



## 2021 ASSEMBLY RESOLUTION

1     **Relating to:** impeaching Meagan Wolfe, Administrator of the Wisconsin Elections  
2             Commission, for corrupt conduct in office.

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*Analysis by the Legislative Reference Bureau*

The resolution provides for the impeachment of Meagan Wolfe, the Administrator of the Wisconsin Elections Commission, for corrupt conduct in office.

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3             **Resolved by the assembly, That** pursuant to article VII, section 1, of the  
4     Wisconsin Constitution, and Wis. Stat. § 17.06 (1), Meagan Wolfe, the Administrator  
5     of the Wisconsin Elections Commission, is impeached for corrupt conduct in office,  
6     thereby warranting trial in the Wisconsin State Senate and removal from office, and  
7     the following articles of impeachment shall be presented to the Wisconsin State  
8     Senate:

9             **Article 1. Administrator Wolfe Unlawfully Promoted the Use of Ballot**  
10     **Drop Boxes**

1 In the Wisconsin Supreme Court's *Teigen* decision, the justices said  
2 Administrator Wolfe's two memos that advised Wisconsin election clerks to use ballot  
3 drop boxes were in violation of the law.

4 The Wisconsin Supreme Court justices explained that it is the job of the  
5 legislature, not WEC Administrator Wolfe, to write Wisconsin election laws. "A  
6 majority of this court permits Administrator Megan Wolfe's unilateral declarations  
7 regarding election procedures to have the force of law, subject only to judicial review  
8 (if the court even bothers to take the case). 'No one man should have all that power.'  
9 Kanye West, *Power* (2010). It is not the province [or the prerogative] of a state  
10 executive official to re-write the state's election code."

11 Wolfe's unlawful promotion of ballot drop boxes had direct consequences on the  
12 2020 presidential election. The cities of Green Bay, Kenosha, Madison, Milwaukee,  
13 and Racine received \$216,000 from the Center for Tech and Civic Life (CTCL) to  
14 specifically purchase and use 44 ballot drop boxes in Wisconsin's five largest  
15 metropolitan areas. No one knows how many thousands of ballots were deposited  
16 in Wisconsin's unlawful drop boxes during the 2020 election.

17 ***Article 2. Administrator Wolfe Unlawfully Permitted Absentee Voting***  
18 ***in Long-Term Care Facilities Without Special Voting Deputies***

19 Wis. Stat. § 6.85 (4) requires each municipality to send two special voting  
20 deputies to qualified retirement homes or residential care facilities for the purpose  
21 of early absentee voting. WEC suspended the special voting deputy requirement  
22 under Wis. Stat. § 6.85 (4) for three 2020 elections. Wisconsin's Legislative Audit  
23 Bureau (LAB) concluded WEC violated Wisconsin election law each time WEC  
24 permitted absentee voting in long-term care facilities without requiring at least two  
25 special voting deputies.

1           The Wisconsin Institute of Law and Liberty (WILL) reviewed WEC's  
2           suspensions of special voting deputies in three 2020 elections and concluded the  
3           following: "But under Wis. Stats. § 6.84 WEC lacked the authority to unilaterally  
4           change the law. It had two choices—figure out a way to comply with the statute (as  
5           some municipalities eventually did) or ask the legislature to change it. Making up  
6           something 'better'—even if it was 'better'—was beyond its authority. It's stunning  
7           that its current chair and Executive Director don't even seem to have recognized this  
8           problem."

9           ***Article 3. Administrator Wolfe Promotes the Curing of Ballots in***  
10          ***Violation of the Law***

11          Administrator Wolfe encourages the curing of absentee ballots by clerks  
12          although the law stipulates that the voters are responsible for providing missing  
13          information. Wis. Stat. § 5.05 (3g) proclaims Administrator Wolfe the chief election  
14          officer of Wisconsin. As chief election officer, Administrator Wolfe is responsible for  
15          the instructions contained in the Election Administration Manual for Wisconsin  
16          Municipal Clerks. The manual states, "Clerks may add a missing witness address  
17          using whatever means are available."

18          The term "curing of the ballot" comes from adding a missing residential  
19          address, city, state, or zip code to an absentee ballot. Curing occurs when an absentee  
20          ballot witness fails to provide his or her complete address information. When clerks  
21          added missing absentee ballot information, they turned invalid absentee ballots into  
22          valid absentee ballots. However, clerks adding missing information to ballot  
23          envelopes is contrary to Wisconsin law.

