



Wauwatosa, WI

Committee of the Whole

Meeting Agenda - Final

7725 W. North Avenue
Wauwatosa, WI 53213

Tuesday, November 19, 2024

7:00 PM

**Council Chambers and Zoom:
<https://servetosa.zoom.us/j/273225010>,
Meeting ID: 273 225 010**

HYBRID MEETING INFORMATION

Members of the public may observe the meeting in-person or via Zoom at the link above. To access the Zoom meeting via phone, call 1-312-626-6799 and enter the Meeting ID.

CALL TO ORDER

ROLL CALL

COMMITTEE OF THE WHOLE ITEMS

1. Presentation by the City Attorney and City Clerk regarding Public Records, Open Meetings, Meeting Procedures and Ethics for members of governmental bodies in Wauwatosa [24-1142](#)

ADJOURNMENT

NOTICE TO PERSONS WITH A DISABILITY

Persons with a disability who need assistance to participate in this meeting should call the City Clerk's office at (414) 479-8917 or send an email to tclerk@wauwatosa.net, with as much advance notice as possible.

Open Meetings

What Every Common Council Member
Needs to Know (and Traps to be Avoided)

Alan Kesner

Wauwatosa City Attorney

Steven Braatz

Wauwatosa City Clerk

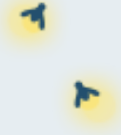
It's a Way of Life

July 30, 2024



Policy Considerations

- “Sunshine Law”
- Decisions made in public
- Based on public information
- Public access and open decision-making, including information gathering



Sec 19.81(1)

- “a representative government of the American type is dependent upon an informed electorate”
- “the public is entitled to the fullest and most complete information regarding the affairs of government”
- “as is compatible with the conduct of governmental business”

Quick Overview

- all meetings
- all state and local governmental bodies
- publicly held
- in places reasonably accessible to members of the public
- open to all citizens at all times
- unless otherwise expressly provided by law

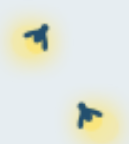


When does the Open Meetings Law apply?

- A meeting
- A governmental body

What is required if the Open Meetings Law applies?

- A proper agenda
- Posted in public places
- Advance notice
- A publicly accessible meeting place
- Discussion and voting in the open
- Record of votes taken



What is a “Meeting”?

A “meeting” is defined as:

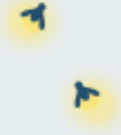
[T]he **convening of members** of a governmental body for the purpose of **exercising the responsibilities**, authority, power or duties delegated to or vested in the body. If one-half or more of the members of a governmental body are present, the meeting is **rebuttably presumed** to be for the purpose of exercising the responsibilities, authority, power or duties delegated to or vested in the body. The term does not include any **social or chance gathering** or conference which is not intended to avoid this subchapter. . . .

Wis. Stat. § 19.82(2) (*emphasis added*).

The Open Meetings law applies . . .

whenever a gathering of members of a governmental body satisfies two requirements:

1. there is a **purpose** to engage in governmental business
2. the **number** of members present is sufficient to determine the governmental body's course of action.



When is a body “gathered to conduct governmental business”?

- any formal or informal discussion, decision or information gathering, on matters within the governmental body’s realm of authority
- members gather to simply hear information on a matter within the body’s realm of authority
- need not actually discuss the matter or otherwise interact with one another to be engaged in governmental business

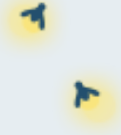


“Walking quorum”

- A series of gatherings among individuals or separate groups of members of a governmental body, each less than quorum size, who agree, tacitly or explicitly, to act uniformly in sufficient number to reach a decision
- Includes telephone calls and e-mail/message strings
- Use cautious with online discussions

Negative Quorum

- Usually a concern on issues where the body operates under a super majority rule
- A group of sufficient size to block a proposal



Digital Meetings

- E-mail and other electronic communications can be a public record
- Also includes text messaging, social media, other electronic communications
- Electronic discussions can be a “Meeting”
 - **Interactive discussions** are like a meeting and should only occur under the procedures for meetings (advance notice, agendas, open real-time public access and minutes)
 - Avoid the use of “Reply All”

Whispering in Meetings

Milwaukee County Corporation Counsel:

- refrain from debate, deliberation or discussion away from the public view
- “communication through whispering, side discussion or note passing which would involve a quorum or negative quorum of the Board or any of its committees and would involve issues which are the business of the Board would potentially generate a complaint which would validly object to a violation of the tenets cited above”
- See *also* Madison Common Council proceedings 2012...

