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From: "Knudson, Dean - ELECTIONS" <Dean.Knudson@wisconsin.gov>
Date: Wednesday, March 18, 2020 at 2:13 PM
To: AO Records <records@americanoversight.org>
Cc: "Magney, Reid - ELECTIONS" <Reid.Magney@wisconsin.gov>
Subject: [Ext]Request for records March 11, 2020; American Oversight

Austin R Evers
American Oversight

Mr. Evers- Records responsive to your request have been attached in pdf format within a zip file.

Your request was overly broad in respect to the dates involved for two reasons. First, a request for multiple years of documents may be considered overly broad under Wisconsin Statutes 19.35(1)(h). A request for 44 months of records is not sufficiently narrow in my judgment. Second, I was not a public official during the period from January 3, 2017 through the date of my appointment to the Wisconsin Elections Commission September 25, 2017. Prior to that time I was serving as a state legislator during the period of your request from June 30, 2016 until January 3, 2017. Your request is specific to the Wisconsin Elections Commission and is for communications between the Republican party officials and myself in my capacity as WEC commissioner.

Despite the overly broad time period covered by your request, I have provided records responsive to your request for the entire period of my service on the Wisconsin Elections Commission.

Not included in this response are many more mass emails that were sent to many others as well as myself. These mass emails were sent to my personal email account as part of the Republican Party's routine communications related to fundraising, organizing and political activities. These were not personally specific to me and they were not specifically related to my office as Commissioner. Previous Attorney General guidance has indicated that such communications are not typically included in requests such as yours. If you would prefer to receive these documents please let me know and

we can discuss the costs involved in producing those documents.

Thank you,

Dean Knudson



Dean Knudson <dean.knudson@gmail.com>

1 YEAR UNTIL ELECTION DAY 2020

Andrew Hitt - Republican Party of Wisconsin <info@wisgop.org>

Mon, Nov 4, 2019 at 11:56 AM

Reply-To: info@wisgop.org

To: Dean Knudson <dean@deanknudson.com>



Dean,

1 year from now Americans will go to the polls and determine who will serve our nation in the White House for the next four years. **2020 is right around the corner, and we have to do everything we can to re-elect President Donald J. Trump.**

[Will you chip in \\$20.20 to help us prepare?](#)

The road to the White House runs right through Wisconsin. The President is depending on us to deliver another victory like we did in 2016. There is so much at stake in this election, and we have to make sure that Wisconsin stays red.

The Democrats have identified Wisconsin as a top target--they are even bringing their national convention to Milwaukee next summer. **We're prepared to fight hard for the President and his agenda, but we can't do it without your help!**

[Please pitch in \\$20.20, \\$40.40, or \\$60.60 now to make sure President Trump wins Wisconsin!](#)

Andrew Hitt
Chairman
Republican Party of Wisconsin

P.S. Don't sit this one out! Contribute \$20.20 now to help us make the next 365 days count.

CONTRIBUTE >>

This message was intended for: dean@deanknudson.com

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Dean Knudson <dean.knudson@gmail.com>

Join us for the Grassroots Kickoff to 2020!

Jesse Garza - Republican Party of Wisconsin <info@wisgop.org>

Thu, Oct 17, 2019 at 9:39 AM

Reply-To: info@wisgop.org

To: Dean Knudson <dknudson@comcast.net>



Dean,

Join leading organizers from the Trump Victory Campaign along with activists and leaders from throughout Wisconsin for the Kickoff to 2020 on Saturday, November 16th. We'll learn how to best engage voters, build local parties and organize for winning Wisconsin again in 2020! The training is open to all county party members.

Those in attendance will learn to:

1. Develop a winning strategy for 2020;
2. More effectively use social media;
3. Better apply parliamentary procedure to meetings;
4. More effectively fundraise, with insights and ideas straight from Trump Victory staff;
5. Identify and build a coalition of key voting groups.

Finally, you'll hear first-hand from the Trump 2020 Campaign and how to keep Wisconsin red when developing your own winning strategy!

Cost is just \$20 to help cover the costs of lunch and refreshments, etc.

Registration starts at 9am, and the program begins at 10am, running till about 4pm.

Join fellow activists and GOP leaders from throughout Wisconsin. (And don't worry, it's the weekend before deer season!) Hope to see you there, but space is limited, so hurry!

