

FILED
07-24-2024
Clerk of Circuit Court
Jackson County, WI
2024CV000071
Honorable Daniel S. Diehn
Branch 2

STATE OF WISCONSIN CIRCUIT COURT JACKSON COUNTY

STATES NEWSROOM,
d/b/a WISCONSIN EXAMINER
111 King St., Suite 24
Madison, WI 53703,

Petitioner,

Case Code: 30952
Case No. 24-CV-

CITY OF BLACK RIVER FALLS,
101 S. 2nd St.
Black River Falls, WI 54615,

Respondent.

PETITION FOR WRIT OF MANDAMUS

This is an action to enforce Wisconsin’s Open Records Law, Wis. Stat. §§ 19.31-19.39. State law declares it the public policy of this state that every citizen is presumptively entitled to complete access to the records of state and local government.

Petitioner States Newsroom, d/b/a Wisconsin Examiner, by its Attorney, Thomas C. Kamenick, of the Wisconsin Transparency Project and Kamenick Law Office, LLC, hereby petitions this Court for a writ of mandamus directing the Respondent, City of Black River Falls, to produce records requested by the Petitioner, alleging to the Court as follows:

FACTUAL ALLEGATIONS

Parties

1. Petitioner States Newsroom is a national 501(c)(3) nonprofit media organization that employs more than 204 full-time editors, reporters, and support staff in 36 states across the country.

2. States Newsroom operates Wisconsin Examiner in Wisconsin. Wisconsin Examiner is a nonpartisan, nonprofit news site offering a fresh perspective on politics and policy. It is the largest news bureau covering state government in Madison, and it offers investigative reporting and daily coverage dedicated to the public interest. Wisconsin Examiner has an address of 111 King Street, Suite 24, Madison, Wisconsin 53703.

3. Respondent City of Black River Falls is a municipality incorporated under the laws of Wisconsin with a business address of 101 South Second Street, Black River Falls, Wisconsin 54615.

4. As a “local . . . public body corporate and politics,” the City is an “Authority” under Wis. Stat. § 19.32(1).

Venue & Jurisdiction

5. This Court has jurisdiction to hear this matter under Wis. Stat. § 19.37(1)(a), which provides record requesters a private right to “bring an action for mandamus asking a court to order release of the record.”

6. Venue is proper in this County under Wis. Stat. § 801.50(2), as the action arose in this County and the Respondent does substantial business in this County.

Facts

7. Henry Redman is a reporter for Wisconsin Examiner. His work has appeared in Urban Milwaukee, the Daily Jefferson County Union, the Chicago Daily Herald, Yahoo News, Apple News and other outlets. Redman has won numerous awards for his work, including best online coverage of news and best feature writing from the Milwaukee Press Club. At all times relevant to this lawsuit, Redman was acting on behalf of Petitioner.

8. On March 6, 2024, Redman made a written request to the City for the following records:

any internal Black River Falls emails and communications, including attachments sent and received by Mayor Jay Eddy, City Attorney Mark Radcliffe, and police department personnel since September 2022 that mention the following names and phrases:

"Kenneth Taylor"

"Taylor"

"Joy Taylor"

True and accurate copies of emails containing that request, other requests, and other communications with the City are attached as Exhibit A.

9. On March 8, the City responded, writing:

The retrieval of e-mail records responsive to your March 6, 2024 open records request requires assistance from our third party Information Technology vendor, Tech Pros due to our email archives being stored in a cloud based system. Tech Pros has estimated the charge for this service would be \$4,400.00. Please advise if you would like us to retrieve these emails/electronic correspondences. If you would like us to proceed with this request, we will require a minimum payment in the amount of \$4,400.00 in advance. Also, please be advised that some or all correspondences with the City attorney may be protected by attorney client privilege, and therefore there will be additional charge of \$225.00 per hour for reviewing emails that include the city attorney.

