



**Judicial  
Watch®**  
*Because no one  
is above the law!*

February 11, 2025

CERTIFIED MAIL

Josh Kaul, Attorney General  
Wisconsin Department of Justice  
PO Box 7857  
Madison, WI 53707-7857

Re: **Wisconsin Open Records Law, §19.31 et seq.**

Mr. Kaul;

On June 14, 2024, *CBS News* reported online that, “Three allies to former President Donald Trump were charged in Wisconsin on Tuesday in connection to an alleged scheme to send slates of fake electors to Congress after the 2020 presidential election and keep Trump in power for a second term... Wisconsin Attorney General Josh Kaul said in a statement. ‘The Wisconsin Department of Justice is committed to protecting the integrity of our electoral process.’”



<https://www.cbsnews.com/news/wisconsin-fake-elector-trump-allies-charged/>

On May 28, 2024, the States United Democracy Center (“SUDC”) issued an update of a “fact sheet” that they had originally posted online on November 6, 2023. Within their report, it was stated, “In December 2020, groups of Republicans in Michigan, Arizona, Georgia, Nevada, New Mexico, Pennsylvania, and Wisconsin met and signed fake Electoral College certificates—posing as their state’s duly elected presidential electors—in an attempt to falsely declare Trump won the 2020 presidential election.”



<https://statesunited.org/resources/michigan-fake-electors/>

Under the Wisconsin Open Records Law, §19.31 et seq., and unless otherwise noted

within the date range of January 1, 2020, to the completion of this request, I am requesting an opportunity to inspect or obtain copies of:

1. Any documents, memos, and/or correspondence provided by non-profit organizations, to include but not limited to the *States United Democracy Center* (“SUDC”) and/or the *Voter Protection Project* (“VPP”), to the Wisconsin Department of Justice (“WDOJ”) regarding the investigation and prosecution of Republican state electors or “fake electors” for the 2020 presidential election.
2. Any communications between WDOJ and the VPP (*ex. email domain @protectvoting.org.*).
3. Any communications between WDOJ and the SUDC (*ex. email domain @statesuniteddemocracy.org*)
4. Any agreement or letter of engagement between SUDC and WDOJ.
5. Any agreement or letter of engagement between VPP and WDOJ.
6. Any communications between SUDC or VPP and any individual or entity, public or private, discussing, researching, mentioning, or alluding to the investigation or prosecution of Republican state electors or “fake electors” for the 2020 presidential election.
7. Any communication from SUDC or VPP to any individual or entity, public or private, recommending, advocating, and/or offering advice or strategy for investigating or prosecuting Republican state electors or “fake electors” for the 2020 presidential election.
8. Any communication from SUDC or VPP to any individual or entity, public or private, recommending, advocating, or offering advice or providing or receiving strategy for preventing Donald Trump and his associates, allies, or supporters from challenging the outcome of the 2020 presidential election.

“COMMUNICATION(S)” means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more persons, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, voice-mail messages, text messages, electronic messaging (including instant messaging and chats delivered through Microsoft Teams, Google Workspace, Zoom Team Chat, or other similar systems), meeting minutes, discussions, releases, statements, reports, publications, and any recordings or reproductions thereof.

“DOCUMENT(S)” or “RECORD(S)” mean any kind of written, graphic, or recorded matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including drafts, originals, non-identical copies, and information stored magnetically, electronically, photographically or otherwise. As used herein, the terms “DOCUMENT(S)” or “RECORD(S)” include, but are not limited to, studies, papers, books, accounts, letters, diagrams, pictures, drawings, photographs, correspondence, telegrams, cables, text messages, emails, memoranda, notes, notations, work papers, intra-office and inter-office communications, communications to, between and among employees, contracts, financial agreements, grants, proposals, transcripts, minutes, orders, reports, recordings, or other documentation of telephone or other conversations, interviews, affidavits, slides, statement summaries, opinions, indices, analyses, publications, questionnaires, answers to questionnaires, statistical records, ledgers, journals, lists, logs, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, tapes, discs, microfilm, and all other records kept, regardless of the title,



author, or origin.

“PERSON” means individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

“REFERS,” “REFERRING TO,” “REGARDS,” REGARDING,” “RELATES,” “RELATING TO,” “CONCERNS,” “CONCERNING” or “PERTAINS TO” mean, containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing, or characterizing, either directly or indirectly, in whole or in part.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$250.00. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to Judicial Watch’s commitment to informing and educating the public regarding government accountability, transparency, and the rule of law. This information is not being sought for commercial purposes.

I would request a response in writing, within five (5) days as described by law, if you intend to deny this request. Also, if you expect a significant delay in fulfilling this request, please contact me with information about when I might expect copies or the ability to inspect the requested records.


We look forward to your prompt response. Any response or records that can be delivered via e-mail attachments are certainly acceptable. Additionally, all responsive records in an electronic format (“PDF” is preferred) is appreciated. We also are willing to accept a “rolling production” of responsive records if it will facilitate a more timely production

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Please be advised that if the records are not provided to our office or if we do not hear from your Office, we will assume that your Office is refusing to comply with our Freedom of Information request. If you do not understand this request or any portion thereof, or if you feel you require clarification of this request or any portion thereof, please contact me immediately at 602.510.7875 or [m Spencer@judicialwatch.org](mailto:m Spencer@judicialwatch.org). The local Arizona address is:

Judicial Watch Inc. / PO Box 30042 / Phoenix, AZ 85046

Sincerely,



MARK SPENCER  
Southwest Projects Coordinator  
Judicial Watch, Inc.