Holiday Inn and Suites Wausau/Rothschild
1000 Imperial Avenue
Rothschild, WI 54474

Register here: https://secure.anedot.com/republican-party-of-wisconsin-0d7b2593-b453-4564-a30a-9c201116f939/kickoff_to_victory

Jesse Garza
Chairman
Republican Party of Wisconsin County Chairman Organization

This message was intended for: dknudson@comcast.net

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Dean Knudson <dean.knudson@gmail.com>

President Trump's Visit To Wisconsin

Chairman Andrew Hitt <info@wisgop.org>
Reply-To: info@wisgop.org
To: Dean & Joy Knudson <dean.knudson@gmail.com>

Wed, Apr 17, 2019 at 12:38 PM



Greetings –

I am pleased to announce that **President Trump will be making another trip to Wisconsin!** On Saturday, April 27th, President Trump will hold a rally at the Resch Center in Green Bay.

President Trump knows that Wisconsin is going to be a crucial state in his fight for reelection! That's why we're asking for your help in Green Bay - to help welcome the President to the Badger State. [To volunteer, please click here and sign up by Wednesday, April 24th.](#)

**VOLUNTEER FOR
PRESIDENT
TRUMP**

DETAILS FOR THE EVENT

Saturday, April 27, 2019 at 7:00pm

Resch Center
820 Armed Forces Dr
Green Bay, WI 54304

Thank you, and I look forward to seeing you next week!

Andrew Hitt
Chairman, Republican Party of Wisconsin

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Dean Knudson <dean.knudson@gmail.com>

Sign Up to Be a Paid Poll Worker!

Andrew Hitt - Republican Party of Wisconsin <info@wisgop.org>

Thu, Aug 22, 2019 at 1:35 PM

Reply-To: info@wisgop.org

To: Dean & Joy Knudson <dean.knudson@gmail.com>



Dean & Joy,

As part of our commitment to ensure sound and fair elections, the Republican Party of Wisconsin is currently seeking volunteers in your community to serve as poll workers for the 2020 election cycle.

Having a Republican presence at polling locations on Election Day will help ensure compliance with our election laws, while also serving as a deterrent to potential fraud and abuse.

As a paid poll worker, you will be trained and compensated by your local municipality to facilitate the polling process and assist voters on election day.

[Sign Up Now to Become a Paid Poll Worker!](#)

We are committed to protecting the integrity of our elections by maximizing Republican representation among the paid poll worker ranks across the state, but we cannot do it without your support! We must work together to defend this fundamental process of our democracy.

Your help is needed, and I'm asking you on behalf of all our Republican candidates to sign-up today!

[Click Here to Sign Up and Help Protect Our Elections.](#)

Thank you,

Chairman Andrew Hitt
Republican Party of Wisconsin

This message was intended for: dean.knudson@gmail.com

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WI-20-0551-A-000007



Dean Knudson <dean.knudson@gmail.com>

They're trying to impeach him

Andrew Hitt - Republican Party of Wisconsin <info@wisgop.org>

Wed, Sep 25, 2019 at 3:33 PM

Reply-To: info@wisgop.org

To: Dean & Joy Knudson <dean.knudson@gmail.com>



Dean & Joy,

Democrats have been plotting to impeach President Trump ever since he first got elected. After coming up empty handed with their Russian collusion delusion, Democrats created a new Ukrainian scandal out of thin air to try to **impeach President Donald Trump**.

[Will you help us fight back?](#)

Nearly two-thirds of Americans oppose impeachment proceedings but Democrats would rather continue their baseless political vendetta against our President than work on the issues that matter to the American people.

[We can't let them get away with it!](#)

President Trump is revitalizing our economy and ensuring the safety of our country all in the face of unprecedented obstruction and political witch hunts like this one - but he cannot face them alone! **[Will you stand with the President?](#)**

[Please pitch in \\$10, \\$25, \\$50 or \\$100 now to give us the tools we need to defend President Trump from this latest witch hunt.](#)

Keep America Great!

Andrew Hitt
Chairman
Republican Party of Wisconsin

P.S. Democrats will do anything to obstruct President Trump. Help us fight back against the left and their radical agenda!

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WI-20-0551-A-000009

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Dean Knudson <dean.knudson@gmail.com>

WI > D.C.