10. On April 25, Redman amended his request to September 2022 through March 2023.

11. On April 29, the City responded that it would cost \$3,000 as well as “an additional charge of \$225.00 per hour for reviewing emails that include the city attorney.”

12. On May 8, Redman asked the City for “a copy of the city’s contract with Tech Pros as well as any emails between the company and city staff about my request.”

13. On May 13, the City responded that it “does not have a contract with Tech Pros,” but did provide email communications. True and accurate copies of those emails are attached as Exhibit B.

14. In those emails, Tech Pros indicated it would need to purchase 10 “Microsoft Purview E-Discovery Licenses” at \$144 apiece and it would spend 20 hours on the request, billed at \$150/hr.

15. On May 14, Redman asked whether the City had anything “to lay out the terms of Tech Pros work with the city? Proposals, policies, terms of service, ‘agreements’, price sheets, MOUs?”

16. The same day, the City responded, “There are no written agreements between the City and Tech Pros.”

17. On May 16, Redman amended his request to only the mayor, the city attorney, and the chief of police, rather than all police personnel.

18. The same day, the City responded with a price of \$800 plus an additional \$450 for “attorney review of these emails to check for attorney client privilege.”

19. On May 17, Redman amended his request to add two police officers.

20. On May 22, the City responded with a price of \$1,200 plus \$450 for “attorney review of these emails to check for attorney client privilege.”

LEGAL CLAIMS **Legal Provisions Common to All Claims**

21. Under Wis. Stat. § 19.31, “it is declared to be the public policy of this state that all persons are entitled to the greatest possible information regarding the affairs of government and the official acts of those officers and employees who represent them.” The statute further provides that “[t]he denial of public access generally is contrary to the public interest, and only in an exceptional case may access be denied,” establishing “a presumption of complete public access to government records, consistent with the conduct of governmental business.”

22. The emails Wisconsin Examiner requested contain information and were created and/or kept by the City and therefore are “records” under Wis. Stat. § 19.32(2).

23. Wisconsin Examiner has a clear legal right to receive the records it requested and the City has a plain legal duty to produce them. Wis. Stat. § 19.35(1)(a) and (b) provide that “any requester has a right to inspect any record” and “to make or receive a copy of a record.” Wis. Stat. § 19.35(4) provides that “Each authority, upon request for any record, shall, as soon as practicable and without delay, either fill the request or notify the requester of the authority’s determination to deny the request in whole or in part and the reasons therefor.”

Claim I
Violation of Wis. Stat. § 19.35(3); Unlawful Fees

24. Authorities are only allowed to charge those fees expressly permitted by statute for records. *Milwaukee Journal Sentinel v. Milwaukee*, 2012 WI 65, ¶36, 341 Wis. 2d 607, 815 N.W.2d 367.

25. Charging an unlawful fee is effectively a denial of a request for records. *Id.*, ¶5.

26. Under Wis. Stat. § 19.35(3)(c), an authority is allowed to “impose a fee upon a requester for locating a record, not exceeding the actual, necessary and direct cost of location, if the cost is \$50 or more.”

27. “Locating” electronic records with searches takes very little time at all. To “locate” a record is to find it by searching. *Journal Sentinel*, 341 Wis. 2d 607, ¶29. “Reviewing” a record is not part of “locating,” *id.*, ¶30, nor does a record have to be in reproducible form before it is considered “located,” *id.*, ¶29. An electronic record is “located” once it has been searched for and found such that it can be viewed. *Id.*, ¶29.

28. The City has chosen a method of storage of its email records that is needlessly burdensome and expensive to use.

29. The City has no contract or other agreement with Tech Pros, which can apparently charge any fee it likes for record access.

30. The City has no way of determining whether Tech Pros' charges are the company's actual costs, whether they are necessarily incurred, or whether a record request directly charges them.

31. Upon information and belief, Tech Pros makes a profit off the fees it charges for record access above and beyond its "actual" costs.

