

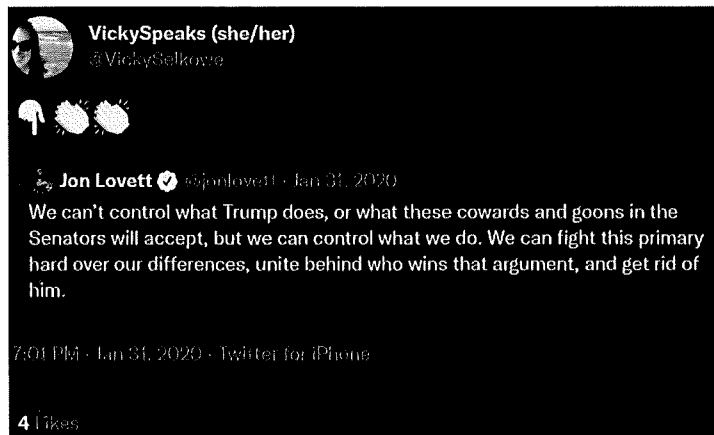


[VickySpeaks \(she/her\) on Twitter: "👉👉👉👉👉👉" / Twitter](#)

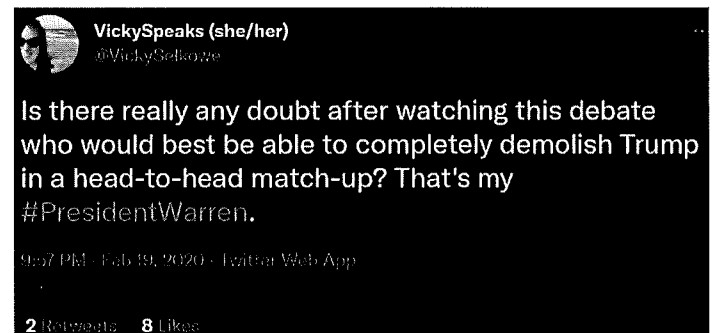
[#Warren2020 via @actblue https://t.co/ZdbJCQibln" / Twitter](#)



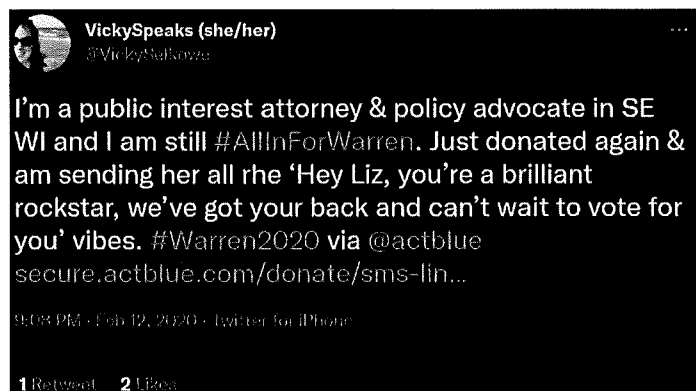
[Danielle Campoamor on Twitter: "Elizabeth Warren of the House of Massachusetts, first of her name, the unburnt, Queen of debates and the eater of men, Khaleesi of the great Democratic party, Breaker of Billionaires, and mother of plans. #DemDebate" / Twitter](#)



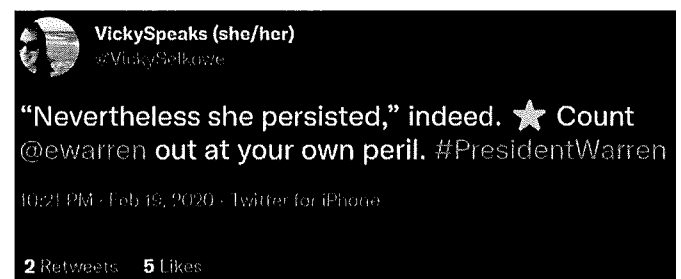
[VickySpeaks \(she/her\) on Twitter: "👉👉👉👉👉👉" / Twitter](#)



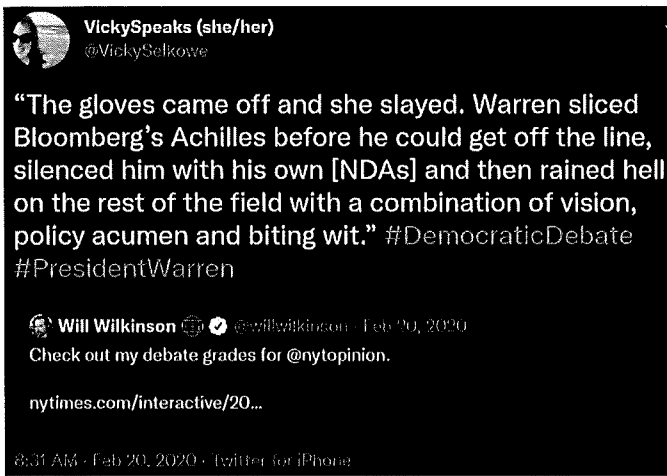
[VickySpeaks \(she/her\) on Twitter: "Is there really any doubt after watching this debate who would best be able to completely demolish Trump in a head-to-head match-up? That's my #PresidentWarren." / Twitter](#)



[VickySpeaks \(she/her\) on Twitter: "I'm a public interest attorney & policy advocate in SE WI and I am still #AllInForWarren. Just donated again & am sending her all rhe 'Hey Liz, you're a brilliant rockstar, we've got your back and can't wait to vote for you' vibes.](#)

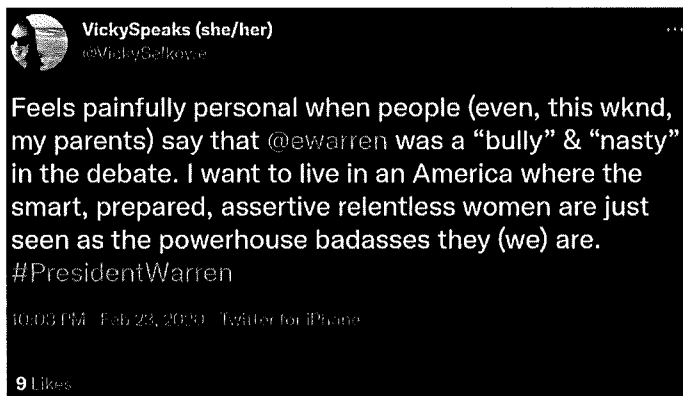


[VickySpeaks \(she/her\) on Twitter: "'Nevertheless she persisted," indeed. ★ Count @ewarren out at your own peril. #PresidentWarren" / Twitter](#)



VickySpeaks (she/her) on Twitter: "The gloves came off and she slayed. Warren sliced Bloomberg's Achilles before he could get off the line, silenced him with his own [NDAs] and then rained hell on the rest of the field with a combination of vision, policy acumen and biting wit." #DemocraticDebate #PresidentWarren" / Twitter

This one is just funny Nicole Najafi on Twitter: "I went on a date with every presidential candidate so you don't have to. (thread 1/9) https://t.co/v9Ou5eGcwn" / Twitter

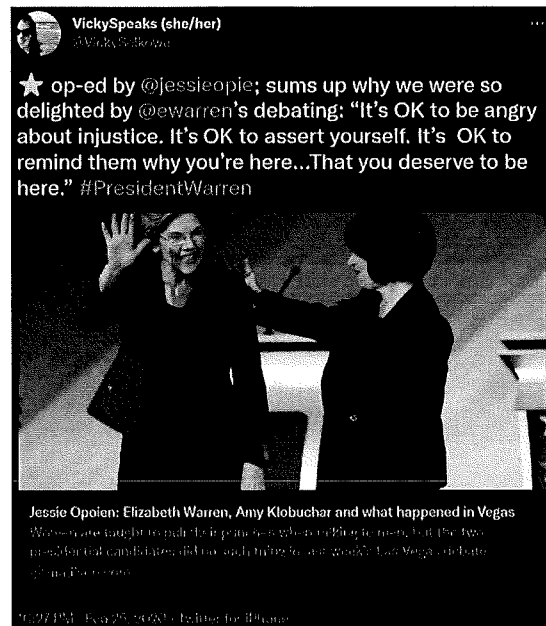


VickySpeaks (she/her) on Twitter: "Feels painfully personal when people (even, this wknd, my parents) say that @ewarren was a "bully" & "nasty" in the debate. I want to live in an America where the smart, prepared, assertive relentless women are just seen as the powerhouse badasses they (we) are. #PresidentWarren" / Twitter



How is this lady a lawyer

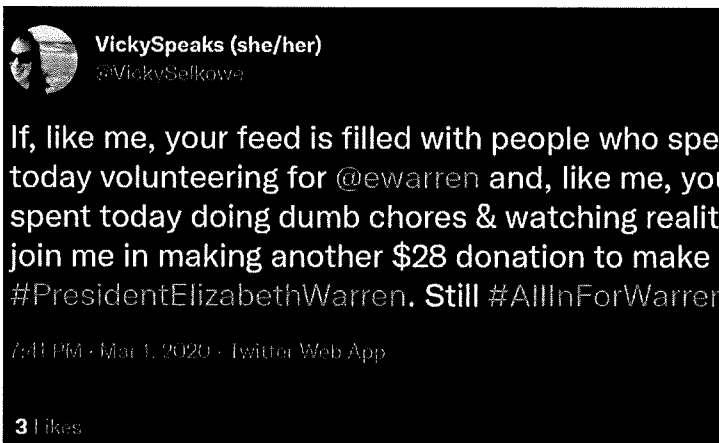
VickySpeaks (she/her) on Twitter: "Just tuning into the #DemDebate2020 now, what have I missed? Has my grrrl @ewarren destroyer anyone yet?" / Twitter



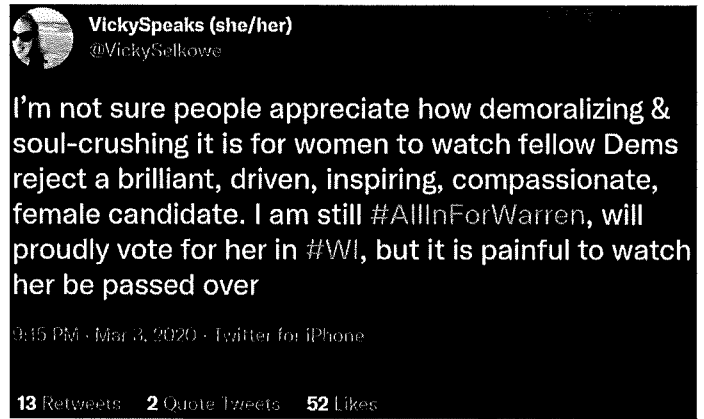
VickySpeaks (she/her) on Twitter: "★ op-ed by @jessieopie; sums up why we were so delighted by @ewarren's debating: "It's OK to be angry about injustice. It's OK to assert yourself. It's OK to remind them why you're here...That you deserve to be here." #PresidentWarren https://t.co/skrV1k5hQi" / Twitter



VickySpeaks (she/her) on Twitter: "This is awesome. And I just so badly want to see @ewarren do something similar - and even more biting and brilliant - to Trump. #PresidentElizabethWarren" / Twitter



VickySpeaks (she/her) on Twitter: "If, like me, your feed is filled with people who spent today volunteering for @ewarren and, like me, you spent today doing dumb chores & watching reality tv, join me in making another \$28 donation to make her #PresidentElizabethWarren. Still #AllInForWarren" / Twitter



VickySpeaks (she/her) on Twitter: "I'm not sure people appreciate how demoralizing & soul-crushing it is for women to watch fellow Dems reject a brilliant, driven, inspiring, compassionate, female candidate. I am still #AllInForWarren, will proudly vote for her in #WI, but it is painful to watch her be passed over" / Twitter

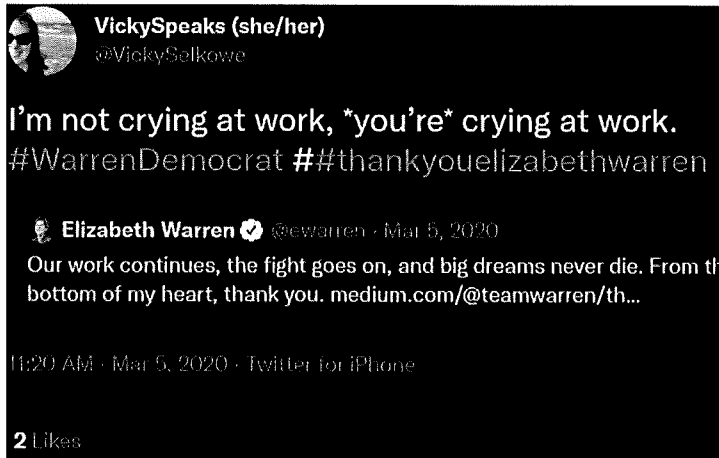


VickySpeaks (she/her) on Twitter: "So, seriously: what happens if @BernieSanders has another heart attack or #JoeMentum becomes #JoeMouth and his gaffes are horrifying or disqualifying? What's our plan then?" / Twitter



VickySpeaks (she/her) on Twitter: "This thread is ☆👏👏👏; sums up all the reasons I too hope

@ewarren stays in through the next debate: "And it's a unique voice, quite frankly. She has deep and detailed policy knowledge. And frankly, she drives the men nuts. Fuck it. That's a good thing." #WarrenDemocrat" / Twitter



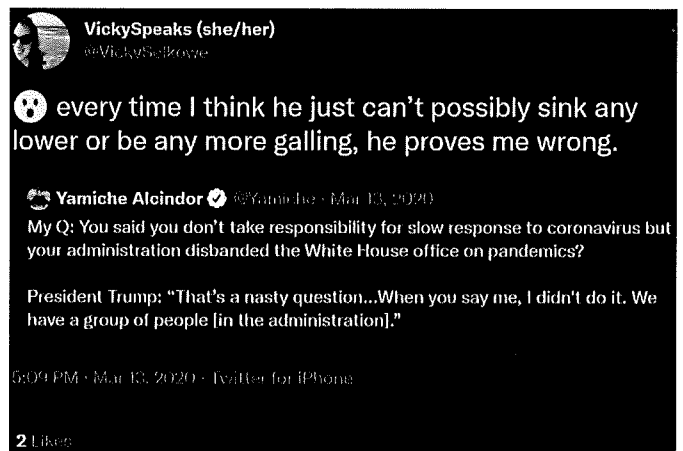
VickySpeaks (she/her) on Twitter: "I'm not crying at work, \*you're\* crying at work. #WarrenDemocrat ##thankyouelizabethwarren" / Twitter



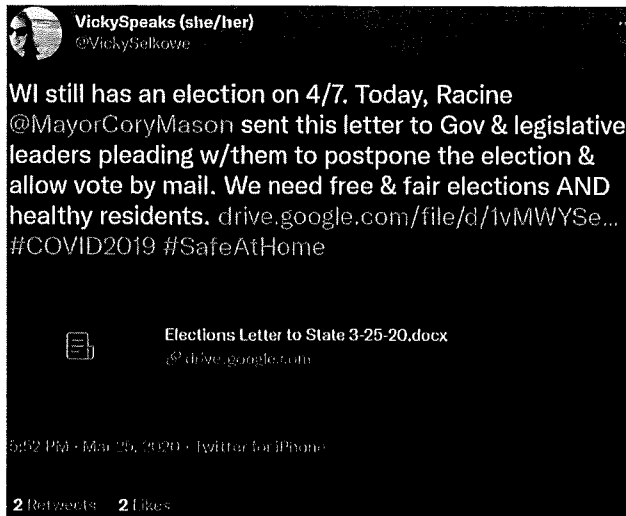
VickySpeaks (she/her) on Twitter: "After being angry & sad all day about @ewarren, I realized that for the first time ever, since my hopeful 10 yr old, idolizing Ferraro self: I no longer believe that a woman will become President in my lifetime. Congrats fellow Dems: you broke me." / Twitter



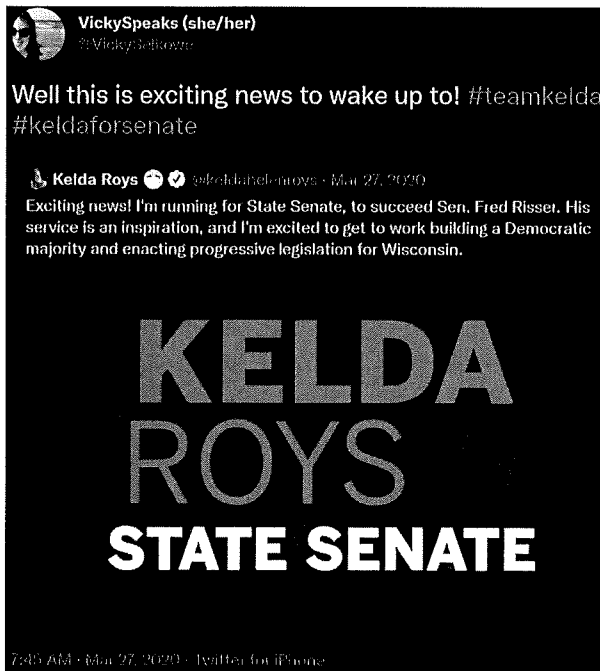
VickySpeaks (she/her) on Twitter: "Seriously, America, you just watch these 5 minutes and tell me you really feel good about blithely passing up the opportunity to have this brilliant, thoughtful, purposeful woman lead us out of the darkness. And no, I am not over it yet, and won't be anytime soon. #WarrenDemocrat" / Twitter



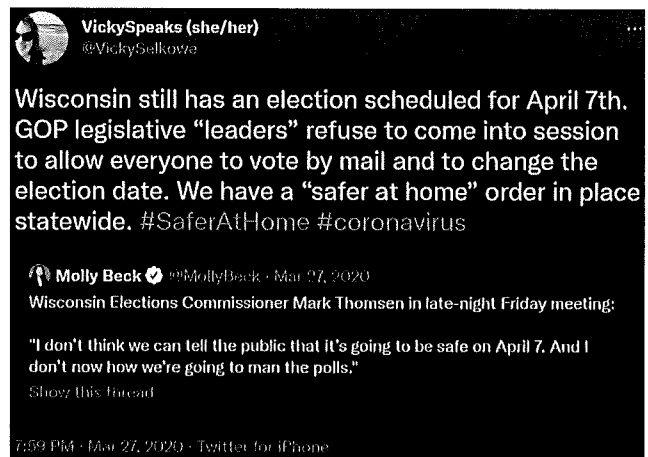
VickySpeaks (she/her) on Twitter: "😬 every time I think he just can't possibly sink any lower or be any more galling, he proves me wrong." / Twitter



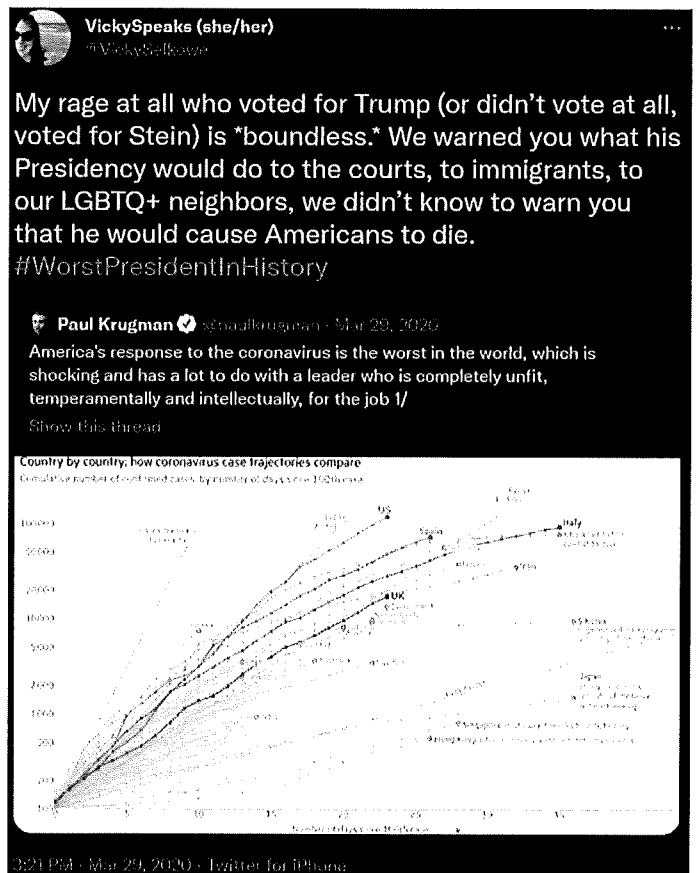
VickySpeaks (she/her) on Twitter: "WI still has an election on 4/7. Today, Racine @MayorCoryMason sent this letter to Gov & legislative leaders pleading w/them to postpone the election & allow vote by mail. We need free & fair elections AND healthy residents. <https://t.co/vM1x49AJX> #COVID2019 #SafeAtHome" / Twitter



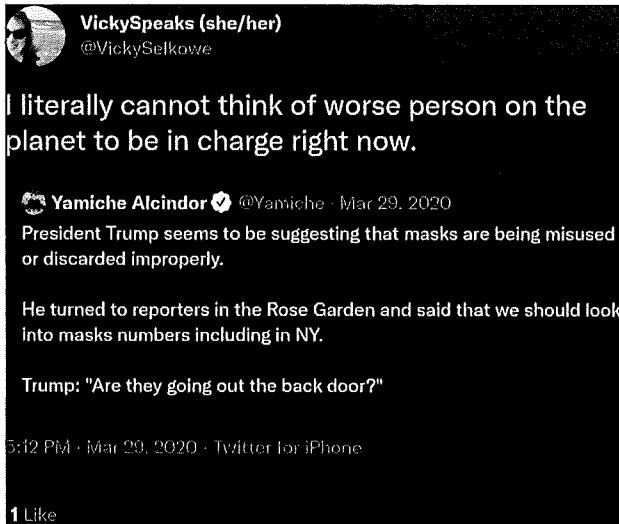
VickySpeaks (she/her) on Twitter: "Well this is exciting news to wake up to! #teamkelda #keldaforsenate" / Twitter



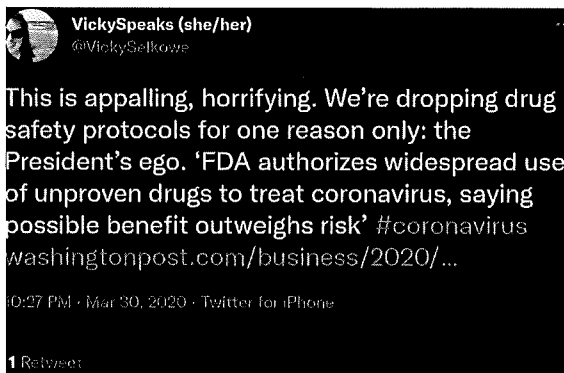
VickySpeaks (she/her) on Twitter: "Wisconsin still has an election scheduled for April 7th. GOP legislative "leaders" refuse to come into session to allow everyone to vote by mail and to change the election date. We have a "safer at home" order in place statewide. #SaferAtHome #coronavirus" / Twitter



VickySpeaks (she/her) on Twitter: "My rage at all who voted for Trump (or didn't vote at all, voted for Stein) is \*boundless.\* We warned you what his Presidency would do to the courts, to immigrants, to our LGBTQ+ neighbors, we didn't know to warn you that he would cause Americans to die. #WorstPresidentInHistory" / Twitter

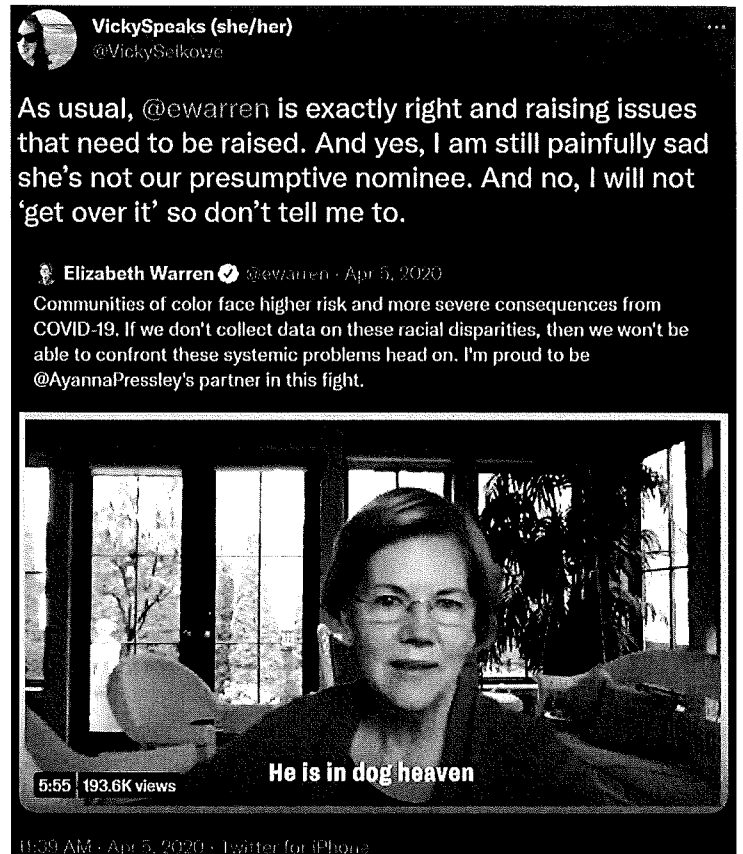
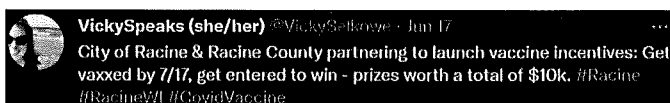
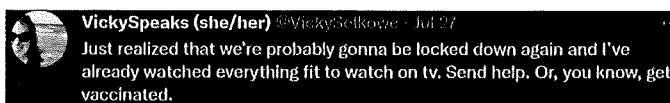
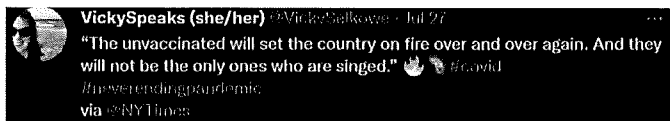


VickySpeaks (she/her) on Twitter: "I literally cannot think of worse person on the planet to be in charge right now." / Twitter

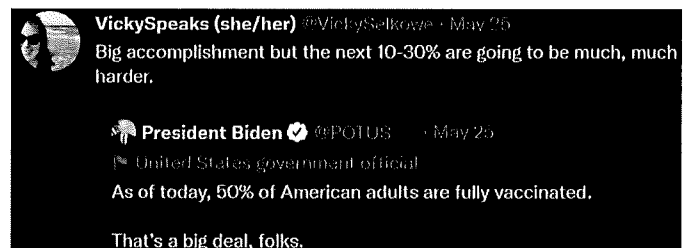


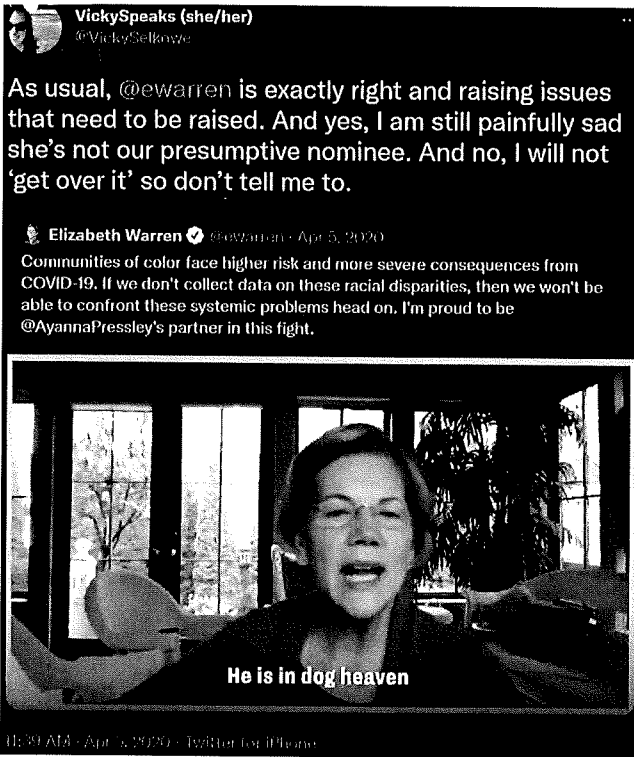
This stupid kowe attacked Trump for lowering FDA regulations but has crowed nonstop for people to get the Covid "vaccine" in numerous tweets since then. We are dealing with a real intellectual here.