24          Wis. Stat. § 6.87 (6d) states, "If a certificate is missing the address of a witness,  
25          the ballot may not be counted." Wis. Stat. § 6.87 (9) is the Wisconsin law that

1 addresses how to correct missing absentee ballot information. The law states, “If a  
2 municipal clerk receives an absentee ballot with an improperly completed certificate  
3 or with no certificate, the clerk may return the ballot to the elector, inside the sealed  
4 envelope when an envelope is received, together with a new envelope if necessary,  
5 whenever time permits the elector to correct the defect and return the ballot within  
6 the period authorized under sub. (6).” According to Wis. Stat. § 6.87 (9), the duty to  
7 correct absentee ballot errors is the voter’s responsibility, not the clerks as  
8 Administrator Wolfe recommends. No where in the Wisconsin statutes does it say  
9 clerks may fill in missing information on an absentee ballot.

10 It is no surprise that WILL discovered high rates of cured ballots in Green Bay  
11 and Racine. US Digital Response (USDR), Elections Group, and National Vote at  
12 Home Institute (NVAHI) were CTCL’s nonprofit partners that were active in curing  
13 Green Bay and Racine ballots. Elections Group offered their “mail and absentee  
14 ballot processing” and “cure process” services to all Zuckerberg 5 cities. USDR  
15 offered the Zuckerberg 5 clerks to automate the processing of their absentee ballots.

16 Michelle Shafer of Elections Group emailed Racine Clerk Tara Coolidge on  
17 October 22, 2020, to report that “Last Week 58 ballots needed curing.” In a  
18 September 4, 2020, email to Green Bay Clerk Teske, USDR employee Erika  
19 Reinhardt offered to streamline and automate Green Bay’s ballot cure process. The  
20 question remains, “Why were non-Wisconsin residents and non-Wisconsin election  
21 officials involved in curing of Wisconsin ballots when curing of ballots is not even  
22 legal in Wisconsin?”

23 ***Article 4. Administrator Wolfe Permits a Spouse, Campaign Volunteer,***  
24 ***etc. to Return Voters’ Absentee Ballot Applications to Clerks’ Offices in***  
25 ***Violation of Wisconsin Election Law***

1           Wis. Stat. § 5.05 (3g) proclaims Administrator Wolfe the chief election officer of  
2           Wisconsin. As chief election officer, Administrator Wolfe is responsible for the  
3           instructions contained in the Election Administration Manual for Wisconsin  
4           Municipal Clerks. The manual states, “If an absentee ballot request is delivered by  
5           a person other than the registered elector (spouse, campaign volunteer, etc.) it is  
6           treated as a by mail request.”

7           Wis. Stat. § 6.86 describes six separate “methods for obtaining an absentee  
8           ballot.” Wis. Stat. § 6.86 (1) (a) 2. provides the law for submitting an absentee ballot  
9           application directly to the municipal clerk. “In person at the office of the municipal  
10          clerk or at an alternate site under s. 6.855, if applicable.”

11          Wis. Stat. § 6.86 (1) (a) 2. only allows for the elector to submit his or her absentee  
12          ballot application in person at the clerk’s office. Wolfe allowing a “spouse,” “campaign  
13          volunteer,” or some other agent acting on behalf of the elector is contrary to the plain  
14          language of Wis. Stat. § 6.86 (1) (a) 2. For Wolfe to treat an absentee ballot  
15          application submitted by an agent to the clerk’s office as a delivered “by mail” request  
16          is also contrary to the plain language of Wis. Stat. § 6.86 (1) (a) 2. and contrary to  
17          what actually occurred.

18          The method in which Wolfe mismanaged the return of absentee ballot  
19          applications and the manner in which Wolfe mismanaged the return of absentee  
20          ballots are analogous. The Wisconsin Supreme Court took up the issue of the  
21          delivery of absentee ballots in the *Teigen* case. The court stated, “In regard to whom  
22          may return an absentee ballot, the circuit court explained that “[it did not] see any  
23          language in the statute that provides a basis for having agents, somebody other than  
24          the elector, actually deliver the ballot.” Further, in quoting the portion of the [Wolfe]  
25          memo that purported to allow family members or other persons to return a ballot on

1 behalf of the voter, the court concluded that it did not “see anything in the statute  
2 that says that.” As with the return of absentee ballots, Wisconsin law does not  
3 provide for a family member or agent to submit an elector’s absentee ballot  
4 application directly to a clerk’s office as Wolfe is allowing.