Mark Morgan <info@wisgop.org>
Reply-To: info@wisgop.org
To: Dean & Joy Knudson <dean.knudson@gmail.com>

Thu, Aug 30, 2018 at 12:22 PM



Dean & Joy,

In their continuing effort to turn Wisconsin into "Washington, D.C. West," the Democrats have brought in yet another D.C. insider to rally liberal voters.

Just days ago, Former Obama Labor Secretary and DNC Chair Tom Perez was in Wisconsin in an attempt to prop up the campaigns of extreme liberals Tony Evers and Josh Kaul.

[Support the Republican Party of Wisconsin with \\$25, \\$50, \\$100, \\$250, or more now to help us fight off the D.C. party bosses and Obama cronies.](#)

Instead of running on the issues – likely because they know they can't win that argument – Tony Evers, Tammy Baldwin, and Josh Kaul called in the big guns to try to win over voters. But we can see right through their cheap antics.

[Stand strong with the Republican Party as we support conservative leaders like Scott Walker, Rebecca Kleefisch, Leah Vukmir, and Brad Schimel!](#)

Instead of standing for Wisconsin families, these far-left candidates have repeatedly shown that they're willing to turn their backs on Wisconsin

families!

Tony Evers failed to revoke the licenses of teachers caught watching porn in the classroom.

Liberal Tammy Baldwin continues to take the side of her Washington party bosses – voting against tax cuts for our families and pushing for government-run health care!

Even Josh Kaul built his legal career working as Hillary Clinton's political attorney instead of fighting for Wisconsin families.

We need candidates who will put OUR needs first – not those who would rather see the D.C. swamp make its way to Wisconsin!

November 6th will be here before we know it. We have to be aggressive in our fundraising so we can fend off the Democrats – both the Madison and D.C. variety – and secure BIG GOP wins up and down the ballot.

[Support the Republican Party of Wisconsin now.](#)

Thank you,

Mark Morgan
Executive Director

CONTRIBUTE »

3/18/2020

Gmail - WI > D.C.

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Dean Knudson <dean.knudson@gmail.com>

WisGOP Statement on the RNC Resolution Condemning Democrats' Secretive Impeachment Investigation

Alesha Guenther - WisGOP Communications <info@wisgop.org>

Fri, Oct 25, 2019 at 4:22 PM

Reply-To: info@wisgop.org

To: Dean & Joy Knudson <dean.knudson@gmail.com>



WisGOP Statement on the RNC Resolution Condemning Democrats' Secretive Impeachment Investigation

[Madison, WI] – In response to the RNC resolution condemning Democrats' secretive impeachment investigation, the Republican Party of Wisconsin issued the following statement from Executive Director Mark Jefferson:

"Today, the RNC Executive Committee unanimously chose to stand with President Trump and condemn House Democrats' secretive and illegitimate impeachment inquiry. These closed-door impeachment proceedings deny our President the due process enjoyed by every other American. The Republican Party of Wisconsin applauds the work President Trump is doing for the American people in the face of yet another partisan witch hunt."

###

[View this release online](#)

This message was intended for: dean.knudson@gmail.com

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Dean Knudson <dean.knudson@gmail.com>

Yard signs

Jim Miller <cd7.chairman@wisgop.info>
Cc: Mark Jefferson <mjefferson@wisgop.org>
Bcc: deanknudson@gmail.com

Wed, Sep 18, 2019 at 2:12 PM

Leaders,

If you're road tripping to Hayward on Saturday for grassroots training, Mark J has offered to bring some Trump 2020 yard signs up in his Smart Car (kidding, but it's car so he's limited to a payload of about 500 signs).

I've attached a pic. They're great quality from Giff Miller of Appleton, our preferred GOP vendor. Cost is \$1.50 per sign plus tax. 100 per box, but perhaps counties can split orders afterwards (Sawyer wants 100 but we will take 50 if someone wants to split).

I suspect Mark will want a check on delivery. His email is cc'd. Let him know if you're interested.

We will try to coordinate more shipments and orders throughout the campaign.

FYI we will likely have some 7th CD candidate(s) joining us on Saturday. See you then?