VickySpeaks (she/her) on Twitter: "This is appalling, horrifying. We're dropping drug safety protocols for one reason only: the President's ego. 'FDA authorizes widespread use of unproven drugs to treat coronavirus, saying possible benefit outweighs risk' #coronavirus https://t.co/LAopznomj4" / Twitter

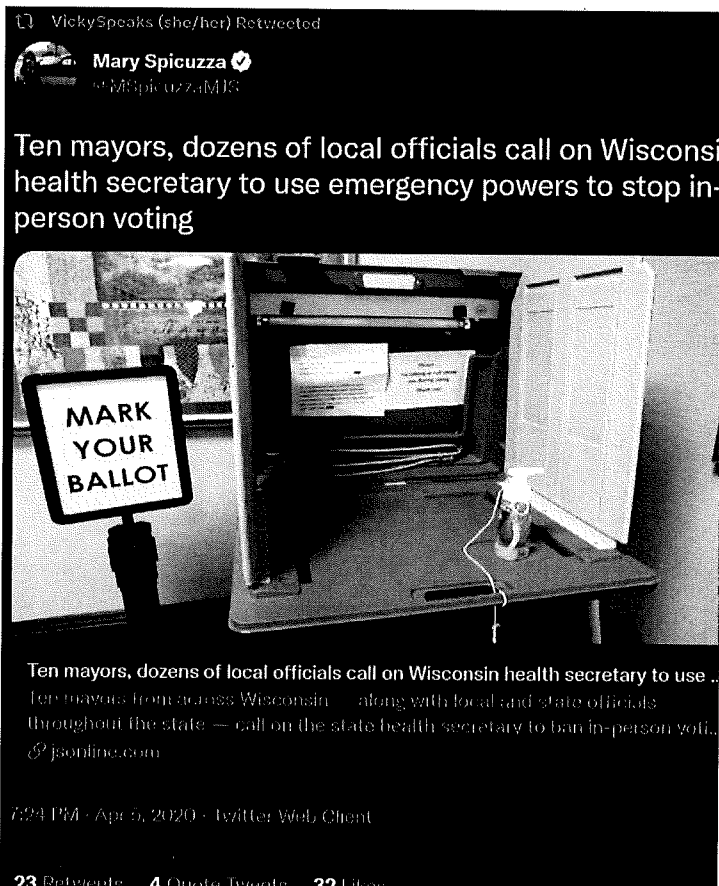


VickySpeaks (she/her) on Twitter: "As usual, @ewarren is exactly right and raising issues that need to be raised. And yes, I am still painfully sad she's not our presumptive nominee. And no, I will not 'get over it' so don't tell me to." / Twitter

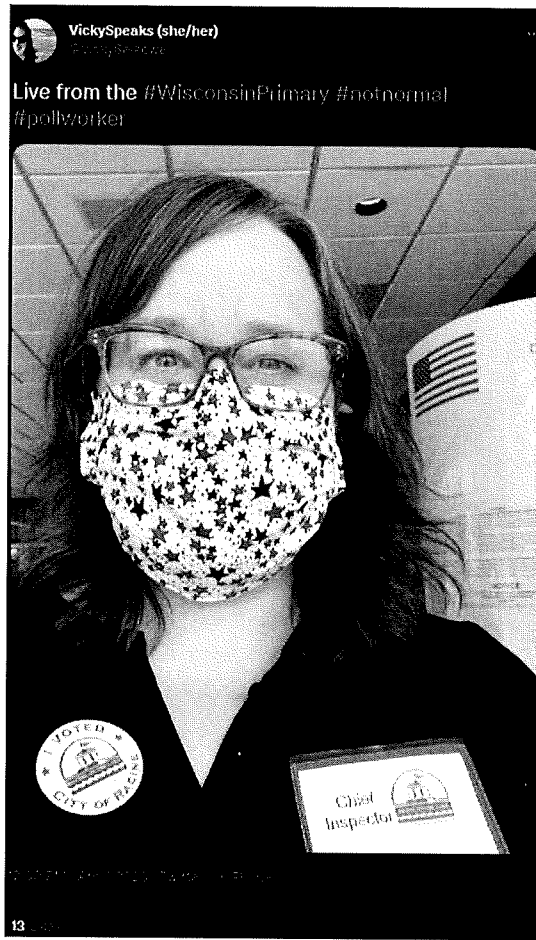




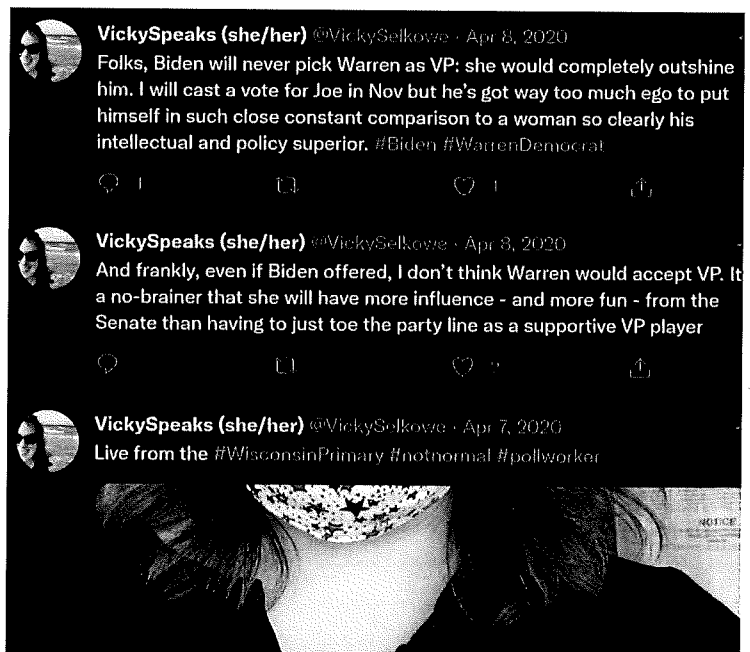
(4) VickySpeaks (she/her) on Twitter: "As usual, @ewarren is exactly right and raising issues that need to be raised. And yes, I am still painfully sad she's not our presumptive nominee. And no, I will not 'get over it' so don't tell me to." / Twitter

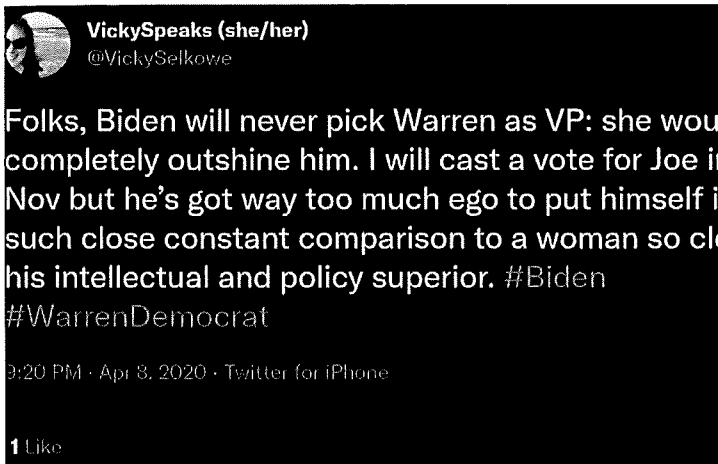


(4) Mary Spicuzza on Twitter: "Ten mayors, dozens of local officials call on Wisconsin health secretary to use emergency powers to stop in-person voting https://t.co/MhUhlEmYAR" / Twitter



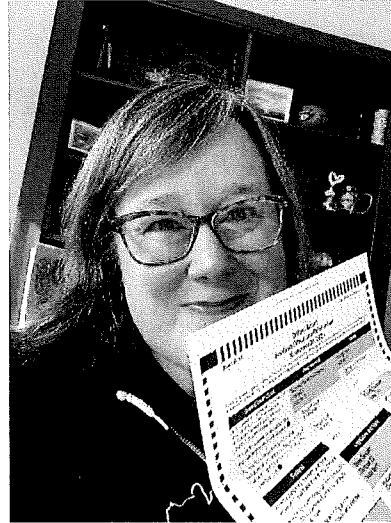
(4) VickySpeaks (she/her) on Twitter: "Live from the #WisconsinPrimary #notnormal #pollworker https://t.co/u4RSSciRIB" / Twitter



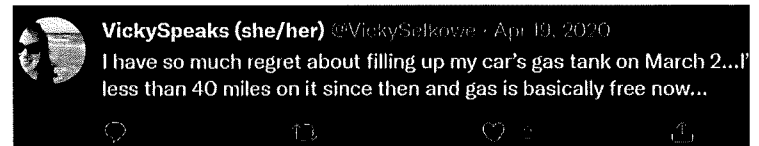
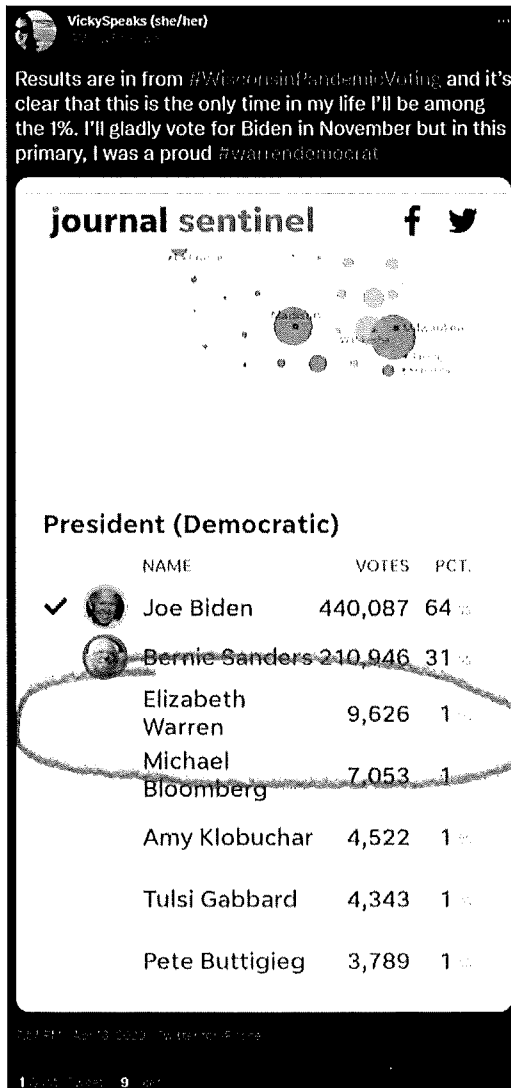


(4) VickySpeaks (she/her) on Twitter: "Folks, Biden will never pick Warren as VP: she would completely outshine him. I will cast a vote for Joe in Nov but he's got way too much ego to put himself in such close constant comparison to a woman so clearly his intellectual and policy superior. #Biden #WarrenDemocrat" / Twitter

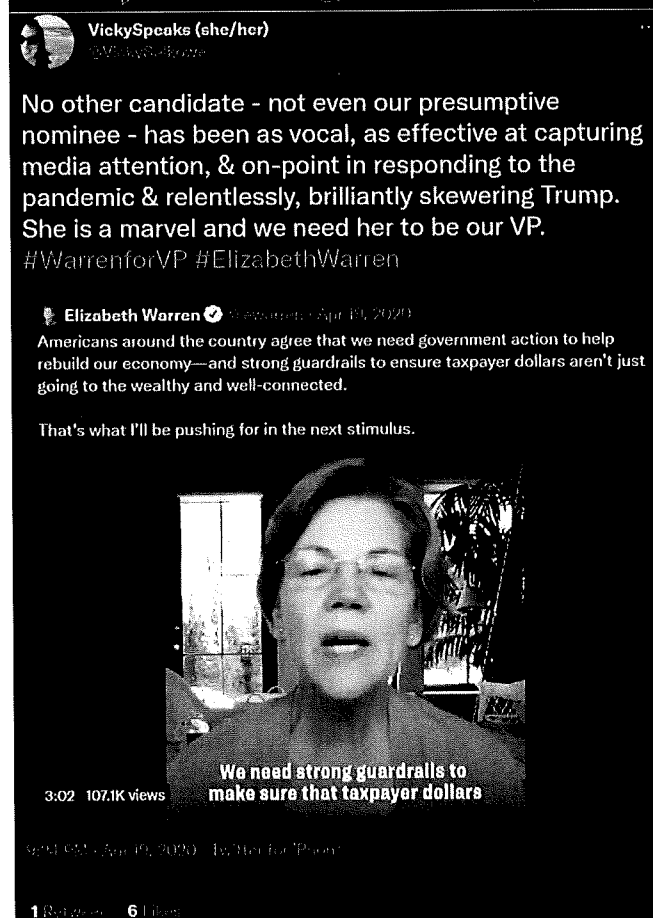
(4) VickySpeaks (she/her) on Twitter: "Results are in from #WisconsinPandemicVoting and it's clear that this is the only time in my life I'll be among the 1%. I'll gladly vote for Biden in November but in this primary, I was a proud #warrendemocrat <https://t.co/8RxtPScpRn>" / Twitter



She's subconsciously praising Trump's economy which manifested itself as cheap gas prices.



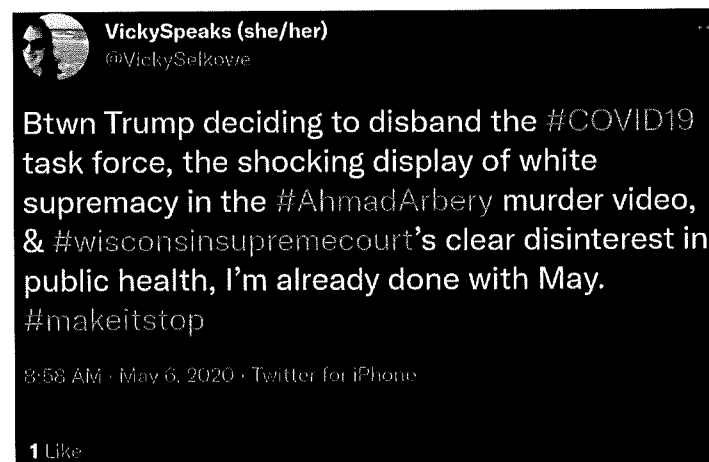




(4) VickySpeaks (she/her) on Twitter: "No other candidate - not even our presumptive nominee - has been as vocal, as effective at capturing media attention, & on-point in responding to the pandemic & relentlessly, brilliantly skewering Trump. She is a marvel and we need her to be our VP. #WarrenforVP #ElizabethWarren" / Twitter



(4) VickySpeaks (she/her) on Twitter: "In case it helps anyone else as much as it helps me, this song, originally written about GW Bush (ah, how sane he seems now in comparison) is the perfect dance-around & loudly sing out your Trump anger song. #TrumplsAnIdiot <https://t.co/3V1nOZBrYE>" / Twitter

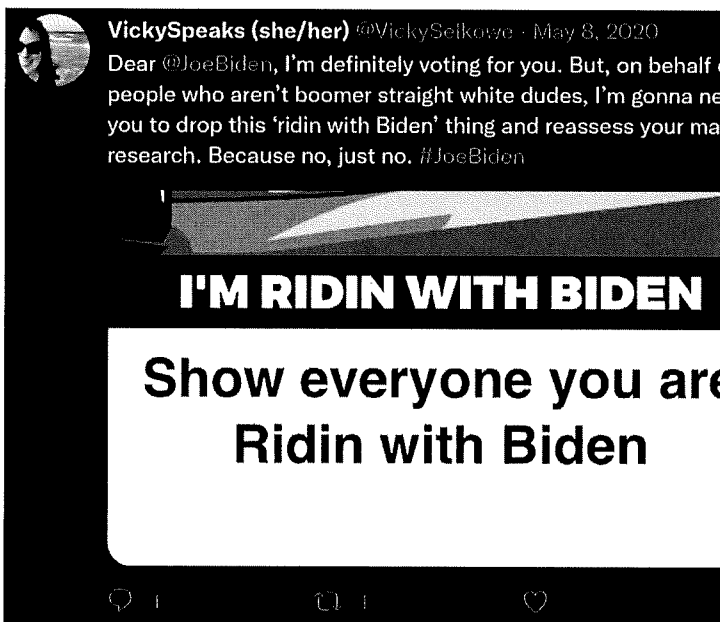


(3) VickySpeaks (she/her) on Twitter: "Btwn Trump deciding to disband the #COVID19 task force, the shocking display of white supremacy in the #AhmadArbery murder video, & #wisconsinsupremecourt's clear disinterest in public

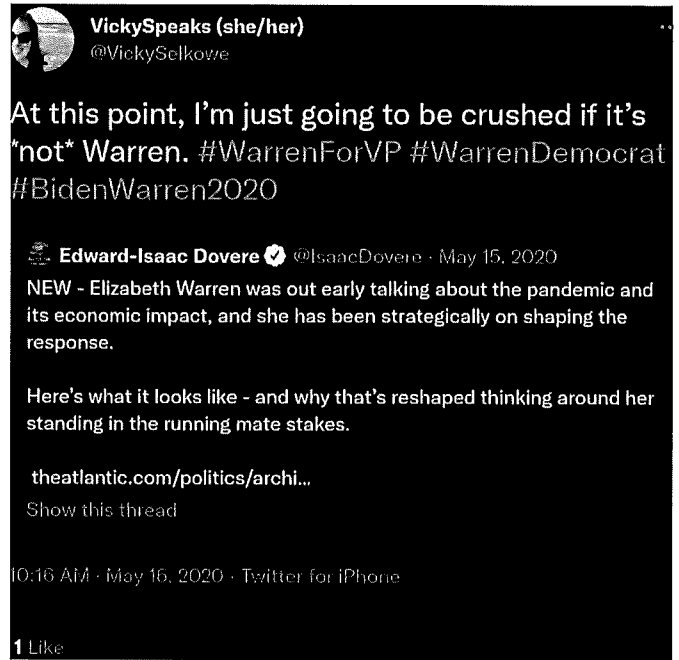
health, I'm already done with May. #makeitstop" /  
Twitter



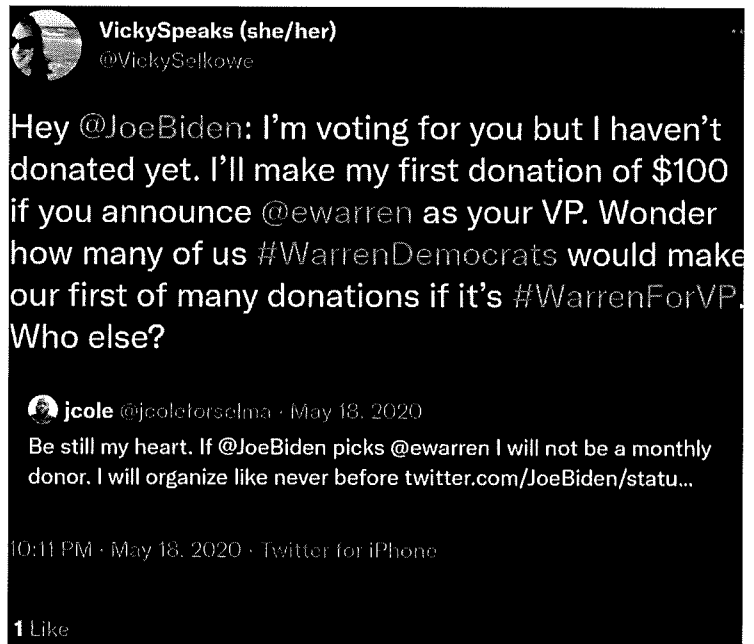
(3) VickySpeaks (she/her) on Twitter: "Yes, it's real:  
<https://t.co/CYc2kyDVvE>" / Twitter



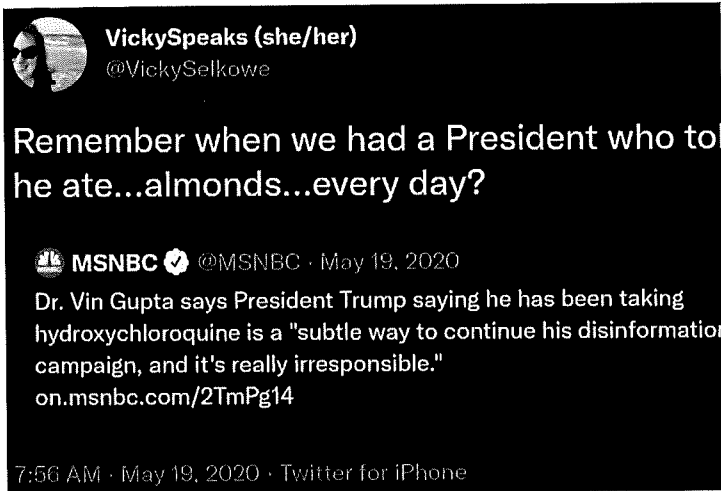
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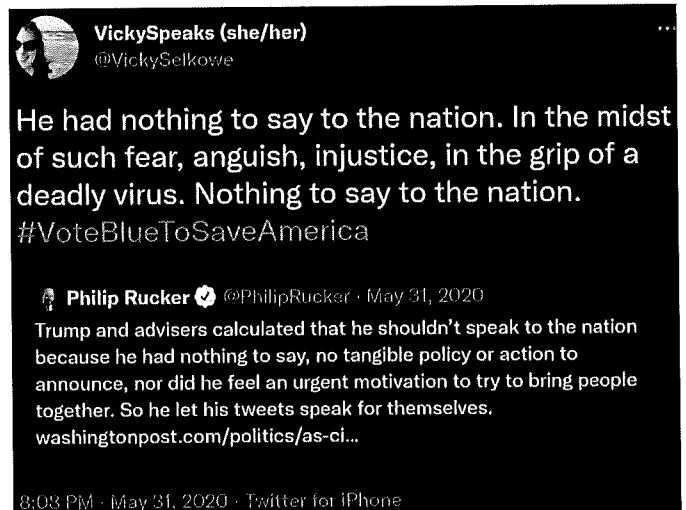
(3) VickySpeaks (she/her) on Twitter: "At this point, I'm  
just going to be crushed if it's \*not\* Warren.  
#WarrenForVP #WarrenDemocrat #BidenWarren2020"  
/ Twitter



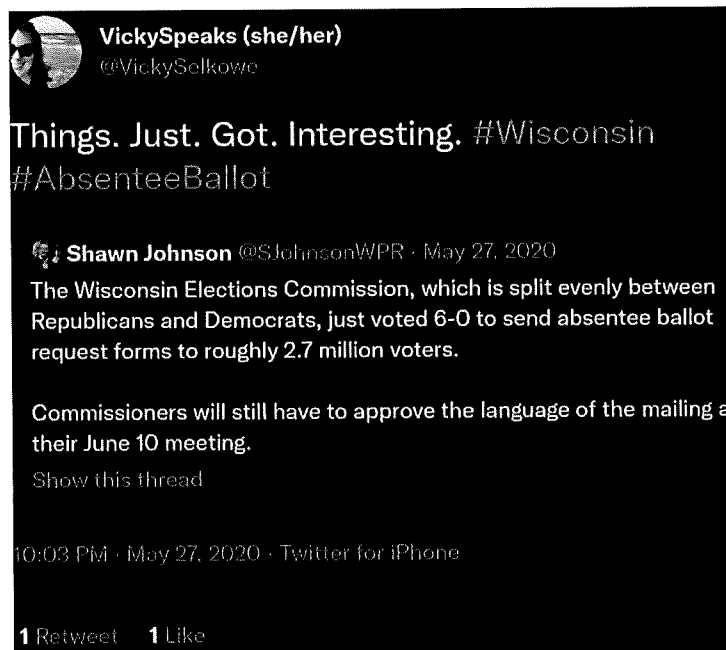
(3) VickySpeaks (she/her) on Twitter: "Hey @JoeBiden:  
I'm voting for you but I haven't donated yet. I'll make  
my first donation of \$100 if you announce @ewarren as  
your VP. Wonder how many of us #WarrenDemocrats  
would make our first of many donations if it's  
#WarrenForVP. Who else?" / Twitter



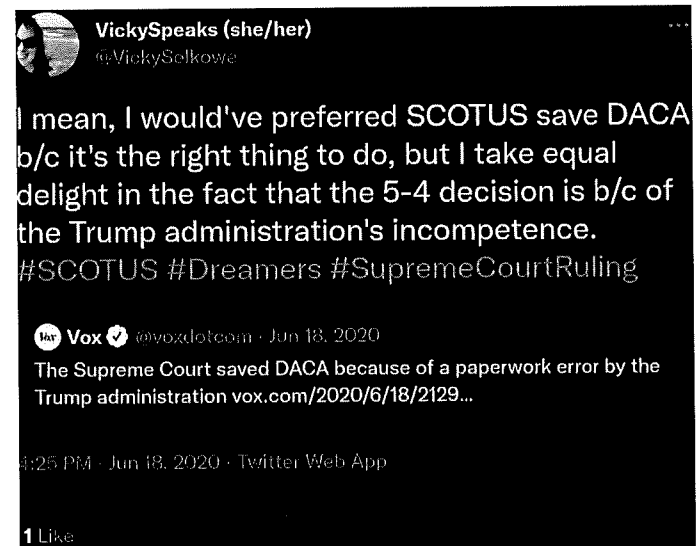
(3) VickySpeaks (she/her) on Twitter: "Remember when we had a President who told us he ate...almonds...every day?" / Twitter



(3) VickySpeaks (she/her) on Twitter: "He had nothing to say to the nation. In the midst of such fear, anguish, injustice, in the grip of a deadly virus. Nothing to say to the nation. #VoteBlueToSaveAmerica" / Twitter



(3) VickySpeaks (she/her) on Twitter: "Things. Just. Got. Interesting. #Wisconsin #AbsenteeBallot" / Twitter



(3) VickySpeaks (she/her) on Twitter: "I mean, I would've preferred SCOTUS save DACA b/c it's the right thing to do, but I take equal delight in the fact that the 5-4 decision is b/c of the Trump administration's incompetence. #SCOTUS #Dreamers #SupremeCourtRuling" / Twitter



**VickySpeaks (she/her)**

@VickySelkowe

Indeed.



