

207 East Buffalo Street, Ste 325
Milwaukee, WI 53202
(414) 272-4032
aclu-wi.org

June 6, 2025

SENT VIA ONLINE SUBMISSION

Milwaukee County Sheriff

821 W. State St. Rm 102

Milwaukee, WI 53233

Re: Open Records Request concerning religious freedom in county jail facilities

To whom it may concern:

Pursuant to Wis. Stat. §§ 19.31 et seq., you are hereby requested to provide the records listed below which are within the custody or control of the Milwaukee County Community Reintegration Center.

In this request, the term "records" or "documents" includes all documented complaints, letters, electronic communications, email, documents, reports, and all other information recorded in any form whatsoever, including, but not limited to, papers, digital electronic media (such as computer discs, hard drives, CDs, jump drives, and tape backup), and analog recording media (such as audio and video tape recordings). Also included are records which may be stored on internet servers accessible to you ("the cloud").

If any material responsive to this request is deemed to be exempt from disclosure, you are requested to identify the material withheld and specify the asserted basis for the exemption. Please release all segregable portions of otherwise exempt material with

appropriate redactions. Documents requested under the public records law must be produced "as soon as practicable and without delay." Wis. Stat. § 19.35(4)(a). The Wisconsin Department of Justice guidance indicates that 10 working days is ordinarily a reasonable time for response to an open records request. See Wisconsin Department of Justice, Public Records Compliance Guide page 15. (May 2024).

You are requested to provide the documents without charge pursuant to Wis. Stat. § 19.35(3)(e). The ACLU of Wisconsin Foundation is a not-for-profit charitable and educational organization dedicated to the protection of civil liberties and government accountability, and waiving fees is in the public interest. Should you decline to waive the charges and the expenses exceed \$50, please contact me so that we may discuss how to proceed.

## RECORDS REQUESTED

- 1. All documents relating to written and verbal complaints submitted by people held at either the Milwaukee County Jail and/or the Community Reintegration Center alleging violations of their First Amendment right to religious freedom, including but not limited to:
  - a. access to religious texts,
  - b. access to appropriate spaces or facilities for religious observance,
  - c. access to items necessary for proper religious observance, e.g., head coverings, prayer rugs, etc.,
  - d. access to religiously appropriate food/diet,
  - e. alleged retaliation for making requests for access to any of the items listed above,
  - f. Revocation of access to religious freedom accommodations as punishment or for any other reason
- All documents relating to written and verbal complaints submitted to you by individuals not currently housed at the Milwaukee County Jail and/or the Community Reintegration Center alleging violations of the First Amendment right to religious freedom of other people, including but not limited to: all emails,

letters, complaints, reports (verbal and written), and other forms of public

feedback submitted by family members, friends, community advocates, faith

leaders, legal counsel, health care workers, social workers, and any other

person

3. All documents that include a response from the Milwaukee County Jail and/or the

Community Reintegration Center to the above mentioned documents, complaints,

reports (including verbal), emails, letters, online submissions.

Please use email to respond to this request by sending the records to <a href="mailto:jweise@aclu-wi.org">jweise@aclu-wi.org</a>. If

the record files are too large to send electronically, they can be mailed to our office at 207 E.

Buffalo Street Suite 325, Milwaukee, Wisconsin, WI, 53202.

Sincerely,

Jade Weise

Jade Weise

Paralegal

ACLU of Wisconsin Foundation