--

Jim Miller
Chair, WI 7th CD Republican Party
715-699-0355

Authorized and Paid for by 7th Congressional District Republican Party - Judith Johnson, Treasurer

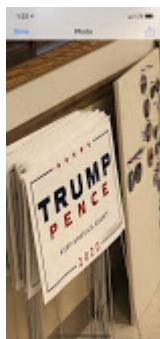


Image-1.jpg
223K

Fwd: Zignego v. WEC, Ozaukee County Case #2019CV0449 - 12/13 motion hearing

Bob Spindell <cd4.chairman@wisgop.info>

Sun 12/15/2019 8:53 PM

To: Knudson, Dean - ELECTIONS <Dean.Knudson@wisconsin.gov>

Per our conversation.

Bob Spindell
414 276-6331 / fax 414 276-3582
Chair
RPW 4th Congressional District
CD4.Chairman@WisGOP.info
Sent from my iPad

Dear Barb:

Following are my notes of the motion hearing today. They are not gospel, but they are a decent summary of arguments and such.

Yours,
John Gallo

Introductory statement by Judge Malloy. He's read the briefs – repeatedly – and is ready to hear arguments & make oral findings. He is balancing the need to take about 30 days to produce a written decision against the need for a prompt resolution.

Judge Malloy stated the main issue: Is there a Wis. Stat. §6.50 (3) violation and, if so, is a temporary injunction or writ of mandamus appropriate?

Judge Malloy described the case background – the facts upon which he would base his decision.

The Electronic Registration Information Center ("ERIC") uses data from the USPS, MV registrations, drivers' licenses, and Social Security Administration death registrations. In 2017, the WEC sent out more than 340,000 notices of potential "deactivation:" dropping people from the voting rolls because, based on ERIC data, there was reason to believe they no longer lived at the place where they were registered. Registrants were given 30 days to confirm that the registration was correct. About 251,000 did not respond and were dropped. About 6000 responded and were kept on the voter rolls. About 84,000 were returned as undeliverable and dropped. About 8000 of those dropped later re-registered at the same address. False positives were attributed to reasons such as: spelling variations ("First" vs. "1st"); registering a vehicle for a college student at the college address, not the home address; partially missing address ("XX Lower" vs. "XX").

In 2019, WEC adopted a stated goal of improving the drop process, making it more accurate & complete. Staff memo, 3/2019, outlines voter roll maintenance procedures in Minnesota, Illinois & other ERIC-using states. The memo says the ERIC data is largely accurate. In June, 2019, WEC voted to expand the drop time from 30 days to 12 - 24 months. WEC did not follow any rule-making procedures to authorize this change of practice/policy. Notice cards were sent out to ERIC "movers" in October (10/11/2019?), but without the 30-day drop notice. WILL filed a complaint about this with WEC. WEC

WI-20-0551-A-000016

responded that it would take no action, that the complaint was untimely and acting on it would operate to the prejudice of WEC staff.

The first issue for the Court was whether the League of Women Voters ("LWV") should be allowed to intervene, per Wis. Stat. §803.09.

LWV argued that its interests were not protected by the government lawyers, that their claims would not have "adequate representation." LWV said that WEC's claim that ERIC data was unreliable was undercut by the 3/2019 staff memo; therefore LWV could not rely on WEC's pressing the matter of ERIC unreliability. LWV filed 2 affidavits, each by a person affected by the 2017 drop procedure. One affiant threw out her drop notice and had to re-register later. I did not follow the other facts behind the other affidavit. I think the affiant moved, registered at the new address, and 4 months later got a drop notice (maybe at the new address, because of the old address). LWV gave a hypothetical reason for unreliability: DMV forms ask for the residence address when registering a vehicle, but it is a common mistake to enter a business address or other different address, which would trigger a false positive report from ERIC.

Judge Malloy criticized LWV for lack of timeliness. It did nothing to object to drop procedures in 2017, and now it wants to slow down a lawsuit which requires prompt determination.

WILL opposed the motion to intervene. Doing the math, it calculates a 4.3% error rate for the 2017 drop procedures. Based on LWV statements, the 2019 error rate is lower.

WEC took no position on the motion to intervene.

Judge Malloy cited a statement by former Justice Shirley Abrahamson, that the parties are entitled to conduct their own litigation. He said the narrow issue in this case is the construction of Wis. Stat. §6.50 (3). Allowing LWV into the lawsuit would introduce other issues into the lawsuit. LWV can litigate those issues elsewhere, or it should have done so in 2017. Judge Malloy quoted a case warning against introducing "fruitlessly complex and never-ending litigation." He found that LWV's interest in the subject of this lawsuit is not direct enough that LWV may intervene as a matter of right. Permissive intervention? No, because it would delay a prompt resolution of this case. LWV motion to intervene denied.