**Igor Bobic** @igorbobic · Jun 29, 2020

In floor speech on Russian bounties and Trump's knowledge  
Sen. Duckworth says "ignorance isn't exculpatory."

"'No one told me' is not an excuse for a commander in chief  
fact a confession of incompetence," she adds

Show this thread

6:36 PM · Jun 30, 2020 · Twitter for iPhone

(3) VickySpeaks (she/her) on Twitter: "Indeed." / Twitter



**VickySpeaks (she/her)**

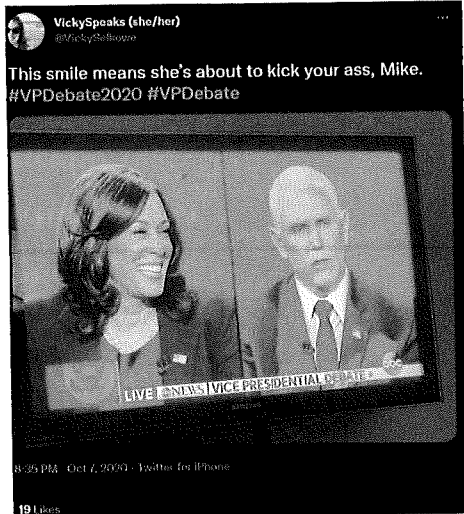
@VickySelkowe

Excoriating response from @WisDOJ to Trump  
plan to send fed agents to #MKE: 'I don't use  
phrase "fascist tactics" lightly. But...no more  
accurate way to describe this admin's repeated  
resort to & incitement of racism, xenophobia,  
and violence.' [preview.tinyurl.com/y6ay3aku](https://t.co/y6ay3aku)

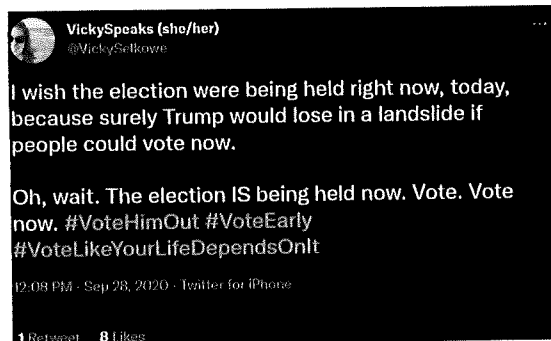
6:04 PM · Jul 23, 2020 · Twitter Web App

1 Like

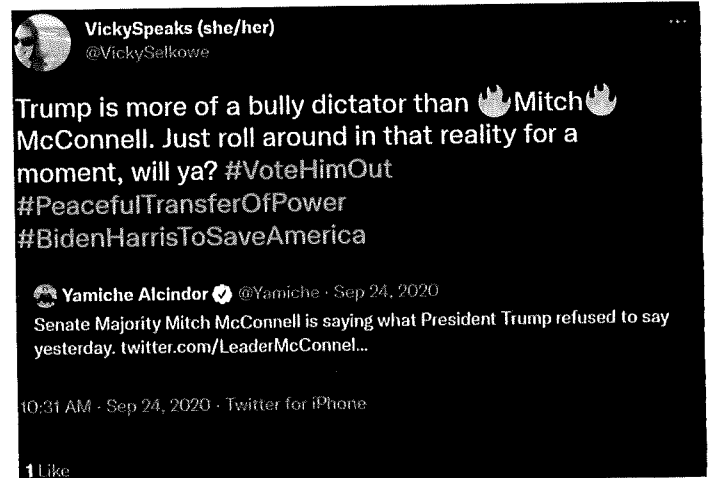
(3) VickySpeaks (she/her) on Twitter: "Excoriating  
response from @WisDOJ to Trump's plan to send fed  
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lightly. But...no more accurate way to describe this  
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xenophobia, and violence.' <https://t.co/0cA2bEOjRG>" /  
Twitter



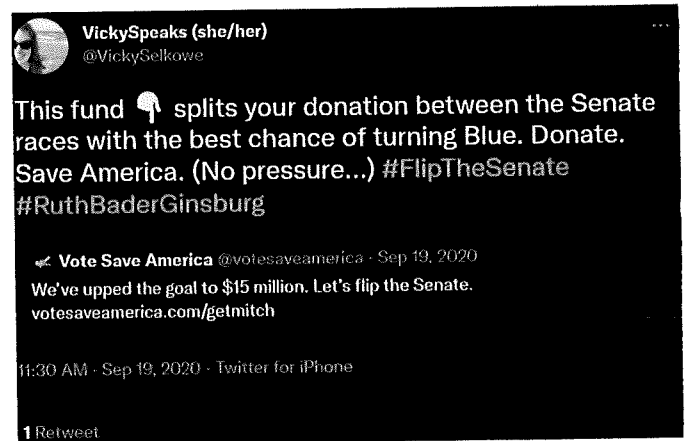
VickySpeaks (she/her) on Twitter: "This smile means she's about to kick your ass, Mike. #VPDebate2020 #VPDebate <https://t.co/SD8qx7jblA>" / Twitter



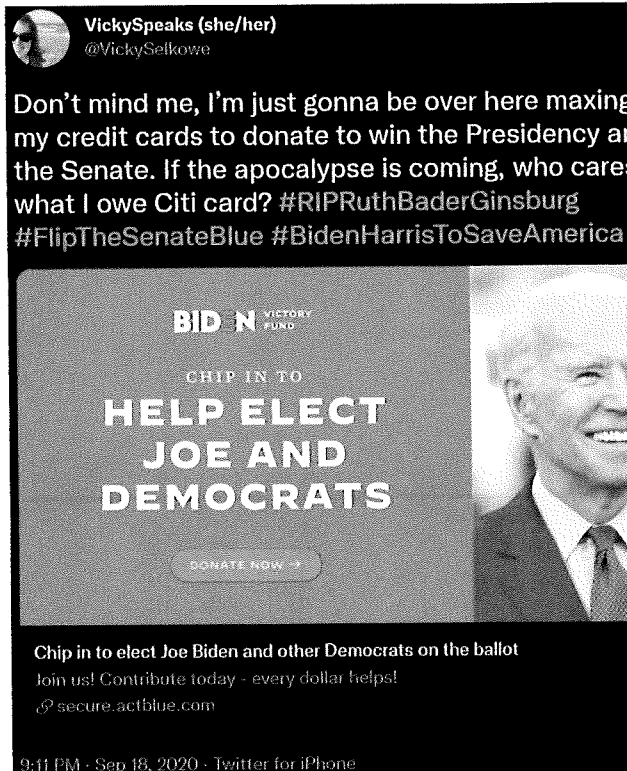
VickySpeaks (she/her) on Twitter: "I wish the election were being held right now, today, because surely Trump would lose in a landslide if people could vote now. Oh, wait. The election IS being held now. Vote. Vote now. #VoteHimOut #VoteEarly #VoteLikeYourLifeDependsOnIt" / Twitter



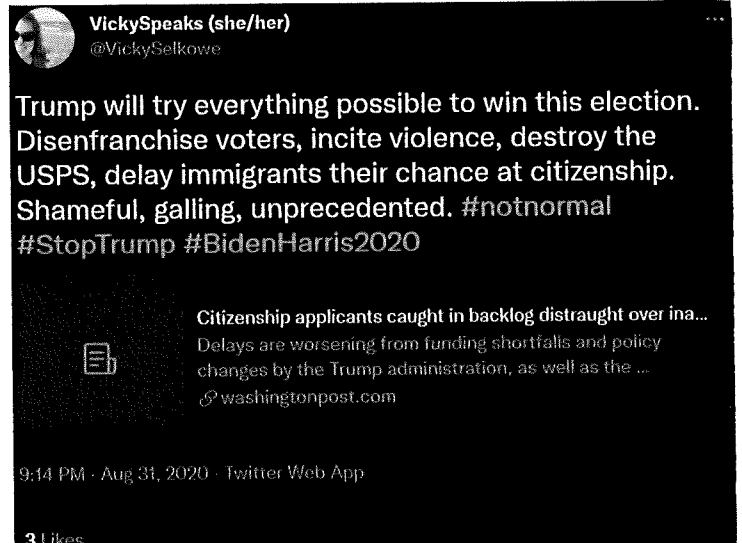
VickySpeaks (she/her) on Twitter: "Trump is more of a bully dictator than 🐻 Mitch 🐻 McConnell. Just roll around in that reality for a moment, will ya? #VoteHimOut #PeacefulTransferOfPower #BidenHarrisToSaveAmerica" / Twitter



VickySpeaks (she/her) on Twitter: "This fund 🐻 splits your donation between the Senate races with the best chance of turning Blue. Donate. Save America. (No pressure...) #FlipTheSenate #RuthBaderGinsburg" / Twitter



VickySpeaks (she/her) on Twitter: "Don't mind me, I'm just gonna be over here maxing out my credit cards to donate to win the Presidency and the Senate. If the apocalypse is coming, who cares what I owe Citi card? #RIPRuthBaderGinsburg #FlipTheSenateBlue #BidenHarrisToSaveAmerica <https://t.co/MuOLLvmW5p>" / Twitter



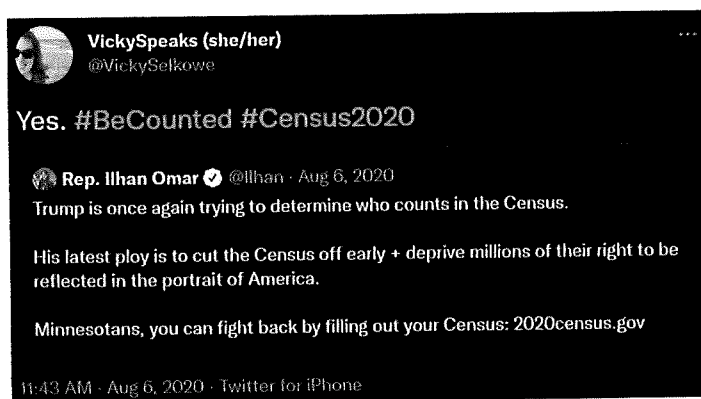
VickySpeaks (she/her) on Twitter: "Trump will try everything possible to win this election. Disenfranchise voters, incite violence, destroy the USPS, delay immigrants their chance at citizenship. Shameful, galling, unprecedented. #notnormal #StopTrump #BidenHarris2020 <https://t.co/Uj6WU8HVSd>" / Twitter



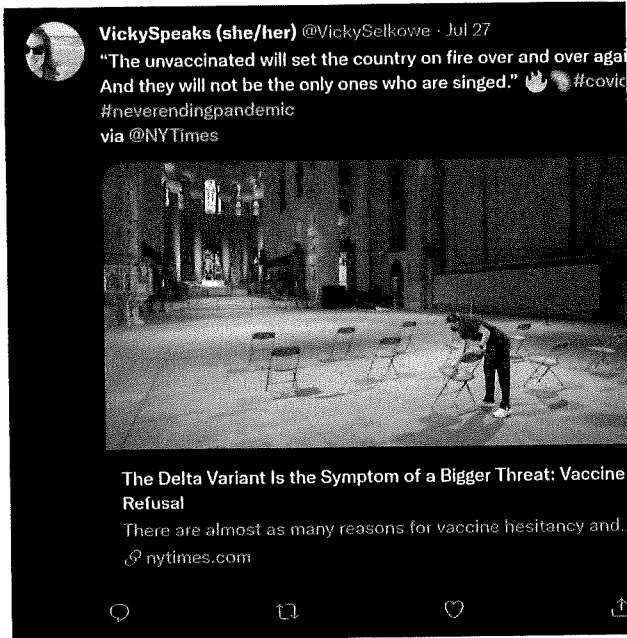
VickySpeaks (she/her) on Twitter: "This is the first time a speech by #JoeBiden has ever made me teary. This is remarkable. Alright, Joey, I'm not just in, I'm IN. Lets do this. #JoeBidenForPresident2020 #BidenHarris2020" / Twitter



VickySpeaks (she/her) on Twitter: "This is such a huge win for Madison and for Democrats statewide. Congratulations, @keldahelenroys!"  
<https://t.co/aQdBAoNvKX> / Twitter



VickySpeaks (she/her) on Twitter: "Yes. #BeCounted #Census2020"  
[/ Twitter](#)



VickySpeaks (she/her) on Twitter: ""The unvaccinated will set the country on fire over and over again. And they will not be the only ones who are singed." 🙌🔥 #covid #neverendingpandemic via @NYTimes <https://t.co/9R4YmxkwHc>" / Twitter

safely & fairly were Herculean. Thanks for sticking with it, @MadisonWIClerk." / Twitter



VickySpeaks (she/her) on Twitter: "Having worked in the #Wisconsin Capitol in 2011 when our Dem senators also fled the state to try to stop the #wisgop's bill attacking public sector unions, I so appreciate the #TexasDemocrats bold & tough decision; I hope they get better results than we did. #TexasDemocratsRock" / Twitter



VickySpeaks (she/her) on Twitter: ""#Wisconsin's municipal election clerks are unsung heroes. The challenges they overcame - including multiple last minute legislative & court-ordered changes - to ensure we could all vote

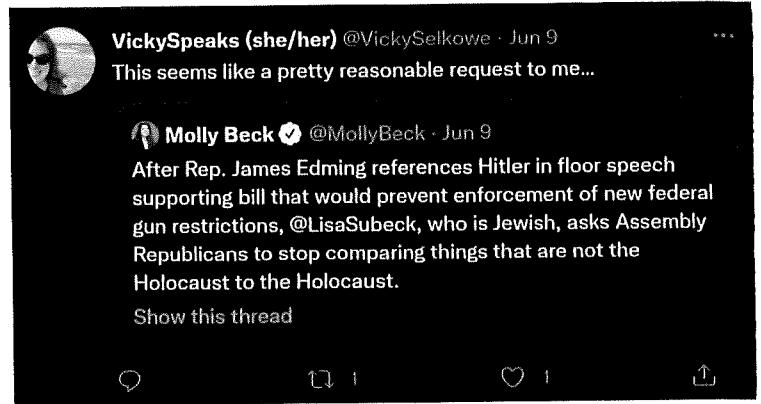


Yamiche Alcindor on Twitter: "Rochelle Walensky, Director of CDC, says 99.5% of deaths from COVID-19 in the United States were from unvaccinated people. "Those deaths were preventable with a simple, safe shot," she says."" / Twitter





VickySpeaks (she/her) on Twitter: "Wow, #PierceBrosnan in #FalsePositiveHulu is really, really bad. And the rest of the movie is so terrible you kinda at least appreciate his effort." / Twitter



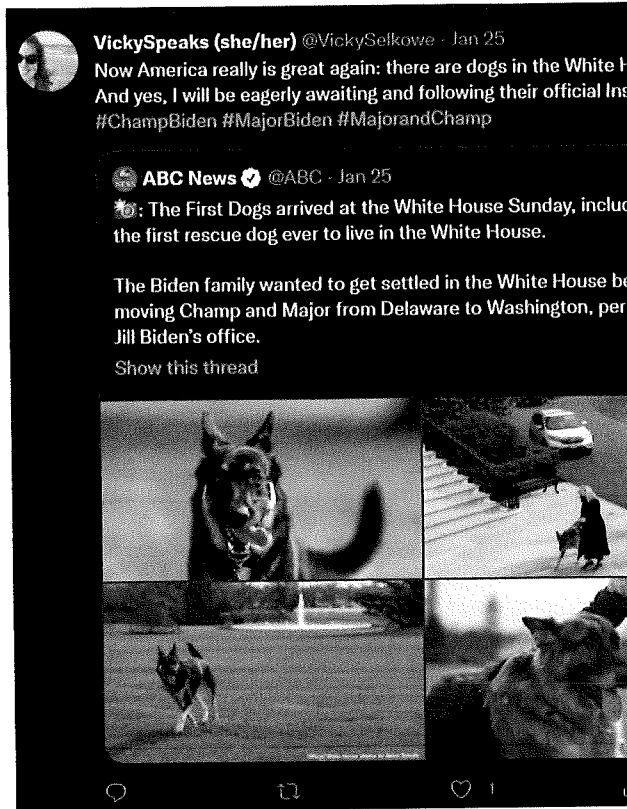
VickySpeaks (she/her) on Twitter: "This seems like a pretty reasonable request to me..." / Twitter



VickySpeaks (she/her) on Twitter: "A) Not surprising at all that Trump turned to the one Black person in his orbit to ask about #juneteenthday; B)Remarkable display of courage for this Black SecServ agent to speak such truth to power; C) A white person shoulda told Trump how offensive his Tulsa plans were." / Twitter



VickySpeaks (she/her) on Twitter: "👉" / Twitter



VickySpeaks (she/her) on Twitter: "Now America really is great again: there are dogs in the White House again. And yes, I will be eagerly awaiting and following their official Insta accounts. #ChampBiden #MajorBiden #MajorandChamp" / Twitter



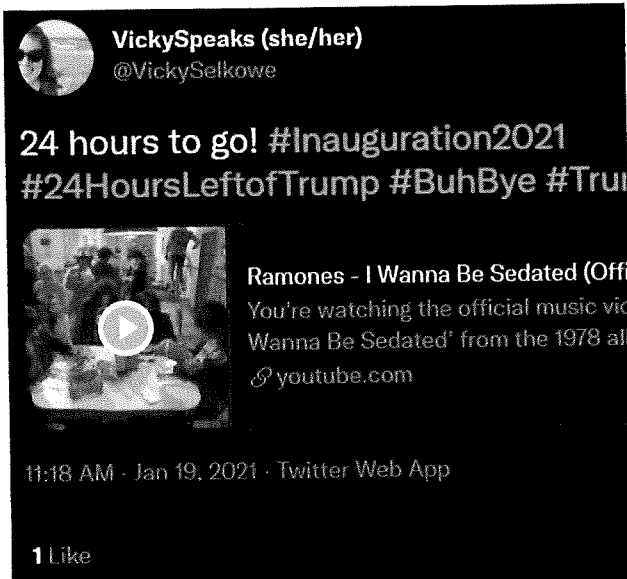
VickySpeaks (she/her) on Twitter: "Relief. Just pure relief. We can breathe again now. #PresidentBiden" / Twitter



VickySpeaks (she/her) on Twitter: "(Half) the nation's blood pressure just went down by at least 45 points. #BuhByeTrump #TrumpsLastDay" / Twitter



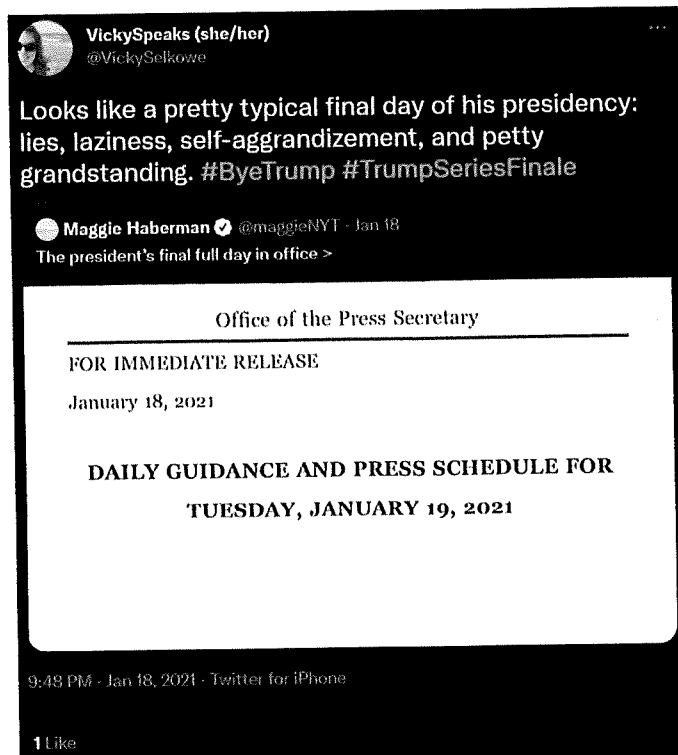
VickySpeaks (she/her) on Twitter: "&lt;checks self&gt; Yup, still happy and hopeful. #BidenHarrisInauguration #hope" / Twitter



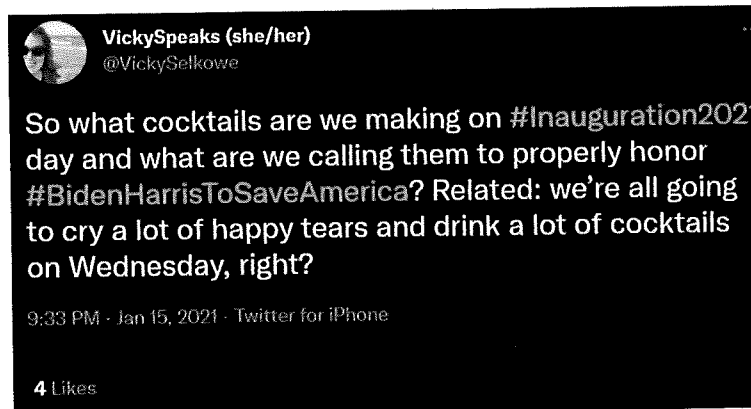
VickySpeaks (she/her) on Twitter: "24 hours to go! #Inauguration2021 #24HoursLeftofTrump #BuhBye #TrumpLastDay <https://t.co/JX1rMBGqp5>" / Twitter



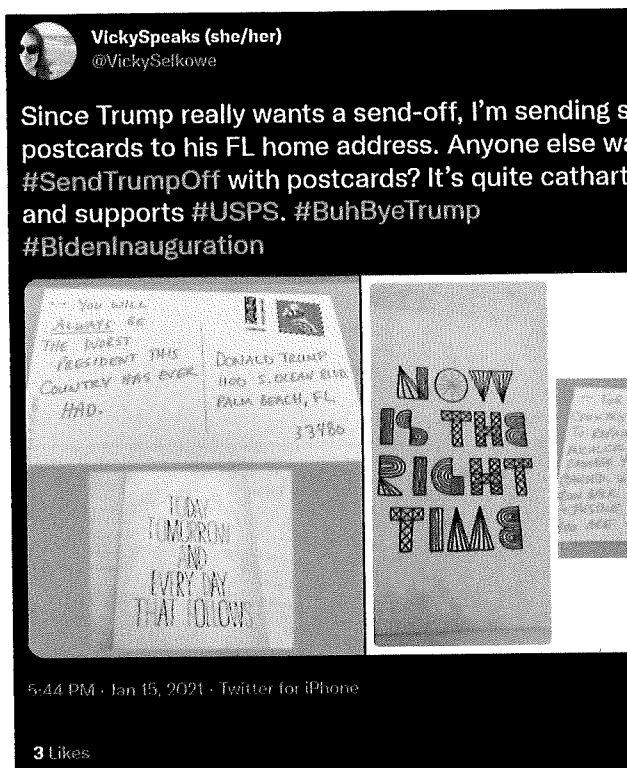
VickySpeaks (she/her) on Twitter: "Today is Trump's last full day in office AND my parents both get their first doses of #COVID19 vaccine. So much relief, all around." / Twitter



