

FILED
09-25-2023
Clerk of Circuit Court
Waukesha County
2023CV001330

STATE OF WISCONSIN CIRCUIT COURT WAUKESHA COUNTY
BRANCH 9

INSTITUTE FOR REFORMING GOVERNMENT
INC., a domestic non-stock corporation,

Petitioner,

Case No. 23-CV-1330

v.

SARAH GODLEWSKI, in her official
capacity as Wisconsin Secretary of State,

Respondent.

SECOND AFFIDAVIT OF ANTHONY LOCOCO

STATE OF WISCONSIN)
) SS.
COUNTY OF WAUKESHA)

Anthony LoCoco, being duly sworn and on oath does state as follows:

1. I am an employee of the Petitioner in this matter and make these
statements based upon my personal knowledge.

2. On September 22, 2023, I received an email from the Secretary of State's
Chief of Staff.

3. A true and correct copy of that email is attached hereto as Exhibit A.

4. Attached to that email were six documents.

5. A true and correct copy of each of the six documents is attached hereto
as Exhibits B through G.

Dated: September 25, 2023.



Anthony LoCoco

Subscribed to and sworn before me this

25th day of September, 2023.



Notary Public, State of Wisconsin

My commission expires 6/12/2026.

NICHOLAS TRONOLONE
NOTARY PUBLIC
STATE OF WISCONSIN



Anthony LoCoco <al@reforminggovernment.org>

Response to your public records request dated March 17, 2023

Schwantes, Nathan - SOS <nathan.schwantes@wisconsin.gov>
To: "al@reforminggovernment.org" <al@reforminggovernment.org>
Cc: "Kilpatrick, Steven C - DOJ" <kilpatricksc@doj.state.wi.us>

Fri, Sep 22, 2023 at 4:47 PM

Dear Mr. LoCoco:

This letter is in response to your public records request dated March 17, 2023, which requested "[a]ll correspondence from March 17, 2022 to March 17[,] 2023 between:"

1. "Douglas La Follette and Governor Tony Evers";
2. "Douglas La Follette and Sarah Godlewski"; and
3. "Douglas La Follette and any Wisconsin Deputy Secretary of State."

A "record" is "created or is being kept by an authority." Wis. Stat. § 19.32(2). An "authority" includes a state office "having custody of a record." Wis. Stat. § 19.32(1).

After conducting a search for records to your request, the Office of the Secretary of State did not locate any responsive records and thus does not have custody of any responsive records. This Office's previous email to you stating that it was "gathering" records was not intended to imply that records had been found; it was merely intended to inform you that the Office was searching for records. When an authority has no responsive records, a response is not required. *See J. Times v. Police & Fire Comm'rs Bd.*, 2015 WI 56, ¶ 55, 362 Wis. 2d 577, 866 N.W.2d 563 (quoting Wis. Dep't of Justice, Wisconsin Public Records Law, Compliance Outline (Sept. 2012)). Therefore, this letter is being provided to you only as a courtesy.

Notwithstanding that this Office does not have custody of any responsive records, in the spirit of openness and transparency, Sarah Godlewski, the current Secretary of State, in her personal capacity, has decided to disclose her own personal emails that, if she were subject to your public records request, would be responsive to paragraph b.

Enclosed are email communications between Douglas La Follette on his sosdoug@hotmail.com address and Sarah Godlewski on her home email address, which is not being revealed. (Emails are dated Nov. 6, 2022, Jan. 24, 27, 29, and 30, 2023, and March 7, 8, and 13, 2023.) Please be aware that Sarah Godlewski was a private citizen at the time of all but one of the emails. As for that November 6, 2022, email that she received in her capacity as a private citizen, Sarah Godlewski occupied the Office of State Treasurer. (Her term ended on January 3, 2023.) Also, please be aware that Sarah Godlewski was sworn in as Secretary of State on March 18, 2023. Accordingly, the enclosed copies of email communications are not "records" and are being provided in response to your public records request only as a courtesy.