32. It is not "necessary" for the City to utilize such a burdensome and expensive method of storing its records.

33. The fees the City is attempting to charge are those imposed by Tech Pros and are therefore not "direct" costs, but rather are indirect costs.

34. "[I]f a record is produced or collected by a person who is not an authority pursuant to a contract entered into by that person with an authority, the authorized fees for obtaining a copy of the record may not exceed the actual, necessary, and direct cost of reproduction or transcription of the record incurred by the person who makes the reproduction or transcription, unless a fee is otherwise established or authorized to be established by law." Wis. Stat. § 19.35(3)(g).

35. Tech Pros is not an authority, but collects records for the City on a contractual basis, even if that contract is not formalized.

36. Tech Pros' fees exceed the actual, necessary, and direct cost of reproduction or transcription of the records in their possession.

37. The fees the City is trying to charge Wisconsin Examiner therefore violate Wis. Stat. § 19.35(3).

38. The City also admits it is charging Wisconsin Examiner for time to “review . . . these emails to check for attorney client privilege,” which is expressly prohibited by *Journal Sentinel*, 341 Wis. 2d 607, ¶30.

39. Those fees therefore also violate Wis. Stat. § 19.35(3).

RELIEF REQUESTED

WHEREFORE, the Petitioner demands a writ of mandamus to issue against the Respondent under Wis. Stat. § 19.37(1):

1. Compelling the Respondent to produce the requested records;
2. Declaring the Petitioner’s rights and limiting the Respondent’s conduct with respect to the requested records;
3. Declaring the Respondent’s location fees exceed its “actual, necessary and direct cost of locating a record”;
4. Awarding the Petitioner reasonable attorney fees, damages of not less than \$100 for each violation, and other actual costs under Wis. Stat. § 19.37(2);
5. Awarding the Petitioner punitive damages under Wis. Stat. § 19.37(3); and
6. Awarding such other relief as the Court deems appropriate.

Dated this July 24, 2024.

Respectfully submitted,
WISCONSIN TRANSPARENCY PROJECT
KAMENICK LAW OFFICE, LLC
Attorney for Petitioner

Electronically Signed by Thomas C. Kamenick
Thomas C. Kamenick, WBN 1063682
(262) 365-7434; tom@wiopenrecords.com
1144 Noridge Trl.
Port Washington, WI 53074

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

From: **Brad Chown** <brad.chown@blackriverfallswi.gov>

Date: Wed, May 22, 2024 at 8:38 AM

Subject: RE: Open records request

To: Henry Redman <henry@wisconsinexaminer.com>



Mr. Redman ~

The cost to retrieve the records is estimated at \$1,200 and attorney review of these emails to check for attorney client privilege is estimated at another \$450 so total estimated cost is \$1,650. We would require \$1,650 in advance and payment of any additional charges to be paid prior to releasing the records.

Thank you !

A. Brad Chown

A. Brad Chown | City Administrator

City of Black River Falls

101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

E-Mail: city.admin@blackriverfallswi.gov

Website: www.blackriverfallswi.gov

Facebook: www.facebook/blackriverfallswi/

Population: 3,622



From: Henry Redman <henry@wisconsinexaminer.com>

Sent: Friday, May 17, 2024 10:14 AM

To: Brad Chown <brad.chown@blackriverfallswi.gov>

Subject: Re: Open records request

Got it, and one more update, how much would it be if I add in emails from officers Ethan Shaffer and Charles Smart to the search?

On Thu, May 16, 2024 at 1:29 PM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

The cost to retrieve the records is estimated at \$800 and attorney review of these emails to check for attorney client privilege is estimated at another \$450 so total estimated cost is \$1,250. We would require \$1,250 in advance and payment of any additional charges to be paid prior to releasing the records.

Thank you !!