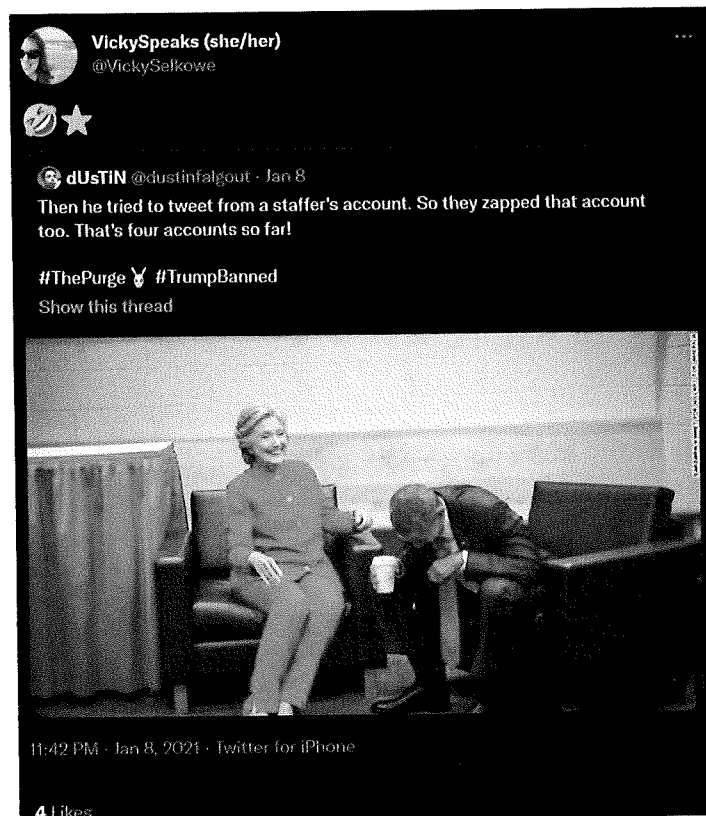
VickySpeaks (she/her) on Twitter: "Looks like a pretty typical final day of his presidency: lies, laziness, self-aggrandizement, and petty grandstanding. #ByeTrump #TrumpSeriesFinale" / Twitter



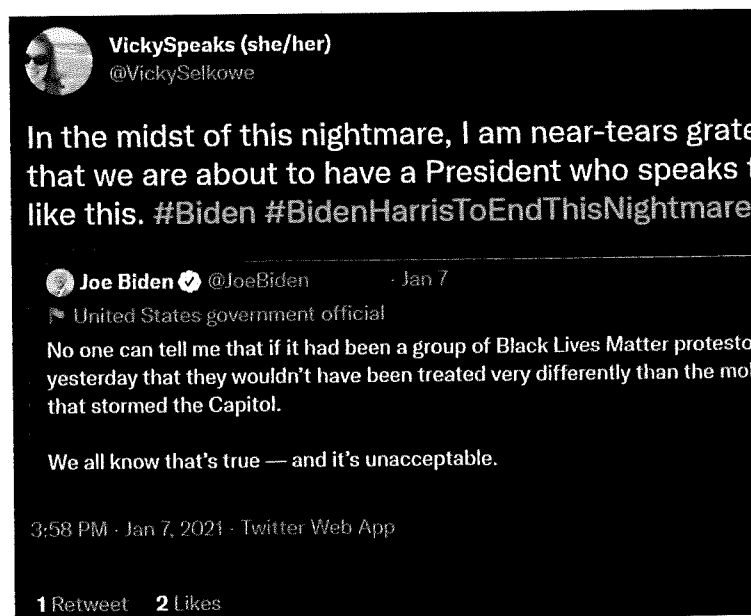
VickySpeaks (she/her) on Twitter: "So what cocktails are we making on #Inauguration2021 day and what are we calling them to properly honor #BidenHarrisToSaveAmerica? Related: we're all going to cry a lot of happy tears and drink a lot of cocktails on Wednesday, right?" / Twitter



VickySpeaks (she/her) on Twitter: "Since Trump really wants a send-off, I'm sending some postcards to his FL home address. Anyone else want to #SendTrumpOff with postcards? It's quite cathartic and supports #USPS. #BuhByeTrump #BidenInauguration <https://t.co/6NVt6Wz0eZ>" / Twitter



VickySpeaks (she/her) on Twitter: "🗑️⭐" / Twitter

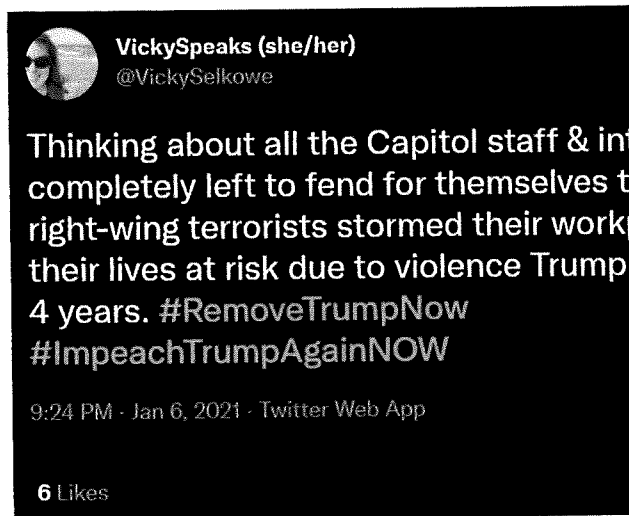


VickySpeaks (she/her) on Twitter: "In the midst of this nightmare, I am near-tears grateful that we are about to have a President who speaks

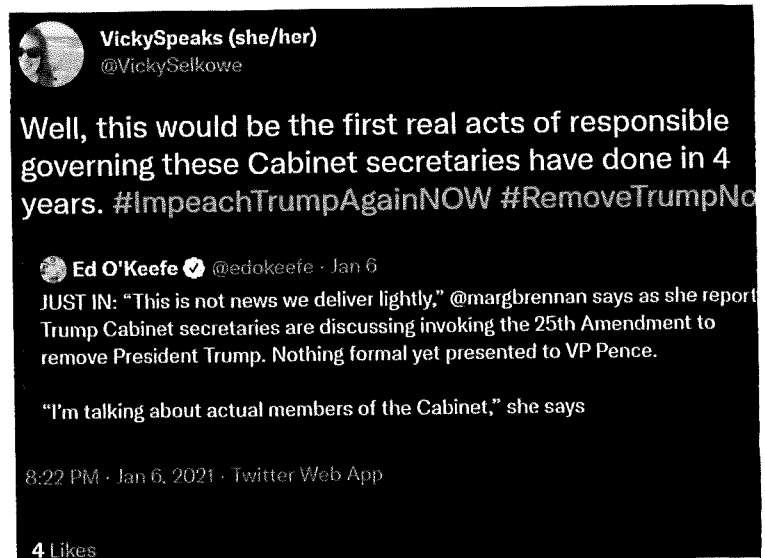
truth like this. #Biden  
[#BidenHarrisToEndThisNightmare" / Twitter](#)



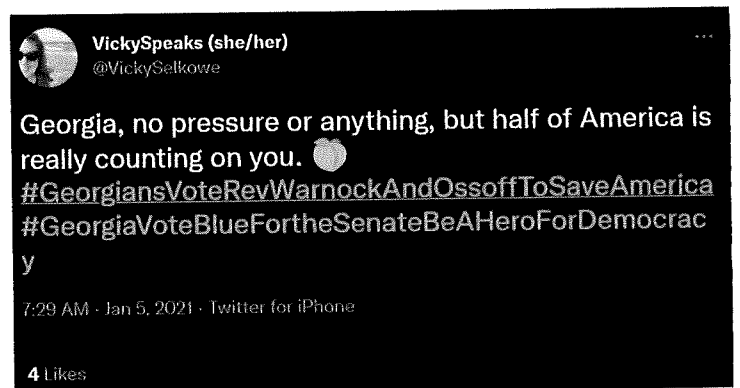
[VickySpeaks \(she/her\) on Twitter: "Their lost lives are directly Trump's responsibility. He must be removed now. #25AmendmentNow #GOPBetrayedAmerica #RemoveTrumpNow" / Twitter](#)



[VickySpeaks \(she/her\) on Twitter: "Thinking about all the Capitol staff & interns who were completely left to fend for themselves today while right-wing terrorists stormed their workplace and put their lives at risk due to violence Trump has incited for 4 years. #RemoveTrumpNow #ImpeachTrumpAgainNOW" / Twitter](#)



[VickySpeaks \(she/her\) on Twitter: "Well, this would be the first real acts of responsible governing these Cabinet secretaries have done in 4 years. #ImpeachTrumpAgainNOW #RemoveTrumpNow" / Twitter](#)



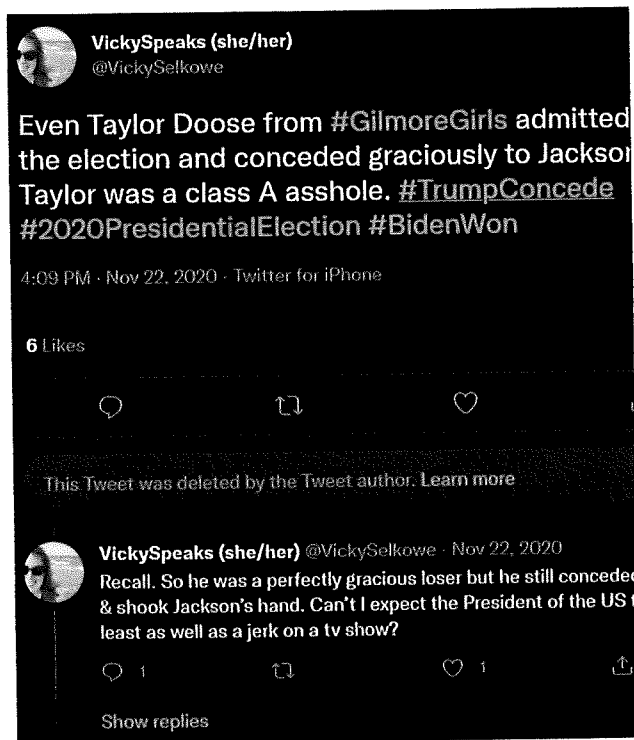
[VickySpeaks \(she/her\) on Twitter: "Georgia, no pressure or anything, but half of America is really counting on you. #GeorgiansVoteRevWarnockAndOssoffToSaveAmerica #GeorgiaVoteBlueFortheSenateBeAHeroForDemocracy" / Twitter](#)



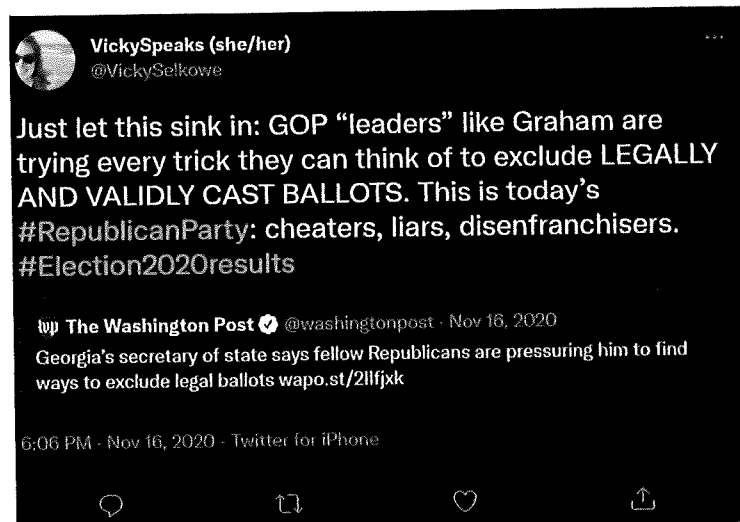
VickySpeaks (she/her) on Twitter: "Trump owes us the 20 days of celebrating he took from us. He should leave 20 days early. #PresidentElectJoeBiden" / Twitter



VickySpeaks (she/her) on Twitter: "It has been 13 days since #BidenHarris2020 officially won. It is long past time for the GOP to stop enabling Trump's sore loser temper tantrum. #TransitionNow #TrumpConcede" / Twitter



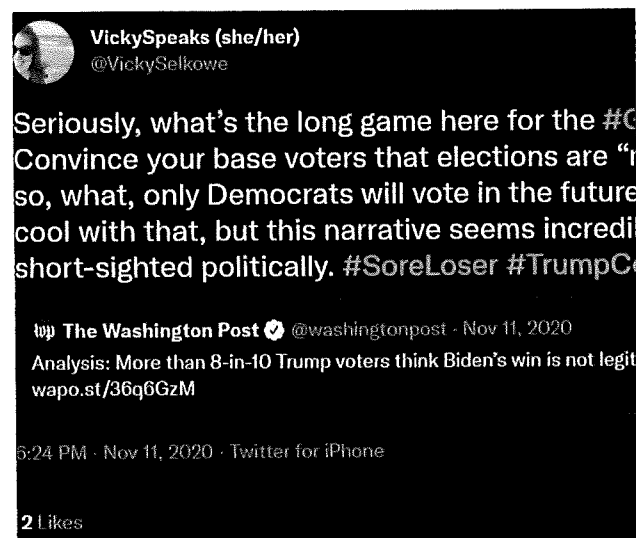
VickySpeaks (she/her) on Twitter: "Even Taylor Doose from #GilmoreGirls admitted he lost the election and conceded graciously to Jackson. And Taylor was a class A asshole. #TrumpConcede #2020PresidentialElection #BidenWon" / Twitter



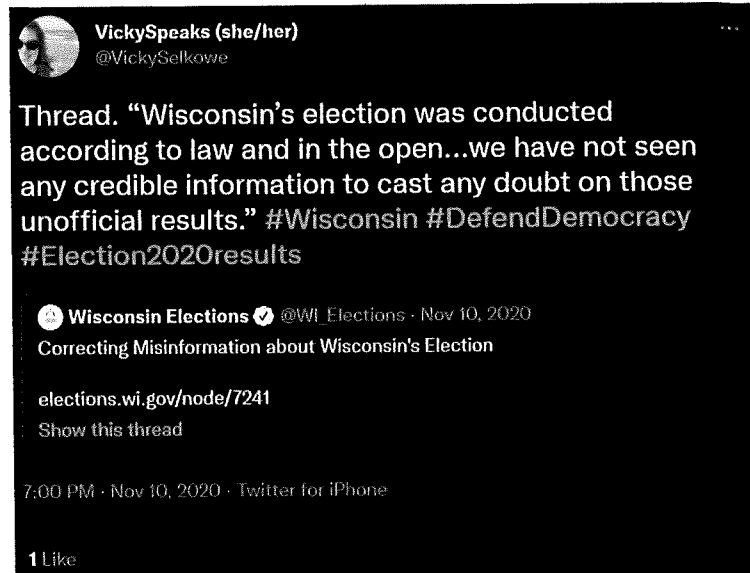
VickySpeaks (she/her) on Twitter: "Just let this sink in: GOP "leaders" like Graham are trying every trick they can think of to exclude LEGALLY AND VALIDLY CAST BALLOTS. This is today's #RepublicanParty: cheaters, liars, disenfranchisers. #Election2020results" / Twitter



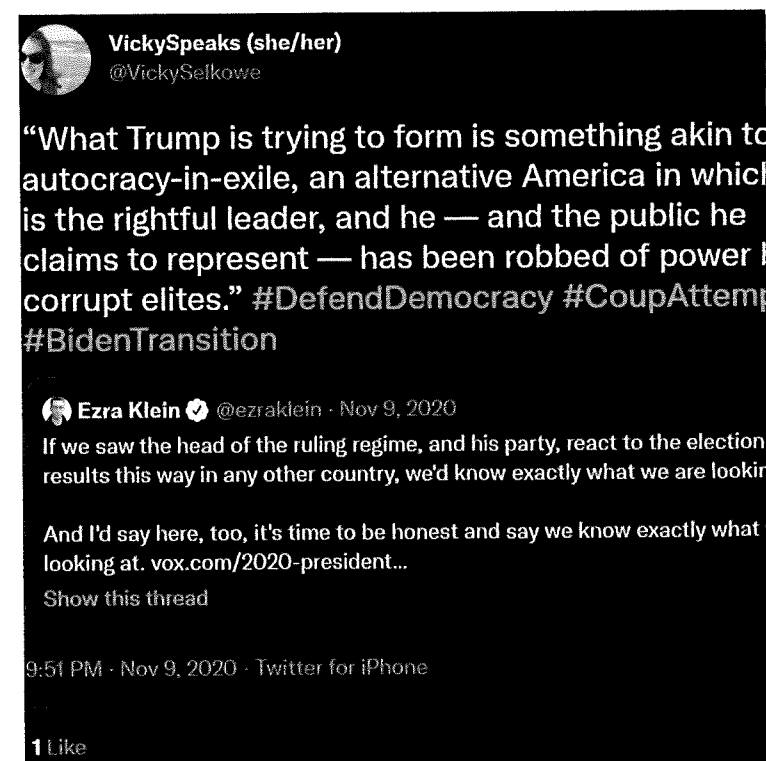
[VickySpeaks \(she/her\) on Twitter: "FINALLY! #Arizona2020 #BidenHarris2020 #Election2020 🎉🍌🌟" / Twitter](#)



[VickySpeaks \(she/her\) on Twitter: "Seriously, what's the long game here for the #GOP? Convince your base voters that elections are "rigged" so, what, only Democrats will vote in the future? I'm cool with that, but this narrative seems incredibly short-sighted politically. #SoreLoser #TrumpConcede" / Twitter](#)



[VickySpeaks \(she/her\) on Twitter: "Thread. "Wisconsin's election was conducted according to law and in the open...we have not seen any credible information to cast any doubt on those unofficial results." #Wisconsin #DefendDemocracy #Election2020results" / Twitter](#)

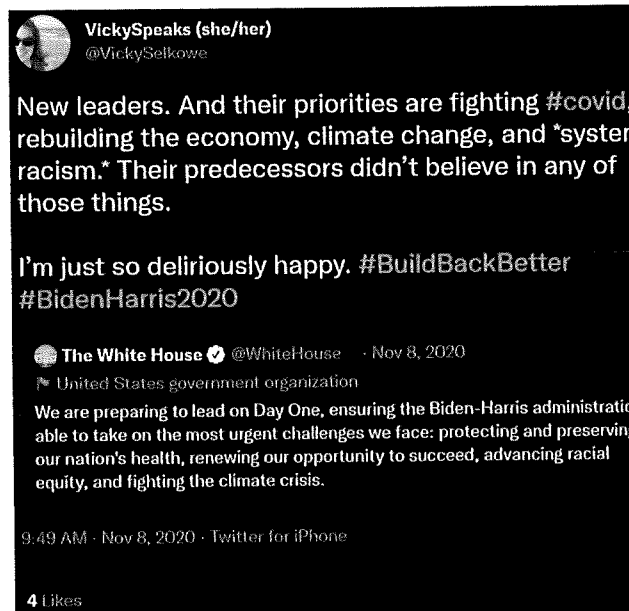


[VickySpeaks \(she/her\) on Twitter: ""What](#)

Trump is trying to form is something akin to an autocracy-in-exile, an alternative America in which he is the rightful leader, and he — and the public he claims to represent — has been robbed of power by corrupt elites.”  
#DefendDemocracy #CoupAttempt  
#BidenTransition" / Twitter



VickySpeaks (she/her) on Twitter: "The #GOP is attempting a coup. #BidenWon #GOPSoreLosers" / Twitter



VickySpeaks (she/her) on Twitter: "New leaders. And their priorities are fighting #covid, rebuilding the economy, climate change, and

\*systemic racism.\* Their predecessors didn't believe in any of those things. I'm just so deliriously happy. #BuildBackBetter #BidenHarris2020" / Twitter

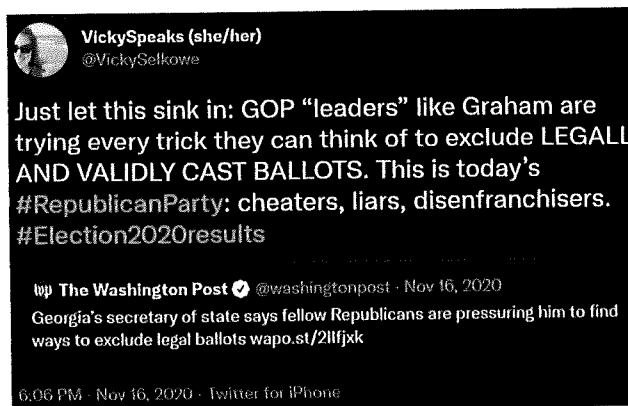


VickySpeaks (she/her) on Twitter: "His hat! #WeJustDid #BidenHarris2020" / Twitter



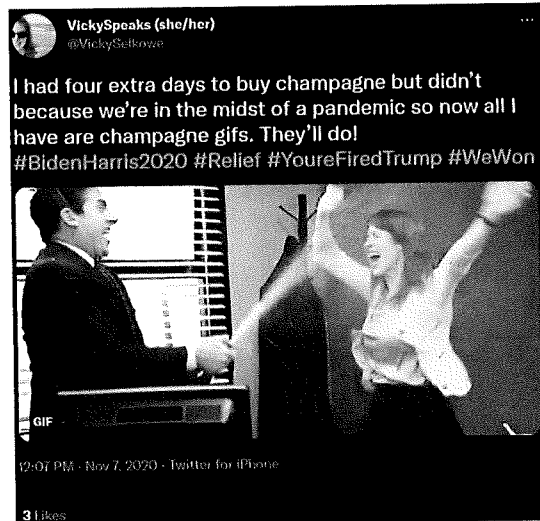


VickySpeaks (she/her) on Twitter: "Omg. Not only do we get Joe & Jill & Kamala & Doug, but there will be DOGS in the #WhiteHouse again! America really will be great again! #BidenHarris2020 #ByeByeTrump <https://t.co/7TRMe6p2y1>" / Twitter

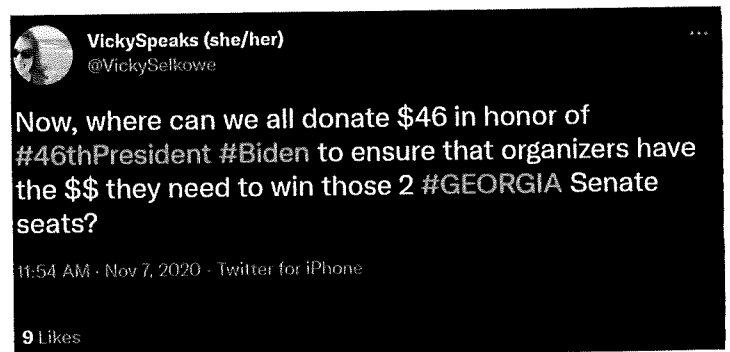


VickySpeaks (she/her) on Twitter: "Just let this sink in: GOP "leaders" like Graham are trying every trick they can think of to exclude LEGALLY AND VALIDLY CAST BALLOTS. This is today's #RepublicanParty: cheaters, liars,

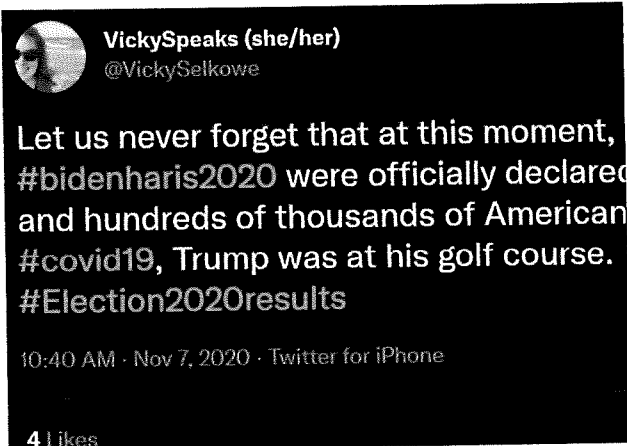
[disenfranchisers. #Election2020results" / Twitter](#)



VickySpeaks (she/her) on Twitter: "I had four extra days to buy champagne but didn't because we're in the midst of a pandemic so now all I have are champagne gifs. They'll do! #BidenHarris2020 #Relief #YoureFiredTrump #WeWon <https://t.co/fo7mXbBYlk>" / Twitter



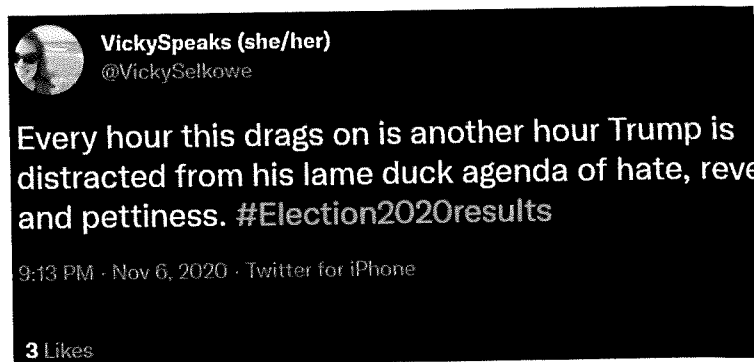
VickySpeaks (she/her) on Twitter: "Now, where can we all donate \$46 in honor of #46thPresident #Biden to ensure that organizers have the \$\$ they need to win those 2 #GEORGIA Senate seats?" / Twitter



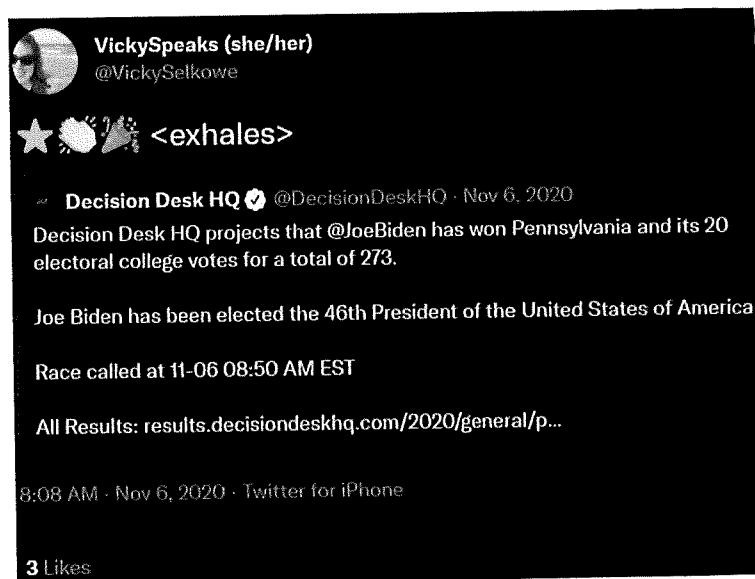
VickySpeaks (she/her) on Twitter: "Let us never forget that at this moment, when #bidenharis2020 were officially declared the winners and hundreds of thousands of Americans are sick with #covid19, Trump was at his golf course. #Election2020results" / Twitter



