AMERICAN OVERSIGHT

February 20, 2026

VIA FACSIMILE

Kenosha County Sheriff's Office
1000 55th St.
Kenosha, WI 53140
Fax: (262) 605-5130

Re: Public Records Law Request

Dear Public Records Officer:

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

Requested Records

American Oversight requests that your office produce the following records "as soon as practicable and without delay":[1]

1. All records reflecting any costs and/or expenditures for legal services or legal counsel related to the cases *Voces de la Frontera, Inc. v. Gerber*.[2]

   To the extent your office has aggregated records sufficient to show all relevant expenses and costs, such as spreadsheets, American Oversight would accept production of such records as sufficient. To the extent your office does not have an aggregated record of these costs, American Oversight requests records reflecting these costs, such as bills, invoices, receipts, charge card or credit card statements, and reimbursement requests.

   For part 1 of this request, please provide all responsive records from January 1, 2025, through the date the search is conducted.

2. A complete copy (including any attachments) of all contracts or subcontracts, amendments, memoranda of understanding, or other written agreements between the Kenosha County Sheriff's Office and any external entities for legal services, including, but not limited to, outside legal counsel.

3. A complete copy (including any attachments) of all contracts or subcontracts, amendments, memoranda of understanding, or other written

[1] Wis. Stat. § 19.35(4)(a).
[2] *Voces de la Frontera v. Gerber*, No. 2025AP2121 (Wis. filed Sept. 18, 2025); *Voces de la Frontera v. Gerber*, 25-cv-01070-wmc, (W.D. Wis. removed Dec. 30, 2025).

agreements between the Kenosha County Sheriff's Office and any external entities for liability insurance.

4. A complete copy (including any attachments) of all contracts or subcontracts, amendments, memoranda of understanding, or other written agreements between any external liability insurance carriers for the Kenosha County Sheriff's Office and any external entities for legal services, including, but not limited to, outside legal counsel.

For parts 2-4 of this request, please provide all responsive records created or in effect from January 1, 2025, through the date the search is conducted.

Fee Waiver Request

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

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

[3] *See generally News*, American Oversight, https://www.americanoversight.org/blog; *State Investigations*, American Oversight, https://www.americanoversight.org/states; *see, e.g.*, *State Government Contacts with Voting-Restriction Activists*, American Oversight, https://www.americanoversight.org/investigation/state-government-contacts-with-voting-restriction-activists; *Wisconsin Documents Offer Window into Early Uncertainty over COVID-19*, American Oversight, https://www.americanoversight.org/wisconsin-documents-offer-window-into-early-uncertainty-over-covid-19.

website[4] and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).[5]

The public has a significant interest in collaboration between U.S. Immigration and Customs Enforcement (ICE) and Wisconsin sheriff's offices.[6] Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the government, including whether, and to what extent, Wisconsin sheriff's offices need additional legal services or liability insurance as a result of collaboration with ICE. American Oversight is committed to transparency and makes the responses agencies provide to public records requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

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

Guidance Regarding the Search & Processing of Requested Records

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

Please search all locations and systems likely to have responsive records regarding official business. **You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts.** Emails conducting government business sent or received on the personal account of the authority's officer or employee constitutes a record for purposes of Wisconsin's public records laws.[7]

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[4] *Documents*, American Oversight, https://www.americanoversight.org/documents.
[5] American Oversight currently has approximately 16,000 followers on Facebook and 94,400 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited Feb. 13, 2026); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited Feb. 13, 2026).
[6] *See, e.g.*, Rich Kremer, *Report: 6 More Wisconsin Sheriffs Sign Cooperative Agreements with ICE in 2025*, Wisconsin Public Radio (updated July 31, 2025, 8:24 AM), https://www.wpr.org/news/aclu-report-wisconsin-sheriffs-sign-cooperative-agreements-with-ice-2025.
[7] Wis. Dep't of J., *Wisconsin Public Records Law Compliance Guide*, Oct. 2019, at 3, https://www.doj.state.wi.us/sites/default/files/office-open-government/Resources/PRL-GUIDE.pdf.

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.[8] If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

Conclusion

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

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

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact David Kronig at records@americanoversight.org or (202) 897-3915. Also, if American Oversight's

[8] Wis. Stat. § 19.36(6).

request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ David Kronig
David Kronig
on behalf of
American Oversight