Closed Meetings

Meeting may convene into closed session *only if*:

- Noted on agenda
- Specific motion made, must note
 - (1) business being considered, and
 - (2) specific subsection of statute
- Majority vote
- May only consider item(s) specified
- May only vote in closed session if voting in open session would frustrate the purpose of the closed session
- May only reconvene in open session if noted in motion closing meeting

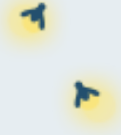
Closed Meetings

Common exemptions under sec. 19.85(1):

- (g) - Conferring with legal counsel regarding litigation strategy
- (b), (c) or (f) - Certain personnel matters
- (e) - Competitive or bargaining reasons
- Other specified reasons
- NOT for final ratification of a collective bargaining agreement

Overlapping Meetings

- Members of Body “A” attend a meeting of Body “B” (remember the “numbers” test)
- The meeting involves a subject over which “A” has some authority
- The gathering is not a “meeting” of Body “A,” only if the membership of “A” did not pre-plan (or “know of”) their attendance or if all of the members of “A” present are also members of “B”



What Are Penalties?

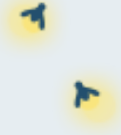
- “Any member ... who knowingly attends a meeting . . .
- shall forfeit *without reimbursement*
- not less than \$25 nor more than \$300
- for each such violation.”

Who Enforces the Open Meetings Law?

- District Attorney
(Milwaukee County Corporation Counsel)
- Wisconsin Department of Justice
(Attorney General)

Other issues (we just don't have time to discuss EVERYTHING):

- “Governmental Body”
- Agendas, timing and posting
- Meeting locations
- Minutes of meetings



Key Takeaways

- Agenda created and posted in advance
- Discuss only items on the posted agenda
- Digital meetings/Online discussions
- Avoid use of "Reply All"

Questions?



Public Policy and Purpose

“[I]t is declared to be the public policy of this state that all persons are entitled to the greatest possible information regarding the affairs of government and the official acts of those officers and employees who represent them.”

Wis. Stat. § 19.31.

Providing citizens with information on the affairs of government is:

- [A]n essential function of a representative government
- an integral part of the routine duties of officers and employees
- a basic tenet of our democratic system



The Request

- Requests do not have to be in writing
- Requester generally does not have to identify himself or herself
- Requester does not need to state the purpose
- Must be reasonably specific
- “Magic words” are not required



Elected Officials

- An elected official is legal custodian of his or her records
- No elected official is responsible for the records of any other elected official

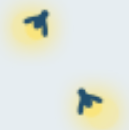
What is a “Record”?

- Any material on which written, drawn, printed, spoken, visual or electromagnetic information is recorded or preserved
- Created or kept in connection with official purpose or function
- Not everything a public official or employee creates is a public record



“Record” includes:

- Handwritten, typed or printed documents;
- Photographs, films and tape recordings;
- Maps and charts;
- Electronic data, records and communications.



“Record” does not include:

- Drafts, notes, preliminary documents and similar materials prepared for the originator’s personal use
- Published material available for sale or at the library
- Purely personal property with no relation to the office
- Material with access limited due to copyright, patent or bequest



The Response

- The custodian **MUST** respond to a public records request
- Response must be given “as soon as practicable and without delay.”
- If the request is in writing, a denial or partial denial of access also must be in writing
- Reasons for denial must be specific and sufficient

Exemptions from Disclosure

- Statutory exemptions
 - Sec. 19.36, Wis. Stats.
 - Trade Secrets
 - Portions of personnel records – Personally Identifiable Information
 - Applicants for public positions (except “Final Candidates”)
- Balancing Test
 - Generally, there are no blanket exemptions from release
 - Balance the strong public interest in disclosure of the record against the public interest favoring nondisclosure

Records regarding Employees and Officials

- *Woznicki v. Erickson*, 202 Wis. 2d 178, 189-94, 549 N.W.2d 699 (1996)
- Employee Records - Sec. 19.356, Stats.
 - Notice to employee before records release
 - Certain employee records regarding discipline or impacting privacy interests
 - Notice in writing and opportunity to respond or initiate court action
 - Statutory waiting periods before records can be released
- Public Officials given opportunity to supplement records before release

Electronic Records

- Different from paper records
- Maintain in electronic format
- Electronic Mail – all “@wauwatosa.net” messages are archived by the City of Wauwatosa
- Text messaging – No viable way to archive appropriately, therefore should not be used for official business

Enforcement

- Mandamus Action
- District Attorney (Milwaukee County Corporation Counsel)
- Attorney General

Penalties

- Attorneys' fees, damages of not less than \$100, and other actual costs
- Civil forfeiture of not more than \$1,000 if a legal custodian arbitrarily or capriciously denies or delays response
- Criminal Penalties for:
 - Destruction, damage, removal or concealment of public records with intent to injure or defraud.
 - Alteration or falsification of public records.

