
Subject: RE: Public Records Law Request (WI-REP-22-0105)
Date: Friday, April 1, 2022 at 1:36:39 PM Eastern Daylight Time
From: Redell, Carol
To: AO Records
CC: Rep.Vos, Fawcett, Steve, Blazel, Ted
Attachments: ASM63 - 2022.02.01 - Am Oversight - OSC.zip

EXTERNAL SENDER

Marwah Adhoob
American Oversight
records@americanoversight.org

Dear Marwah:

Open records requests are processed through the Assembly Chief Clerk's office for billing purposes only. You submitted an open records request to Representative Vos. The records are being provided in electronic format and, thus, there is no charge for any location or reproduction costs. Accordingly, all records that are responsive to your request are attached to this email.

Carol Redell
Office of the Assembly Chief Clerk
17 West Main Street, Suite 401
Madison, Wisconsin 53703
608.266.1501
carol.redell@legis.wi.gov



2021 ASSEMBLY JOINT RESOLUTION

1 **Relating to:** calling for the resignation of the administrator, assistant
2 administrator, and several members of the Wisconsin Elections Commission.

3 Whereas, the Wisconsin Constitution vests the power to make and change laws
4 in the Wisconsin Legislature; and

5 Whereas, through an Act, the Legislature created the Wisconsin Elections
6 Commission to faithfully administer and enforce Wisconsin's election laws in a
7 transparent manner, free from partisan bias; and

8 Whereas, on February 8, 2021, the Legislature charged the Legislative Audit
9 Bureau with the task of evaluating the recent efforts by the Elections Commission
10 to comply with election laws; and

11 Whereas, on October 22, 2021, the Legislative Audit Bureau reported its
12 findings to the Legislature, identifying numerous instances of election law violations
13 by the Elections Commission and its staff, including their failure to perform their
14 statutorily required duties, issuance of elections guidance that contradicted existing

1 statutes, and failure to promulgate administrative rules to reflect recent changes to
2 elections statutes; and

3 Whereas, on October 28, 2021, the Racine County Sheriff's Office announced
4 the results of an investigation, accusing several members of the Elections
5 Commission of violating election laws by issuing directives to local government
6 officials to illegally suspend the use of special voting deputies during the 2020
7 elections; and

8 Whereas, the purposeful actions of the administrator of the Elections
9 Commission and several of its members to ignore or contravene existing laws in
10 effect usurped the Legislature's constitutional authority to write the laws of this
11 state, undermining the legitimacy of government in Wisconsin and the public's
12 confidence in Wisconsin's elections process; and

13 Whereas, the egregious misconduct of Elections Commission Administrator
14 Meagan Wolfe, Assistant Administrator Richard Rydecki, and Commissioners
15 Marge Bostelmann, Julie M. Glancey, Ann S. Jacobs, Dean Knudson, and Mark L.
16 Thomsen renders them unfit to serve in their current positions; now, therefore, be
17 it

18 ***Resolved by the assembly, the senate concurring, That*** the Wisconsin
19 Legislature forcefully urges Wisconsin Elections Commission Administrator
20 Meagan Wolfe, Wisconsin Elections Commission Assistant Administrator Richard
21 Rydecki, and Wisconsin Elections Commissioners Marge Bostelmann, Julie M.
22 Glancey, Ann S. Jacobs, Dean Knudson, and Mark L. Thomsen to immediately resign
23 from the Elections Commission; and, be it further

From: "Rep.Sanfelippo" <Rep.Sanfelippo@legis.wisconsin.gov>
Sent: Monday, December 6, 2021, 9:31 AM
To: "Rep.Sanfelippo" <Rep.Sanfelippo@legis.wisconsin.gov>
Subject: Co-sponsorship of LRB-5380 – Calling for the resignation of the administrator, assistant administrator, and several members of the Wisconsin Elections Commission
Attachments: 21-5380_1.pdf

Co-Sponsorship Memorandum

To: All Legislators

From: Rep. Joe Sanfelippo

Date: December 6, 2021

Re: Co-sponsorship of LRB-5380 – calling for the resignation of the administrator, assistant administrator, and several members of the Wisconsin Elections Commission.

Deadline: THURSDAY, December 9th at Noon

In recent years, despite its statutory duty to administer and ensure compliance with election laws, the Wisconsin Elections Commission has taken actions that have clearly contravened existing statutes. These have included the Wisconsin Elections Commission ordering local clerks to illegally suspend the use of special voting deputies, neglecting to properly maintain accurate voter registration records, and failing to promulgate administrative rules necessary to implement state statutes, among other issues. Consequently, the [Legislature directed](#) the Wisconsin Legislative Audit Bureau to conduct a review of the Wisconsin Elections Commission's actions and their compliance with current laws.

In its [recent report](#), the Wisconsin Legislative Audit Bureau identified multiple examples of the Wisconsin Elections Commission and its staff violating election laws by refusing to perform their statutorily prescribed duties, issuing election guidance that contradicted existing statutes, and failing to promulgate administrative rules to reflect recent changes to election statutes. These findings represent the latest examples of the Wisconsin Elections Commission's ongoing disinterest in adhering to the constraints or the obligations that our state's laws impose on the agency.

It has become increasingly clear that certain officials at the Wisconsin Elections Commission have repeatedly disregarded their duty to faithfully and impartially implement our election laws. Instead, by continually taking actions directly inconsistent with state laws, these Wisconsin Elections Commission officials have effectively appropriated the lawmaking

authority of the Legislature by illegally substituting their own preferences and agendas in place of the clear directives of the democratically elected representatives of the public.

The Legislature cannot let stand such a brazen and intentional usurpation of its constitutional prerogative over creating the law by a few individuals abusing the authority of their official positions. This resolution seeks to hold these individuals accountable by formally demanding the immediate resignations of Wisconsin Elections Commission Administrator Megan Wolfe, Assistant Administrator Richard Rydecki, and Commissioners Marge Bostelmann, Julie M. Glancey, Ann S. Jacobs, Dean Knudson, and Mark L. Thomsen, and expressing the Legislature's intent to pursue their removal should they refuse. The resolution further urges the Attorney General to conduct a thorough investigation into these individuals' actions and to make criminal referrals to local district attorneys as appropriate and supported by their findings.