Exhibit A

Sincerely,



Nate Schwantes
Chief of Staff
Office of the Secretary of State, Wisconsin
nathan.schwantes@wisconsin.gov
www.sos.wi.gov
Phone: 608-261-7429

6 attachments

-  **Gmail Correspondence 11.6.22-1780217_Redacted.pdf**
264K
-  **Gmail Correspondence 1.24.23-1780222_Redacted.pdf**
82K
-  **Gmail Correspondence 1.29.23-1780225_Redacted.pdf**
108K
-  **Gmail Correspondence 1.30.23-1780220_Redacted.pdf**
131K
-  **Gmail Correspondence 3.9.23-1780223_Redacted.pdf**
128K
-  **Gmail Correspondence 3.13.23-1780228_Redacted.pdf**
61K



Sarah Godlewski [REDACTED]@gmail.com>

I have not heard from you about this project ?

1 message

Doug La Follette <sosdoug@hotmail.com>

Sun, Nov 6, 2022 at 2:41 PM

To: "gary.goyke@gmail.com" <gary.goyke@gmail.com>

Cc: "srickoz@yahoo.com" <srickoz@yahoo.com>, "rsage@tds.net" <rsage@tds.net>, Ryan Kelly <rkelly@cleanwisconsin.org>, "mredsten@cleanwisconsin.org" <mredsten@cleanwisconsin.org>, "tomburney1212@icloud.com" <tomburney1212@icloud.com>, "tpgerman@aol.com" <tpgerman@aol.com>, "tmarks@tmaperitus.com" <tmarks@tmaperitus.com>, Sarah Godlewski [REDACTED]@gmail.com>

Do you know some people who will help with this?

Thanks, Doug

I was doing my laps around the capitol a few months back and I noticed that the bust of Fighting Bob La Follette didn't have a plaque telling visitors who he was. Over the past months, I've worked with SCERB to get a plaque approved. I held a press conference today to announce that it had been approved. We just need the funding to create it, which is where you come in. If you'd like to donate to help commemorate the life and career of one of Wisconsin's greatest political heroes, we need your help.

If you'd like to donate please write a check payable to Pechmann Memorials and send it to my office at P.o. box 7848, Madison, WI 53707. I will continue to update you on the progress we're making towards **our \$2,742 goal**. Thank you all.

Exhibit B



Doug La Follette
Secretary of State

sosdoug@hotmail.com

1211 Rutledge St.

Madison, WI 53703

608-255-7343

"The supreme issue, involving all the others, is the encroachment of the powerful few upon the rights of the many"
- Robert La Follette



Sarah Godlewski [REDACTED]@gmail.com>

Re: Budget Ideas--2

1 message

Sarah Godlewski [REDACTED]i@gmail.com>
To: Doug La Follette <sosdoug@hotmail.com>
Cc: Jessa L Lane [REDACTED]@gmail.com>

Tue, Jan 24, 2023 at 12:32 PM

Sounds good!!! Keep me posted.

On Tue, Jan 24, 2023 at 12:19 PM Doug La Follette <sosdoug@hotmail.com> wrote:

Hi Doug,

I hope you are well and your Jan is off to a good start. I'm sorry I didn't send the budget information below earlier.

[Doug] No problem I understand. I hope your dad is doing well.

Thank you for these ideas.

I will discuss them with Jessa later today and see what she thinks; she may have worked on some of these already I don't know.

I was helping my Dad who is recovering from surgery. Happy to talk more.

1. Chapter 230: Allows employees to transfer between agencies. You could ask about FTE transfer from DOA or DFI to your office using Chapter 230 as the vehicle to do so.

2. LRB and additional or joint appropriation: Have you spoken with Bob Lang or your financial analyst about any potential joint appropriations between your office and Guv. This is often another possibility.

3. LTEs through Guv: You can ask if the Gov's team has any LTEs.

This is a start and I will see what else I can find.

Forward

S

Exhibit C



Sarah Godlewski [REDACTED]@gmail.com>

Re: Greetings

1 message

Sarah Godlewski [REDACTED]@gmail.com>
To: Doug La Follette <sosdoug@hotmail.com>

Sun, Jan 29, 2023 at 11:25 AM

Hi Doug,

It's nice to hear from you, and I hope the budget negotiations are going well. I would love to schedule time to chat.

I just landed in Panamá and will be here for a week. Can we find time when I get back? After Feb 8?

Hope your travels are going well and you are somewhere warm!

Thanks, Sarah

Sent from my iPhone

On Jan 27, 2023, at 12:26 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hi on Friday morning,

Tom mentioned to me that you had the idea of the three of us getting together for a little chat.