Questions?



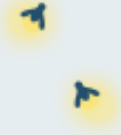
Purpose

“The proper operation of democratic government requires that public officials and employees be independent, impartial and responsible to the people; that government decisions and policy be open and transparent; that public office not be used for personal gain; and that the public have confidence in the integrity of its government.”

– Sec. 2.05.010, Wauwatosa Municipal Code

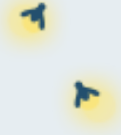
The big picture (why have a code of ethics?)

- Strengthen citizens' confidence in the integrity of governmental officials
- Help preserve the integrity of the governmental decision-making process
- Officials not to profit from holding public office



General Prohibitions

- Influence or Reward
- Private Benefit
- Financial Interest
- Disclosure of Confidential Information



What laws apply?

- Local law: Chapter 2.05, Wauwatosa Municipal Code. *Code of Ethics for City Officials and Employees*
- State law: Section 19.59, Wisconsin Statutes. *Codes of ethics for local government officials, employees and candidates*

Who are “Officials” covered by local law?

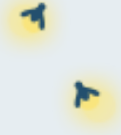
- Elected and appointed officials
- Includes board, committee and commission members
- Also covers employees

Who is covered by State law?

- Elected officials
- County administrators and city and village managers
- Individuals appointed for a specified term
- Appointees serving at the pleasure of the governing body or chief executive

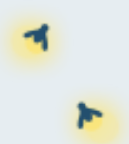
Conflict of Interest- Influence or Reward

- Anything of Value
- Reasonably expected to influence action
- Award for action or inaction
- Does not prohibit outside employment
- Does not include items of “inconsequential value” or received independent of official position



State Law: Influence and Reward

- May not solicit or accept
- Anything of value
- If it could reasonably be expected to influence judgment
- Or could reasonably be considered a reward for official action



State Law Exceptions:

- Items received on behalf of the local governmental unit and primarily for the benefit of the governmental unit
- Items unrelated to the individual's holding public office or position



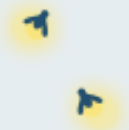
Conflict of Interest – Private Benefit

- May not use public position or office
- To obtain financial gain or anything of substantial value
- For the private benefit of self or immediate family,
- Or for an organization with which the official is associated.



Private Benefit – exceptions and processes

- Campaign contributions acceptable
- Disclose financial interest on the record prior to initial discussion of issue
- Refrain from acting on matter
- Join public if in a public meeting



State Law: Financial Interest

- No official action
- Substantially affecting a matter
- In which the official, a member of his or her immediate family, or an organization with which the official is associated
- Has a substantial financial interest

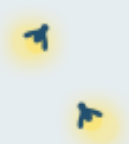
Confidential Information

- shall not intentionally disclose or use
- confidential information concerning the government
- to gain anything of value
- or to advance a financial, personal, or other private interest



Standards and rules an official has to know!!

- *Don't accept items or services offered to you because of your position*
- *Don't participate in decisions which affect you financially*



Reporting and Enforcement

- Verified written complaints to City Attorney
- Forwarded to the accused official
- Preliminary Investigation
- Complaints against Officials reviewed by Common Council/Government Affairs Committee

Advisory Opinions

- Request from City Attorney, in writing
- Opinions to Government Affairs Committee, names not disclosed, unless applicant consents
- State law: request for opinion from City Attorney is confidential, and is evidence of intent to comply with rules

Enforcement and Penalties - local

- Officials: Common Council determines penalty
- Forfeiture not less than \$100
- Censure, suspension or termination
- Items of value returned or donated to City

Enforcement and penalties - State Law

- District Attorney, Attorney General
- \$1,000 forfeiture
- \$5,000 fine and 1 year imprisonment

Where to get more information

- City Attorney
- State of Wisconsin Ethics Commission

ethics@wi.gov

<https://ethics.wi.gov>

Phone: 608.226.8123

Sources

1. Section 2.02.010
Wauwatosa Municipal Code
2. Robert's Rules of Order
Newly Revised 12th Edition

Order of Precedence of Motions

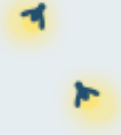
1. To adjourn;
2. To table;
3. To close debate;
4. To postpone to a certain day (“hold”);
5. To refer to a standing committee;
6. To refer to a special committee;
7. To amend;
8. To postpone indefinitely (“place on file”)

