this email information on what I would recommend for your rental.

Please let me know if you have any thoughts and or questions.

Thank you!

Craig Woytal Milwaukee Office Products, Inc. (262) 832-0222

www.milwaukeeofficeproducts.com

EXTERNAL: Re: Green Bay Documents - Supplement

Mel Barnes <mbarnes@lawforward.org>

Tue 10/19/2021 9:55 AM

To: 6 <6@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>

Cc: Jeffrey Mandell <jmandell@staffordlaw.com>; Christine Sun <christine@statesuniteddemocracy.org>; Victoria Bassetti <victoria@statesuniteddemocracy.org>; Aaron Scherzer <Aaron@statesuniteddemocracy.org>

Good Morning Mr. Kloster,

The file I sent yesterday did not include unique page numbers--I apologize. Attached is a version with identifying numbers continuous from our Friday production. Please reference this numbered version in any future communications for our mutual convenience.

Will you please confirm receipt of this copy?

Thank you, Mel

Mel Barnes (she, hers)

Staff Counsel Mbarnes@lawforward.org | 920.740.1816 Law Forward, Inc.

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





/lawfwd



@lawfwd

Interested in learning more about redistricting in Wisconsin? Check out our new guide.

From: Mel Barnes

Sent: Monday, October 18, 2021 5:01 PM

To: '6@wispecialcounsel.org' <6@wispecialcounsel.org'; 'coms@wispecialcounsel.org'

<coms@wispecialcounsel.org>

Cc: Jeffrey Mandell staffordlaw.com>; Christine Sun <christine@statesuniteddemocracy.org>; Victoria

Bassetti <victoria@statesuniteddemocracy.org>; Aaron Scherzer <Aaron@statesuniteddemocracy.org>

Subject: Green Bay Documents - Supplement

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.

From: Marley, Patrick

Sent: Monday, November 29, 2021 12:58 PM

To: 1; Coms

Subject: EXTERNAL: Open records request for legal contracts

Justice Gableman:

Under the state's open records law, I am requesting:

- -- Copies of all contracts and subcontracts between the Office of Special Counsel and the Thomas More Society;
- -- Copies of all contracts and subcontracts between the Office of Special Counsel and the Amistad Project;
- -- Copies of all contracts and subcontracts between the Office of Special Counsel and Mohrman, Kaardal and Erickson;
- -- Copies of all contracts and subcontracts between the Office of Special Counsel and attorney Jim Bopp and/or his firm;
- -- Copies of all contracts and subcontracts between the Office of Special Counsel and the James Madison Center for Free Speech.

I am seeking contracts and subcontracts that are made directly with the Office of Special Counsel, as well as contracts and subcontracts that are made with any of the office's contactors, including but not limited to Michael Dean.

If you have questions about this request, please let me know. Thank you.

Patrick Marley

State Capitol reporter

journal sentinel

Mobile: 608.235.7686 Office: 608.258.2262 patrick.marley@jrn.com @patrickdmarley www.jsonline.com



Sublease Agreement

This Sublease is made and entered into by and between CONSULTARE LLC (hereinafter "Sublessor") and THOMAS MORE SOCIETY (hereinafter "Sublessee").

Recitations

- 0.1 Whereas, Sublessee desires to sub-lease office space from Sublessor at the offices located at 155 S. Executive Drive Suites 212 & 110A, located in Brookfield, Wisconsin.
- 0.2 Whereas, Sublessor has agreed to sublease 886 rentable square feet of space to Sublessee commencing October 1, 2021 through the Lease termination date of September 30, 2022.
- 0.3 Whereas, Sublessor and Sublessee desire to accommodate the sub-lease in accordance with the agreement below.

Agreement

Now, therefore, in consideration of the above Recitations and the promises and agreements hereinafter contained, it is agreed between Sublessor and Sublessee that:

- 1.1 Term. Sublessee agrees to sub-lease the 886 rentable square feet of space, shown on the attached Exhibit A as "TMS" and the common area spaces, for a period of One (1) Year, commencing October 1, 2021 and ending at midnight on September 30, 2022.
- 1.2 Base Rent. Sublessee will pay to Sublessor the Base Rent of \$1218.25 per month. Rent shall be paid to Sublessor on or before the first day of each month of the term. Sublessor and Sublessee acknowledge and agree, and with its consent below, the Landlord acknowledges and agrees, that Sublessee's payment of Base Rent hereunder is Sublessee's only rental obligation with respect to its use and possession of the subleased premise and such payment of Base Rent includes Sublesee's share of real property taxes, insurance, utilities, building operation expenses and other services provided by Landlord under the Lease
- 1.3 Agreement. Sublessee agrees to abide by all terms, rules and regulations as set forth in Landlord's original Lease Agreement which is attached hereto and made part of this agreement. With respect to the subleased premises, Sublessee shall have all rights and obligations as Tenant has to the Demised Premises under said original Lease Agreement.
- 1.4 Improvements. None.
- 1.5 Warrant of Authority. Each party warrants and represents to the other that they have the power and authority to enter into and perform all their obligations under this Sub-lease and that such party has performed all acts and obtained all approvals necessary to make this Sub-lease a valid, binding legal obligation and each person who executes this Sub-lease in a representative capacity on behalf of either party individually warrants that (s)he is duly authorized to do so.

In witness whereof, this Sub-lease is duly executed and delivered as of the date specified below.

BY: Date: Q / Z 7 / Z \
Sublessor: Mighael Gablemen for Consultare LLC

BY: Andrew Balk Date: Sublessee: Andrew Bath for Thomas More Society

Landlord Consent: Juk Hoffman

John Hoffman

John Hoffman

John Hoffman

John Hoffman

John Hoffman



Sublease Agreement

This Sublease is made and entered into by and between CONSULTARE LLC (hereinafter "Sublessor") and MOHRMAN, KAARDAL & ERICKSON, P.A. (hereinafter "Sublessee").

Recitations

- 0.1 Whereas, Sublessee desires to sub-lease office space from Sublessor at the offices located at 155 S. Executive Drive Suites 212 & 110A, located in Brookfield, Wisconsin.
- 0.2 Whereas, Sublessor has agreed to sublease 1272 rentable square feet of space to Sublessee commencing October 1, 2021 through the Lease termination date of September 30, 2022.
- 0.3 Whereas, Sublessor and Sublessee desire to accommodate the sub-lease in accordance with the agreement below.

Agreement

Now, therefore, in consideration of the above Recitations and the promises and agreements hereinafter contained, it is agreed between Sublessor and Sublessee that:

- 1.1 Term. Sublessee agrees to sub-lease the 1272 rentable square feet of space for a period of One (1) Year, commencing October 1, 2021 and ending at midnight on September 30, 2022.
- 1.2 Base Rent. Sublessee will pay to Sublessor the Base Rent of \$1749 .00 per month. Rent shall be paid to Sublessor on or before the first day of each month of the term.
- 1.3 Agreement. Sublessee agrees to abide by all terms, rules and regulations as set forth in Landlord's original Lease Agreement which is attached hereto and made part of this agreement.
- 1.4 Improvements. None.
- 1.5 Warrant of Authority. Each party warrants and represents to the other that they have the power and authority to enter into and perform all their obligations under this Sub-lease and that such party has performed all acts and obtained all approvals necessary to make this Sub-lease a valid, binding legal obligation and each person who executes this Sub-lease in a representative capacity on behalf of either party individually warrants that (s)he is duly authorized to do so.

In witness whereof, this Sub-lease is duly executed and delivered as of the date specified below.

BY: Sublessors Michael Gablemen for Consulta	Date: 9/22/2021 re LLC	
BY: William Molyman Sublessee 24/4/4/4 am Mohrman for Mohrman	Date: 9/21/2021 , Kaardal & Erickson, P.A.	
Landlord Consent: Jack Hoffman	9/22/2021	
Johnd-Hoffman⊨Managing Partner		



AGREEMENT FOR LEGAL SERVICES

THIS AGREEMENT, is made and entered into by and between Michael Gableman, in his official capacity as Special Counsel, Wisconsin State Assembly Committee on Elections and Campaigns (hereinafter "Client") and The Bopp Law Firm, P.C. (hereinafter "The Firm"). This agreement supersedes any and all previously executed agreements between the parties with respect to the services contemplated herein.

WHEREAS, Client desires to retain The Firm to represent Client in the litigation styled as *Wisconsin Election Commission*, et al. v. *Wisconsin State Assembly*, et al., Case No. 2021-cv-002552 in the Wisconsin Dane County Circuit Court, and in any subsequent appellate proceedings.

THE PARTIES AGREE as follows:

Section 1 <u>Hourly Rates</u>. Client will pay the following hourly rates for attorneys: \$450/hour for James Bopp, Jr. and \$240/hour for Courtney Turner Milbank. Other attorneys may assist at The Firm's discretion at their corresponding hourly rates charged by the Firm. Hourly rates for attorneys undergo periodic review and may increase during the term of this Agreement upon notice to Client.