VickySpeaks (she/her) on Twitter: "It's HAPPENING!" / Twitter



VickySpeaks (she/her) on Twitter: "Every hour this drags on is another hour Trump is distracted from his lame duck agenda of hate, revenge, and pettiness. #Election2020results" / Twitter



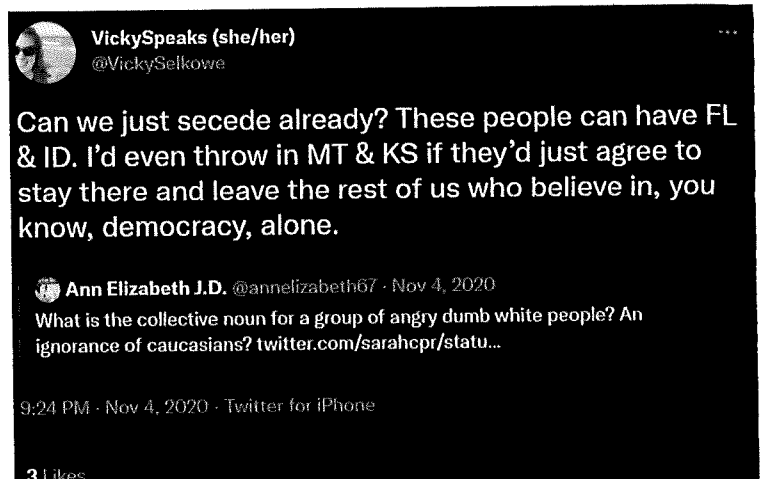
VickySpeaks (she/her) on Twitter: "<exhales>" / Twitter



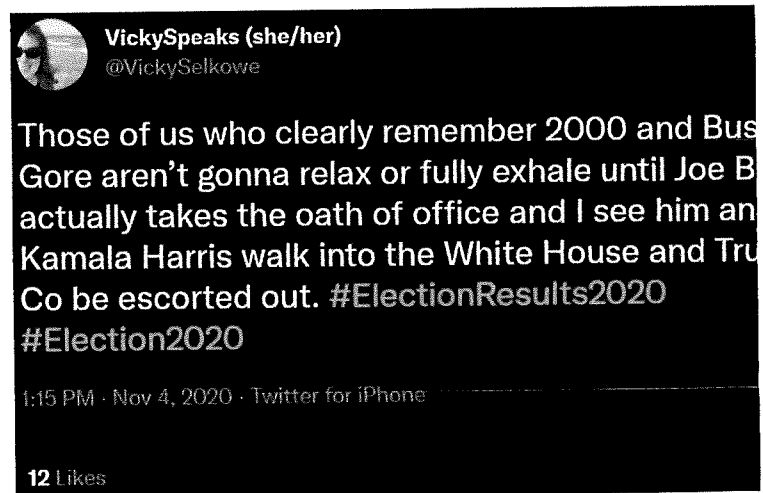
VickySpeaks (she/her) on Twitter: "This is so mean to obese turtles. But otherwise, right on. #TrumpMeltdown #CountAllTheVotes" / Twitter



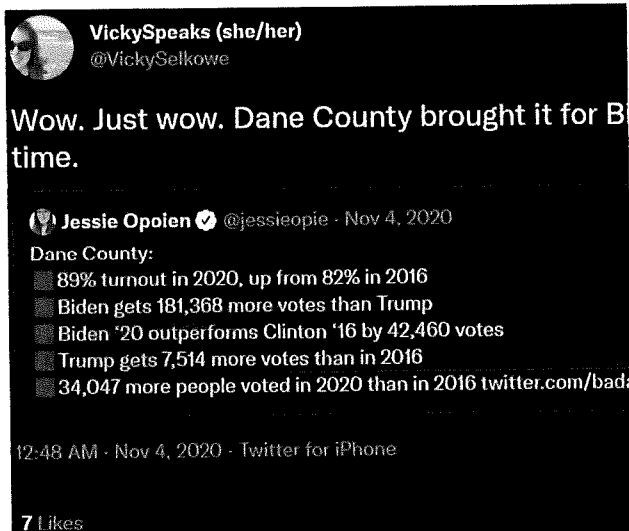
VickySpeaks (she/her) on Twitter: "Fixed your headline for you, @nytimes. #TrumpMeltdown #ElectionResults2020 <https://t.co/iHoeupBykV>" / Twitter



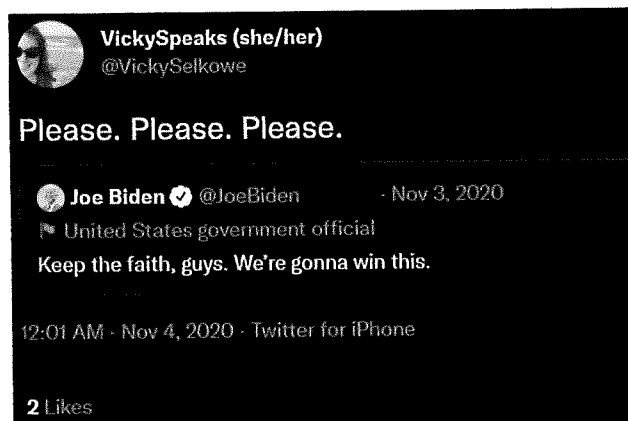
VickySpeaks (she/her) on Twitter: "Can we just secede already? These people can have FL & ID. I'd even throw in MT & KS if they'd just agree to stay there and leave the rest of us who believe in, you know, democracy, alone." / Twitter



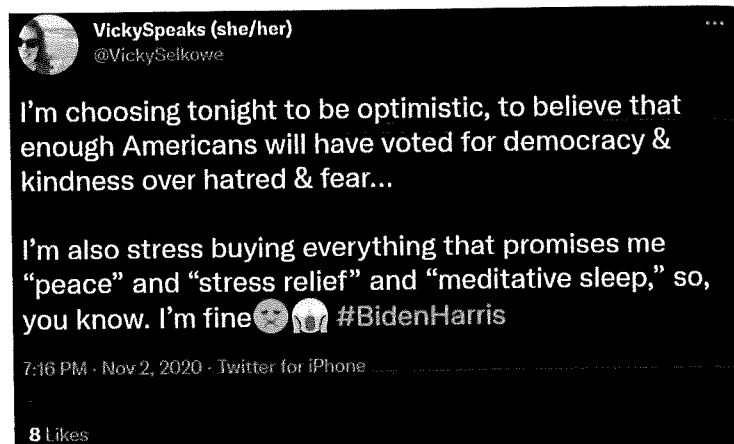
VickySpeaks (she/her) on Twitter: "Those of us who clearly remember 2000 and Bush v. Gore aren't gonna relax or fully exhale until Joe Biden actually takes the oath of office and I see him and Kamala Harris walk into the White House and Trump & Co be escorted out. #ElectionResults2020 #Election2020" / Twitter



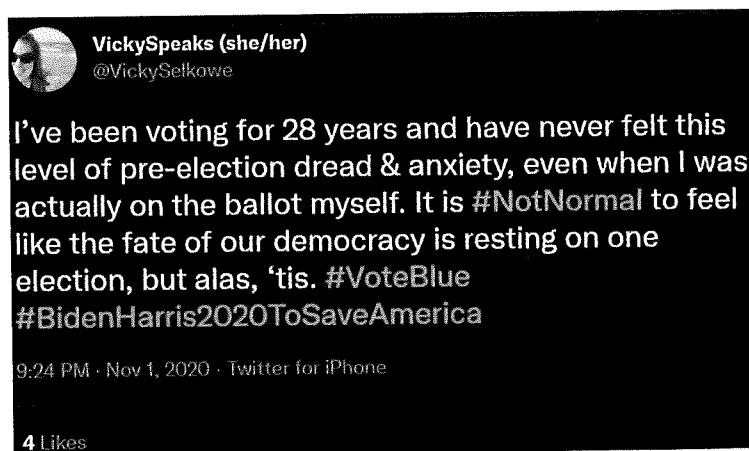
VickySpeaks (she/her) on Twitter: "Wow. Just wow. Dane County brought it for Biden big time." / Twitter



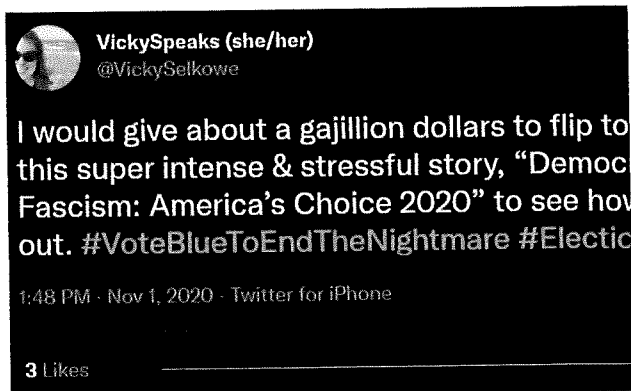
VickySpeaks (she/her) on Twitter: "Please. Please. Please." / Twitter



VickySpeaks (she/her) on Twitter: "I'm choosing tonight to be optimistic, to believe that enough Americans will have voted for democracy & kindness over hatred & fear... I'm also stress buying everything that promises me "peace" and "stress relief" and "meditative sleep," so, you know. I'm fine 🙄🙄 #BidenHarris" / Twitter



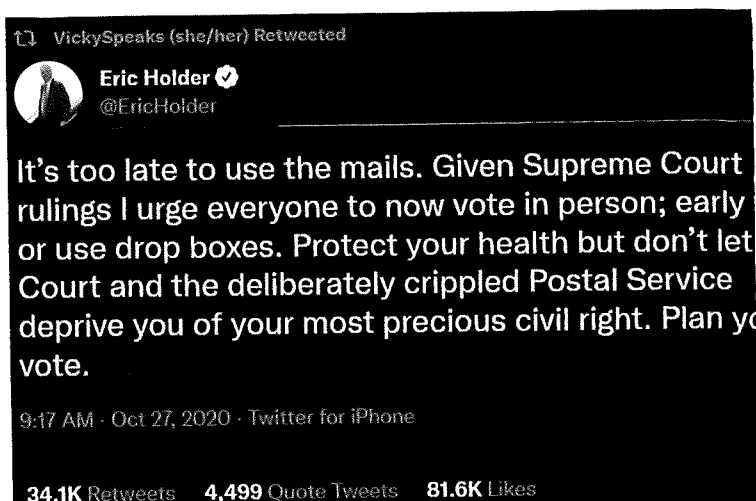
VickySpeaks (she/her) on Twitter: "I've been voting for 28 years and have never felt this level of pre-election dread & anxiety, even when I was actually on the ballot myself. It is #NotNormal to feel like the fate of our democracy is resting on one election, but alas, 'tis. #VoteBlue #BidenHarris2020ToSaveAmerica" / Twitter



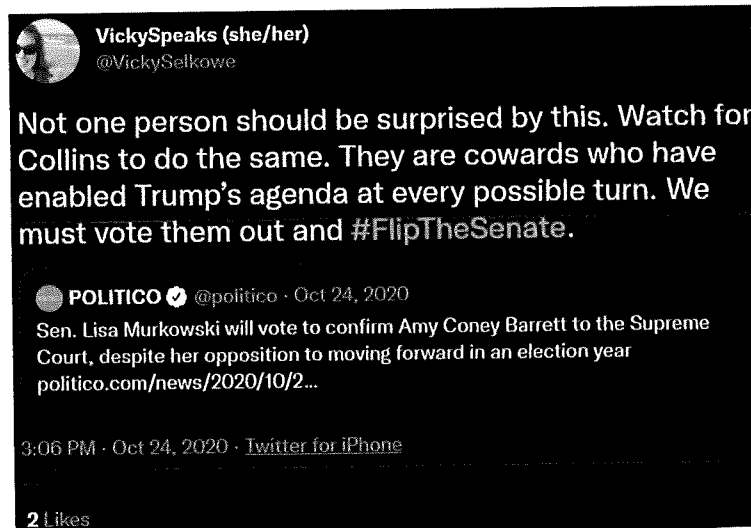
VickySpeaks (she/her) on Twitter: "I would give about a gajillion dollars to flip to the end of this super intense & stressful story, "Democracy or Fascism: America's Choice 2020" to see how this turns out. #VoteBlueToEndTheNightmare #Elections2020" / Twitter



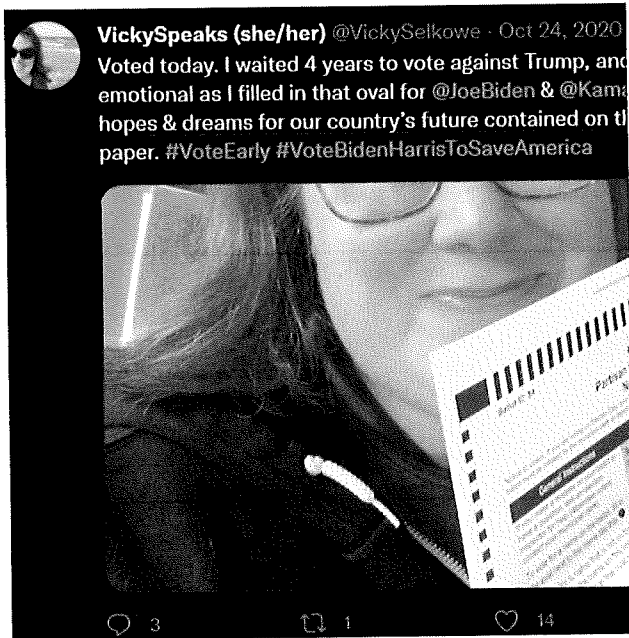
VickySpeaks (she/her) on Twitter: "Maya Angelou taught us that when someone shows you who they are, believe them the first time. Trump & the GOP have shown us plenty this first time. Let's not give them a second. #VoteTrumpOut2020" / Twitter



Eric Holder on Twitter: "It's too late to use the mails. Given Supreme Court rulings I urge everyone to now vote in person; early vote or use drop boxes. Protect your health but don't let the Court and the deliberately crippled Postal Service deprive you of your most precious civil right. Plan your vote." / Twitter



VickySpeaks (she/her) on Twitter: "Not one person should be surprised by this. Watch for Collins to do the same. They are cowards who have enabled Trump's agenda at every possible turn. We must vote them out and #FlipTheSenate." / Twitter



VickySpeaks (she/her) on Twitter: "Voted today. I waited 4 years to vote against Trump, and I got a little emotional as I filled in that oval for @JoeBiden & @KamalaHarris. All my hopes & dreams for our country's future contained on this one piece of paper. #VoteEarly #VoteBidenHarrisToSaveAmerica <https://t.co/kHHgGvub0w>" / Twitter



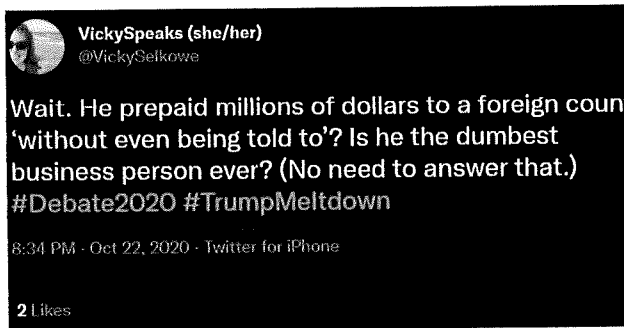
VickySpeaks (she/her) on Twitter: "YES." / Twitter



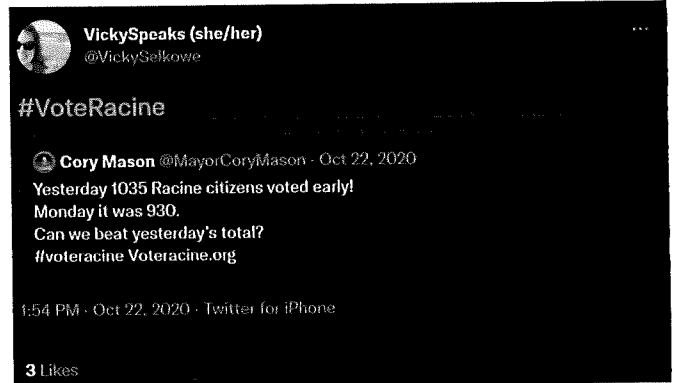
VickySpeaks (she/her) on Twitter: "Go #VoteBlueToEndThisNightmare so we don't have to ever hear the full version of that disastrous and ignorant Inauguration address. #Debates2020 #DebateTonight #VoteBidenHarrisToSaveAmerica2020" / Twitter



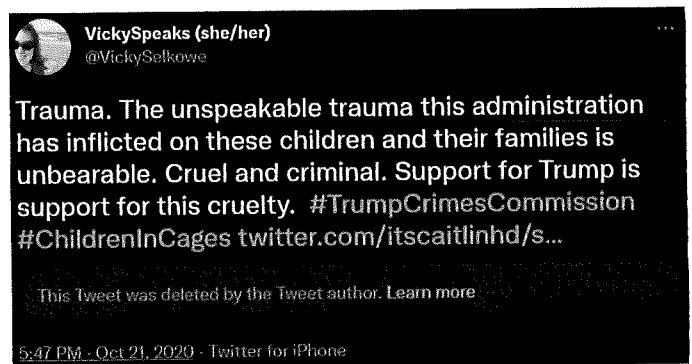
VickySpeaks (she/her) on Twitter: "I am the least racist person in this room" is literally exactly what the most racist person in the room always says. #DebateTonight #Debates2020 #TrumpMeltdown" / Twitter



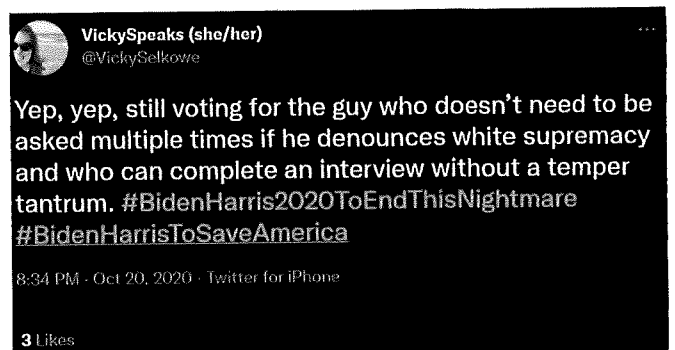
VickySpeaks (she/her) on Twitter: "Wait. He prepaid millions of dollars to a foreign country 'without even being told to'? Is he the dumbest business person ever? (No need to answer that.) #Debate2020 #TrumpMeltdown" / Twitter



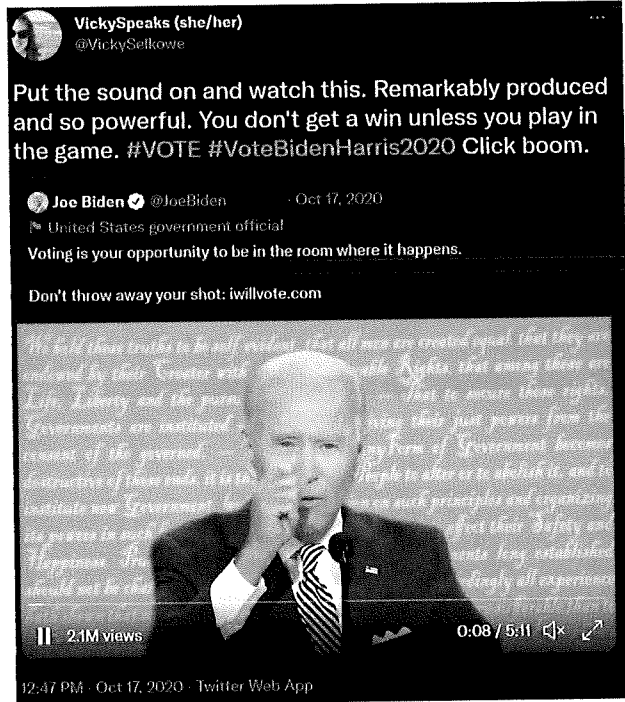
VickySpeaks (she/her) on Twitter: "#VoteRacine" / Twitter



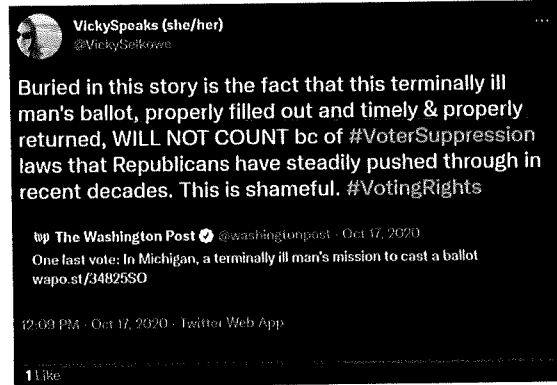
VickySpeaks (she/her) on Twitter: "Trauma. The unspeakable trauma this administration has inflicted on these children and their families is unbearable. Cruel and criminal. Support for Trump is support for this cruelty. #TrumpCrimesCommission #ChildrenInCages" / Twitter



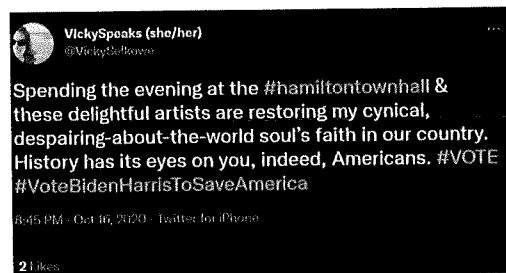
VickySpeaks (she/her) on Twitter: "Yep, yep, still voting for the guy who doesn't need to be asked multiple times if he denounces white supremacy and who can complete an interview without a temper tantrum. #BidenHarris2020ToEndThisNightmare #BidenHarrisToSaveAmerica" / Twitter



VickySpeaks (she/her) on Twitter: "Put the sound on and watch this. Remarkably produced and so powerful. You don't get a win unless you play in the game. #VOTE #VoteBidenHarris2020 Click boom." / Twitter



VickySpeaks (she/her) on Twitter: "Buried in this story is the fact that this terminally ill man's ballot, properly filled out and timely & properly returned, WILL NOT COUNT bc of #VoterSuppression laws that Republicans have steadily pushed through in recent decades. This is shameful. #VotingRights" / Twitter



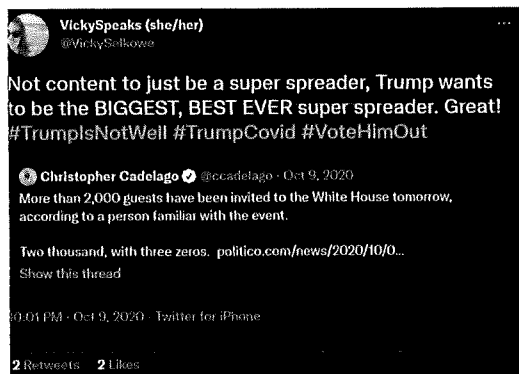
VickySpeaks (she/her) on Twitter: "Spending the evening at the #hamiltontownhall & these delightful artists are restoring my cynical, despairing-about-the-world soul's faith in our country. History has its eyes on you, indeed, Americans. #VOTE #VoteBidenHarrisToSaveAmerica" / Twitter



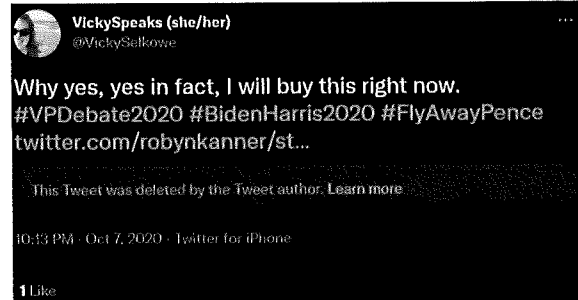
VickySpeaks (she/her) on Twitter: "I don't even need to read this email. I'll do whatever @Lin Manuel and the #Hamilton cast want me to do. Here, take all my money. You can have it bc this is ☆👏👏👏👏 Most quickly opened campaign email this cycle? #BidenHarris2020 https://t.co/JfHTwRWWZU" / Twitter



VickySpeaks (she/her) on Twitter: "I just want to stop having mini-panic attacks every time a news alert pops up on my phone, wondering frantically, 'oh shit, what has he done NOW?' #BidenHarris2020 #VoteHimOut2020 #VoteBlueToSaveOurDemocracy" / Twitter



VickySpeaks (she/her) on Twitter: "Not content to just be a super spreader, Trump wants to be the BIGGEST, BEST EVER super spreader. Great! #TrumpsNotWell #TrumpCovid #VoteHimOut" / Twitter



VickySpeaks (she/her) on Twitter: "Why yes, yes in fact, I will buy this right now. #VPDebate2020 #BidenHarris2020 #FlyAwayPence" / Twitter



VickySpeaks (she/her) on Twitter: "No one should be surprised that men who don't respect women talk over & interrupt women. Mansplaining sexists gonna be mansplaining sexists. What they don't get is that women sick of this shit are gonna be voters who are sick of this shit. #VPDebates #VPDebate #KamalaHarrisVP" / Twitter



CENTER FOR  
TECH AND  
CIVIC LIFE

August 3, 2020

City of Racine

Dear Mayor Mason,

I am pleased to inform you that the Center for Tech and Civic Life ("CTCL") has decided to award a grant to support the work of the City of Racine.