If you would like to co-sponsor LRB-5380, please reply to this email, contact Rep. Sanfelippo's office 6-0620 [no later than Thursday, December 9th at Noon.](#)

Sent: Thursday, December 23, 2021, 2:55 PM
To: "Swenson, Dean" <Dean.Swenson@legis.wisconsin.gov>
Subject: DOT Personal Information

Hi Dean,

Regarding the maintenance of voter registration records in the audit, I'm wondering why the audit does not recommend that the individual's address is provided to WEC if there is a non-match? Isn't this information provided to the clerk when registering to vote and reconciled with the DOT database?

Have a great weekend,

Jake Wolf
Office of Assembly Speaker Robin Vos
608-266-9171

From: "Toftness, Jenny" <Jenny.Toftness@legis.wisconsin.gov>
Sent: Monday, January 24, 2022, 12:20 PM
To: "Joyce, Angela" <Angela.Joyce@legis.wisconsin.gov>
Cc: "Vos, Robin" <Robin.Vos@legis.wisconsin.gov>; "Wolf, Jake" <Jake.Wolf@legis.wisconsin.gov>
Subject: Draft statement to MJS

Sen. Bernier was kind enough to share her bill election reform bill draft with my office. I am not the author of this draft and never planned to be. I agree that we should focus on election reforms suggested by the Legislative Audit Bureau, but do not support the expansion of drop box use in Wisconsin.

Elections & Campaigns Committee Hearing

December 8, 2021

- I. Rep. Brandtjen
 - a. Discussing emails between Michael Rubenstein and Claire Woodall-Vogg
 - b. Nonprofit organization gave money to 5 Wisconsin cities
 - c. Emails were conversing about creating a computer system
 - i. WEC reaches out to talk about building a program with National Vote at Home organization
 - d. There were also phone and zoom calls which we don't have record of
 - e. Claire looping many people and nonprofits in, looking into census track to build a voter database
 - f. Rubenstein asks for an API to access all WI voter data, but Claire refuses
 - g. Eventually Rubenstein gains the opportunity to see all Wisconsin voter info, they have a new program to track the skin color of voters
 - h. Vote Wisconsin org: Run by left wing nonprofit, created application allowing them to put new voters into the system, could easily lead to ballot harvesting
- II. Questions
 - a. Rep Thesefeldt: What was the overall goal of the application creation?
 - i. A: To allow them to directly add voters into the voter rolls
 - b. T: So you don't need to go through the state?
 - i. A: Yes, raises the question of who else had access to the application, apparently 100s APIs sent out
 - c. T: So anybody who wants the information must call WEC and pay for it?
 - i. A: Yes, but in this case we have no records of money being transferred even though we know APIs were somehow distributed (or stolen)
 - d. T: Did the WI IT department help build this program?
 - i. A: Yes
 - e. Rep. Rozar: Do we have any evidence that ballot harvesting occurred?
 - i. A: Seeing 100 downloads raises the question of who had access, we need to find out who all was uploaded to the rolls before determining if there was harvesting
- III. Jeff O'Donnell
 - a. Software engineer, did a voter roll data report for the state, his analysis revealed a few red flags
 - b. 7m registered voters in current WI voter database
 - c. Population is 5.8m, people aren't removed after death but rather are made inactive
 - d. 4.5m residents over 18, 3.5m of which are currently registered
 - e. In 2020 election, 1.9m voted absentee and 1.3m in person
 - f. 72.9% turnout rate, 93% of actively registered voters voted
 - g. Issue: Wisconsin doesn't release the number of people who actually voted
 - h. Issue: In the database, voter ID's are represented by strings of numbers. Some of these numbers have a number of zeroes in front of them. If the system is set to

read these strings numerically, instead of tracking all characters, two different strings could yield the same result

- i. Example: 0123 and 123 would be read as the same number, but could each exist on separate voter ID strings
 - i. 52k people with the same numeric ID voted in 2020
 - j. Issue: The ID numbers are not assigned sequentially (in order of the registration)
 - i. This is necessary to determine the order in which people were registered
 - k. 16 ID strings are non-numeric
 - i. Suggests that the ID's are created by people, not automated by the system
 - l. Thousands of gaps of 10 in strings (jumping from 10 to 20 instead of 10 to 11)
 - i. No clear pattern, again suggests that ID strings are not being automatically assigned
 - m. Database lists out application dates and how long someone has been registered in 10 year intervals
 - i. 121k registered between 110 and 119 years ago
 - ii. Over 500k with the same date of 1/1/1918, 119k of which are currently active
 - iii. 205k registered on 11/3/2020
 - iv. 900k total registered in 2020, 46k had information which didn't match DMV records
 - v. 10% of the roll registered in the 6 months preceding 11/3
 - vi. Of those, 32k are now inactive
 - vii. 42k who voted in 2020 are now inactive
 - viii. 9k registered since 2016 but only voted in 2020 election
 1. Suggests votes could be cast in the name of people
 - n. Overall, a huge indicated potential for manipulation
 - o. Must make information more public
- IV. Questions
- a. Rep Rozar: What prompted your analysis?
 - i. A: Working with other grassroots groups, was asked to take a look at WI elections
 - b. Rep Brandtjen: With 157k voters with the same numeric string, how do you compare voters?
 - i. A: It's very difficult, this is an outdated practice, the system can yield very wrong results by reading numbers instead of all characters
 - c. B: So there are codes in the system which mean something to the WEC staff?
 - i. A: Hopefully these codes are legitimate, but either way it isn't standard practice, possible there is a more nefarious explanation
 - d. B: Do we know when the database was built?
 - i. A: No
 - e. Rep Rozar: Should a public organization be more clear on the meaning of these codes?

- i. A: Yes. The database already uses some valid codes, but the thought that there could be hidden ones is disturbing
- V. Dr. Doug Frank
 - a. Working on WI data since March, previously worked on election data in 30 other states
 - b. Already did one report summarizing election issues
 - c. Basically, there is an issue of altering voter rolls
 - i. Knocking on thousands of doors has revealed extensive numbers of phantom voters
 - d. The hack is in the voter rolls, not voting machines
 - e. Discovered a loophole: Counties only report the rolls once per month
 - i. Could register, vote, and de-register without being reported if you did it within the month
 - f. Looking at public data from 2009-2021
 - i. Over time, the number of registrants fluctuates around election dates
 - 1. Lots of registration pre-election and purging post-election
 - 2. This is somewhat normal
 - ii. However, it's suspicious that it always inflates to the same percentage of eligible voters
 - iii. 1/6 of registrants were removed after 2020 election
 - 1. Milwaukee lost $\frac{1}{4}$
 - 2. We definitely didn't lose that much population
 - iv. These fluctuations are not normal, the same voters always come back to active
 - v. All counties have the same pattern, suggesting the fluctuations in registration are centrally controlled
 - g. Repeatedly asked for a list of who all voted in the election, but the clerks can't provide it
 - h. Shows the system is vulnerable and begs investigation
- VI. Questions
 - a. Rep Rozar: Can you give more explanation about the potential benefit to inflating the voter rolls
 - i. A: Makes the denominator larger in voter turnout rate: WI advertised a 70% turnout which sounds reasonable, but the numbers suggest a rate of 90% of registered voters voting, which seems unlikely
 - b. Rep Emerson: So do you think the election was stolen
 - i. A: Yes, it's more likely than not that it was stolen and warrants investigation
- VII. Eric Cardel
 - a. WI Bribery Statute
 - i. Stat 12.11 is very specific: Giving money to a person so the government will print material with a political (get out the vote) message counts as bribery