No Debate on These Motions

- To Adjourn
- To Table
- To Close Debate

To Speak on a Matter

- gain recognition from the presiding officer
 - When two or more members request the floor at the same time, the presiding officer shall determine who is first to speak
- avoid personalities
- confine remarks to the question under debate
- no member shall speak more than twice on any question



Abstentions/Recusal (Voting “Present”)

- Every member expected to vote “yes” or “no”
- If a member abstains, it is expected that the member will state reasons for abstaining
- Any member may request the cause for the abstention by the nonvoting member
- A nonvoting member need not respond to such request, but such refusal shall be noted in the minutes

Reconsideration

- Any member who voted with the prevailing side on a question may move for reconsideration of the vote:
 - At any time during the same meeting
 - At the next succeeding regular meeting of the council (if the member had announced his intention to move for reconsideration at the prior meeting)

Odds and Ends

- Any member desiring to change vote on any question must do so before the presiding officer announces the result of the vote.
- On all questions it shall be in order for any member to demand a roll call vote.
- Further interpretation and additional detail can be found in Roberts Rules.



GEORGE WASHINGTON (1732-1799)

GEORGE
WASHINGTON'S

Rules

of
CIVILITY
&
DECENT BEHAVIOUR
IN COMPANY AND CONVERSATION

Applewood Books

Washington's Rules of Civility and Decent Behavior (1746)

- 1st EVERY action done in company ought to be with some sign of respect to those that are present.
- 35th LET your discourse with [others] of business be short and comprehensive.
- 49th USE no reproachful language against any one; neither curse nor revile.
- 50th BE not hasty to believe flying reports to the disparagement of any.



Washington's Rules of Civility and Decent Behavior (cont'd)

58th LET conversation be without malice or envy, for it is a sign of a tractable and commendable nature; and in all cases of passion admit reason to govern.

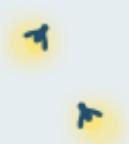
67th DETRACT not from others; neither be excessive in commanding.

77th TREAT with [others] at fit times about business; and whisper not in the company of others.

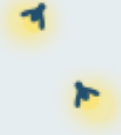
88th BE not tedious in discourse, make not many digressions, nor repeat often the same manner of discourse.

Washington's Rules of Civility and Decent Behavior (110th and final rule)

“Labour to keep alive in your breast that little celestial fire called conscience.”



Questions?



Open Meetings

The City Attorney's Office

Complying with Chapter 19 of the Wisconsin Statutes

Notice

The City must give the public prior notice of the time, date and place of every meeting of all governmental bodies, including the Common Council, its standing committees and all its boards and commissions. The notice must also include the agenda items to be discussed. If an item is not included on the publicly noticed agenda, it cannot be discussed. Notice of a meeting must be given at least 24 hours, excluding Sundays and holidays, before the meeting, unless such notice is impossible or impractical. Best practice is to publish notice in advance of 24 hours whenever possible. Questions about agendas and public notice should be directed to the City Clerk's Office or the City Attorney's Office.



Meetings

Under Wisconsin law, a meeting happens whenever a sufficient number of members of a body "convene" for the purpose of exercising its responsibilities, powers or duties. For the Common Council, a sufficient number of Alderpersons is 5. For standing committees, a sufficient number of Alderpersons is 3. A body can "convene" in person, digitally, and even telephonically. Meetings do not include any social or chance gatherings that are not intended to circumvent the law. To be on the safe side, the City Clerk's Office frequently posts notices of "informal gatherings" when it is likely that multiple members of a body may attend the same event.

Quorum

A quorum of Alderpersons must be present at a meeting of the Common Council or its standing committees to take action on any item properly noticed. The Wauwatosa Code of Ordinances defines a quorum of the Common Council as 11 Alderpersons. A quorum of the standing committees is 5 Alderpersons. For all other boards and commissions, unless defined differently by rule, a quorum is a majority of members. Short a few members at a properly noticed meeting? A group can still meet to discuss properly noticed items, but no action may be taken.