The Court turned to the main issue, the question of injunctive relief or mandamus.

WILL argued. The issue is whether the ERIC information is "reliable enough" to be trusted, not whether it is perfect. The information is provided by the registrant in an interaction with the government. Per WEC's numbers, the ERIC list is largely accurate. The statute anticipates some imperfection in the information. That is why registrants are given 30 days to object to being dropped. Failing that, Wisconsin has same-day registration. Errors do not prevent a person from voting.

WILL says the WEC's position – that Wis. Stat. §6.50 (3) does not apply to it – creates anomalies. Since 2003, the state, not localities, is charged with maintaining voter registration rolls. State law mandates membership in ERIC. To say that the state is not bound by a statute which governs maintenance of voter rolls is an effective repeal of §6.50 (3). The rules of statutory interpretation disfavor on an interpretation which nullifies the statute. Wis. Stat. §6.50 (3) uses the term "board of election commissioners." That term is not defined by statute, and it is broad enough to include WEC.

WEC has not followed any rule-making procedure to authorize its current policy.

WILL has standing for 2 reasons. Wisconsin has taxpayer standing, the right of a taxpayer to sue regarding illegal expenditures of money. Wis. Stat. §5.06 also grants standing to sue to challenge election officials' decisions.

Irreparable harm is threatened if the voting lists are not in legally mandated condition by the February election. Injunctions can require a party to take affirmative steps.

WEC argued. Wis. Stat. §6.50 (3) does not apply to WEC. The statutes use the term "board of election commissioners" deliberately in Wis. Stat. §7.20 and 7.21, and throughout the election statutes, to refer to the Milwaukee County entity. See also Wis. Stat. §5.025 and "commission." The statutory references to ERIC do not talk about using it for drop procedures. The reliability percentages regarding ERIC data are not reliable – WEC created that information for WEC use.

WILL does not have taxpayer standing. No money is being spent on inactivity, WEC's failure to send 30-day drop notices. Where voter standing is granted by Wis. Stat. §5.06 (2), the remedy is under Wis. Stat. §5.06 (8): judicial review under Wis. Stat. §227.57 (Administrative Procedure Act). An injunction should preserve the status quo – the voter rolls as they now stand. A writ of mandamus requires a higher standard than injunctive relief, violation of a positive and plain duty. Under the statute's plain language, Wis. Stat. §6.50 (3) is not applicable to WEC.

WILL responded. "Board of election commissioners" is not defined in the statutes. Per statute, section headings are not part of the statute. Per the rules of statutory construction, statutes must be read together to give them a logical, cohesive application. Maintenance of voter rolls was given to WEC. Use of ERIC data disenfranchised no one. WEC did not follow rule-making procedures. Wis. Stat. §5.50 (15) gives the court authority . . . (missed this).

Regarding the WEC's Oct., 2019 notices: WEC decided not to follow the law. WEC sent notices saying WEC would not follow the law. WEC could fix this by following the law, dropping registrants after 30 days, and sending a new notice of the drop and advising of the procedures available to re-register.

By the Court: Judge Malloy discussed the standards for issuing an injunction. Then he discussed mandamus. Mandamus is an extraordinary writ to compel performance of a duty which is due. There must be a plain a positive duty. Plaintiffs must be facing substantial damages, and they must lack an adequate remedy at law.

WEC has been implementing Wis. Stat. §6.50 (3) since 2015, understanding it to be its duty. It has exercised control of the drop process and did not follow any rule-making procedure to change this. The Court finds WEC has a clear and positive duty to maintain the voter rolls and drop procedure under Wis. Stat. §6.50 (3). There is no basis in law for the WEC's 1 - 2 year time frame for processing drops. Yes, plaintiffs have standing to sue. Money was spent on notices which violated the law. The WEC director should not have refused to address WILL's complaint. Doing so elevated the interests of WEC staff over that of the electorate. Is there an adequate remedy at law? The Court cannot think of any other remedy. The Court will issue a writ of mandamus for WEC to comply with Wis. Stat. §6.50 (3). WILL will draft an order. The Court will not stay its decision, because of the tight time frame for WEC to comply before the February election.