5 In another passage the court stated, “Teigen focuses his challenge to the March  
6 2020 [Wolfe] memo on the following sentence: ‘A family member or another person  
7 may also return the ballot on behalf of the voter.’” *Teigen* argues, correctly, that this  
8 advice was contrary to Wis. Stat. § 6.87 (4) (b) 1. As with the *Teigen* case, a family  
9 member or another person submitting an absentee ballot application to the clerk on  
10 behalf of an elector is contrary to law.

11 As with the following *Teigen* quote, Wis. Stat. § 6.86 (1) (a) 2. requires a  
12 person-to-person exchange between the elector who is submitting an absentee  
13 ballot application and the clerk or the clerk’s official representative. “Rather, this  
14 statute specifies return of absentee ballots through two and only two means: mailing  
15 by the voter to the municipal clerk, or personal delivery by the voter to the municipal  
16 clerk. And personal delivery to the clerk contemplates a person-to-person exchange  
17 between the voter and the clerk or the clerk’s authorized representative at either the  
18 clerk’s office or a designated alternate site. Wis. Stat. §§ 5.02 (10), 6.855, 6.87 (4) (b)  
19 1., 6.88 (1). The two [Wolfe] memos advising otherwise therefore conflict with the law  
20 and are properly void.”

21 ***Article 5. Administrator Wolfe Maintains an Absentee Ballot Request***  
22 ***Webpage Presumably in Violation of Wisconsin Election Law***

23 On July 26, 2022, Hot Government President Harry Wait requested absentee  
24 ballots for Wisconsin House Speaker Robin Vos, Racine Mayor Corey Mason, and  
25 several other registered Wisconsin voters. Harry ordered absentee ballots to prove

1 how easy it was for one person to obtain absentee ballots by using the names of other  
2 Wisconsin voters. Harry had no intention of using the absentee ballots to vote. Harry  
3 quickly and publicly confessed to requesting absentee ballots in the name of others  
4 in his emails that he sent to Racine County Sheriff Christopher Schmaling, Racine  
5 Clerk Tara Coolidge, Racine County Clerk Patricia Hanson, etc. By Harry bringing  
6 state and national attention to this issue, Harry exposed the flaws in WisVote's  
7 process of mailing of absentee ballots to voters.

8 Wis. Stat. § 6.86 describes six “methods for obtaining an absentee ballot.” All  
9 six methods to request an absentee ballot require “proof of identification,” though  
10 there are a few limited exceptions. After Harry went public with his absentee ballot  
11 requests for other people, WEC sent out confirmation postcards to voters who  
12 requested absentee ballots be sent to new addresses. WEC sending out postcards to  
13 verify that absentee ballots were properly sent is WEC's admission that the WisVote  
14 absentee ballot request process was flawed.

15 Had Administrator Wolfe required WisVote to ask Harry to provide proof of  
16 identification as the law required, Harry would not have received other people's  
17 absentee ballots, and WEC would not have had to send out confirmation cards. The  
18 real crime is the mailing of absentee ballots without first receiving proof of  
19 identification as the law demands. Because of Harry, the public is learning why proof  
20 of identification is such an important safeguard to preventing vote fraud.

21 A WEC webpage provides an online form in which voters can submit their  
22 names, addresses, and birthdate to obtain an absentee ballot. Wis. Stat. § 6.86  
23 describes six “methods for obtaining an absentee ballot”; however, none of six Wis.  
24 Stat. § 6.86 methods state that WisVote's absentee ballot form is a lawful method to

1 apply for absentee ballots. Furthermore, Wis. Stat. § 6.86 requires voters to only  
2 direct their absentee ballot requests to their municipal clerk, not WEC.

3 The Wisconsin Supreme Court ruled that Administrator Wolfe did not have the  
4 authority to create a law that allowed citizens to use ballot drop boxes to return their  
5 absentee ballots. According to Wis. Stat. § 6.86, “an absent elector may make a  
6 written application to the municipal clerk of that municipality for an official ballot,”  
7 but Wis. Stat. § 6.86 does not give WEC the authority to WEC to intervene in the  
8 absentee ballot application process. Since there is no law that allows WEC to serve  
9 as an absentee ballot intermediary, Administrator Wolfe created her own absentee  
10 voting application law like she created the ballot drop box law. It appears that  
11 Administrator Wolfe deliberately set up WEC’s absentee voting application method  
12 as means for absentee voters to avoid Wisconsin’s requirement for proof of  
13 identification.