Closed Sessions

Virtually all of the business conducted by the Common Council, its standing committees and all its boards and commissions must be conducted publicly at properly noticed meetings. Under Wisconsin law, closed sessions may only be used for limited types of discussions. A full list of permissible topics can be found in Wisconsin Statutes section 19.85. Items for closed session must still be publicly noticed and must be publicly marked for a possible closed session discussion. It is essential that items discussed in a closed session remain confidential.

Wisconsin law operates under the presumption that all work of a governmental body should be done in public and that all meetings should be held open to the public.

Open Meetings

The City Attorney's Office

Complying with Chapter 19 of the Wisconsin Statutes

Beware Of Walking Quorums

Members of a government body can violate the open meetings law by communicating in walking quorums about City business outside of properly noticed meetings. A walking quorum is a series of gatherings among separate groups of members, each less than a quorum size, who tacitly or explicitly agree to act or vote in a certain manner in numbers sufficient to determine a course of action.

Forward and Reply All features in emails can result in walking quorums. To avoid this, staff recommends use of Bcc when emailing multiple members of a body.



Electronic Communications

During meetings communications between members about items on the agenda must occur publicly. Interactive electronic communications between members can be considered meetings depending on the number of participants, the number of communications, the time frame of communications and the extent of conversation-like interactions. Failure to properly notice those electronic communication and to allow for public viewing is a violation of the open meetings law.

Staff

Alan Kesner, City Attorney
(414) 479-8902, akesner@wauwatosa.net

Hanna Kolberg, Deputy City Attorney
(414) 479-8904, hkolberg@wauwatosa.net

Citizen Participation

Wisconsin law ensures the right of the public to attend and observe open session meetings. The law does not require a body to allow the public to speak or actively participate. Typically the Common Council does not take public comments at meetings unless a public hearing has been scheduled. Citizen participation is more common at meetings of the standing committees. Committee chairs frequently set the ground rules for citizen participation at their respective meetings. Public participation at board and commission meetings is similarly dependent on their own operating rules and the nature of the agenda items up for discussion.

Recording

As long as recording does not disrupt a meeting, members of the public are allowed to record or film open-session meetings.



Governmental bodies must make reasonable efforts to accommodate any person who wants to record, film or take photographs during the meeting, as long as there is no interference with the conduct of the meeting or the rights of the participants.

The open meetings law does not require a governmental body to permit recording of an authorized closed session. If a body does choose to record a closed session, it should be aware that the recording is not automatically exempt from disclosure under public records law.

Public Records

The City Attorney's Office

Requesters

Generally any person has the right to request any record from the City, with very few exceptions. Requesters are not required to identify themselves and they do not need to provide a reason for their request.

Custodians

Alderpersons are custodians of their own records. That means that each Alderperson is responsibly for maintaining their own records as defined by Wisconsin law. The easiest way to accomplish this is to use your city email account to conduct all city business. That way city staff can assist in archiving and locating records. The city has no other means by which to archive your records, so you must be sure to retain any and all other records pursuant to the city's record retention policy.

Records

Records includes any material on which written, drawn, printed, spoken, visual, or electronic data is recorded or preserved. In addition to more traditional documents, records include audio and video files, data in databases, emails, social media, and text messages. Records do not include purely personal property.

Staff

Alan Kesner, City Attorney
(414) 479-8902, akesner@wauwatosa.net

Hanna Kolberg, Deputy City Attorney
(414) 479-8904, hkolberg@wauwatosa.net

Personal Accounts

The content of a record determines whether or not a record is a public record, not the medium, format or location. In other words, it doesn't matter what accounts you are using to conduct city business. All city business, regardless of how or where conducted, is subject to the public records law. Best practice is to use personal accounts for personal business and professional accounts for city business. As the custodian of your own records, you will be responsible for conducting a careful search of ANY account that may have information responsive to a public record request.

Filling Requests

A request may be verbal or in writing and the city cannot require the use of a particular form. No magic words are required, the request must simply describe the records requested and be reasonably specific as to the time and subject matter. If you don't understand a request, contact the requester in writing and request a clarification. Only records that exist at the time of the request must be produced, you should not create new records responsive to a request. If there are no responsive records, inform the requester. There are very few legal basis on which record requests can be outright denied. If you received a request where you believe the public interest in disclosure is outweighed by public policy against disclosure please contact the City Attorney's Office for assistance. Likewise, if you believe information in a record is subject to redaction, please contact the City Attorney's Office.

Under Wisconsin law, almost everything is considered a record and presumed to be available to the public. It is a crime in the State of Wisconsin to destroy or conceal public records.