1. Nobody can accept money to encourage people to go to the polls
- b. Racine got \$100k to get mayor to join a group which had private meetings, eventually agreed to CTCL grants and conditions
- c. Cities couldn't lower budget for elections, we should be concerned nonprofits are influencing election procedures
- d. The government shouldn't engage in private plans to get out the vote
 - i. Mayors were clearly using private money to increase turnout
- e. Commission says they must allocate 1/5 of funds to encourage in-person voting
 - i. Curious, considering the name of this plan is WI State Voting and the stated purpose was to prevent COVID risks from voting
- f. Major issue: Certain groups of people were targeted
 - i. Cities told to focus on "historically disenfranchised voters" such as African-Americans, Latinos, Felons
 - ii. Those not in the "WI 5" cities got no voting aid
 - iii. No mention at all of encouraging all people to vote
- g. Green Bay: Focused on increasing minority votes by 25%
- h. Madison: Ran ads in Spanish language and Hip Hop radio
- i. Kenosha: Provided van service to disabled and nonwhite people (how is that not racial discrimination)
- j. Private \$ paid for secure dropboxes which weren't under constant surveillance
- k. Legal analysis
 - i. Was the CTCL transfer of \$8m a transfer of an "item of value?"
 1. Obviously yes
 - ii. Was the transfer "to another person?"
 1. Debatable, legislature should clear this up
 - iii. Was this meant to induce voters to go to the polls?
 1. Absolutely
 - iv. No case law on this issue
 - v. Whether we should regulate the use of private funds to encourage voting is up to the legislature

VIII. Questions

- a. Rep Rozar: Doc signed was for WI Safe Voting, when did the purpose change away from COVID safety and towards getting out the vote?
 - i. A: It seems to have been the goal from the beginning, it's clear that this was never about public health. The plan was apparently put together in 13 days but no records of mayor communications exist over these days, implying that the plans were drafted by CTCL, no doctors consulted at all.
- b. R: So it's incorrect to say that CTCL was acting with safety motivations?
 - i. A: Yes, furthermore the plan was also offered to other cities with different terms, possibly to mask the fact that certain cities and demographics were clearly targeted.

Elections & Campaigns Committee Hearing

December 8, 2021

- I. Rep. Brandtjen
 - a. Discussing emails between Michael Rubenstein and Claire Woodall-Vogg
 - b. Nonprofit organization gave money to 5 Wisconsin cities
 - c. Emails were conversing about creating a computer system
 - i. WEC reaches out to talk about building a program with National Vote at Home organization
 - d. There were also phone and zoom calls which we don't have record of
 - e. Claire looping many people and nonprofits in, looking into census track to build a voter database
 - f. Rubenstein asks for an API to access all WI voter data, but Claire refuses
 - g. Eventually Rubenstein gains the opportunity to see all Wisconsin voter info, they have a new program to track the skin color of voters
 - h. Vote Wisconsin org: Run by left wing nonprofit, created application allowing them to put new voters into the system, could easily lead to ballot harvesting
- II. Questions
 - a. Rep Thesefeldt: What was the overall goal of the application creation?
 - i. A: To allow them to directly add voters into the voter rolls
 - b. T: So you don't need to go through the state?
 - i. A: Yes, raises the question of who else had access to the application, apparently 100s APIs sent out
 - c. T: So anybody who wants the information must call WEC and pay for it?
 - i. A: Yes, but in this case we have no records of money being transferred even though we know APIs were somehow distributed (or stolen)
 - d. T: Did the WI IT department help build this program?
 - i. A: Yes
 - e. Rep. Rozar: Do we have any evidence that ballot harvesting occurred?
 - i. A: Seeing 100 downloads raises the question of who had access, we need to find out who all was uploaded to the rolls before determining if there was harvesting
- III. Jeff O'Donnell
 - a. Software engineer, did a voter roll data report for the state, his analysis revealed a few red flags
 - b. 7m registered voters in current WI voter database
 - c. Population is 5.8m, people aren't removed after death but rather are made inactive
 - d. 4.5m residents over 18, 3.5m of which are currently registered
 - e. In 2020 election, 1.9m voted absentee and 1.3m in person
 - f. 72.9% turnout rate, 93% of actively registered voters voted
 - g. Issue: Wisconsin doesn't release the number of people who actually voted
 - h. Issue: In the database, voter ID's are represented by strings of numbers. Some of these numbers have a number of zeroes in front of them. If the system is set to

read these strings numerically, instead of tracking all characters, two different strings could yield the same result

- i. Example: 0123 and 123 would be read as the same number, but could each exist on separate voter ID strings
 - i. 52k people with the same numeric ID voted in 2020
 - j. Issue: The ID numbers are not assigned sequentially (in order of the registration)
 - i. This is necessary to determine the order in which people were registered
 - k. 16 ID strings are non-numeric
 - i. Suggests that the ID's are created by people, not automated by the system
 - l. Thousands of gaps of 10 in strings (jumping from 10 to 20 instead of 10 to 11)
 - i. No clear pattern, again suggests that ID strings are not being automatically assigned
 - m. Database lists out application dates and how long someone has been registered in 10 year intervals
 - i. 121k registered between 110 and 119 years ago
 - ii. Over 500k with the same date of 1/1/1918, 119k of which are currently active
 - iii. 205k registered on 11/3/2020
 - iv. 900k total registered in 2020, 46k had information which didn't match DMV records
 - v. 10% of the roll registered in the 6 months preceding 11/3
 - vi. Of those, 32k are now inactive
 - vii. 42k who voted in 2020 are now inactive
 - viii. 9k registered since 2016 but only voted in 2020 election
 1. Suggests votes could be cast in the name of people
 - n. Overall, a huge indicated potential for manipulation
 - o. Must make information more public
- IV. Questions
- a. Rep Rozar: What prompted your analysis?
 - i. A: Working with other grassroots groups, was asked to take a look at WI elections
 - b. Rep Brandtjen: With 157k voters with the same numeric string, how do you compare voters?
 - i. A: It's very difficult, this is an outdated practice, the system can yield very wrong results by reading numbers instead of all characters
 - c. B: So there are codes in the system which mean something to the WEC staff?
 - i. A: Hopefully these codes are legitimate, but either way it isn't standard practice, possible there is a more nefarious explanation
 - d. B: Do we know when the database was built?
 - i. A: No
 - e. Rep Rozar: Should a public organization be more clear on the meaning of these codes?