14 When Harry Wait submitted absentee ballot requests using other people’s  
15 names, none of Harry’s absentee ballot requests were legitimate since WEC had no  
16 legal authority to establish the WisVote absentee ballot request form. The irony of  
17 WEC wanting to charge Harry Wait with a crime is that Harry Wait submitted his  
18 absentee ballot requests by using WEC’s illegal system.

19 ***Article 6. Administrator Wolfe’s Failure to Make a Timely Decision in***  
20 ***the Weidner et al. v. Tara Coolidge WEC complaint allowed Racine’s Mobile***  
21 ***Polling Place to be Used for Alleged Unlawful Voting in Two Elections***

22 HOT Government members Sandy Weidner and Sandra Morris submitted a  
23 WEC complaint on March 24, 2022, because the Racine mobile polling location was  
24 not accessible to every disabled person as required by law. Wis. Stat. 5.25 (4) (a)  
25 states, “Each polling place shall be accessible to all individuals with disabilities.” In

1 response to the complaint, Racine Clerk Tara Coolidge said that a bell was placed  
2 outside the mobile polling location door for voters who were physically unable to  
3 enter the converted mobile home. Racine implied that the bell constituted a  
4 “reasonable accommodation” for voters unable to enter. However, the handicap  
5 accessibility law for polling places is absolute. The statute does not provide the  
6 clerk’s office to unilaterally decide to have a reasonable accommodation as an  
7 alternative; the law unequivocally mandates that “Each polling place shall be  
8 accessible to all individuals with disabilities.”

9 WEC requires a Polling Place Accessibility Survey for each new polling place.  
10 As soon as WEC discovered Racine failed to submit a Polling Place Accessibility  
11 Survey, Administrator Wolfe should have temporarily restrained Racine from using  
12 its mobile polling location until WEC determined that the mobile unit was accessible  
13 to all individuals with disabilities as the law requires.

14 Administrator Wolfe’s malfeasance allowed Racine to use its mobile polling  
15 place in two elections. WILL filed a WEC complaint alleging that Racine’s mobile  
16 polling location is a ploy for partisan politics. Most likely WILL will file a circuit  
17 court lawsuit regardless of how WEC decides its mobile polling place complaint.  
18 Indeed, the second complaint could have been avoided had Administrator Wolfe  
19 restrained Racine from using the mobile polling place until WEC completed the  
20 required Polling Place Accessibility Survey.

21 WEC had one standard for the Racine mobile polling location and another  
22 standard for Harry Wait. During the August WEC commissioners meeting,  
23 Administrator Wolfe and the commissioners discussed expediting a Harry Wait  
24 investigation. Harry requested absentee ballots to expose the vulnerability of  
25 WisVote’s absentee ballot request form. Once Harry said what he did to public

1 officials and the public, there was no chance that Harry could vote multiple times.  
2 On the other hand, as the complaint involving the Racine mobile polling continued  
3 to linger at WEC, in two elections Racine voters casted ballots in a polling place after  
4 a complaint alleged Racine's mobile polling location violates the law. Because votes  
5 were most likely cast at an illegal polling place, the complaint involving the Racine  
6 mobile polling location is the WEC complaint that Administrator Wolfe should have  
7 expedited, not the complaint against Harry Wait.

8 **Article 7. Administrator Wolfe Recommended Brooklyn, New York,**  
9 **Resident Michael Spitzer-Rubinstein to help Wisconsin Election Clerks with**  
10 **the 2020 election in Alleged Violation of Wisconsin's Election Official and**  
11 **Election Fraud Laws**

12 August 28, 2020, Milwaukee Election Commission Claire Woodall-Vogg  
13 recommended Michael Spitzer-Rubenstein and Hillary Hall of the NVAHI to  
14 Administrator Wolfe. Without properly vetting Spitzer-Rubenstein, 12 minutes  
15 later Administrator Wolfe sent her own Spitzer-Rubenstein recommendation email.  
16 She said, "Green Bay, Madison, Racine and Kenosha-Passing along a  
17 recommendation and resource from Milwaukee. Just wanted you to be aware in case  
18 you thought this might be a group you are interested in working with or learning  
19 about. Claire in Milwaukee okayed me sending this along, and it sounds like you  
20 should reach out to Michael at michael@voteathome.org if you are interested in  
21 learning more."