The following is a description of the grant:

**AMOUNT OF GRANT:** Nine hundred, forty-two thousand, one hundred US dollars (USD \$942,100.00).

**PURPOSE:** The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration in the City of Racine in accordance with the Wisconsin Safe Voting Plan 2020 ("Appendix").

Before we transmit these funds, we ask that you sign this agreement promising to use the grant funds in compliance with United States tax laws. Specifically, by signing this letter you agree to the following:

1. The City of Racine is a U.S., state, or local government unit or political subdivision in the meaning of 26 USC 170(c)(1).



2. This grant shall be used *only* for the public purpose described above, and for no other purposes.
3. The City of Racine shall not use any part of this grant to give a grant to another organization unless CTCL agrees to the specific sub-recipient in advance, in writing.
4. The City of Racine has produced a plan for safe and secure election administration in 2020, including an assessment of election administration needs, budget estimates for such assessment, and an assessment of the impact of the plan on voters. This plan is attached to this agreement as an Appendix. The City shall expend the amount of this grant for purposes contained in this plan by December 31, 2020.
5. This grant is intended to support and shall be used solely to fund the activities and purposes described in the plan produced pursuant to paragraph 4.
6. The City of Racine shall produce a report documenting how this grant has been expended in support of the Appendix. This report shall be provided to CTCL by January 31, 2021.
7. The City of Racine shall not reduce or otherwise modify planned municipal spending on 2020 elections, including the budget of the City Clerk of Racine ("the Clerk") or fail to appropriate or provide previously budgeted funds to the Clerk for the term of this grant. Any amount reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.
8. CTCL may discontinue, modify, withhold part of, or ask for the return of all or part of the grant funds if it determines, in its sole judgment, that (a) any of the above conditions have not been met or (b) it must do so to comply with applicable laws or regulations.
9. The grant project period of June 15, 2020 through December 31, 2020 represents the dates between which covered costs may be applied to the grant.

Your acceptance of these agreements should be indicated below. Please have an authorized representative of The City of Racine sign below, and return a scanned copy of this letter to us by email at [grants@techandcivicliflife.org](mailto:grants@techandcivicliflife.org)

On behalf of CTCL, I extend my best wishes in your work.

Sincerely,

Tiana Epps Johnson  
Executive Director  
Center for Tech and Civic Life

Accepted on behalf of the City of Racine:

**SEE ATTACHMENT**

By: \_\_\_\_\_

Title: \_\_\_\_\_

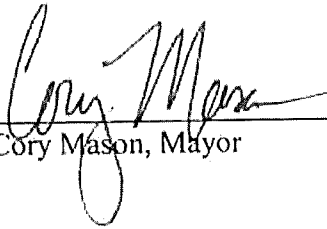
Date: \_\_\_\_\_

**APPENDIX:** Wisconsin Safe Voting Plan 2020 Submitted to the Center for Tech & Civic Life  
June 15, 2020

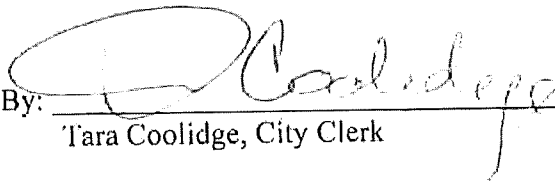
Center for TECH & CIVIC LIFE  
[HELLO@TECHANDCIVICLIFE.ORG](mailto:HELLO@TECHANDCIVICLIFE.ORG)

Page 3

CITY OF RACINE

By:  8/6/2020  
Cory Mason, Mayor Date


ATTEST:

By:  8/6/2020  
Tara Coolidge, City Clerk Date

Provisions have been made to pay the liability that will accrue hereunder.

By:  8-6-20  
David Brown, Finance Director Date

APPROVED AS TO FORM:

By:  August 6 2020  
Scott R. Letteney, City Attorney Date



CENTER FOR  
TECH AND  
CIVIC LIFE

August 31, 2020

City of Racine

Dear Mayor Mason,

I am pleased to inform you that the Center for Tech and Civic Life ("CTCL") has decided to award you a grant to support the work of the City of Racine.

The following is a description of the grant:

**AMOUNT OF GRANT:** Six Hundred Fifty-Seven Thousand US Dollars (USD \$657,000).

**PURPOSE:** The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration in the City of Racine in accordance with the Wisconsin Safe Voting Plan 2020 and the attached "Additional Resources Requested for November 3rd, 2020 General Election."

Before we transmit these funds, we ask that you sign this agreement promising to use the grant funds in compliance with United States tax laws. Specifically, by signing this letter you agree to the following:

1. The City of Racine is a local government unit or political subdivision in the meaning of 26 USC 170(c)(1).
2. This grant shall be used *only* for the public purpose described above, and for no other purposes.
3. The City of Racine shall not use any part of this grant to give a grant to another organization unless CTCL agrees to the specific grant in writing.
4. The City of Racine has produced a plan for safe and secure election administration in 2020 and a supplement to such plan, including an assessment of election administration

needs, budget estimates for such assessment, and an assessment of the impact of the plan on voters. This supplemental plan is attached to this agreement. The City shall expend the amount of this grant for purposes contained in this plan by December 31, 2020.

5. The City of Racine shall produce a report documenting how this grant has been expended in support of the activities described in paragraph 4. This report shall be written and sent to CTCL by January 31, 2021 or in any other format approved by CTCL.
6. The City of Racine shall not reduce the budget of the City Clerk of Racine ("the Clerk") or fail to appropriate or provide previously budgeted funds to the Clerk for the term of this grant. Any amount reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.
7. CTCL may discontinue, modify, withhold part of, or ask for the return all or part of the grant funds if it determines, in its sole judgment, that (a) any of the above conditions have not been met or (b) it must do so to comply with applicable laws or regulations.
8. The grant project period of June 15, 2020 through December 31, 2020 represents the dates between which covered costs may be applied to the grant.

Your acceptance of these agreements should be indicated below. Please have an authorized representative of The City of Racine sign below, and return a scanned copy of this letter to us by email at [grants@techandcivicliflife.org](mailto:grants@techandcivicliflife.org)

On behalf of CTCL, I extend my best wishes in your work.

Sincerely,

Tiana Epps Johnson  
Executive Director  
Center for Tech and Civic Life



CITY OF RACINE

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_







# JANEL BRANDTJEN

STATE REPRESENTATIVE • 22<sup>ND</sup> ASSEMBLY DISTRICT

Honorable Mayor Mason  
730 Washington Avenue  
Racine, WI 53403

## DELIVERED ELECTRONICALLY

March 15, 2021

Dear Mayor Mason,

I am writing in my capacity as Chair of the Assembly Committee on Campaigns and Elections. Pursuant to the state open records law, Wis. Stat. § 13.45(7), I am requesting any communications including, but not limited to, emails and attachments, both sent and received; text messages; messages and materials exchanged or viewed through online applications; any other correspondence, internal and external; and all other records, including both physical and electronic, between any persons in the City of Racine Clerk's Office, any person in the City of Racine Mayor's Office, any person in the City of Racine Attorney's Office and the organizations/people listed below. I am requesting these documents for the timespan of August 1, 2020 through November 20, 2020.

- Any persons in the National Vote At Home Institute
- Any persons in the Center for Tech and Civic Life
- Any persons in The Elections Group
- Any persons in the ideas42
- Any persons in The Wisconsin Five/The Wisconsin 5
- Michael Barr
- Denise Gaumer-Hutchinson
- Hillary Hall
- Sam Munger
- Michael Spitzer-Rubenstein

We request these documents be delivered electronically and as soon as possible.

Thank you,

State Representative Janel Brandtjen



Honest Open Transparent

Vicky Selkove  
City of Racine  
730 Washington Ave.  
Racine, Wi. 53403

3-17-2021

**Subject: Wisconsin Public Records Request**

Ms. Vicky Selkove,

**This letter is a request for the inspection of the following records under Wisconsin Public Record laws.  
(Wisconsin Statutes 19.31-39 and others)**

This Wisconsin Public Records Request is specifically focused on any records of the following between Jan 1<sup>st</sup>, 2020 to December 31<sup>st</sup>, 2020:

**Specific records requests:**

**Maintain and protect ALL records of the following.**

The requester wishes to review all documents, videos, and media as soon as possible of the following:

1. **Vicky Selkove** and/or Vicky Selkove acting as Manager of Strategic Initiatives & Community Partnerships and Multicultural Liaison, or in other capacities, records to include emails, texts, notes, inner office correspondence and videos relating to the City of Racine activities concerning the 2020 November elections with the listed below keywords, (#2).
2. Key words in the above-mentioned request include CTCL, National Vote at Home Institute, Center for Tech and Civic Life, Wisconsin Safe voting plan, poll worker(s), Ideas42, ballot, box,



boxes, security, camera(s) Dominion, vote, voting machines, grant, Madison, Green Bay, Milwaukee, Kenosha, Racine, contract(s), agreement(s), lock(s), key(s), Michelle Nelson, Tiana Epps Johnson, John McLaughlin, Kris Teske, Antaramian, Maribeth Witzel-Behl, S. Claire Woodall-Vogg, Kathleen Fischer, Whitney May, Hillary Hall, Michael Spitzer-Rubenstein,

The requester wishes to review these files in its entirety.

Please be aware that the Open Record laws define "records" to include information that is maintained on paper as well as electronically stored records, such as data files, video, and unprinted emails.

Wisconsin Public Record laws shall be construed in every instance with the presumption of complete public access consistent with the conduct of government business. The denial of access to public records is generally contrary to the public interest and only in exceptional cases can public records access be denied. Should you deny any part of this request, the law requires you to do so in writing and state what part of the law you believe entitles you to deny my request. {Wisconsin Statute 19.35,(4),(a)}

The law requires you to respond to this request "as soon as possible and without delay". Compliance is mandatory by law. Comply and produce all the requested records or deny the records request (all or in part) within ten days.

*Compliance at some unspecified future time is not authorized by the public records law. The records custodian has two choices: comply or deny. WTMJ, Inc. v. Sullivan, 204 Wis. 2d 452, 457-58, 555 N.W.2d 140, 142 (Ct. App. 1996).*

To expedite and simplify the response, and in stewardship of our good earth's resources, please respond to this request in an electronic media form.

If there are questions or clarification needed of this request, please inform me so I may clarify or refine this request.

Please promptly contact me so I may conduct an inspection of these records.

Respectfully submitted,

HOT Government &  
Harry Wait

*S Harry Wait*

---

4353 Shianne Street  
Union Grove, WI. 53182  
Ph. 262-770-9796  
harrytrex@gmail.com

HOTGovernment@gmail.com

Submitted via email.  
[vicky.selkove@cityofracine.org](mailto:vicky.selkove@cityofracine.org)

Honest Open Transparent

Tara Coolidge  
City of Racine  
730 Washington Ave.  
Racine, Wi. 53403

3-17-2021

**Subject: Wisconsin Public Records Request**

Ms. Tara Coolidge,

**This letter is a request for the inspection of the following records under Wisconsin Public Record laws.  
(Wisconsin Statutes 19.31-39 and others)**

This Wisconsin Public Records Request is specifically focused on any records of the following between Jan 1<sup>st</sup>, 2019 to December 31<sup>st</sup>, 2020:

**Specific records requests:**

**Maintain and protect ALL records of the following.**

The requester wishes to review all documents as requested below:

1. **Tara Coolidge**, City clerk - records to include emails, notes and correspondence relating to City of Racine activities concerning the 2019 and 2020 elections with the listed below contents.
2. Copies of City of Racine policies and procedures for selection and hiring of poll workers.
3. All communications between the office of the Mayor, office of the City Attorney and office of Human resources concerning poll workers and the 2020 elections.



4. All communications containing CTCL, National Vote at Home Institute, Center for Tech and Civic Life, Wisconsin Safe voting plan, Ideas42, Michelle Nelson, Tiana Epps Johnson, John McLaughlin, Kris Teske, Antaramian, Maribeth Witzel-Behl, S. Claire Woodall-Vogg, Kathleen Fischer, Whitney May, Hillary Hall, Michael Spitzer-Rubenstein,

5. List and copies of all poll workers used by City of Racine in 2019 and 2020 elections.

6. List and copies of all poll worker applicants in 2019 and 2020.

7. List and copies of all names and inquiries to be a poll worker in 2019 and 2020

8. List and copies of all denials to be a poll worker in 2019 and 2020

9. Any other lists of poll workers used for conducting elections within the City of Racine during elections of 2020 that are not included within 5,6,7,8.

10. List of outside contractors, vendors and /or volunteer organizations used to provide or manage poll workers during 2020 elections.

*Done* The requester wishes to review these files in its entirety.

Please be aware that the Open Record laws define "records" to include information that is maintained on paper as well as electronically stored records, such as data files, video, and unprinted emails.

Wisconsin Public Record laws shall be construed in every instance with the presumption of complete public access consistent with the conduct of government business. The denial of access to public records is generally contrary to the public interest and only in exceptional cases can public records access be denied. Should you deny any part of this request, the law

requires you to do so in writing and state what part of the law you believe entitles you to deny my request. {Wisconsin Statute 19.35,(4),(a)}

The law requires you to respond to this request "as soon as possible and without delay". Compliance is mandatory by law. Comply and produce all the requested records or deny the records request (all or in part) within ten days.

*Compliance at some unspecified future time is not authorized by the public records law. The records custodian has two choices: comply or deny. WTMJ, Inc. v. Sullivan, 204 Wis. 2d 452, 457-58, 555 N.W.2d 140, 142 (Ct. App. 1996).*

To expedite and simplify the response, and in stewardship of our good earth's resources, please respond to this request in an electronic media form.

If there are questions or clarification needed of this request, please inform me so I may clarify or refine this request.

Please promptly contact me so I may conduct an inspection of these records.

Respectfully submitted,

HOT Government &  
Harry Wait

*S Harry Wait*

---

4353 Shianne Street  
Union Grove, Wi. 53182  
Ph. 262-770-9796  
harrytrex@gmail.com

HOTGovernment@gmail.com

Submitted via email.  
[TaraCoolidge@cityofRacine.org](mailto:TaraCoolidge@cityofRacine.org).

Honest Open Transparent

Tara Coolidge,  
City of Racine  
730 Washington Ave.  
Racine, Wi. 53403

6 - 14 - 2021

**Subject: Wisconsin Public Records Request**

Tara Coolidge,

**This letter is a request for the inspection of the following records under Wisconsin Public Record laws.  
(Wisconsin Statutes § 19.31-39 and others)**

This Wisconsin Public Records Request is specifically focused on any records held by the City of Racine and specifically pertaining to the November 3<sup>rd</sup>, 2020 elections, hereinafter "the election", in the City of Racine.

**Specific records requests:**

**Maintain and protect ALL records of the following.**

**1. Electronic voting system(s) certifications or records**

Requester seeks records of all certifications of voting devices and sample ballots, and any and all communications pertaining to such certifications from the election.

**2. Electronic voting system(s) records of equipment and ballot testing**

Requester seeks all records of:

1. The date(s) of all tests of electronic voting equipment and ballots from the election.
2. The location(s) of all tests of electronic voting equipment and ballots from the election.





3. Notices of all tests of electronic voting equipment and ballots from the election.
4. All documentation listing attendees of the tests of electronic voting equipment and ballots from the election.
5. All results, printed or other, of the tests of electronic voting equipment and ballots from the election.
6. All records of the sealing and retention of "ballots and programs" of electronic voting equipment and ballots from the election.

### **3. Records of the receiving, counting, tallying, and return of ballots where electronic voting system(s) are utilized**

Requester seeks all records and documentation of the receiving, counting, tallying, return of ballots, any and all inspector statements and/or certifications, and any and all communications concerning inspector statements and certifications from the election.

### **4. Records of proceedings at central counting locations**

Requester seeks all records, documentation, and communications of elections officials, technicians, employees, or any other personnel concerning proceedings, determinations, inspections, and discrepancies at central counting locations of the election.

### **5. Records of vote tabulation(s)**

Requester seeks all records, documentation, and communications of elections officials, technicians, employees, or any other personnel concerning proceedings, determinations, inspections, and discrepancies regarding the vote tabulation at locations other than central counting locations of the election.

### **6. Records of the official return**

Requester seeks all records, documentation, and communications of elections officials, technicians, employees, or any other personnel concerning the official return of the vote produced by automatic tabulation equipment of the election.

### **7. Post-election audits of electronic voting system(s)**

Requester seeks all records of any and all communications, certifications, statements, and documentation provided to or requested from the "commission"

as defined in Wisconsin Statute § 5.025 regarding post-election audits of voting machines.

The requester wishes to review these files in its entirety. Please be aware that the Open Record laws define "records" to include information that is maintained on paper as well as electronically stored records, such as data files, video, and unprinted emails.

Wisconsin Public Record laws shall be construed in every instance with the presumption of complete public access consistent with the conduct of government business. The denial of access to public records is generally contrary to the public interest and only in exceptional cases can public records access be denied. Should you deny any part of this request, the law requires you to do so in writing and state what part of the law you believe entitles you to deny my request. {Wisconsin Statute § 19.35,(4),(a)}

The law requires you to respond to this request "as soon as possible and without delay". Compliance is mandatory by law. Comply and produce all the requested records or deny the records request (all or in part) within ten days.

*Compliance at some unspecified future time is not authorized by the public records law. The records custodian has two choices: comply or deny. WTMJ, Inc. v. Sullivan, 204 Wis. 2d 452, 457-58, 555 N.W.2d 140, 142 (Ct. App. 1996).*

To expedite and simplify the response, and in stewardship of our good earth's resources, please respond to this request in an electronic media form.

If there are questions or clarification needed of this request, please inform me so I may clarify or refine this request.

Please promptly contact me so I may conduct an inspection of these records.

Respectfully submitted,  
HOT Government &  
Harry Wait

*S Harry Wait*

---

4353 Shianne Street

Union Grove, Wi. 53182

Ph. 262-770-9796

harrytrex@gmail.com

hotgovernment@gmail.com

Submitted via email.

Tara.Coolidge@cityofracine.org

# MOHRMAN, KAARDAL & ERICKSON, P.A.

ATTORNEYS AND COUNSELORS AT LAW

150 SOUTH FIFTH STREET  
SUITE 3100  
MINNEAPOLIS, MINNESOTA 55402

ERICK G. KAARDAL

TELEPHONE: 612/466-0927  
FACSIMILE: 612/341-1076  
WRITER'S E-MAIL: KAARDAL@MKLAW.COM

April 29, 2021

Via Online Submission, Email and U.S. Mail

Tara Coolidge, City Clerk  
City of Racine  
730 Washington Ave, Room 103  
Racine, WI 53403  
tara.coolidge@cityofracine.org

Re: *Wisconsin Public Records Law Request*

Dear Tara Coolidge:

This is a public records request on behalf of the Wisconsin Voters Alliance regarding actions taken by the City of Racine, its employees, and by grant mentors, election advocates, voting navigators, consultants or private sector staff that assisted this city's election administration during the August 2020 state and federal primary and the November 2020 state and federal general election. My requests are made under the Wisconsin Open Records law, Wisc. Stat. §§ 19.31-19.39.

The Wisconsin Attorney General recommends 10 days as an appropriate amount of time to respond to requests.<sup>1</sup> I request that a complete response to the documents requested be completed before May 20, 2021. However, as you discover documents, and to keep within the timeline, partial and on-going disclosures would not be discouraged up to the May 20th deadline.

Meanwhile, I would be open to discuss a possible extension of the deadline provided that I be kept reasonably informed on your progress with the request and informed of the rationale for any delay. Nevertheless, any cooperation does not waive the statutory rights to seek judicial relief for delays, denials of access to data, or other non-compliance allegations as they arise or are committed. Wisc. Stat. §19.37. I would like to include this information in upcoming filings or supplement filings filed before the Wisconsin Election Commission ("WEC").

All copies of documents requested should be placed on a USB or Type-C flash drive to ensure copying and personnel time are kept at a minimum for my client.

<sup>1</sup> Wisconsin Attorney General, "Wisconsin Public Records Law Compliance Guide." October 2019. 16. <https://www.doj.state.wi.us/sites/default/files/office-open-government/Resources/PRL-GUIDE.pdf>. Accessed 4.27.2021.



**Governing Statutes and instructions.**

Under Wisc. Stat. §19.31, it is the declared policy of the state of Wisconsin 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. Further, providing persons with such information is an essential function of a representative government and an integral part of the routine duties of officers and employees whose responsibility it is to provide such information. To that end, §§ 19.32 to 19.37 shall be construed in every instance with a presumption of complete public access, consistent with the conduct of governmental business. The denial of public access generally is contrary to the public interest, and only in an exceptional case may access be denied. According to the Wisconsin Attorney General, any denial or partial denial to our written requests must also be in writing, they must be specific, must cite to a statute, and must include the public policy reasons for the refusal.<sup>2</sup>

General statements, conclusions, or references are unacceptable and challengeable as non-responsive and as avoiding possible judicial review to determine proper labeling as nonpublic data.

**General understandings for the document requests.**

If for any reason you do not understand a document request, you are to immediately contact me for clarification, in writing. If you are giving any word in the request a meaning other than its ordinary customary dictionary meaning, identify the word and provide your own definition. If you provide your own definition, however, this does not eviscerate your obligation to complete the request and to provide the document(s).

Intentional avoidance of responding or disclosure of data relevant or relating to the request by failing to clarify the demand voluntarily, or to give words meanings contrary to customary usage will be deemed as non-responsive and subject to judicial proceedings.

All documents provided are to be compiled in the categories of the requests made whenever possible. If one document fulfills more than one request, then only one copy of the complete document need be provided. Unnecessary duplication is wasteful. But, if you are not sure of its previous disclosure, then include it again to ensure the request is fulfilled. Furthermore, if a document has attachments, the attachments must be included. Attachments are considered part of the whole regardless if referenced in the body of the primary document responsive to the request.

Finally, if you have no document responsive to a request made, you are to specifically state “no documents found” and identify that request.

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<sup>2</sup> Wisconsin Attorney General, “Wisconsin Public Records Law Compliance Guide.” October 2019. 16. <https://www.doj.state.wi.us/sites/default/files/office-open-government/Resources/PRL-GUIDE.pdf>. Accessed 4.27.2021.

**Time-period governing the requests.**

For all requests, the time-period of each request is during the period from April 1, 2020 to the present unless otherwise indicated.

Abbreviations.

“WEC” refers to the Wisconsin Elections Commission.

“You” or “you” refers to any person associated with the City of Racine in any way, directly or indirectly.

“CTCL” refers to the Center for Tech and Civic Life.

“Official” refers to any elected official, appointed position, or any paid staff or volunteer acting on behalf of or for the City of Racine.

**Definition of “documents.”**

References in the requests for “documents” or “document” is meant to be all-inclusive. I can list in two pages of double-spaced type what “document” refers to but this should not be necessary in a data practices act request. Therefore, objections made or non-disclosure of documents because the request did not specifically say “report,” “letter,” or “e-mail communication” is not acceptable and will be subject to judicial proceedings if an objection is made or a relevant document is not disclosed.

**Definition of “social media.”**

A social media post is an electronic communication made by anyone directly or indirectly related to the city on a social media site through their publicly funded cell phone or related to a work purpose through their personal phone. This includes, but is not limited to, Facebook, Facebook Messenger, Twitter, TikTok, Instagram, Snapchat, Telegram, WhatsApp, Reddit, and Google Messenger.

**Definition of “text message.”**

A text message is any electronic communication sent and received by mobile phone over any platform or application, as well as any message sent by a personal computer over the same platform or application. This includes, but is not limited to, Messages by Google, Apple Messages, Microsoft Teams, Slack, Cisco Jabber, WebEx, Zoom, Skype, Google Hangouts, GoToMeeting, workplace by Facebook or Salesforce Chatter.

**The Requests.**

I hereby request the following data, under the Wisconsin Open Records Law:

1. Provide any and all social media posts made on government funded cell phones by city officials that relate to or reference the following topics:
  - a. CTCL, Tiana-Epps Johnson, Josh Goldman, Whitney May, NVAHI, Hillary Hall, Michael Spitzer, Rubenstein, Idea42, Center for Civic Design, US Digital Response, The Elections Group, Quick Base, voter registration, ballot counting, ballot transport, reconstruction, election, voter outreach, absentee ballots, cure, curing, grant, claw-back, grant conditions, grant requirements, grant rules.
2. Provide any and all text messages made on government funded cell phones by city officials that reference the following topics:
  - a. CTCL, Tiana-Epps Johnson, Josh Goldman, Whitney May, NVAHI, Hillary Hall, Michael Spitzer, Rubenstein, Idea42, Center for Civic Design, US Digital Response, The Elections Group, Quick Base, voter registration, ballot counting, ballot transport, reconstruction, election, voter outreach, absentee ballots, cure, curing, grant, clawback, grant conditions, grant requirements, grant rules.
3. All documents in the City of Racine's possession referring to or relating to CTCL's grant for the city.
4. All documents in the City of Racine's possession referring to or relating to any CTCL's grant requirement or condition for the city.
5. All documents in the City of Racine's possession referring to, or relating to any meeting held between any City official and any group, entity, or organization referred to the city through or by CTCL.
6. All documents in the City of Racine's possession referring to or relating to any meetings with any person from any private organization (including non-profits), consulting group or entity, or any other for-profit or non-profit entity regarding the election process in Racine, including but not limited to absentee ballots.
7. All documents in the City of Racine's possession referring or relating to algorithms utilized in the City's election process administration, voter outreach, or absentee ballot collection.
8. All documents or recordings in the City of Racine's possession referring or relating to any presentation, PowerPoint decks of meetings held on absentee

ballots, elections, voter outreach, safe election funding or spending, election administration budgets, or election process administration.

9. All documents in the City of Racine's possession referring to or relating to the design of or drafting of the language utilized on ballots or absentee ballots.
  