- i. A: Yes. The database already uses some valid codes, but the thought that there could be hidden ones is disturbing
- V. Dr. Doug Frank
 - a. Working on WI data since March, previously worked on election data in 30 other states
 - b. Already did one report summarizing election issues
 - c. Basically, there is an issue of altering voter rolls
 - i. Knocking on thousands of doors has revealed extensive numbers of phantom voters
 - d. The hack is in the voter rolls, not voting machines
 - e. Discovered a loophole: Counties only report the rolls once per month
 - i. Could register, vote, and de-register without being reported if you did it within the month
 - f. Looking at public data from 2009-2021
 - i. Over time, the number of registrants fluctuates around election dates
 - 1. Lots of registration pre-election and purging post-election
 - 2. This is somewhat normal
 - ii. However, it's suspicious that it always inflates to the same percentage of eligible voters
 - iii. 1/6 of registrants were removed after 2020 election
 - 1. Milwaukee lost $\frac{1}{4}$
 - 2. We definitely didn't lose that much population
 - iv. These fluctuations are not normal, the same voters always come back to active
 - v. All counties have the same pattern, suggesting the fluctuations in registration are centrally controlled
 - g. Repeatedly asked for a list of who all voted in the election, but the clerks can't provide it
 - h. Shows the system is vulnerable and begs investigation
- VI. Questions
 - a. Rep Rozar: Can you give more explanation about the potential benefit to inflating the voter rolls
 - i. A: Makes the denominator larger in voter turnout rate: WI advertised a 70% turnout which sounds reasonable, but the numbers suggest a rate of 90% of registered voters voting, which seems unlikely
 - b. Rep Emerson: So do you think the election was stolen
 - i. A: Yes, it's more likely than not that it was stolen and warrants investigation
- VII. Eric Cardel
 - a. WI Bribery Statute
 - i. Stat 12.11 is very specific: Giving money to a person so the government will print material with a political (get out the vote) message counts as bribery

1. Nobody can accept money to encourage people to go to the polls
- b. Racine got \$100k to get mayor to join a group which had private meetings, eventually agreed to CTCL grants and conditions
- c. Cities couldn't lower budget for elections, we should be concerned nonprofits are influencing election procedures
- d. The government shouldn't engage in private plans to get out the vote
 - i. Mayors were clearly using private money to increase turnout
- e. Commission says they must allocate 1/5 of funds to encourage in-person voting
 - i. Curious, considering the name of this plan is WI State Voting and the stated purpose was to prevent COVID risks from voting
- f. Major issue: Certain groups of people were targeted
 - i. Cities told to focus on "historically disenfranchised voters" such as African-Americans, Latinos, Felons
 - ii. Those not in the "WI 5" cities got no voting aid
 - iii. No mention at all of encouraging all people to vote
- g. Green Bay: Focused on increasing minority votes by 25%
- h. Madison: Ran ads in Spanish language and Hip Hop radio
- i. Kenosha: Provided van service to disabled and nonwhite people (how is that not racial discrimination)
- j. Private \$ paid for secure dropboxes which weren't under constant surveillance
- k. Legal analysis
 - i. Was the CTCL transfer of \$8m a transfer of an "item of value?"
 1. Obviously yes
 - ii. Was the transfer "to another person?"
 1. Debatable, legislature should clear this up
 - iii. Was this meant to induce voters to go to the polls?
 1. Absolutely
 - iv. No case law on this issue
 - v. Whether we should regulate the use of private funds to encourage voting is up to the legislature

VIII. Questions

- a. Rep Rozar: Doc signed was for WI Safe Voting, when did the purpose change away from COVID safety and towards getting out the vote?
 - i. A: It seems to have been the goal from the beginning, it's clear that this was never about public health. The plan was apparently put together in 13 days but no records of mayor communications exist over these days, implying that the plans were drafted by CTCL, no doctors consulted at all.
- b. R: So it's incorrect to say that CTCL was acting with safety motivations?
 - i. A: Yes, furthermore the plan was also offered to other cities with different terms, possibly to mask the fact that certain cities and demographics were clearly targeted.

From: "Jones, Wyatt" <Wyatt.Jones@legis.wisconsin.gov>
Sent: Wednesday, December 8, 2021, 4:40 PM
To: "Wolf, Jake" <Jake.Wolf@legis.wisconsin.gov>
Subject: Elections Committee Hearing Notes
Attachments: Elections and Campaigns Committee Hearing Notes.docx

Hi Jake,

I went to the Elections Committee Hearing today and took some notes on the 4 speakers and questions asked. I tried to gather all information and make things as clear as possible but let me know if you have any questions. I enjoyed the experience of going and would be happy to get sent to other meetings to observe in the future, they seem like a great learning opportunity.

Wyatt

Preliminary Report Highlights: 12/29/21

Why were so many voter registrations at a single address?

Why were so many registrations given under a single phone number?

Why was there a blip at 4:00AM in the reported statewide returns?

Does the legislature have the ability to enact election regulations via joint resolution?

Gableman investigating beyond LAB's "mere waste, fraud, and abuse"

How much authority can clerks contract away to private organizations? (Zuckerburg \$\$)

- The LAB report does not discuss this issue in enough detail. There is more to find.
- Reviewing contracts between municipalities and private groups
- Selective targeting of certain voters via ballot drop box placement

There is a lack of statutorily mandated training for clerks

In 2015, 28,906 voters information did not match DMV records. These numbers have increased under WEC's tenure.

There is evidence that numerous complaints by clerks to WEC were ignored.

March 2020 SVD guidance is completely contrary to law. – Racine Co. Sheriff

Some WEC guidance (online FAQs) are issued without a commission vote.