22 Administrator Wolfe who is Wisconsin's highest election official gave her gold  
23 seal of approval for Michael Spitzer-Rubenstein to perform election official duties  
24 although Mr. Spitzer-Rubenstein lacked the training, certification, and oath of office  
25 that is required to work Wisconsin elections.

1 According to Wis. Stat. § 5.02 (4e), the definition of an election official is “an  
2 individual who is charged with any duties relating to the conduct of an election.” The  
3 Wisconsin Election Administration Manual states, “Election officials perform a very  
4 important public service by enhancing the high quality and integrity of our  
5 elections,” and it is important for a municipal clerk to make sure individuals are  
6 “qualified and well-trained.”

7 Michael Spitzer-Rubenstein was neither qualified nor well-trained, and his  
8 New York residence disqualified him from becoming a Wisconsin election official.  
9 After Wolfe recommended Spitzer-Rubenstein to the municipal election clerks, any  
10 jobs the clerks assigned to Spitzer-Rubenstein would have involved his participation  
11 in the conducting of an election and a violation of Wis. Stat. § 5.02 (4e).

12 Had Administrator Wolfe hired Spitzer-Rubenstein as a WEC employee, Mr.  
13 Spitzer-Rubenstein would have had to complete a job application, submit a resume,  
14 attend multiple job interviews, and undergo a background check. Because Mr.  
15 Spitzer-Rubenstein was not a vetted WEC employee and he was without the  
16 requisite Wisconsin training, certification, and qualifications, Administrator Wolfe’s  
17 referral of Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha,  
18 and Racine constitutes official misconduct and malfeasance.

19 After Administrator Wolfe recommended Spitzer-Rubenstein to Racine,  
20 Spitzer-Rubenstein was involved in the Racine 2020 election in several ways:

- 21 • Spitzer-Rubenstein set up a ballot tracking and map system for Racine
- 22 • Spitzer-Rubenstein collected Racine ballots and transported them
- 23 • Spitzer-Rubenstein created an absentee ballot log for the Racine ballots that  
24 were received from the post office and ballot drop boxes

1           • Spitzer-Rubenstein or his subordinates delivered ballots to the Racine polling  
2 places

3           Green Bay employee Deanna Debruler wrote to Representative Shae Sortwell  
4 that Spitzer-Rubenstein role was “purely advisory.” What were  
5 Spitzer-Rubenstein’s qualifications and experience that made him qualified to  
6 advise Green Bay on how to conduct Wisconsin elections?

7           Since Wis. Stat. § 5.02 (4e) defines an election official as “an individual who is  
8 charged with any duties relating to the conduct of an election,” Spitzer-Rubenstein  
9 would have had to have been a Wisconsin election official in order to advise Green  
10 Bay election officials. However, Spitzer-Rubenstein could not become a Wisconsin  
11 election official because he was a New York resident, and he lacked the required  
12 training, certification, and oath of office. Debruler’s email said Spitzer-Rubenstein’s  
13 role was purely advisory, but Debruler did not explain. What election advice did  
14 Spitzer-Rubenstein provide to the City of Green Bay?

15           After Administrator Wolfe’s recommended Spitzer-Rubenstein to Green Bay,  
16 Spitzer-Rubenstein was involved in the 2020 Green Bay election in numerous ways,  
17 so numerous that they are not all listed below.

- 18           • Providing Instructions to the Central Count workers
- 19           • Offering to take “curing ballots” off of the City of Green Bay’s plate
- 20           • Setting up voting machines and patterns in the Central Count Location
- 21           • Allocating poll workers on election day
- 22           • Determining whether to accept ballots after the deadline of 8 p.m.

23           HOT Government Vice-President Jay Stone filed a WEC complaint in which  
24 he alleged Administrator Wolfe committed election fraud with her Michael  
25 Spitzer-Rubenstein recommendation. Wis. Stat. § 12.13 (2) (b) 7. states, “In the

1 course of the person's official duties or on account of the person's official position,  
2 intentionally violate or intentionally cause any other person to violate any provision  
3 of chs. 5 to 12 for which no other penalty is expressly prescribed."