Because I'm travelling around so much what would you think about doing that with a zoom call or my team?

Hope you're doing fine have a good day and a good weekend.

Doug

Doug La Follette
Secretary of State

sosdoug@hotmail.com

1211 Rutledge St.

Madison, WI 53703

608-255-7343

"The supreme issue, involving all the others, is the encroachment of the powerful few upon the rights of the many"

Exhibit D

- Robert La Follette

From: Sarah Godlewski <[REDACTED]@gmail.com>

Sent: Tuesday, January 24, 2023 12:07 PM

To: Doug La Follette <sosdoug@hotmail.com>

Subject: Budget Ideas

Hi Doug,

I hope you are well and your Jan is off to a good start. I'm sorry I didn't send the budget information below earlier. I was helping my Dad who is recovering from surgery. Happy to talk more.

1. Chapter 230: Allows employees to transfer between agencies. You could ask about FTE transfer from DOA or DFI to your office using Chapter 230 as the vehicle to do so.
2. LRB and additional or joint appropriation: Have you spoken with Bob Lang or your financial analyst about any potential joint appropriations between your office and Guv. This is often another possibility.
3. LTEs through Guv: You can ask if the Gov's team has any LTEs.

This is a start and I will see what else I can find.

Forward

S



Sarah Godlewski [REDACTED]@gmail.com>

It was

1 message

Doug La Follette <sosdoug@hotmail.com>

Mon, Jan 30, 2023 at 5:04 PM

To: Sarah Godlewski [REDACTED]i@gmail.com>

https://madison.com/news/local/govt-and-politics/fighting-bob-la-follette-plaque-unveiled-at-capitol-building/article_3612286c-3555-5840-9e59-6ea6840265bd.html#tracking-source=home-top-story

Doug La Follette
Secretary of State

sosdoug@hotmail.com

1211 Rutledge St.

Madison, WI 53703

608-255-7343

"The supreme issue, involving all the others, is the encroachment of the powerful few upon the rights of the many"

- Robert La Follette

From: Sarah Godlewski [REDACTED]@gmail.com>**Sent:** Monday, January 30, 2023 5:03 PM**To:** Doug La Follette <sosdoug@hotmail.com>**Subject:** Re: Greetings—2

Congrats on the Fighting Bob dedication. Sounds like it was a big success. Read the State Journal today.

Will follow up on connecting soon.

Thanks, Doug!

Sent from my iPhone

Exhibit E

On Jan 29, 2023, at 12:48 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hi Doug,

It's nice to hear from you, and I hope the budget negotiations are going well. I would love to schedule time to chat.

— things haven't really started yet. I've been working on a letter to send the joint finance.

Yes, when you get back and get settled, let me know. I will plan a time to talk.

I just landed in Panamá and will be here for a week. Can we find time when I get back? After Feb 8?

—/🤔🤔

Hope your travels are going well and you are somewhere warm!

—just got back to Madison late last night. We have the big dedication of the fighting Bob plaque tomorrow and then I hope to head out to San Diego later in the week for some warm weather.

Thanks, Sarah

Sent from my iPhone

On Jan 27, 2023, at 12:26 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hi on Friday morning,

Tom mentioned to me that you had the idea of the three of us getting together for a little chat.

Because I'm travelling around so much what would you think about doing that with a zoom call or my team?

Hope you're doing fine have a good day and a good weekend.

Doug

Doug La Follette
Secretary of State

sosdoug@hotmail.com

1211 Rutledge St.

Madison, WI 53703

608-255-7343

"The supreme issue, involving all the others, is the
encroachment of the powerful few upon the rights of the
many"

- Robert La Follette

From: Sarah Godlewski <[REDACTED]@gmail.com>
Sent: Tuesday, January 24, 2023 12:07 PM
To: Doug La Follette <sosdoug@hotmail.com>
Subject: Budget Ideas

Hi Doug,

I hope you are well and your Jan is off to a good start. I'm sorry I didn't send the budget information below earlier. I was helping my Dad who is recovering from surgery. Happy to talk more.

1. Chapter 230: Allows employees to transfer between agencies. You could ask about FTE transfer from DOA or DFI to your office using Chapter 230 as the vehicle to do so.