WEC issued ballots excluding Green Party candidate prior to WI Supreme Court Opinion.

Indefinitely Confined

Democracy in the Park

Failure of WEC to notify respective boards of municipal and county clerks who did not receive WEC elections training.

- Private groups filled the vacuum - "One clerk has noted outside advice negatively impacted the security of the vote."

Technological Tools (voting machines and election databases)

- What modifications and approvals are allowed by WEC?
- Unauthorized access to the voter database

Excessive Charges for Public Registration Data

- o Some outside groups provided access to database without a fee and on an expedited basis

Useful Links:

[The Wisconsin Purchase - The American Conservative](#)



Wisconsin State Legislature

Assembly Committee on Campaigns and Elections - Motion 1

1. The Assembly Committee on Campaigns and Elections (the Committee) authorizes the Office of the Special Counsel, and Justice Michael Gableman, as Special Counsel, to assist the Committee in carrying out its duties under 2021 Assembly Resolution 15.
2. The Committee or the Office of the Special Counsel, as authorized by the Assembly Committee on Organization, may compel the production of documents, tangible items, and intangible items within the scope of the committee's jurisdiction and authority, by use of a legislative subpoena.
3. The Committee or the Office of the Special Counsel, as authorized by the Assembly Committee on Organization, may compel the appearance of a person to give testimony within the scope of the committee's jurisdiction and authority in open Committee sessions by use of a legislative subpoena. The Chair of the Committee may permit the Special Counsel or his designee to question persons or witnesses testifying before the Committee. The questions by the Special Counsel or his designee permitted by this paragraph shall be in addition to any questions asked by the members of the Committee and in no manner shall preclude members of the Committee from questioning any person or witness.
4. The Office of the Special Counsel, as authorized by the Assembly Committee on Organization and the Assembly Committee on Campaigns and Elections, may compel the appearance of a person to give testimony within the scope of the Committee's jurisdiction and authority, in open or closed session before the Office of the Special Counsel, under oath, by use of a legislative subpoena and as provided by law. Interviews may be conducted by the Special Counsel or his designee.
5. All interviews conducted by or on behalf of the Special Counsel shall be stenographically or electronically recorded and reduced to a transcript. In addition to stenographic or electronic recordation, the Special Counsel may have a video recording made of any interview.
6. The Committee or the Office of the Special Counsel may permit witnesses to testify remotely by audio-visual, video, or other appropriate means.

From: "Swenson, Dean" <Dean.Swenson@legis.wisconsin.gov>
Sent: Monday, January 3, 2022, 6:52 AM
To: "Wolf, Jake" <Jake.Wolf@legis.wisconsin.gov>
Subject: RE: DOT Personal Information

Hi Jake –

Our report included on p. 24 an Issue for Legislative Consideration that discusses this issue. Our report mentions that personally identifiable information such as names, dates of birth, and drivers license numbers could be provided by DOT to WEC, but statutes could also require DOT to provide address information.

If you would like to discuss this issue further, please let me know.

Dean
608.266.2818

From: Wolf, Jake <Jake.Wolf@legis.wisconsin.gov>
Sent: Thursday, December 23, 2021 2:55 PM
To: Swenson, Dean <Dean.Swenson@legis.wisconsin.gov>
Subject: DOT Personal Information

Hi Dean,

Regarding the maintenance of voter registration records in the audit, I'm wondering why the audit does not recommend that the individual's address is provided to WEC if there is a non-match? Isn't this information provided to the clerk when registering to vote and reconciled with the DOT database?

Have a great weekend,

Jake Wolf
Office of Assembly Speaker Robin Vos
608-266-9171

From: "Luckey, Michael" <Michael.Luckey@legis.wisconsin.gov>
Sent: Thursday, January 20, 2022, 12:57 PM
To: "Wolf, Jake" <Jake.Wolf@legis.wisconsin.gov>

LRB-5268 (Bernier)

Pre-Election Topics: items in LAB or WILL audit

- * ERIC Lists
- * Data Sharing Agreements (DOT, DOC, DHS)
- * Electronic Voting Equipment
- * Clerk Training
- * Vacancies
- * Polling Locations
- * Default Dates
- * Reviewing Forms

LRB-5269 (Bernier)

Election Day Issues: items in LAB or WILL audit

- * Personal Care Voting Assistants
 - * Entry to a facility
 - * Visits to facilities
- * Use of Private Resources – **standalone**
- * Election fraud
- * Absentee Ballot Certificates
- * Drop Boxes
- * Appointment of Poll Workers
- * Municipal Board of Canvassers

LRB-5270 (Bernier)

Post-Election Day Topics: items in LAB or WILL audit

- * Formal complaints concerning election law violations
- * Reports concerning election law violations
- * Post-election audits of electronic voting systems

LRB-4680 (Bernier)

Indefinitely Confined Voters

Michael Luckey

Chief of Staff, Senator Kathy Bernier
Wisconsin's 23rd Senate District
(608) 266-7511

From: Andrew <andrewcoggercell@gmail.com>
Sent: Monday, January 24, 2022, 8:40 PM
To: Rep.Vos@legis.wisconsin.gov; Jeff.Bellini@legis.wisconsin.gov;
Tyler.Clark@legis.wisconsin.gov; Abbey.Fabick@legis.wisconsin.gov;
Steve.Fawcett@legis.wisconsin.gov; Angela.Joyce@legis.wisconsin.gov;
Adam.King@legis.wisconsin.gov; Moriah.Krogstad@legis.wisconsin.gov;
Alex.Richter@legis.wisconsin.gov; Kelly.Smith@legis.wisconsin.gov;
Jenny.Toftness@legis.wisconsin.gov; Jake.Wolf@legis.wisconsin.gov
Subject: Where are Gableman's weekly reports?

First of all; I thought Donald Trump was a "billionaire". Why the fuck are Wisconsin taxpayers picking up the tab for auditing the state, because Trump is a sore loser? Why isn't Trump paying for it himself?

And now this clown Gableman isn't making his reporting available? Let me drop a guess; Gableman is going to find that "Trump really won", provide zero evidence, and no one will take him seriously. Pissing away that 676k for absolutely nothing.

Robin, you're one of the biggest pussies in Wisconsin political history. You're a disgrace.

On Thu, Jan 13, 2022, 8:06 PM Andrew <andrewcoggercell@gmail.com> wrote:

She's not a weak, spineless, pathetic coward like Robin. Kathleen isn't out here repeating Trump's pathetic lies that "he really won" an election he lost by 7 million votes.