Section 2 <u>Local Counsel</u>. Pursuant to SCR 10.03(4), a non-resident attorney seeking admission to practice in Wisconsin courts must associate with a member of the State Bar of Wisconsin. Accordingly, Client authorizes The Firm to enter into an agreement with Michael D. Dean, LLC to serve as local counsel. Client will pay the following hourly rates for local counsel: \$275/hour for Michael D. Dean and \$175/hour for David J. Craig and Michael D. Dean, LLC will monthly invoice Client for their services, once approved by The Firm.

Section 3 <u>Costs and Expenses</u>. Costs and expenses are in addition to the hourly charges for legal services. Costs and expenses include, but are not limited to, court charges, copies, postage, telephone, fax, travel, parking, special materials, exhibits, photographs, investigators, experts, computer assisted legal research and all other disbursements, costs, or expenses attributable to said legal services. Client agrees to pay for computer assisted legal research at \$3.00 per minute. Client agrees to pay for copies and facsimiles (incoming or outgoing) at the rate of \$.25 per page for 1-25 total pages, \$.15 per page for 26-100 total pages, and \$.10 per page for more than 100 total pages. Total pages are those copied or facsimiled during a copying or facsimiling event.

Section 4 <u>Invoices</u>. The Firm shall invoice Client monthly for any fees, costs, or expenses incurred under this Agreement. All invoices are due and payable within 30 days of receipt. Each invoice shall constitute an account stated and objections must be made in a reasonable time. Interest accruing at 1.5% per month will be



applied to past due accounts until paid. Client agrees to pay all attorney fees, costs and expenses of collecting Client's account if legal action is taken to collect fees, costs and expenses due The Firm.

Section 5 <u>Client's Cooperation</u>. By this Agreement, Client agrees to cooperate with the Firm and provide all information known to Client or available to Client, which in the opinion of the Firm would aid in its representation of Client in this matter. Client further agrees to notify the Firm immediately of any change in Client's address or contact information, to review all documentation sent to Client by the Firm, and to promptly and thoroughly participate in the preparation and/or production of any documents that we request of Client.

Section 6 <u>Termination by Client</u>. The Firm will be obligated to honor any instructions of Client requesting termination of the Firm's representation, only if such instructions are delivered to The Firm in writing bearing the Client's personal signature. If Client elects to terminate The Firm's representation, Client is responsible for all fees, costs, and expenses incurred pursuant to this Agreement. Should The Firm be required to perform any services or functions after receipt of such instructions, Client is responsible for any fees, cost, and expenses for these services.

Section 7 <u>Withdrawal by The Firm</u>. The Firm also may withdraw from the representation of Client upon Client's failure to make payments in accordance with this Agreement, failure to cooperate with the agreed provisions of representation, or failure to follow the advice of the Firm, or under any circumstances permitted by or required by the Indiana Rules of Professional Conduct. Any termination of The Firm's representation would be subject to the approval of the tribunal and will only be done after reasonable notice has been provided.

Section 8 <u>File Retention and Destruction</u>. At the conclusion of the matter addressed in this Agreement, documents and property that Client has provided to us will, at Client's request, be returned to Client. The Firm shall retain Client's legal files for an indefinite period. At any time after five years have elapsed since the conclusion of the matter, after ten business days of notifying Client in writing, which includes by electronic mail sent to Client's last known electronic mail addresses, The Firm may destroy these files unless Client notifies The Firm in writing that it wishes to take possession of them. The Firm reserves the right to charge administrative fees and costs associated with researching, retrieving, copying, and delivering such files.

Section 9 <u>Disputes</u>. This Agreement shall be governed by Indiana law and courts in the State of Indiana. Any dispute arising under or in connection with the Agreement or related to any matter which is the subject of this Agreement shall be resolved on the basis of Indiana law without giving effect to Indiana's conflict of law principles and brought in a court located in Indiana.



The undersigned persons represent that they are duly authorized to sign this agreement and hereby agree to the terms and conditions of legal employment, as specified above.

This Agreement may be signed in any number of counterparts. Each counterpart is an original and together, all of the counterparts form a single document. Signatures delivered by email in PDF format shall be effective.

11 //	
Michael Gableman Special Counsel, Wisconsin State Assembly Committee on Elections and Campaigns	11/17/21 Date
As authorized and approved for payment by the Wisconsin State Assembly by:	
Robin Vos, Spenker of the Wisconsin State Assembly	11/n/21 Date
James Bopp, Jr. The Bopp Law Firm, P.C.	Date