



Bucher Law Group, LLC

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Delivery via Certified Mail – Return Receipt

May 10, 2011

The Honorable Ismael Ozanne  
Dane County District Attorney's Office  
Dane County Courthouse, Room 3000  
215 South Hamilton Street  
Madison, WI 53703

Dear District Attorney Ozanne:

I am following up my Open Records Request of April 7, 2011, delivered to your office via certified mail. As of the date of this letter, I have received no response to this request. We believe this to be an unreasonable denial of our Open Records Request and, therefore, we will be proceeding with a civil action within the next ten (10) days relative to the denial of this request.

As a previous prosecutor, I realize how busy you are and how difficult it can be to respond to cases. However, this is not an exception to not responding in a timely fashion under the Wisconsin Open Records Law.

To reiterate my previous demand, please accept this letter as a written Open Records Request pursuant to §19.35 Wis. Stats. for copies of any documentation and correspondence, - including letters, memoranda, emails, reports, etc. - and any communication – including any cell records, voice mails, texts, and any and all other correspondence and communication in your possession, custody and control between you any individual and/or group relative to litigation in the following Dane County cases:

2011CV1244 – Ismael R. Ozanne v. Jeff Fitzgerald et al.

2011CV1175 – Dane County et al v. State of Wisconsin et al.

2011CV1421 – Laborers Local 236 AFL-CIO et al. v. State of Wisconsin et al.

This Open Records Request encompasses any and all of the aforementioned correspondence and communication between you and any other individual or group

May 10, 2011  
Page Two

relative to your decision to bring an action that is not investigatory in nature. This is a continuing request for copies of any documents as they are produced relative to these matters. I am familiar with the decision of State v. Faust. However, that case does not include non-prosecutorial documents such as emails, correspondence, cell phone records and voice mails and any other documents in existence, in whatever form of communication, is producible under the Open Records Law.

Further, if a complaint was filed, I would request the identity of the filer of said complaint and a copy of the complaint, as well as any other documents and correspondence, in whatever format, including any documents produced either on your personal computer or the computer provided by either Dane County or the State of Wisconsin, if any of these computers were utilized to produce and/or respond to any messages received.

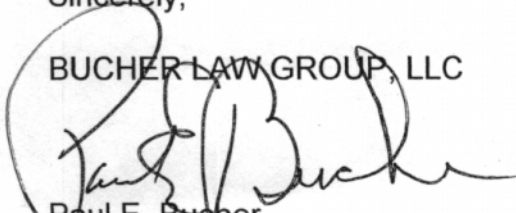
I recognize you may have a significant amount of documentation to produce relative to this request. However, I had certainly expected a response within thirty (30) days to my previous Open Records Request. Therefore, I would ask that a prompt response be provided to this office within ten (10) days. Should a response not be received in this office within ten (10) days, we will move forward appropriately with a civil action.

Should there be a cost associated with this request, please notify me and I will immediately remit same.

Thank you for your courtesies in this matter.

Sincerely,

BUCHER LAW GROUP, LLC



Paul E. Bucher  
Attorney at Law

PEB/sac