4 Administrator Wolfe's intentional recommendation of Mr. Spitzer-Rubenstein  
5 to Green Bay and Racine clerks led Mr. Spitzer-Rubenstein to perform dozens of  
6 Green Bay and Racine election official duties as evidence by Mr.  
7 Spitzer-Rubenstein's numerous aforementioned emails. Mr. Spitzer-Rubenstein  
8 violated Wis. Stat. § 5.02 (4e) because he performed Green Bay and Racine election  
9 official duties though he was not a Wisconsin election official. Administrator Wolfe  
10 should have vetted Spitzer-Rubenstein to learn that he was ineligible to become a  
11 Wisconsin election official before she recommended him.

12 Wolfe said she recommended Spitzer-Rubenstein to Green Bay, Kenosha,  
13 Madison, and Racine because these are four of the five largest Wisconsin cities, but  
14 Wolfe has never told us, what were the specific election duties that she thought  
15 Spitzer-Rubenstein could perform? Because Administrator Wolfe's intentional  
16 August 28, 2020, job recommendation led Mr. Spitzer-Rubenstein to violate the  
17 Wisconsin election official law, which doesn't have a penalty, Administrator Wolfe  
18 presumably violated one of Wisconsin's election fraud statutes, namely Wis. Stat. §  
19 12.13 (2) (b) 7.

20 Jay Stone accused Administrator Wolfe of election fraud with his complaint on  
21 or about April 14, 2022. Harry Wait submitted absentee ballot applications on July  
22 26, 2022. Within weeks the Wisconsin Department of Justice sent out investigators  
23 to interview Harry and other witnesses. Has the Wisconsin DOJ interviewed any of  
24 the key figures in the Wolfe fraud complaint? Has the DOJ interviewed Meagan  
25 Wolfe, Jay Stone, Michael Spitzer-Rubenstein, Racine Clerk Tara Coolidge, Green

1 Bay Clerk Kris Teske, or others? If not, then the Wisconsin DOJ has one standard  
2 for outsiders like Harry Wait and another standard for insiders like Meagan Wolfe.

3 **Article 8. Administrator Wolfe Presumably Misinterpreted a Wisconsin**  
4 **Law to Dismiss a WEC Complaint and Then Assigned Two of Her**  
5 **Subordinates to Adjudicate the Complaints Against Her in an Alleged**  
6 **Cover-Up**

7 On August 28, 2020, HOT Government Vice-President Jay Stone filed a WEC  
8 complaint because CTCL gave \$6.3 million in disproportionate election  
9 administration grants to five Democratic run Wisconsin cities. Mr. Stone did not  
10 question whether it was legal for CTCL to provide election administration grants to  
11 Wisconsin municipalities; his WEC complaint only questioned the grants'  
12 disproportionality; Stone cited First and Fourteenth Amendment violations as the  
13 basis of his complaint.

14 Administrator Wolfe announced a WEC CARES subgrant on June 17, 2020, for  
15 \$4.1 million. Wolfe sent her grant announcement to all 1,922 election jurisdictions  
16 and provided an equal share of the \$4.1 million to each Wisconsin jurisdiction who  
17 applied for the grant. By comparison, CTCL secretly offered its grants to only  
18 Wisconsin's five largest cities, and CTCL distributed its grant money unevenly to a  
19 tiny percentage of Wisconsin election jurisdictions. In June 2020, Wolfe made sure  
20 all Wisconsin election jurisdictions had an equal opportunity to apply for the CARES  
21 subgrant and that each election jurisdiction received a fair share, but two months  
22 later Wolfe was unconcerned that CTCL invited only five Wisconsin jurisdictions to  
23 apply for its grants and CTCL disproportionately distributed its grants to Wisconsin  
24 election jurisdictions.

1           Every study of CTCL's grants has shown Stone was right about CTCL's  
2           disproportionate and partisan distribution of grants, including WILL's. Ten weeks  
3           before the November 3, 2020, election, Stone's complaint said, "CTCL specifically  
4           targeted its grant money to Wisconsin's five largest cities because CTCL's grant  
5           increases Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe  
6           Biden's chances of winning Wisconsin's 10 electoral votes." Will had this to say about  
7           CTCL's grants helping candidate Joe Biden, "[CTCL's] Spending Increased Turnout  
8           for Joe Biden. Areas of the state that received [CTCL's] grants saw statistically  
9           significant increases in turnout for Democrats. Increases in turnout were not seen  
10          for Donald Trump."