10. All documents in the City of Racine's possession referring to or relating to census tracts or census information shared with any outside group, organization, or entity including but not limited to CTCL, the National Vote at Home Institute, Idea42, Quick Base, Center for Civic Design, US Digital Response, or the Elections Group.

Sincerely,

*/s/Erick G. Kaardal*

EGK/mg



## Vince Fahnlander

---

**From:** Erick Kaardal  
**Sent:** Tuesday, August 10, 2021 1:40 PM  
**To:** Vince Fahnlander  
**Subject:** FW: Racine Public Records Requests  
**Attachments:** Racine Public Records Requests.pdf

**From:** Erick Kaardal  
**Sent:** Tuesday, July 13, 2021 12:16 PM  
**To:** 'publicrecords@cityofracine.org' <publicrecords@cityofracine.org>  
**Subject:** Racine Public Records Requests

Dear Mr. Letteney:

I represent Wisconsin Voters Alliance, H.O.T. Government and Janel Brandtjen regarding public records requests to the City of Racine. You are the City Attorney. Because of the delay in receiving documents, my clients are considering litigation in Racine County Circuit Court. I am hoping this communication will spur the City to immediate compliance so such a lawsuit is unnecessary.

Please find enclosed the following public records requests:

Wisconsin Voters Alliance – 4/30/21  
H.O.T. Government- 3/17/21, 3/17/21, 6/14/21  
Janel Brandtjen—3/15/21

The City of Racine has failed to properly respond to all six public records requests. This lack of production of documents is unacceptable under Wisconsin open records law., Wisconsin Statutes section 13.45(7). Because of the City's violative non-response, my clients are entitled to a judicial remedy in Racine County Circuit Court. But, we want to avoid that through this communication.

Time is of the essence because of pending matters in the Wisconsin Elections Commission including a July 28 deadline for reply memoranda which relate to certain requested public records.

Please contact me immediately to resolve the disputes identified in this letter so that litigation is unnecessary.

Thank you.

egk

Erick G. Kaardal  
Mohrman, Kaardal and Erickson, P.A.  
150 S. Fifth St., Ste. 3100  
Minneapolis MN 55402  
612-341-1074  
f. 612-341-1076



**Vince Fahnlander**

---

**From:** Erick Kaardal  
**Sent:** Tuesday, August 10, 2021 1:45 PM  
**To:** Vince Fahnlander  
**Subject:** FW: Public Records Request (PR2021-055)

**From:** \_EXT\_ATT\_RECORDS <PublicRecords@cityofracine.org>  
**Sent:** Thursday, July 15, 2021 4:05 PM  
**To:** Harry Wait <harrytrex@gmail.com>  
**Cc:** Erick Kaardal <kaardal@mklaw.com>  
**Subject:** RE: Public Records Request (PR2021-055)

Dear Mr. Wait,

Thank you for your email. The City of Racine has received your request to revise the search criteria related to your public records request (PR2021-055), concerning Vicky Selkove's records. The City will proceed to process your request as revised and respond thereto as soon as practicable and without delay. Thank you again.

City Attorney's Office  
30 Washington Avenue  
Room 201  
Racine, Wisconsin 53403  
(262) 636-9115  
Fax: (262) 636-9570

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**From:** Harry Wait [mailto:harrytrex@gmail.com]  
**Sent:** Thursday, July 15, 2021 12:21 PM  
**To:** \_EXT\_ATT\_RECORDS <PublicRecords@cityofracine.org>  
**Cc:** Erick Kaardal <kaardal@mklaw.com>  
**Subject:** Re: Public Records Request (PR2021-055)



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July 23, 2021

*Sent via Email to kaardal@mklaw.com*

Attorney Erick Kaardal  
Mohrman, Kaaral & Erickson, P.A.  
150 South Fifth Street, Suite 3100  
Minneapolis, Minnesota 55402

**Re: Public Records Request PR2021-084**

Dear Attorney Kaardal:

This correspondence is being sent on behalf of City of Racine ("City") in response to your public records request (PR2021-084), which asked for the following records created between April 1, 2020 through the date of the request, April 29, 2021:

1. [A]ny and all social media posts made on government funded cell phones by city officials that relate to or reference the following topics:
  - a. CTCL, Tiana-Epps Johnson, Josh Goldman, Whitney May, NVAHI, Hillary Hall, Michael Spitzer, Rubenstein, Idea42, Center for Civic Design, US Digital Response, The Elections Group, Quick Base, voter registration, ballot counting, ballot transport, reconstruction, election, voter outreach, absentee ballots, cure, curing, grant, claw-back, grant conditions, grant requirements, grant rules.
2. [A]ny and all text messages made on government funded cell phones by city officials that reference the following topics:
  - a. CTCL, Tiana-Epps Johnson, Josh Goldman, Whitney May, NVAHI, Hillary Hall, Michael Spitzer, Rubenstein, Idea42, Center for Civic Design, US Digital Response, The Elections Group, Quick Base, voter registration, ballot counting, ballot transport, reconstruction, election, voter outreach, absentee ballots, cure, curing, grant, clawback, grant conditions, grant requirements, grant rules.

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3. All documents in the City of Racine's possession referring to or relating to CTCL's grant for the city.
4. All documents in the City of Racine's possession referring to or relating to any CTCL's grant requirement or condition for the city.
5. All documents in the City of Racine's possession referring to, or relating to any meeting held between any City official and any group, entity, or organization referred to the city through or by CTCL.
6. All documents in the City of Racine's possession referring to or relating to any meetings with any person from any private organization (including non-profits), consulting group or entity, or any other for-profit or non-profit entity regarding the election process in Racine, including but not limited to absentee ballots.
7. All documents in the City of Racine's possession referring or relating to algorithms utilized in the City's election process administration, voter outreach, or absentee ballot collection.
8. All documents or recordings in the City of Racine's possession referring or relating to any presentation, PowerPoint decks of meetings held on absentee ballots, elections, voter outreach, safe election funding or spending, election administration budgets, or election process administration.
9. All documents in the City of Racine's possession referring to or relating to the design of or drafting of the language utilized on ballots or absentee ballots.
10. All documents in the City of Racine's possession referring to or relating to census tracts or census information shared with any outside group, organization, or entity including but not limited to CTCL, the National Vote at Home Institute, Idea42, Quick Base, Center for Civic Design, US Digital Response, or the Elections Group.

Please note that the end-date for the timeframe encompassed by these requests was established on the date your request was submitted (April 29, 2021), in accordance with 73 Op. Wis. Att'y Gen. 37, 44 (1984), which concluded that the Wisconsin Public Records law's right of access applies only to records that exist at the time the request is made.

#### **I. Request Number 1**

At the outset of the City's response to your request number 1, it should be noted that you are welcome to review all social media posts that have been made during the specified timeframe on the City's social media pages, which are available to the public online. If any records exist

that are responsive to your request number 1, they will still be viewable on these public social media pages.

Your request number 1 asks the City to provide “any and all social media posts made on government funded cell phones [between April 1, 2020 and April 29, 2021] by city officials that relate to or reference” 27 topics, which are then listed in your request. Based on your request as written, it is unclear whether you are seeking records containing all of the 27 topics listed or if you are seeking records containing one or more of the 27 topics listed. It is unlikely that any social media post was made on a government funded cell phone by a city official that relates to or references all 27 of the topics you listed in one post. As such, the City will proceed to analyze your request number 1 under the assumption that you are asking for any and all social media posts made in the specified timeframe on government funded cell phones by city officials that relate to or reference one or more of the 27 topics listed.

In your request letter dated April 29, 2021, you define the term “official” to mean “any elected official, appointed position, or any paid staff or volunteer acting on behalf of or for the City of Racine.” You also define “social media” as follows:

A social media post is an electronic communication made by anyone directly or indirectly related to the city on a social media site through their publicly funded cell phone or related to a work purpose through their personal phone. This includes, but is not limited to, Facebook, Facebook Messenger, Twitter, TikTok, Instagram, Snapchat, Telegram, WhatsApp, Reddit, and Google Messenger.

Despite this broad definition of “social media,” which includes posts “made by anyone directly or indirectly related to the city . . . through their publicly funded cell phone or related to a work purpose through their personal phone,” your request number 1 appears to limit the social media records you are requesting to those posts that were made only “on government funded cell phones by city officials.”

Even when the City takes this more narrowly defined request into consideration, in order to fulfill this request, the City would need to take the following steps:

1. Locate each of the more than 900 “city officials” who have worked for the City between April 1, 2020 through April 29, 2021, and ask each of them if they had access to a “government funded cell phone” at any point during that time;
2. Ask those “city officials” who did have access to a “government funded cell phone” during the specified time frame whether they used said cell phone to post to one or more social media sites;
  - a. Note that, because social media sites do not generally identify the device upon which a social media post is created, the City would have to rely on the individual recollection of each “city official” as to whether they made a particular post from a “government funded cell phone” or some other device.

3. Locate and review all social media posts that “city officials” identify as having been made on a “government funded cell phone” in order to determine whether the content of the posts relates to or references one or more of the 27 topics listed in request number 1.
4. Generate copies of any responsive social media posts in order to provide these records in response to your request.

If the City were to take the steps outlined above in order to respond to your request number 1, it would be unreasonably burdensome and extremely costly. City staff would need to be taken away from their regular duties in order to assist in locating and contacting of all of the more than 900 “city officials” who have worked for the city between April 1, 2020 through April 29, 2021. City staff would then need to locate any responsive social media posts identified by these “city officials” as being responsive to your request. The search for and location of any records that may be responsive to this request would likely take several employees multiple days, if not weeks, to complete.

Wisconsin Statute section 19.35(3)(c) allows the City 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.” The labor costs associated with locating these records would easily run into the thousands, which the City would require prepayment for, pursuant to Wisconsin Statute section 19.35(3)(f).

Furthermore, the Wisconsin Court of Appeals has held that the public records law will not be interpreted to impose such a burden upon a records custodian “that the normal functioning of the office would be severely impaired.” *Schopper v. Gehring*, 210 Wis. 2d 208, 213 (Wis. Ct. App. 1997). When a records request places an unreasonable burden upon the custodian to prepare the documents necessary to fulfill the request, the request is so over broad as to be inadequate. *Id.*

As such, the City has determined that your request number 1 is so overbroad as to be inadequate because, if the City were to take the steps outlined above in order to respond to your request number 1, it would be unreasonably burdensome.

Nonetheless, you are welcome to review all social media posts that have been made during the specified timeframe on the City’s social media pages, which are available to the public online. If any records exist that are responsive to your request number 1, they will still be viewable on these public social media pages.

## **II. Request Number 2**

Your request number 2 asks the City to provide “any and all text messages made on government funded cell phones [between April 1, 2020 and April 29, 2021] by city officials that relate to or reference” 27 topics, which are then listed in your request. Based on your request as written, it is unclear whether you are seeking records containing all of the 27 topics listed or if you are seeking records containing one or more of the 27 topics listed. It is unlikely that any text

message was made on a government funded cell phone by a city official that relates to or references all 27 of the topics you listed in one post. As such, the City will proceed to analyze your request number 2 under the assumption that you are asking for any and all text messages made in the specified timeframe on government funded cell phones by city officials that relate to or reference one or more of the 27 topics listed.

In your request letter dated April 29, 2021, you define the term “official” to mean “any elected official, appointed position, or any paid staff or volunteer acting on behalf of or for the City of Racine.” You also define “text message” as follows:

A text message is any electronic communication sent and received by mobile phone over any platform or application, as well as any message sent by a personal computer over the same platform or application. This includes, but is not limited to, Messages by Google, Apple Messages, Microsoft Teams, Slack, Cisco Jabber, WebEx, Zoom, Skype, Google Hangouts, GoToMeeting, workplace by Facebook or Salesforce Chatter.

Despite this broad definition of “text message,” which includes messages “sent and received by mobile phone over any platform or application, as well as any message sent by a personal computer over the same platform or application” your request number 2 appears to limit the text message records you are requesting to those text messages that were made only “on government funded cell phones by city officials.”

Even when the City takes this more narrowly defined request into consideration, in order to fulfill this request, the City would need to take the following steps:

1. Locate each of the more than 200 “government funded cell phones” that were in service between April 1, 2020 through April 29, 2021.
2. Locate and review all “text messages made on [the 200+] government funded cell phones by city officials” during the specified time frame in order to determine whether the content of the text messages relates to or references one or more of the 27 topics listed in request number 2.
3. Generate copies of any responsive text messages in order to provide these records in response to your request.

If the City were to take the steps outlined above in order to respond to your request number 2, it would be unreasonably burdensome and extremely costly. City staff would need to be taken away from their regular duties in order to assist in locating all of the more than 200 “government funded cell phones” that have been in service between April 1, 2020 through April 29, 2021. City staff would then need to locate any review all of the text messages sent or received on each cell phone to determine whether they are responsive to your request. The search for and location of any records that may be responsive to this request would likely take several employees multiple days, if not weeks, to complete.

Wisconsin Statute section 19.35(3)(c) allows the City 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.” The labor costs associated with locating these records would easily run into the thousands, which the City would require prepayment for, pursuant to Wisconsin Statute section 19.35(3)(f).

Furthermore, the Wisconsin Court of Appeals has held that the public records law will not be interpreted to impose such a burden upon a records custodian “that the normal functioning of the office would be severely impaired.” *Schopper*, 210 Wis. 2d at 213. When a records request places an unreasonable burden upon the custodian to prepare the documents necessary to fulfill the request, the request is so over broad as to be inadequate. *Id.*

As such, the City has determined that your request number 2 is so overbroad as to be inadequate because, if the City were to take the steps outlined above in order to respond to your request number 2, it would be unreasonably burdensome.

### **III. Requests Number 3, 4, 5, and 6**

In response to your requests number 3, 4, 5, and 6, the City has uploaded a number of responsive records to a Dropbox that can be accessed using the following URL: <https://www.dropbox.com/sh/hm0lt5zpznom5ma/AAA4LegyZAMmMwN0gXH90RNYa?dl=0>. Please take notice that these records may be deleted from this Dropbox after a period of time, as additional storage space is needed.

In response to requests number 3, 4, 5, and 6, in the aforementioned Dropbox, the City has provided you with the City’s grant applications and grant agreement correspondence relating to the three grants awarded that the Center for Tech and Civic Life (“CTCL”) awarded to the City.

The City searched its Outlook files for all Outlook items (emails, meeting invitations, etc.) sent or received between April 1, 2020 and April 29, 2021 containing the following keywords:

- “CTCL”; or
- “Center for Tech & Civic Life”; or
- “Center for Tech and Civic Life”

All of the releasable records that were responsive to this search have been uploaded to the aforementioned Dropbox. Certain emails were not released because they constitute privileged attorney-client communications and/or attorney work-product sent to or from and/or initiated by the City Attorney’s Office or employees thereof. These emails were withheld to prevent the disclosure of attorney-client privileged communications and/or confidential attorney work product that is not subject to disclosure. *See* Wis. Stat. § 905.03; *Seifert v. Sch. Dist.*, 2007 WI App 207, ¶128, 305 Wis. 2d 582, 602-04, 740 N.W.2d 177, 187; *George v. Record Custodian*, 169 Wis. 2d 573, 582, 485 NW 2d 460 (Wis. Ct. App. 1992); *Wis. Newspress, Inc. v. Sch. Dist. of Sheboygan Falls*, 199 Wis. 2d 768, 782-83, 546 N.W.2d 143 (1996). The Wisconsin Court of Appeals has



held that, “[t]he Open Records Law cannot be used to circumvent established principles that shield [attorney] work product. Nor can it be used as a discovery tool.” *Seifert v. School District of Sheboygan Falls*, 2007 WI App 207, ¶ 28, 305 Wis. 2d 582, 740 N.W.2d 177.

In addition to the search above, the City searched for all Outlook items sent to or from any email address ending with “@cityofracine.org” that were sent to or from an email address ending with:

- “@techandciviclelife.org”;
- “@voteathome.org”;
- “@electionsgroup.com”; and/or
- “sam.munger@gmail.com”

All of the releasable records that were responsive to this search have been uploaded to the aforementioned Dropbox. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; and/or (b) duplicate copies of the same Outlook item.

Furthermore, a number of additional Outlook items that the City had come across in the course of responding to other public records requests similar to yours have also been uploaded to the aforementioned Dropbox. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; (b) duplicate copies of the same Outlook item; and/or (3) non-responsive and/or otherwise unrelated to the subject(s) of your requests.

With regards to any non-privileged attorney-client communications and/or non-confidential attorney work-product sent to or from and/or initiated by the City Attorney’s Office or employees thereof and/or outside counsel representing the City Attorney’s Office that have been provided to you without redaction in the enclosed, these records are being disclosed based upon a determination that they are not privileged attorney-client communications and/or confidential attorney work-product. However, the City is not waiving its attorney-client privilege and/or confidentiality for any other past or future attorney-client communications and/or attorney work-product.

Additional records referring or relating to CTCL may be found among the City’s legislative files, which are available online by searching the City of Racine’s Legistar database at <https://cityofracine.legistar.com/Legislation.aspx>.

Additionally, video recordings of the meetings that correspond with any responsive legislative records of the City’s Common Council and its standing committees, which took place between April 1, 2020 and April 29, 2021, are available for public viewing on the City’s Facebook page (City of Racine, On the Lake) at <https://www.facebook.com/CityOfRacineWI/>.

#### **IV. Request Number 7**

No records exist that are responsive to your request number 7, which asks for “[a]ll documents in the City of Racine's possession referring or relating to algorithms utilized in the City's election process administration, voter outreach, or absentee ballot collection.”

#### **V. Request Number 8**

Your request number 8 asks for “[a]ll documents or recordings in the City of Racine's possession referring or relating to any presentation, PowerPoint decks of meetings held on absentee ballots, elections, voter outreach, safe election funding or spending, election administration budgets, or election process administration.”

It is unclear whether this request is asking for copies of presentation materials (e.g. PowerPoint slide decks) referring or related to the 7 keywords/phrases identified above, or if this request is asking for records that refer or relate to presentations on the subjects listed above.

In an attempt to locate records that refer or relate to the 7 keywords/phrases identified above, the City searched its Outlook files for all Outlook items sent or received between April 1, 2020 and April 29, 2021 containing the following keywords/phrases:

- “absentee ballot”;
- election;
- “voter outreach”;
- “safe election funding”;
- “safe election spending”;
- “election administration budget”; or
- “election process administration”

This search returned more than 248,000 Outlook items.

Wisconsin law favors open access to public records; however, the Wisconsin Court of Appeals found that the right to inspect public records is not absolute—“[a]t some point, an overly broad request becomes sufficiently excessive to warrant rejection under [section] 19.35(1)(h).” *State ex rel. Gehl v. Connors*, 2007 WI App 238, ¶ 24, 306 Wis. 2d 247, 742 N.W.2d 530. Furthermore, a records custodian should not have to guess at what records a requester desires. *Seifert v. Sch. Dist. of Sheboygan Falls*, 2007 WI App 207, ¶ 42, 305 Wis. 2d 582, 740 N.W.2d 177. The Wisconsin Court of Appeals has held that the public records law will not be interpreted to impose such a burden upon a records custodian “that the normal functioning of the office would be severely impaired.” *Schopper*, 210 Wis. 2d at 213. When a records request places an unreasonable burden upon the custodian to prepare the documents necessary to fulfill the request, the request is so over broad as to be inadequate. *Id.*

A public records request containing 7 broad search terms, which require a records custodian to review hundreds of thousands of records in order to determine which, if any, are responsive to the request is unreasonably burdensome and would severely impair the normal functioning of the custodian's office. Due to the unreasonable burden created by the overly broad nature of your request, this request as written is not legally sufficient under Wisconsin Statute section 19.35(1)(h). As such, the City is denying your request number 8 as written.

Nonetheless, in an effort to provide you with known records that may be responsive to some or all of the keywords/phrases in your request number 8, the City would refer you to the records and website links that the City has provided above in response to your requests number 3, 4, 5, and 6. The City would specifically direct you to the City of Racine's Legistar database at <https://cityofracine.legistar.com/Legislation.aspx> and City's Facebook page (City of Racine, On the Lake) at <https://www.facebook.com/CityOfRacineWI/> for any responsive documents or recordings of presentations that were made by City staff to the City's Common Council between April 1, 2020 and April 29, 2021.

Furthermore, in an effort to provide you with any records that are responsive to a request for copies of presentation materials (e.g. Power Point slide decks) referring or related to the 7 keywords/phrases identified above, the City has reached out to Kane Communications in order to get any presentation materials they may have created or presented on the City's behalf that relate to these topics. The City anticipates receiving a response from Kane Communications in the next week, and the City will forward you any records received from Kane Communications that may be responsive to this request as soon as practicable and without delay.

#### **VI. Request Number 9**

No records exist that are responsive to your request number 9, which asks for "[a]ll documents in the City of Racine's possession referring to or relating to the design of or drafting of the language utilized on ballots or absentee ballots."

#### **VII. Request Number 10**

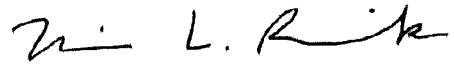
No records exist that are responsive to your request number 10, which asks for "[a]ll documents in the City of Racine's possession referring to or relating to census tracts or census information shared with any outside group, organization, or entity including but not limited to CTCL, the National Vote at Home Institute, Idea42, Quick Base, Center for Civic Design, US Digital Response, or the Elections Group."

As stated above, the City plans to provide you with any responsive records it receives from Kane Communications next week as soon as practicable and without delay. Beyond that, if you feel that there are any additional records that may be responsive to your request but were not included amongst the records that were released, please contact [PublicRecords@cityofracine.org](mailto:PublicRecords@cityofracine.org). To the extent that your request has been denied, this determination is subject to review by mandamus under Wis. Stat. § 19.37(1), or upon application to the Attorney General or District

Letter to Attorney Kaardal  
July 23, 2021  
Page 10

Attorney. If you have any other questions or concerns about this response, please contact my office at the email address provided above to discuss the matter. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. L. Roubik". The signature is fluid and cursive, with the first name "M." and last name "Roubik" clearly distinguishable.

Marisa L. Roubik  
Assistant City Attorney

Jennifer L. Williams  
Deputy City Attorney

Marisa L. Roubik  
Assistant City Attorney

Robin K. Zbikowski  
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Scott R. Letteney  
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Stacey Salvo  
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Karen J. Wirtz  
Executive Legal Assistant

Maricela Mora  
Administrative Assistant

July 16, 2021

*Sent via Email to Rep.Brandtjen@legis.wi.gov*

State Representative Janel Brandtjen  
P.O. Box 8952  
Madison, WI 53708-8952

**Re: Public Records Request PR2021-053**

Dear Representative Brandtjen:

This correspondence is being sent on behalf of City of Racine ("City") in response to your public records request (PR2021-053), which asked for the following records:

[A]ny communications including, but not limited to, emails and attachments, both sent and received; text messages; messages and materials exchanged or viewed through online applications; any other correspondence, internal and external; and all other records, including both physical and electronic, between any persons in the City of Racine Clerk's Office, any person in the City of Racine Mayor's Office, any person in the City of Racine Attorney's Office and the organizations/people listed below. . . . for the timespan of August 1, 2020 through November 20, 2020.

1. Any persons in the National Vote At Home Institute
2. Any persons in the Center for Tech and Civic Life
3. Any persons in The Elections Group
4. Any persons in the ideas42
5. Any persons in The Wisconsin Five/The Wisconsin 5
6. Michael Barr
7. Denise Gaumer-Hutchinson
8. Hillary Hall
9. Sam Munger
10. Michael Spitzer-Rubenstein

Based on the information provided in your request, the City searched its records and found the following:

City Hall  
730 Washington Avenue, Room 201  
Racine, Wisconsin 53403  
262-636-9115  
Fax: 262-636-9570



1. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that were sent to or from an email address ending with “@voteathome.org,” which yielded 157 responsive Outlook items (i.e., emails, calendar invites, etc.) that were sent between 3/1/2020 and 6/4/2021. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; (b) sent to or from City employees other than those named in your request; and/or (3) duplicate copies of the same Outlook item.
2. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that were sent to or from an email address ending with “@techandcivillife.org,” which yielded 315 responsive Outlook items that were sent between 3/1/2020 and 6/4/2021. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; (b) sent to or from City employees other than those named in your request; and/or (3) duplicate copies of the same Outlook item. Additionally, the City has provided all grant applications sent from the City to the Center for Tech and Civic Life and all grant agreements sent from the Center for Tech and Civic Life to the City.
3. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that were sent to or from an email address ending with “@electionsgroup.com,” which yielded 30 responsive Outlook items that were sent between 8/1/2020 and 11/20/2020. Please note that some of the responsive records provided may be duplicate copies of the same Outlook item.
4. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that were sent to or from an email address ending with “@ideas42.org,” which yielded 0 responsive Outlook items that were sent between 8/1/2020 and 11/20/2020.
5. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that contained the phrase “The Wisconsin Five” or “The Wisconsin 5,” which yielded 1 responsive Outlook item that was sent between 8/1/2020 and 11/20/2020.
6. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that contained a sender or recipient named “Michael Barr,” which yielded 0 responsive Outlook items that were sent between 8/1/2020 and 11/20/2020.
7. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that contained a sender or recipient named “Denise Gaumer-Hutchinson,” which yielded 0 responsive Outlook items that were sent between 8/1/2020 and 11/20/2020.
8. Any records that are responsive to your request regarding Hillary Hall are included amongst the emails that are responsive to your request number 1, above. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; (b) sent to or from City

- employees other than those named in your request; and/or (3) duplicate copies of the same Outlook item.
9. The City searched for all emails sent to or from any email address ending with “@cityofracine.org” that were sent to or from the email address “sam.munger@gmail.com,” which yielded 17 responsive Outlook items that were sent between 8/1/2020 and 11/20/2020. Please note that some of the responsive records provided may be duplicate copies of the same Outlook item.
  10. Any records that are responsive to your request regarding Michael Spritzer-Rubenstein are included amongst the emails that are responsive to your request number 1, above. Please note that some of the responsive records provided may have been: (a) sent or received outside of the date range specified in your request; (b) sent to or from City employees other than those named in your request; and/or (3) duplicate copies of the same Outlook item.