A. Brad Chown

A. Brad Chown | City Administrator

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101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

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Population: 3,622



From: Henry Redman <henry@wisconsinexaminer.com>

Sent: Thursday, May 16, 2024 10:20 AM

To: Brad Chown <brad.chown@blackriverfallswi.gov>

Subject: Re: Open records request

Got it, thanks! How much would the request cost if I adjusted it to not include all police personnel, reworded as this:

To request, under Wisconsin open records law, any internal Black River Falls emails and communications, including attachments sent and received by Mayor Jay Eddy, City Attorney Mark Radcliffe, and the chief of police since September 2022 that mention the following names and phrases:

"Kenneth Taylor"

"Taylor"

"Joy Taylor"

On Tue, May 14, 2024 at 11:30 AM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

There are no written agreements between the City and Tech Pros.

Thank you !

A. Brad Chown

A. Brad Chown | City Administrator

City of Black River Falls

101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

E-Mail: city.admin@blackriverfallswi.gov

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Population: 3,622



From: Henry Redman <henry@wisconsinexaminer.com>

Sent: Tuesday, May 14, 2024 11:15 AM

To: Brad Chown <brad.chown@blackriverfallswi.gov>

Subject: Re: Open records request

Thanks! So if there's not a contract is there something to lay out the terms of Tech Pros work with the city? Proposals, policies, terms of service, "agreements", price sheets, MOUs?

On Mon, May 13, 2024 at 9:32 AM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

The City does not have a contract with Tech Pros. The records responsive to your request for emails between the City and Tech Pros related to your original open records request are attached.

Thank you !!

A. Brad Chown

A. Brad Chown | City Administrator

City of Black River Falls

101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

E-Mail: city.admin@blackriverfallswi.gov

Website: www.blackriverfallswi.gov

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Population: 3,622



From: Henry Redman <henry@wisconsinexaminer.com>

Sent: Wednesday, May 8, 2024 11:11 AM

To: Brad Chown <brad.chown@blackriverfallswi.gov>

Subject: Re: Open records request

Okay, thanks Brad. Before paying the \$3,000 I'd like to first request a copy of the city's contract with Tech Pros as well as any emails between the company and city staff about my request.

Thanks!

On Mon, Apr 29, 2024 at 1:29 PM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

The retrieval of e-mail records responsive to your March 6, 2024 open records request as revised with your April 25, 2024 email changing the timeframe of the request still requires assistance from our third party Information Technology vendor, Tech Pros due to our email archives being stored in a cloud based system. Tech Pros has estimated the charge for this service would be \$3,000.00.

Please advise if you would like us to retrieve these emails/electronic correspondences. If you would like us to proceed with this request, we will require a minimum payment in the amount of \$3,000.00 in advance. This is an estimate and additional charges may apply. Also, please be advised that some or all correspondences with the City attorney may be protected by attorney client privilege, and therefore there will be additional charge of \$225.00 per hour for reviewing emails that include the city attorney.

Please feel free to contact me if you have any questions.

I look forward to your response.

Thank you !

A. Brad Chown

A. Brad Chown | City Administrator

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101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

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Website: www.blackriverfallswi.gov

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From: Henry Redman <henry@wisconsinexaminer.com>

Sent: Thursday, April 25, 2024 10:53 AM

To: Brad Chown <brad.chown@blackriverfallswi.gov>

Subject: Re: Open records request

Hi Brad,

Sorry I've been busy with other work and out of town. I'm wondering what the request would cost if I limited it to September 2022 through March 2023?

On Mon, Apr 15, 2024 at 4:13 PM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

I am following up to find out the status of your March 6, 2024 open records request and whether or not you want us to proceed.

Thank you !