The contrast between Robin and Kathleen is striking. Trump is 2,000 miles away, banned from twitter, covering himself in orange face paint; how come Kathleen isn't afraid of Trump? What the fuck is your excuse? He can't hurt you, bro.

On Sat, Jan 8, 2022, 11:17 AM Andrew <andrewcoggercell@gmail.com> wrote:

It's January of 2022, and Robin is still too much of a coward to look his voters in the eye, like a man, and tell them that Trump lost the election. He lost by 7 million votes; it wasn't even close. And yet for some reason, this loser Trump is still able to cuck every single elected Republican in America.

How does such a weak, pathetic coward like Robin become a leader of anything? There's no way this office actually respects you. I'm sure your wife doesn't either.

On Fri, Dec 10, 2021, 9:32 AM Andrew <andrewcoggercell@gmail.com> wrote:

At what point does this get embarrassing for you? This office condones Gableman trying to have mayors arrested, because Donald Trump is a sore loser? Trump got his ass kicked by 20k votes in Wisconsin, and 7 million votes nationwide. It wasn't even close.

Robin, it's time that you stopped being a pussy. You need to look your voters in the eye, like a man, and tell them that Donald Trump lost the election. Trump is an irrelevant, retired loser in Florida. He can't even go out in public without painting himself orange first. You don't have to be afraid of Donald Trump anymore.

Sent: Wednesday, January 5, 2022, 4:28 PM
To: "Blazel, Ted" <Ted.Blazel@legis.wisconsin.gov>
Subject: FW: Wis Gableman PRR executed retainer
Attachments: Wisc Gableman PRR retainer agreement executed.pdf

From: James Bopp, Jr. <jboppjr@aol.com>
Sent: Wednesday, January 5, 2022 11:20 AM
To: coms@wispecialcounsel.org; Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Cc: miked@michaelddeanllc.com; jgallant@bopplaw.com
Subject: Wis Gableman PRR executed retainer

Attached. Jim

Sent: Tuesday, February 1, 2022, 1:58 PM
To: 'Courtney Milbank' <cmilbank@bopplaw.com>
Subject: FW: Wisc Gableman PRR - Legislative Council Memo

It looks like we don't have it.

From: Ronald S. Stadler <rsstadler@kopkalaw.com>
Sent: Friday, January 28, 2022 3:11 PM
To: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Subject: RE: Wisc Gableman PRR - Legislative Council Memo

I have looked and I don't see it in any files we have.

From: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Sent: Friday, January 28, 2022 2:37 PM
To: Ronald S. Stadler <rsstadler@kopkalaw.com>
Subject: FW: Wisc Gableman PRR - Legislative Council Memo

Were we unsuccessful in getting that memo for Gableman's team?

From: Courtney Milbank <cmilbank@bopplaw.com>
Sent: Thursday, January 27, 2022 8:11 PM
To: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Subject: RE: Wisc Gableman PRR - Legislative Council Memo

No. I haven't seen anything.

Courtney Turner Milbank, JD, MBA
Attorney

The Bopp Law Firm, PC | www.bopplaw.com
The National Building | 1 South 6th Street | Terre Haute, Indiana 47807
voice: (812) 232-2434, ext. 42 | fax: (812) 235-3685 | cmilbank@bopplaw.com

NOTICE AND DISCLAIMERS:

The preceding message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you believe that this message has been sent to you in error, please (1) do not read it, (2) reply to the sender that you have received the message in error, and (3) erase or destroy the message. To the extent this e-mail message contains legal advice, it is solely for the benefit of the client(s) of The Bopp Law Firm, P.C. represented by the Firm in the particular matter that is the subject of this message and may not be relied upon by any other party.

Internal Revenue Service regulations require that certain types of written advice include a disclaimer: To the extent the preceding message contains written advice relating to a Federal tax issue, the written advice is not intended or written to be used, and it cannot be used by the recipient or any other taxpayer, for the purposes of avoiding Federal tax penalties, and was not written to support the promotion or marketing of the transaction or matters discussed herein.

On Jan 27, 2022, 6:05 PM -0500, Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>, wrote:

Did you ever get an answer on this? **From:** Courtney Milbank <cmilbank@bopplaw.com>
Sent: Tuesday, January 25, 2022 3:02 PM

To: Fawcett, Steve <Steve.Fawcett@legis.wisconsin.gov>
Cc: Cassandra Dougherty <CDougherty@bopplaw.com>
Subject: FW: Wisc Gableman PRR - Legislative Council Memo

Steve, In our hearing the other day, American Oversight mentioned a legislative counsel memo, dated October 1, 2021. See email below discussing the memo. Do you have access to this memo? Or is there public access to legislative counsel memos? I would like to review this memo before filing our reply, but have not yet seen a copy of it. Courtney -----

Courtney Turner Milbank, JD,
MBA Attorney The Bopp Law Firm, PC | www.bopplaw.com The National Building | 1 South 6th Street | Terre Haute, Indiana 47807 voice: (812) 232-2434, ext. 42 | fax: (812) 235-3685 | cmilbank@bopplaw.com **NOTICE AND DISCLAIMERS:** *The preceding message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you believe that this message has been sent to you in error, please (1) do not read it, (2) reply to the sender that you have received the message in error, and (3) erase or destroy the message. To the extent this e-mail message contains legal advice, it is solely for the benefit of the client(s) of The Bopp Law Firm, P.C. represented by the Firm in the particular matter that is the subject of this message and may not be relied upon by any other party. Internal Revenue Service regulations require that certain types of written advice include a disclaimer: To the extent the preceding message contains written advice relating to a Federal tax issue, the written advice is not intended or written to be used, and it cannot be used by the recipient or any other taxpayer, for the purposes of avoiding Federal tax penalties, and was not written to support the promotion or marketing of the transaction or matters discussed herein.* **From:** Cassandra Dougherty <CDougherty@bopplaw.com>
Sent: Tuesday, January 25, 2022 3:59 PM
To: Courtney Milbank <cmilbank@bopplaw.com>
Subject: Wisc Gableman PRR - Legislative Council Memo

