

July 1, 2024

Paul M. Ferguson  
Office of Open Government  
Wisconsin Department of Justice  
P.O. Box 7857  
Madison, WI 53707-7857  
*via email at [opengov@widoj.gov](mailto:opengov@widoj.gov)*

**Re: Open Records Request re Office of the Solicitor General 2016–2019**

Dear Mr. Ferguson,

Please accept this letter as a request pursuant to Wis. Stat. 19.31 *et seq.* for the following records of Attorney General Brad Schimel, Deputy Attorney General Andrew Cook, Chief Deputy Attorney General and Senior Counsel Paul Connell, Assistant Deputy Attorney General and Chief of Staff Delanie Breuer, Deputy Solicitor General Ryan Walsh, Assistant Attorney General Luke Berg, Assistant Attorney General Amy Miller, Solicitor General Misha Tseytlin, Deputy Solicitor General Kevin LeRoy, and Assistant Attorney General Sopen Shah:

1. Timesheets, including punch-time and/or elapsed-time reports, from October 1, 2016, through December 31, 2017;
2. Expense reports for all travel paid for or reimbursed by the state, including requests for reimbursement, receipts, invoices, travel itineraries and/or folios, and reimbursement payments, from October 1, 2016, through December 31, 2017;
3. All emails (including attachments and calendar invites) sent or received on 11/17/2016, 11/18/2016, and 11/19/2016;
4. All emails (including attachments and calendar invites) sent or received on 7/09/2017, 7/10/2017, 7/11/2017, 7/12/2017, and 7/13/2017;

5. All emails (including attachments and calendar invites) sent or received from October 1, 2016, through December 31, 2017, containing any of the following keywords:
  - a. Abortion
  - b. Roe
  - c. Mississippi
  - d. "15-week"
  - e. "15 week"
  - f. "fetal viability"
  
6. All emails (including attachments and calendar invites) from October 1, 2016, through December 31, 2017, *between* (a) any of the Office of the Solicitor General staff members listed in the introduction of this request *and* (b) any of the following external individuals or entities, including anyone communicating from an email address ending in the following domains:
  - a. Alliance Defending Freedom (@adflegal.org)
  - b. Susan B. Anthony (@sbalist.org, @sba-list.org, @sbapro-life.org)
  - c. Federalist Society (@fedsoc.org, @fed-soc.org)
  - d. Kellie Fiedorek (kfiedorek@adflegal.org)
  - e. Jameson Taylor
  - f. Denise Burke
  - g. Marjorie Dannenfelser (mdannenfelser@sba-list.org)
  - h. Scott Stewart
  - i. Lynn Fitch
  - j. Michelle Williams
  - k. Leonard Leo (leonard.leo@fed-soc.org, @honestelections.org, ll@leonardleo.com, leonard.anthony.leo@gmail.com, lleo@fed-soc.org, leonard.leo@mindspring.com, leonard.leo@hotmail.com)

For request item 6, we do not seek, and that this request specifically *excludes*, the *initial* mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails *are* responsive to this request. In other words, for example, if Brad Schimel received a mass-distribution newsletter email from The



Heritage Foundation, that initial email would *not* be responsive to this request. However, if Schimel responded to, or forwarded, that email to anyone at one of the emails or domains listed in request item 6, that subsequent message would be responsive to this request and the complete email chain should be produced.

You may also exclude from your response any records that were publicly released in January through July of 2018 and in response to open records requests filed by Katelyn Ferral, Joanna Beilman-Dulin, Keegan Kyle, and Patrick Marley.

We are happy to work with you or your office to refine this description and/or to identify responsive records. Please note that we are not requesting any confidential or personal information about any employee (i.e., date of birth, home address, phone number). Given the targeted nature of this request, we are hopeful you can respond within five business days.

In accordance with Wis. Stat. § 19.35(3)(e), we respectfully request that the records be produced without charge. Providing us with a waiver of fees is in the “public interest” because we will, in accordance with our organizational mission, make the records available to the public without charge. These disclosures will likely contribute to a better understanding of relevant government procedures by the general public. If our request for a fee waiver is denied in whole or in part, or if you have any other questions or concerns, please contact the undersigned attorney at [cdonahoe@lawforward.org](mailto:cdonahoe@lawforward.org) or 608.284.8401.

Sincerely,

Chris Donahoe  
Staff Counsel

Ben Sparks  
Senior Counsel

Law Forward Inc.  
222 West Washington Avenue, Suite 250  
Madison, WI 53703-2725

American Oversight  
1030 15<sup>th</sup> Street NW, Suite B255  
Washington, DC 20005