2. LRB and additional or joint appropriation: Have you spoken with Bob Lang or your financial analyst about any potential joint appropriations between your office and Guv. This is often another possibility.

3. LTEs through Guv: You can ask if the Gov's team has any LTEs.

This is a start and I will see what else I can find.

Forward

S



Sarah Godlewski [REDACTED]@gmail.com>

Re: Greetings—3

1 message

Sarah Godlewski [REDACTED]@gmail.com>
To: Doug La Follette <sosdoug@hotmail.com>

Thu, Mar 9, 2023 at 8:04 AM

Hi Doug,

I think I mentioned- I am on the road a lot for Janet so I apologize I didn't connect. Im in Milwaukee today until 10 pm and then Eau Claire tomorrow. How does next week look?

Sent from my iPhone

On Mar 8, 2023, at 6:11 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hello on Wednesday evening I'm home if you wanna talk or we can do something tomorrow
608-255-7343
Doug

Doug LaFollette

On Mar 7, 2023, at 11:45 PM, Sarah Godlewski [REDACTED]@gmail.com> wrote:

Hi Doug,

I hope you've been well and have had enjoyable travel! It's always nice to get away during the dog days of winter.

Are you back in Madison? I would love to connect either in-person or over zoom. How does next week look for you?

Thank you,
Sarah

On Mon, Jan 30, 2023 at 5:03 PM Sarah Godlewski [REDACTED]@gmail.com> wrote:
Congrats on the Fighting Bob dedication. Sounds like it was a big success. Read the State Journal today.

Will follow up on connecting soon.

Thanks, Doug!

Sent from my iPhone

On Jan 29, 2023, at 12:48 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hi Doug,

It's nice to hear from you, and I hope the budget negotiations are going well. I would love to schedule time to chat.

— things haven't really started yet. I've been working on a letter to send the joint finance.
Yes, when you get back and get settled, let me know. I will plan a time to talk.

I just landed in Panamá and will be here for a week. Can we find time when I get back? After Feb 8?

—/🤔🤔

Hope your travels are going well and you are somewhere warm!

—just got back to Madison late last night. We have the big dedication of the fighting Bob plaque tomorrow and then I hope to head out to San Diego later in the week for some warm weather.

Exhibit F

Thanks, Sarah

Sent from my iPhone

On Jan 27, 2023, at 12:26 PM, Doug La Follette <sosdoug@hotmail.com> wrote:

Hi on Friday morning,

Tom mentioned to me that you had the idea of the three of us getting together for a little chat.

Because I'm travelling around so much what would you think about doing that with a zoom call or my team?

Hope you're doing fine have a good day and a good weekend.

Doug

Doug La Follette
Secretary of State

sosdoug@hotmail.com

1211 Rutledge St.

Madison, WI 53703

608-255-7343

"The supreme issue, involving all the others, is the encroachment of the powerful few upon the rights of the many"

- Robert La Follette

From: Sarah Godlewski [REDACTED] <[REDACTED]@gmail.com>
Sent: Tuesday, January 24, 2023 12:07 PM
To: Doug La Follette <sosdoug@hotmail.com>
Subject: Budget Ideas

Hi Doug,

I hope you are well and your Jan is off to a good start. I'm sorry I didn't send the budget information below earlier. I was helping my Dad who is recovering from surgery. Happy to talk more.

1. Chapter 230: Allows employees to transfer between agencies. You could ask about FTE transfer from DOA or DFI to your office using Chapter 230 as the vehicle to do so.

2. LRB and additional or joint appropriation: Have you spoken with Bob Lang or your financial analyst about any potential joint appropriations between your office and Guv. This is often another possibility.

3. LTEs through Guv: You can ask if the Gov's team has any LTEs.

This is a start and I will see what else I can find.

Forward

S



Sarah Godlewski [REDACTED]@gmail.com>

sorry I missed you last week...

1 message

Sarah Godlewski [REDACTED]@gmail.com>

Mon, Mar 13, 2023 at 8:35 AM

To: Doug La Follette <sosdoug@hotmail.com>

Hi Doug,

I'm sorry we didn't connect last week. Max had an unexpected death in the family and was overseas, and I needed to be in Appleton and Eau Claire. Life was a little hectic.

I would love to connect if you have time this week -- I can come to you or if you are not in town -- chat via zoom? Let me know.

Thanks
Sarah

Exhibit G