A. Brad Chown

A. Brad Chown | City Administrator

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E-Mail: city.admin@blackriverfallswi.gov

Website: www.blackriverfallswi.gov

Facebook: www.facebook/blackriverfallswi/

Population: 3,622



From: Brad Chown

Sent: Friday, March 8, 2024 4:27 PM

To: henry@wisconsinexaminer.com

Cc: Jay Eddy <brf.mayor@blackriverfallswi.gov>; BRF Police Chief <brfpd.chief@blackriverfalls.us>; mark@radcliffelawfirm.com

Subject: RE: Open records request

Mr. Redman ~

The retrieval of e-mail records responsive to your March 6, 2024 open records request requires assistance from our third party Information Technology vendor, Tech Pros due to our email archives being stored in a cloud based system. Tech Pros has estimated the charge for this service would be \$4,400.00. Please advise if you would like us to retrieve these emails/electronic correspondences. If you would like us to proceed with this request, we will require a minimum payment in the amount of \$4,400.00 in advance. Also, please be advised that some or all correspondences with the City attorney may be protected by attorney client privilege, and therefore there will be additional charge of \$225.00 per hour for reviewing emails that include the city attorney.

Please feel free to contact me if you have any questions.

I look forward to your response.

Thank you !

A. Brad Chown

A. Brad Chown | City Administrator

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Website: www.blackriverfallswi.gov

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Population: 3,622



From: Jay Eddy <brf.mayor@blackriverfallswi.gov>
Sent: Wednesday, March 6, 2024 11:14 AM
To: Brad Chown <brad.chown@blackriverfallswi.gov>
Subject: Fwd: Open records request

Sent from my iPhone

Begin forwarded message:

From: Henry Redman <henry@wisconsinexaminer.com>
Date: March 6, 2024 at 11:04:30 AM CST
To: BRF Police Chief <brfpd.chief@blackriverfalls.us>, Jay Eddy <brf.mayor@blackriverfallswi.gov>, cityattorney@radcliffelawfirm.com
Subject: Open records request

Hello,

This email is to request, under Wisconsin open records law, any internal Black River Falls emails and communications, including attachments sent and received by Mayor Jay Eddy, City Attorney Mark Radcliffe, and police department personnel since September 2022 that mention the following names and phrases:

"Kenneth Taylor"

"Taylor"

"Joy Taylor"

You can reach me here or the number below with any questions or clarifications. Digital .pdf files are preferred.

Thanks,

--

Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

--

Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

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Henry Redman

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Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

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Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

Brad Chown

From: Brad Chown
Sent: Monday, April 29, 2024 1:25 PM
To: John Gethers
Subject: RE: Open records request

Ok, thanks.

A. Brad Chown

A. Brad Chown | City Administrator

City of Black River Falls

101 South Second Street, Black River Falls, WI 54615

Phone: 715-284-5514 | Cell: 715-299-3671

E-Mail: city.admin@blackriverfallswi.gov

Website: www.blackriverfallswi.gov

Facebook: www.facebook.com/blackriverfallswi/

Population: 3,622



From: John Gethers <john.gethers@techpros.biz>
Sent: Monday, April 29, 2024 1:23 PM
To: Brad Chown <brad.chown@blackriverfallswi.gov>
Subject: Re: Open records request

Still requires the licensing and time. \$3K. It's tough to estimate because some of this is before the O365 migration.

John



John Gethers

President

Tech Pros


Phone: 715.544.3102

Email: John.Gethers@techpros.biz

Website: www.techpros.biz

[Book a Call](#)

 [Schedule a Technology Review](#)

 [Schedule an Assessment](#)

From: Brad Chown <brad.chown@blackriverfallswi.gov>

Sent: Monday, April 29, 2024 11:20:58 AM

To: John Gethers <john.gethers@techpros.biz>

Subject: FW: Open records request

John ~

Any updates on cost related to revised open records request as illustrated below?

Thanks !!

A. Brad Chown

A. Brad Chown | City Administrator

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Phone: 715-284-5514 | Cell: 715-299-3671

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Population: 3,622



Brad Chown

From: Brad Chown
Sent: Thursday, April 25, 2024 11:01 AM
To: John Gethers
Subject: FW: Open records request

John ~

Let me know what the cost would be related to the revised open records request below

Thanks !!