The aforementioned responsive records have been uploaded to a Dropbox that can be accessed using the following URL:  
[https://www.dropbox.com/sh/m1km111nsh832zi/AACvhf1CJMqj9qQPad54T\\_a?dl=0](https://www.dropbox.com/sh/m1km111nsh832zi/AACvhf1CJMqj9qQPad54T_a?dl=0)

As you will see upon your review of these responsive records, redactions were made to the City’s FEIN, after balancing the presumption of access in Wis. Stat. § 19.31 against the public interest in protecting the privacy of the unique identification numbers issued by the Internal Revenue Service to the City. Without such protections, the City could be vulnerable to fraud, which would be to the public’s detriment. As a result of this balancing test, it was determined that the public policy interests in favor of protecting the City’s FEIN (akin to the way the City is required by law to redact this information from court filings and redact social security numbers from public records prior to release) outweighed the public’s interest in disclosure of this information. See Wis. Stat. § 801.19(1)(a)2.; see also 42 U.S.C. § 405(c)(2)(C)(viii)(I); Wis. Stat. § 19.36(10)(a).

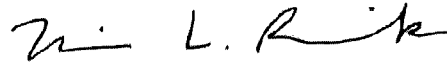
Additionally, redactions were made to a password and to URLs that link to data entry portals, after balancing the presumption of access in Wis. Stat. § 19.31 against the public interest in protecting the privacy of password protected elections materials and data entry portals used by elections workers. Without such protections, the data that exists in these password protected documents could be altered, which would cause additional staff time and labor to correct and reconcile, which would be to the public’s detriment. As a result of this balancing test, it was determined that the public policy interests in favor of protecting the password and URLs outweighed the public’s interest in disclosure of this information. However, in the interest of disclosure, PDF versions of the data entry portal pages have been released.

If you feel that there are any additional records that may be responsive to your request but were not included amongst the records that were released, please contact [PublicRecords@cityofracine.org](mailto:PublicRecords@cityofracine.org). To the extent that your request has been denied, this determination is subject to review by mandamus under Wis. Stat. § 19.37(1), or upon application to the Attorney General or District Attorney. If you have any other questions or concerns about

Letter to Rep. Brandtjen  
Page 4

this response, please contact my office at the email address provided above to discuss the matter.  
Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. L. Roubik". The signature is fluid and cursive, with the first name "M." and last name "Roubik" clearly distinguishable.

Marisa L. Roubik  
Assistant City Attorney

Cc: Attorney Erick Kaardal  
Racine City Attorney Scott Letteney



## Vince Fahnlander

---

**From:** Erick Kaardal  
**Sent:** Tuesday, August 10, 2021 1:45 PM  
**To:** Vince Fahnlander  
**Subject:** FW: Public Records Request (PR2021-056)  
**Attachments:** PR2021-056 - Tara Coolidge public records request.docx

**From:** \_EXT\_ATT\_RECORDS <PublicRecords@cityofracine.org>  
**Sent:** Friday, July 16, 2021 5:08 PM  
**To:** Harry Wait <harrytrex@gmail.com>; Erick Kaardal <kaardal@mklaw.com>  
**Subject:** FW: Public Records Request (PR2021-056)

Dear Mr. Wait,

I am writing on behalf of the City of Racine (“City”) in response to the attached public records request (PR2021-056), in which you asked for Tara Coolidge’s “records to include emails, notes and correspondence [from January 1, 2019 to December 31, 2020] relating to City of Racine activities concerning the 2019 and 2020 elections with the listed below contents.” Your request (see attached) then proceeded to outline nine discrete requests, which were numbered 2 through 10, each of which will be individually addressed below.

To the extent that responsive records exist, as outlined in the following, responsive records have been uploaded to a Dropbox that can be accessed using the following URL:  
<https://www.dropbox.com/sh/kwcamobyb8t1wef/AABgAIIUgAcxxuE40oqqhK0La?dl=0>

Please take notice that these records may be deleted from this Dropbox after a period of time, as additional storage space is needed.

**2. Copies of City of Racine policies and procedures for selection and hiring of poll workers.**

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 2.

**3. All communications between the office of the Mayor, office of the City Attorney and office of Human resources concerning poll workers and the 2020 elections.**

In response to your request number 3, the City searched for records of communications containing the keywords “poll workers” and “2020 election,” which were received by *all* employees/officials employed in the City’s office of the Mayor, office of the City Attorney, and the office of Human Resources. Based on these search parameters, no records were found to exist that are responsive to request number 3.

**4. All communications containing CTCL, National Vote at Home Institute, Center for Tech and Civic Life, Wisconsin Safe voting plan, Ideas42, Michelle Nelson, Tiana Epps Johnson, John McLaughlin, Kris Teske, Antaramian, Maribeth Witzel-Behl, S. Claire Woodall-Vogg, Kathleen Fischer, Whitney May, Hillary Hall, Michael Spitzer-Rubenstein,**



Based on your request number 4 as written, it is unclear whether you are seeking records containing *all* 16 of the keywords listed above or if you are seeking records containing *any* of the 16 keywords listed above. If you are requesting Tara Coolidge's records from 2019 and 2020 that contain *all* 16 of the keywords listed above, no records exist that are responsive to your request. Conversely, if you are requesting Tara Coolidge's records from 2019 and 2020 that contain *any* of the 16 keywords listed above, there are over 41,000 emails from 2020 alone (some of which may be duplicates) that were sent to or from Tara Coolidge's City of Racine email account, which contain one or more of those 16 keywords. The City contacted you with a request for clarification of your request number 4 on April 30, 2021; however, as of today's date, you have offered no further clarification to the City. As such, the City will respond to this request as written.

Wisconsin law favors open access to public records; however, the Wisconsin Court of Appeals found that the right to inspect public records is not absolute—"[a]t some point, an overly broad request becomes sufficiently excessive to warrant rejection under [section] 19.35(1)(h)." *State ex rel. Gehl v. Connors*, 2007 WI App 238, ¶ 24, 306 Wis. 2d 247, 742 N.W.2d 530. Wisconsin Statute section 19.35(1)(h) states that, "a request for a record without a reasonable limitation as to subject matter or length of time represented by the record does not constitute a sufficient request." The purpose of the time and subject matter limitations are to prevent unreasonably burdening a records custodian by requiring the records custodian to spend excessive amounts of time and resources deciphering and responding to a request. *Schopper v. Gehring*, 210 Wis. 2d 208, 213, 565 N.W.2d 187 (Ct. App. 1997); *State ex rel. Gehl*, 2007 WI App 238, ¶ 17. A records custodian should not have to guess at what records a requester desires. *Seifert v. Sch. Dist. of Sheboygan Falls*, 2007 WI App 207, ¶42, 305 Wis. 2d 582, 740 N.W.2d 177. The Wisconsin Court of Appeals has held that the public records law will not be interpreted to impose such a burden upon a records custodian "that the normal functioning of the office would be severely impaired." *Schopper*, 210 Wis. 2d at 213. When a records request places an unreasonable burden upon the custodian to prepare the documents necessary to fulfill the request, the request is so over broad as to be inadequate. *Id.*

A public records request containing 16 different search terms, which requires a records custodian to review tens of thousands of records in order to determine which, if any, are responsive to the request is unreasonably burdensome and would severely impair the normal functioning of the custodian's office. Due to the unreasonable burden created by the overly broad nature of your request, this request as written is not legally sufficient under Wisconsin Statute section 19.35(1)(h). As such, the City is denying your request number 4 as written.

Nonetheless, in an effort to provide you with known records that may be responsive to some or all of the search terms in your request number 4, the City has uploaded several hundred Outlook items (e.g., emails, meeting invites, etc.) to the Dropbox linked to above.

As you will see upon your review of these records, redactions were made to the City's FEIN, after balancing the presumption of access in Wis. Stat. § 19.31 against the public interest in protecting the privacy of the unique identification numbers issued by the Internal Revenue Service to the City. Without such protections, the City could be vulnerable to fraud, which would be to the public's detriment. As a result of this balancing test, it was determined that the public policy interests in favor of protecting the City's FEIN (akin to the way the City is required by law to redact this information from court filings and redact social security numbers from public records prior to release) outweighed the public's interest in disclosure of this information. *See* Wis. Stat. § 801.19(1)(a)2.; *see also* 42 U.S.C. § 405(c)(2)(C)(viii)(I); Wis. Stat. § 19.36(10)(a).

Additionally, redactions were made to a password and to URLs that link to data entry portals, after balancing the presumption of access in Wis. Stat. § 19.31 against the public interest in protecting the

privacy of password protected elections materials and data entry portals used by elections workers. Without such protections, the data that exists in these password protected documents could be altered, which would cause additional staff time and labor to correct and reconcile, which would be to the public's detriment. As a result of this balancing test, it was determined that the public policy interests in favor of protecting the password and URLs outweighed the public's interest in disclosure of this information. However, in the interest of disclosure, PDF versions of the data entry portal pages have been released.

**5. List and copies of all poll workers used by City of Racine in 2019 and 2020 elections.**

The City contacted you with a request for clarification of your request number 5 on April 30, 2021; however, as of today's date, you have offered no further clarification to the City. As such, the City will respond to this request as written.

The City has uploaded the records to the Dropbox linked to above, which the City believes to be responsive to your request number 5.

Within the records that are responsive to your request number 5, redactions were made to employees' home addresses, personal phone numbers, and, in one instance, a personal email address, per Wis. Stat. § 19.36(10)(a). Because poll workers were compensated by the City for the work they performed for the City on Election Day, these individuals fall within the definition of an "employee" as set forth in Wis. Stat. § 19.32(1bg). It should be noted that some regular fulltime City staff members whose names appear on these lists did not serve as poll workers, but rather assisted as "greeters" at polling places or otherwise provided support to poll workers on election days.

**6. List and copies of all poll worker applicants in 2019 and 2020.**

The City contacted you with a request for clarification of your request number 6 on April 30, 2021; however, as of today's date, you have offered no further clarification to the City. As such, the City will respond to this request as written.

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 6.

**7. List and copies of all names and inquiries to be a poll worker in 2019 and 2020**

The City contacted you with a request for clarification of your request number 7 on April 30, 2021; however, as of today's date, you have offered no further clarification to the City. As such, the City will respond to this request as written.

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 7.

**8. List and copies of all denials to be a poll worker in 2019 and 2020**

The City contacted you with a request for clarification of your request number 8 on April 30, 2021; however, as of today's date, you have offered no further clarification to the City. As such, the City will respond to this request as written.

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 8.

**9. Any other lists of poll workers used for conducting elections within the City of Racine during elections of 2020 that are not included within 5,6,7,8.**

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 9.

**10. List of outside contractors, vendors and /or volunteer organizations used to provide or manage poll workers during 2020 elections.**

Aside from the records that are being released in response to this public records request, the City is not aware of any additional records that exist that are responsive to your request number 10.

To the extent that your request has been denied, this determination is subject to review by mandamus under Wis. Stat. § 19.37(1), or upon application to the Attorney General or District Attorney. If you have any questions or concerns, please submit them by responding to this email. Thank you.

City Attorney's Office  
730 Washington Avenue  
Room 201  
Racine, Wisconsin 53403  
(262) 636-9115  
Fax: (262) 636-9570

RECIPIENTS - PLEASE CONTACT ME PRIOR TO FORWARDING MESSAGES DESIGNATED AS ATTORNEY-CLIENT COMMUNICATIONS.

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**From:** \_EXT\_ATT\_RECORDS  
**Sent:** Friday, April 30, 2021 5:28 PM  
**To:** [harrytrex@gmail.com](mailto:harrytrex@gmail.com)  
**Subject:** Public Records Request (PR2021-056)

Dear Mr. Wait,

I am writing on behalf of the City of Racine ("City") in response to the attached public records request (PR2021-056), in which you asked for Tara Coolidge's "records to include emails, notes and correspondence [from January 1, 2019 to December 31, 2020] relating to City of Racine activities concerning the 2019 and 2020 elections with the listed below contents." Your request (see attached) then proceeded to outline nine discrete requests, which were numbered 2 through 10, each of which will be individually addressed below.

The information provided below concerning request numbers 2, 4, 5, 6, 7, 8, and 9, and 10, is intended to be a status update on these specific requests, which are still being processed. Furthermore, with regards to request numbers 4, 5, 6, 7, and 8, the City is requesting clarification of these specific requests. None of the information below is intended to be a denial of any of your requests.

**2. Copies of City of Racine policies and procedures for selection and hiring of poll workers.**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

**3. All communications between the office of the Mayor, office of the City Attorney and office of Human resources concerning poll workers and the 2020 elections.**

In response to your request number 3, the City searched for records of communications containing the keywords “poll workers” and “2020 election,” which were received by *all* employees/officials employed in the City’s office of the Mayor, office of the City Attorney, and the office of Human Resources. Based on these search parameters, no records were found to exist that are responsive to request number 3.

**4. All communications containing CTCL, National Vote at Home Institute, Center for Tech and Civic Life, Wisconsin Safe voting plan, Ideas42, Michelle Nelson, Tiana Epps Johnson, John McLaughlin, Kris Teske, Antaramian, Maribeth Witzel-Behl, S. Claire Woodall-Vogg, Kathleen Fischer, Whitney May, Hillary Hall, Michael Spitzer-Rubenstein,**

Based on your request number 4 as written, it is unclear whether you are seeking records containing *all* 16 of the keywords listed above or if you are seeking records containing *any* of the 16 keywords listed above. If you are requesting Tara Coolidge’s records from 2019 and 2020 that contain *all* 16 of the keywords listed above, no records exist that are responsive to your request. Conversely, if you are requesting Tara Coolidge’s records from 2019 and 2020 that contain *any* of the 16 keywords listed above, there are over 41,000 emails from 2020 alone that were sent to or from Tara Coolidge’s City of Racine email account, which contain one or more of those 16 keywords. If neither of those interpretations of your records request number 4 are correct, further clarification of your request is needed in order for the City to continue processing your request number 4.

Wisconsin law favors open access to public records; however, the Wisconsin Court of Appeals found that the right to inspect public records is not absolute—“[a]t some point, an overly broad request becomes sufficiently excessive to warrant rejection under [section] 19.35(1)(h).” *State ex rel. Gehl v. Connors*, 2007 WI App 238, ¶ 24, 306 Wis. 2d 247, 742 N.W.2d 530. Wisconsin Statute section 19.35(1)(h) states that, “a request for a record without a reasonable limitation as to subject matter or length of time represented by the record does not constitute a sufficient request.” The purpose of the time and subject matter limitations are to prevent unreasonably burdening a records custodian by requiring the records custodian to spend excessive amounts of time and resources deciphering and responding to a request. *Schopper v. Gehring*, 210 Wis. 2d 208, 213, 565 N.W.2d 187 (Ct. App. 1997); *State ex rel. Gehl*, 2007 WI App 238, ¶ 17. A records custodian should not have to guess at what records a requester desires. *Seifert v. Sch. Dist. of Sheboygan Falls*, 2007 WI App 207, ¶42, 305 Wis. 2d 582, 740 N.W.2d 177. The Wisconsin Court of Appeals has held that the public records law will not be interpreted to impose such a burden upon a records custodian “that the normal functioning of the office would be severely impaired.” *Schopper*, 210 Wis. 2d at 213. When a records request places an unreasonable burden upon the custodian to prepare the documents necessary to fulfill the request, the request is so over broad as to be inadequate. *Id.*

A public records request that requires a records custodian to review tens of thousands of records in order to determine which, if any, are responsive to the request is unreasonably burdensome and would severely impair the normal functioning of the custodian's office. Due to the unreasonable burden created by the overly broad nature of your request, this request as written is not legally sufficient under Wisconsin Statute section 19.35(1)(h). As such, in an effort to assist both the City and you as the requester in determining how best to proceed with your request number 4, the City is offering you the option to revise, clarify, and narrow your request.

There is no legal requirement that you revise, clarify, or narrow your request, nor should anything in this email be construed as a denial of your request at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin's Public Records laws.

Please respond to this email to inform the City if there are any revisions that you wish to make to your request number 4, or if you would prefer for the City to proceed to analyze and respond to your request number 4 as it is currently written.

**5. List and copies of all poll workers used by City of Racine in 2019 and 2020 elections.**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

To ensure that the City provides you with all of the records you are seeking, further clarification would assist the City in determining what your request for "list and copies" is asking for. Specifically, it is unclear what, if any, records you want "copies" of, beyond any responsive lists that are located and provided to you in response to your request.

There is no legal requirement that you clarify your request, nor should anything in this email be construed as a denial of your request at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin's Public Records laws.

Unless you indicate otherwise, the City will continue to process this request under the assumption that this request is only asking for a copy of any "list" that is responsive to this request.

**6. List and copies of all poll worker applicants in 2019 and 2020.**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

To ensure that the City provides you with all of the records you are seeking, further clarification would assist the City in determining what your request for "list and copies" is asking for. Specifically, it is unclear what, if any, records you want "copies" of, beyond any responsive lists that are located and provided to you in response to your request.

There is no legal requirement that you clarify your request, nor should anything in this email be construed as a denial of your request at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin's Public Records laws.

Unless you indicate otherwise, the City will continue to process this request under the assumption that this request is only asking for a copy of any “list” that is responsive to this request.

**7. List and copies of all names and inquiries to be a poll worker in 2019 and 2020**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

To ensure that the City provides you with all of the records you are seeking, further clarification would assist the City in determining what your request for “list and copies” is asking for. Specifically, it is unclear what, if any, records you want “copies” of, beyond any responsive lists that are located and provided to you in response to your request.

There is no legal requirement that you clarify your request, nor should anything in this email be construed as a denial of your request at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin’s Public Records laws.

Unless you indicate otherwise, the City will continue to process this request under the assumption that this request is only asking for a copy of any “list” that is responsive to this request.

**8. List and copies of all denials to be a poll worker in 2019 and 2020**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

To ensure that the City provides you with all of the records you are seeking, further clarification would assist the City in determining what your request for “list and copies” is asking for. Specifically, it is unclear what, if any, records you want “copies” of, beyond any responsive lists that are located and provided to you in response to your request.

There is no legal requirement that you clarify your request, nor should anything in this email be construed as a denial of your request at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin’s Public Records laws.

Unless you indicate otherwise, the City will continue to process this request under the assumption that this request is only asking for a copy of any “list” that is responsive to this request.

**9. Any other lists of poll workers used for conducting elections within the City of Racine during elections of 2020 that are not included within 5,6,7,8.**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

**10. List of outside contractors, vendors and /or volunteer organizations used to provide or manage poll workers during 2020 elections.**

The City is in the process of searching for any records that may be responsive to this request. Any records that are located and determined to be responsive to this request will be provided to you as soon as practicable and without delay.

To reiterate, there is no legal requirement that you revise or clarify any of your requests, nor should anything in this email be construed as a denial of your requests at this time. This correspondence is not intended to discourage you from fully exercising your rights under Wisconsin's Public Records laws.

Please respond to this email to inform the City if there are any revisions or clarifications that you wish to make to your requests, or if you would prefer for the City to proceed to analyze and respond to your requests as they are currently written.

Again, this correspondence is not a denial of your requests. However, in the event that a public records request were to be denied, that determination would be subject to review by mandamus under Wis. Stat. § 19.37(1), or upon application to the Attorney General or District Attorney.

Thank you.

City Attorney's Office  
730 Washington Avenue  
Room 201  
Racine, Wisconsin 53403  
(262) 636-9115  
Fax: (262) 636-9570  
[marisa.roubik@cityofracine.org](mailto:marisa.roubik@cityofracine.org)

RECIPIENTS - PLEASE CONTACT ME PRIOR TO FORWARDING MESSAGES DESIGNATED AS ATTORNEY-CLIENT COMMUNICATIONS.

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**John P. Serketich**  
Principal Assistant Corporation Counsel  
730 Wisconsin Avenue  
Racine, WI 53403  
262-636-3758  
fax: 262-636-3549  
John.Serketich@RacineCounty.com

**VIA ELECTRONIC MAIL ONLY**

August 6, 2021

Harry Wait  
4353 Shianne Street  
Union Grove, WI, 53182

Dear Mr. Wait:

This is in partial response to a public records request, dated April 8, 2021, wherein you requested the specific records set forth below between February 1, 2020 to December 31, 2020 set forth below. We intend to respond the outstanding requests forthwith. Please be advised that I am not the custodian of records for the Racine County Clerk nor the Information Technology Department and that I am writing only in my capacity as counsel for Racine County.

You requested:

1. Wendy Christensen, County clerk - records to include emails, notes and correspondence relating to County of Racine activities concerning the 2020 elections with the listed below contents.

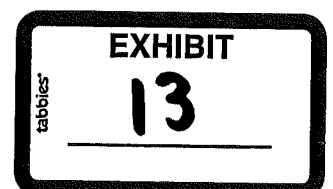
*Due to the volume of e-mails that were returned for your search, additional time is required to complete this request. Our office will supplement this response when those e-mails are ready for disclosure.*

2. Copies of County of Racine policies and procedures for selection and hiring of poll workers.

*Each individual municipality performs the selection and hiring of poll workers; therefore, there are no records responsive to your request in the custody or control of Racine County.*

3. All communications between the office of the County Executive, office of the County Legal Counsel and office of Human resources concerning the 2020 elections.

*Due to the volume of e-mails that were returned for your search, additional time is required to complete this request. Our office will supplement this response when those e-mails are ready for disclosure.*



4. All communications containing CTCL, National Vote at Home Institute, Center for Tech and Civic Life, Wisconsin Safe voting plan, Ideas42, Michelle Nelson, Tiana Epps Johnson, John McLaughlin, Kris Teske, John Antaramian, Maribeth Witzel-Behl, S. Claire Woodall-Vogg, Kathleen Fischer, Whitney May, Hillary Hall, Michael Spitzer-Rubenstein, Tara Coolidge, Vicky Salkowe, Regi Bachochin, Fabi Maldonado, Jody Spencer, Nick Demske, Melissa Kaprelian-Becker, Robin Vos, Van Wanggaard, Robert Wittke, Cory Mason, Scott Letteney, Marisa Roubik.

*Due to the volume of e-mails that were returned for your search, additional time is required to complete this request. Our office will supplement this response when those e-mails are ready for disclosure.*

5. Identify Racine County computer, voting machine, software or any other electronic device owned, leased, or used by Racine County with ID 3b:4d:09:3d:be:56 and 07:59:bb:8c:3b:11 and 5b:90ce.66.f5:83 and 5b:90cc.66.f5:83 in 2020.

*There are no records responsive to this request in the custody or control of Racine County.*

6. Identify the owner user or lessee in Racine County in 2020 of IP address and location IP 216.186.47 and 2.16.186.2

*There are no records responsive to this request in the custody or control of Racine County.*

7. Copy of purchase, lease, user agreement Racine County has with Dominion voting machines from 2015-2020.

*Enclosed please find all records responsive to your request; the serial numbers of the equipment were redacted to maintain the security of election systems.*

8. Copy of purchase, lease, user, agreement Racine County has with Smartmatic voting software from 2015-2020.

*There are no records responsive to this request in the custody or control of Racine County.*

9. Copy of contract with Dominion voting machines 2015-2020.

*The contract with Dominion Voting Systems is part of the Command Central contract, which is enclosed in response to this request.*

10. Copy of software agreement with Smartmatic, Dominion Voting Systems, Scytl or any other voting software used in collecting votes, storing votes, counting votes, adjudicating votes, or transmitting votes in Racine County from 2015-2020.

*There are no contracts between Racine County and Smartmatic, Scytl, or other vendors for the time frame you requested. As noted in the response above, the contract with Dominion Voting Systems is part of the Command Central contract, which is enclosed in response to this request.*

11. Contract or contracts with all other voting machines or software used in voting in Racine County elections in 2020.

*Enclosed please find all known records responsive to your request, which include Resolution 2016-157 and the Command Central contract referenced in above responses.*

12. Were any or all voting machines or election devices including software owned, leased, or used connected to the internet in any form counting votes, collecting votes, adjudicating votes, storing votes, or transmitting votes while votes were being cast, counted, stored, adjudicated, reviewed, transmitted, between November 1, 2020 thru November 5, 2020 give specific details as how the internet was used.

*There are no records responsive to this request in the custody or control of Racine County. To answer your question, the voting machines are never connected while/during the voting process. The machines are only connected (manually by designated poll workers) after the votes are cast, counted, etc., then the machines are disconnected from the internet after transmission of the results is completed.*

13. Were any representatives of Dominion, Smartmatic, or any software or voting device manufacturer present at any voting location between November 1, 2020 and November 5, 2020. If so, identify who they were.

*There are no known records in the custody or control of Racine County. It is possible that Command Central representatives were on site, but their presence is not logged or recorded by Racine County.*

14. Identify all persons who verified the vote count in Racine County for the November 3, 2020 election.

*Enclosed please find all known records responsive to your request.*

15. Number of adjudicated ballots in Racine County from November 1, 2020 thru November 5, 2020 per presidential election per voting machine and

physical location.

*Enclosed please find all known records responsive to your request, which is the same record disclosed in response to your request list above as number 14.*

16. Identify any and all voting machines or election devices including software owned, leased, or used that have default passwords.

*The records disclosed in response to your other requests set forth herein are the only responsive records.*

17. Confirm or deny contract requires identifying FOIA requesters.

*Please see the enclosed Command Central contract for any responsive information.*

Pursuant to Wis. Stat. § 19.35(4)(b), this determination is subject to review by mandamus under Wis. Stat. § 19.37(1) or upon application to a district attorney or the Attorney General.

You previously paid \$183.24 for location fees which was received on May 28, 2021. As previously indicated, there will be additional fees associated with completing the remainder of your request. We will provide the final costs with our supplemental response.

Sincerely,

*Electronically signed by John P. Serketich*

John P. Serketich  
Principal Assistant Corporation Counsel

Enc. (4)