Ethics

The City Attorney's Office

Wauwatosa Code of Ordinances Chapter 2.05

Purpose

The purpose of Chapter 2.05 of the Wauwatosa Code of Ordinances is to establish guidelines for ethical standards of conduct for all city officials and employees. The chapter sets forth actions that are contrary to the best interests of the city and requires the disclosure of financial and other interests in matters affecting the city. You should also familiarize yourself with Wisconsin State Statutes sections 19.59, 946.10 and 946.18, which all apply to local elected officials.

Gifts

You may neither give nor receive anything of value if it could reasonably be expected to influence your action, inaction, judgment or vote. You also may not accept rewards for any action or inaction. It is not a conflict of interest for you to receive gifts of inconsequential value or gifts that are given to you independent of your position as an official.

Private Benefit

You may not use your public position to obtain financial interest or anything of value for yourself, your family, or any organizations with which you may be affiliated. From time to time city business may intersect with your personal business. When this happens, you must publicly disclose the nature and extent of your interests before participating in the discussion.

Staff

Alan Kesner, City Attorney
(414) 479-8902, akesner@wauwatosa.net

Hanna Kolberg, Deputy City Attorney
(414) 479-8904, hkolberg@wauwatosa.net

Recusal

If the intersection of personal business with city business could result in a financial gain or anything of value for yourself, your immediate family, or any organization with which you are affiliated, you are prohibited from informally or formally discussing or acting on that item.

Should such a situation arise in a public meeting, you should withdraw from the meeting while that item is being discussed. If the meeting is not public, you must leave the room while the item is addressed. This situation occasionally presents itself and you should not feel uncomfortable for having to recuse yourself. Your recusal lends integrity to the process.

Confidential Information

As an alderperson you will be privy to confidential information related to the city and its business. Disclosure of confidential information could disadvantage the city as it conducts its business and at times could implicate the health, safety and well-being of residents. You are prohibited from disclosing confidential information, especially if that disclosure is to gain something of value or to advance a financial, personal or private interest.

Life As An Alderperson

As an alderperson, your authority and influence is realized only when the Common Council acts as a body. As an individual, your rights and privileges in the City of Wauwatosa are the same as any other resident. City staff is committed to making your time on the Council a success, so when in doubt, ask!

Confidential ethics opinions may be obtained by contacting the City Attorney's Office.

Social Media

The City Attorney's Office



Create a separate Facebook page (not profile)

Elected officials are strongly encouraged to separate personal from professional social media accounts, so that city-related matters and all public records generated from those posts are easily archived and not intermingled with personal posts. Your page should be publicly accessible. You should not block anyone from your page.

Archive your accounts

The benefits of having a PAGE is that the page will be accessible to anyone. (No one has to request to see your content.) Pages can also be adequately archived for public records law purposes. Personal profiles do not have this same ability. Pages also have messenger features to easily respond to constituents. Your role as an elected official is subject to records requests. You are responsible for archiving your social media.

Be aware of where you are posting from your personal profile vs. professional page

You might be tagged by a neighbor in an online conversation. The tag might be to your personal profile. If the topic is city business, we recommend responding from your professional page, so that records are with that professional page.

If other elected officials start talking in the same thread, be aware of open meeting laws or walking quorums. It is best practice to respond in the thread and say something like, "Thanks for your comment. Because of Open Meeting Laws, I cannot comment here, but I invite you to attend the upcoming meeting where we can talk more."

Comment moderation

Government maintained social media pages which permit public comments are public forums under the First Amendment. It is critical to adopt a social media policy because, in the absence of such policy, any restriction on speech (e.g., deleting comments) will likely violate the First Amendment.

If you plan to moderate comments, you should have a social media policy. We can provide you a template social media policy. When you create a social media policy, you must uniformly enforce it.

Respect the right to free speech – including unfavorable criticism. Use the comment as an opportunity to invite a constituent to a meeting or participate in an upcoming topic.

Key Takeaways

- ✓ If you want your social media account to remain "personal," don't use it for official purposes. Have a plan to maintain your own records.
- ✓ Be aware of where you're posting, so you're not violating Open Meeting Laws.
- ✓ Don't block users or delete comments just because someone criticizes you.
- ✓ Have a social media policy, make it public, and follow it consistently. If you limit what your followers can comment, the limits should be reasonable, viewpoint-neutral, and enforced consistently.

Staff

Alan Kesner, City Attorney
(414) 479-8902, akesner@wauwatosa.net

Hanna Kolberg, Deputy City Attorney
(414) 479-8904, hkolberg@wauwatosa.net