A. Brad Chown

A. Brad Chown | City Administrator

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Website: www.blackriverfallswi.gov

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Population: 3,622



From: Henry Redman <henry@wisconsinexaminer.com>
Sent: Thursday, April 25, 2024 10:53 AM
To: Brad Chown <brad.chown@blackriverfallswi.gov>
Subject: Re: Open records request

Hi Brad,

Sorry I've been busy with other work and out of town. I'm wondering what the request would cost if I limited it to September 2022 through March 2023?

On Mon, Apr 15, 2024 at 4:13 PM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

Mr. Redman ~

I am following up to find out the status of your March 6, 2024 open records request and whether or not you want us to proceed.

From: Henry Redman <henry@wisconsinexaminer.com>
Sent: Thursday, April 25, 2024 10:53 AM
To: Brad Chown <brad.chown@blackriverfallswi.gov>
Subject: Re: Open records request

Hi Brad,

Sorry I've been busy with other work and out of town. I'm wondering what the request would cost if I limited it to September 2022 through March 2023?

On Mon, Apr 15, 2024 at 4:13 PM Brad Chown <brad.chown@blackriverfallswi.gov> wrote:

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I am following up to find out the status of your March 6, 2024 open records request and whether or not you want us to proceed.

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From: Brad Chown
Sent: Friday, March 8, 2024 4:27 PM
To: henry@wisconsinexaminer.com
Cc: Jay Eddy <brf.mayor@blackriverfallswi.gov>; BRF Police Chief <brfpd.chief@blackriverfalls.us>; mark@radcliffelawfirm.com
Subject: RE: Open records request

Mr. Redman ~

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therefore there will be additional charge of \$225.00 per hour for reviewing emails that include the city attorney.

Please feel free to contact me if you have any questions.

I look forward to your response.

Thank you !

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From: Jay Eddy <brf.mayor@blackriverfallswi.gov>
Sent: Wednesday, March 6, 2024 11:14 AM
To: Brad Chown <brad.chown@blackriverfallswi.gov>
Subject: Fwd: Open records request

Sent from my iPhone

Begin forwarded message:

From: Henry Redman <henry@wisconsinexaminer.com>
Date: March 6, 2024 at 11:04:30 AM CST
To: BRF Police Chief <brfpd.chief@blackriverfalls.us>, Jay Eddy <brf.mayor@blackriverfallswi.gov>, cityattorney@radcliffelawfirm.com
Subject: Open records request

Hello,

This email is to request, under Wisconsin open records law, any internal Black River Falls emails and communications, including attachments sent and received by Mayor Jay Eddy, City Attorney Mark Radcliffe, and police department personnel since September 2022 that mention the following names and phrases:

"Kenneth Taylor"

"Taylor"

"Joy Taylor"

You can reach me here or the number below with any questions or clarifications. Digital .pdf files are preferred.

Thanks,

--

Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

--

Henry Redman

Reporter | Wisconsin Examiner

440-420-0550

Brad Chown

From: John Gethers <john.gethers@techpros.biz>
Sent: Wednesday, March 6, 2024 4:00 PM
To: Brad Chown
Subject: EDiscovery - Records Request from Tech Pros
Attachments: Quote QUO629024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged



Hi Brad,

We have prepared a quote for you. Please note that this quote is valid until Wednesday, 20 March 2024.

You can accept the quote, ask a question, or print the quote for your records.

[View Quote](#)

Thanks,
John Gethers
Tech Pros



TECH PROS

EDiscovery - Records Request

Prepared for **City of Black River Falls**

By John Gethers | john.gethers@techpros.biz
Valid until Wednesday, March 20, 2024

\$4,440.00

Product	Quantity	Price	Amount
 Microsoft Purview E-Discovery License	10	\$144.00	\$1,440.00
 Labor	20	\$150.00	\$3,000.00

Subtotal	\$4,440.00
Shipping	\$0.00
Tax	\$0.00
Total	\$4,440.00