Hi Courtney: Please see below for everything AO said on the legislative council memo: [Dane County Circuit Court: American Oversight vs. Assembly Office of Special Counsel et al - WisconsinEye \(wiseeye.org\)](#) (at 01:39:18) • Under open records law, if you request a record or if record is subject of litigation, it cannot be deleted. § 19.35(5). • There is a Legislative Council memo “prepared on this very point” dated October 1, 2021, where the Legislative Council says that “**because the OSC is a sub-unit of the legislature, it is not exempt from record retention requirements as individual legislators are.**” (at 01:40:43) • Petitioner argues that Respondents cannot assert new reasons for denial; cites Breyer. **Cassandra Dougherty, JD** Associate Attorney The Bopp Law Firm, PC | www.bopplaw.com The National Building | 1 South 6th Street | Terre Haute, Indiana 47807 voice: (812) 232-2434, ext. 42 | fax: (812) 235-3685 | cdougherty@bopplaw.com **NOTICE AND DISCLAIMERS:** *The preceding message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you believe that this message has been sent to you in error, please (1) do not read it, (2) reply to the sender that you have received the message in error, and (3) erase or destroy the*

message. To the extent this e-mail message contains legal advice, it is solely for the benefit of the client(s) of The Bopp Law Firm, P.C. represented by the Firm in the particular matter that is the subject of this message and may not be relied upon by any other party. Internal Revenue Service regulations require that certain types of written advice include a disclaimer: To the extent the preceding message contains written advice relating to a Federal tax issue, the written advice is not intended or written to be used, and it cannot be used by the recipient or any other taxpayer, for the purposes of avoiding Federal tax penalties, and was not written to support the promotion or marketing of the transaction or matters discussed herein.

Note: This e-mail may contain confidential information. If you have received this e-mail without being the proper recipient, you are hereby notified that any review, copying or distribution of it is strictly prohibited. Please inform us immediately and destroy the original transmittal. Please visit www.kopkcalaw.com for other information concerning our firm

This email has been scanned for email related threats and delivered safely by Mimecast.

AGREEMENT FOR LEGAL SERVICES

THIS AGREEMENT, is made and entered into by and between Michael Gableman, in his official capacity as Special Counsel, Wisconsin State Assembly Committee on Elections and Campaigns (hereinafter "Client") and The Bopp Law Firm, P.C. (hereinafter "The Firm"). This agreement supersedes any and all previously executed agreements between the parties with respect to the services contemplated herein.

WHEREAS, Client desires to retain The Firm to represent Client in the litigation styled as *American Oversight v. Assembly Office of Special Counsel*, Case No. 2021-cv-003007 in the Wisconsin Dane County Circuit Court, and in any subsequent appellate proceedings.

THE PARTIES AGREE as follows:

Section 1 Hourly Rates. Client will pay the following hourly rates for attorneys: \$450/hour for James Bopp, Jr. and \$240/hour for Courtney Turner Milbank. Other attorneys may assist at The Firm's discretion at their corresponding hourly rates charged by the Firm. Hourly rates for attorneys undergo periodic review and may increase during the term of this Agreement upon notice to Client.

Section 2 Local Counsel. Pursuant to SCR 10.03(4), a non-resident attorney seeking admission to practice in Wisconsin courts must associate with a member of the State Bar of Wisconsin. Accordingly, Client authorizes The Firm to enter into an agreement with Michael D. Dean, LLC to serve as local counsel. Client will pay the following hourly rates for local counsel: \$275/hour for Michael D. Dean and \$175/hour for David J. Craig and Michael D. Dean, LLC will monthly invoice Client for their services, once approved by The Firm.

Section 3 Costs and Expenses. Costs and expenses are in addition to the hourly charges for legal services. Costs and expenses include, but are not limited to, court charges, copies, postage, telephone, fax, travel, parking, special materials, exhibits, photographs, investigators, experts, computer assisted legal research and all other disbursements, costs, or expenses attributable to said legal services. Client agrees to pay for computer assisted legal research at \$3.00 per minute. Client agrees to pay for copies and facsimiles (incoming or outgoing) at the rate of \$.25 per page for 1-25 total pages, \$.15 per page for 26-100 total pages, and \$.10 per page for more than 100 total pages. Total pages are those copied or facsimiled during a copying or facsimiling event.

Section 4 Invoices. The Firm shall invoice Client monthly for any fees, costs, or expenses incurred under this Agreement. All invoices are due and payable within 30 days of receipt. Each invoice shall constitute an account stated and objections must be made in a reasonable time. Interest accruing at 1.5% per month will be

applied to past due accounts until paid. Client agrees to pay all attorney fees, costs, and expenses of collecting Client's account if legal action is taken to collect fees, costs, and expenses due The Firm.

Section 5 Client's Cooperation. By this Agreement, Client agrees to cooperate with the Firm and provide all information known to Client or available to Client, which in the opinion of the Firm would aid in its representation of Client in this matter. Client further agrees to notify the Firm immediately of any change in Client's address or contact information, to review all documentation sent to Client by the Firm, and to promptly and thoroughly participate in the preparation and/or production of any documents that we request of Client.

Section 6 Termination by Client. The Firm will be obligated to honor any instructions of Client requesting termination of the Firm's representation, only if such instructions are delivered to The Firm in writing bearing the Client's personal signature. If Client elects to terminate The Firm's representation, Client is responsible for all fees, costs, and expenses incurred pursuant to this Agreement. Should The Firm be required to perform any services or functions after receipt of such instructions, Client is responsible for any fees, cost, and expenses for these services.

Section 7 Withdrawal by The Firm. The Firm also may withdraw from the representation of Client upon Client's failure to make payments in accordance with this Agreement, failure to cooperate with the agreed provisions of representation, or failure to follow the advice of the Firm, or under any circumstances permitted by or required by the Indiana Rules of Professional Conduct. Any termination of The Firm's representation would be subject to the approval of the tribunal and will only be done after reasonable notice has been provided.

Section 8 File Retention and Destruction. At the conclusion of the matter addressed in this Agreement, documents and property that Client has provided to us will, at Client's request, be returned to Client. The Firm shall retain Client's legal files for an indefinite period. At any time after five years have elapsed since the conclusion of the matter, after ten business days of notifying Client in writing, which includes by electronic mail sent to Client's last known electronic mail addresses, The Firm may destroy these files unless Client notifies The Firm in writing that it wishes to take possession of them. The Firm reserves the right to charge administrative fees and costs associated with researching, retrieving, copying, and delivering such files.

Section 9 Disputes. This Agreement shall be governed by Indiana law and courts in the State of Indiana. Any dispute arising under or in connection with the Agreement or related to any matter which is the subject of this Agreement shall be resolved on the basis of Indiana law without giving effect to Indiana's conflict of law principles and brought in a court located in Indiana.

The undersigned persons represent that they are duly authorized to sign this agreement and hereby agree to the terms and conditions of legal employment, as specified above.

This Agreement may be signed in any number of counterparts. Each counterpart is an original and together, all of the counterparts form a single document. Signatures delivered by email in PDF format shall be effective.

Electronically signed: Michael J. Gableman, for Client
Michael Gableman
Special Counsel, Wisconsin State Assembly
Committee on Elections and Campaigns

January 4, 2022

Date

As authorized and approved for payment by
the Wisconsin State Assembly by:

Robin Vos, Speaker of the Wisconsin State Assembly

Date


James Bopp, Jr., for The Firm
The Bopp Law Firm, P.C.

Date

1 / 4 / 22

AGREEMENT FOR LEGAL SERVICES

THIS AGREEMENT, is made and entered into by and between Michael Gableman, in his official capacity as Special Counsel, Wisconsin State Assembly Committee on Elections and Campaigns (hereinafter "Client") and The Bopp Law Firm, P.C. (hereinafter "The Firm"). This agreement supersedes any and all previously executed agreements between the parties with respect to the services contemplated herein.

WHEREAS, Client desires to retain The Firm to represent Client in the litigation styled as *American Oversight v. Assembly Office of Special Counsel*, Case No. 2021-cv-003007 in the Wisconsin Dane County Circuit Court, and in any subsequent appellate proceedings.

THE PARTIES AGREE as follows:

Section 1 Hourly Rates. Client will pay the following hourly rates for attorneys: \$450/hour for James Bopp, Jr. and \$240/hour for Courtney Turner Milbank. Other attorneys may assist at The Firm's discretion at their corresponding hourly rates charged by the Firm. Hourly rates for attorneys undergo periodic review and may increase during the term of this Agreement upon notice to Client.

Section 2 Local Counsel. Pursuant to SCR 10.03(4), a non-resident attorney seeking admission to practice in Wisconsin courts must associate with a member of the State Bar of Wisconsin. Accordingly, Client authorizes The Firm to enter into an agreement with Michael D. Dean, LLC to serve as local counsel. Client will pay the following hourly rates for local counsel: \$275/hour for Michael D. Dean and \$175/hour for David J. Craig and Michael D. Dean, LLC will monthly invoice Client for their services, once approved by The Firm.

Section 3 Costs and Expenses. Costs and expenses are in addition to the hourly charges for legal services. Costs and expenses include, but are not limited to, court charges, copies, postage, telephone, fax, travel, parking, special materials, exhibits, photographs, investigators, experts, computer assisted legal research and all other disbursements, costs, or expenses attributable to said legal services. Client agrees to pay for computer assisted legal research at \$3.00 per minute. Client agrees to pay for copies and facsimiles (incoming or outgoing) at the rate of \$.25 per page for 1-25 total pages, \$.15 per page for 26-100 total pages, and \$.10 per page for more than 100 total pages. Total pages are those copied or facsimiled during a copying or facsimiling event.

Section 4 Invoices. The Firm shall invoice Client monthly for any fees, costs, or expenses incurred under this Agreement. All invoices are due and payable within 30 days of receipt. Each invoice shall constitute an account stated and objections must be made in a reasonable time. Interest accruing at 1.5% per month will be

applied to past due accounts until paid. Client agrees to pay all attorney fees, costs, and expenses of collecting Client's account if legal action is taken to collect fees, costs, and expenses due The Firm.

Section 5 Client's Cooperation. By this Agreement, Client agrees to cooperate with the Firm and provide all information known to Client or available to Client, which in the opinion of the Firm would aid in its representation of Client in this matter. Client further agrees to notify the Firm immediately of any change in Client's address or contact information, to review all documentation sent to Client by the Firm, and to promptly and thoroughly participate in the preparation and/or production of any documents that we request of Client.

Section 6 Termination by Client. The Firm will be obligated to honor any instructions of Client requesting termination of the Firm's representation, only if such instructions are delivered to The Firm in writing bearing the Client's personal signature. If Client elects to terminate The Firm's representation, Client is responsible for all fees, costs, and expenses incurred pursuant to this Agreement. Should The Firm be required to perform any services or functions after receipt of such instructions, Client is responsible for any fees, cost, and expenses for these services.

Section 7 Withdrawal by The Firm. The Firm also may withdraw from the representation of Client upon Client's failure to make payments in accordance with this Agreement, failure to cooperate with the agreed provisions of representation, or failure to follow the advice of the Firm, or under any circumstances permitted by or required by the Indiana Rules of Professional Conduct. Any termination of The Firm's representation would be subject to the approval of the tribunal and will only be done after reasonable notice has been provided.

Section 8 File Retention and Destruction. At the conclusion of the matter addressed in this Agreement, documents and property that Client has provided to us will, at Client's request, be returned to Client. The Firm shall retain Client's legal files for an indefinite period. At any time after five years have elapsed since the conclusion of the matter, after ten business days of notifying Client in writing, which includes by electronic mail sent to Client's last known electronic mail addresses, The Firm may destroy these files unless Client notifies The Firm in writing that it wishes to take possession of them. The Firm reserves the right to charge administrative fees and costs associated with researching, retrieving, copying, and delivering such files.

Section 9 Disputes. This Agreement shall be governed by Indiana law and courts in the State of Indiana. Any dispute arising under or in connection with the Agreement or related to any matter which is the subject of this Agreement shall be resolved on the basis of Indiana law without giving effect to Indiana's conflict of law principles and brought in a court located in Indiana.

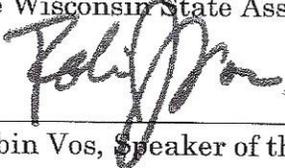
The undersigned persons represent that they are duly authorized to sign this agreement and hereby agree to the terms and conditions of legal employment, as specified above.

This Agreement may be signed in any number of counterparts. Each counterpart is an original and together, all of the counterparts form a single document. Signatures delivered by email in PDF format shall be effective.

_____, for Client
Michael Gableman
Special Counsel, Wisconsin State Assembly
Committee on Elections and Campaigns

Date

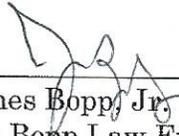
As authorized and approved for payment by
the Wisconsin State Assembly by:



Robin Vos, Speaker of the Wisconsin State Assembly

1/4/22

Date


_____, for The Firm
James Bopp Jr.
The Bopp Law Firm, P.C.

1/4/22

Date