11          Administrator Wolfe and her staff were communicating with CTCL and CTCL's  
12          partners before and during the period when Wolfe was investigating Stone's  
13          complaint. For example, Wolfe and Noah Praetz of the Elections Group exchanged  
14          emails 18 days before Stone filed his complaint. CTCL sent an August 18, 2020,  
15          email to WEC Assistant Administrator Richard Rydecki to make WEC aware of  
16          CTCL's free cybersecurity training and rural election administration grants.

17          Michael Spitzer-Rubenstein emailed Administrator Wolfe on August 25, 2020,  
18          three days before she recommended him to the clerks of Green Bay, Kenosha,  
19          Madison, and Racine. Spitzer-Rubenstein's subject line was "Elections  
20          Communications Assistance with CTCL." CTCL's Keegan Hughes emailed Rydecki  
21          with a description of USDR's tech support. Both Spitzer-Rubenstein and Keegan  
22          mentioned CTCL in their emails because they thought using CTCL's name was the  
23          best way to receive a positive response from WEC's staff.

24          Green Bay Mayor Eric Genrich's Chief of Staff Celestine Jeffreys emailed  
25          Rydecki on August 31, 2020, to let WEC know about Green Bay receiving a \$1 million

1 election administration grant from CTCL. In a September 1, 2020, response to  
2 Jeffery's email, Rydecki said he provided the WEC Commissioners with Green Bay's  
3 addendum prior to the Commissioners' meeting.

4 Administrator Wolfe sent a September 1, 2020, email to her subordinates  
5 asking if they were interested in attending a meeting with Spitzer-Rubinstein.  
6 Rachel Lefsky of the NVAHI emailed Administrator Wolfe on September 2, 2020, to  
7 invite Wolfe and others to an Operation Toolkit Demo.

8 Stone's complaint regarding CTCL's grant never stood a chance because of WEC  
9 and Wolfe's cozy relationship with CTCL, USDR, NVAHI, and their employees.  
10 Wolfe should have disclosed her relationship with CTCL, CTCL's partners, and their  
11 employees before she reviewed and decided the Stone complaint.

12 Indeed, Wolfe relationships with CTCL and its partners created a bias before  
13 she rendered her Stone complaint decision. Wolfe's bias in favor of CTCL is obvious  
14 because the emails between Wolfe and CTCL and CTCL's partners abruptly stopped  
15 on September 2, 2020, a mere three business days after Stone filed his WEC  
16 complaint. Wolfe's fear of getting caught is the only reason Wolfe stopped emailing  
17 and working directly with CTCL and its partners.

18 In Wolfe's September 11, 2020, decision she wrote, "Complaints filed under  
19 Section 5.06 are filed by individuals that are served by local election officials, but you  
20 do not reside in any of the municipalities cited in the complaint." However, at a  
21 meeting of the Wisconsin Assembly Committee on Campaigns and Elections, Wolfe  
22 said, "There is mechanisms and statutes in terms of what the commission can look  
23 into through a formal complaint and one was filed with the commission but again the  
24 commission doesn't have any sort of statutory authority over private grant funding  
25 and so it was dismissed."

1 Wolfe gave two contrasting reasons why she dismissed Stone's complaint. In  
2 her letter she said she was dismissing Stone's complaint because Stone did not live  
3 in the same municipalities as the officials he filed his complaint against. At the  
4 Assembly committee hearing, Wolfe said she dismissed Stone's complaint because  
5 the commission had no statutory authority over private funding, which was very  
6 different than what she wrote in her letter to Stone.

7 Wolfe misled the Assembly committee because Wis. Stat. § 5.06 (4) clearly  
8 authorized the commission to perform a compliance review that Stone's complaint  
9 requested. The statute states, "The commission may, on its own motion, investigate  
10 and determine whether any election official, with respect to any matter concerning  
11 nominations, qualifications of candidates, voting qualifications, including residence,  
12 ward division and numbering, recall, ballot preparation, election administration or  
13 conduct of elections, has failed to comply with the law or abused the discretion vested  
14 in him or her by law or proposes to do so."

15 After Wolfe dismissed Stone's complaint, Stone filed a complaint against Wolfe  
16 to challenge the reasons Wolfe gave for dismissing his complaint. Stone claimed  
17 Wolfe deliberately misinterpreted Wis. Stat. § 5.06 (1) as a quick and easy means to  
18 dispose of his CTCL related complaint. Two times in Wolfe's letter she said Stone had  
19 to reside in the municipalities cited in his complaint. Wis. Stat. § 5.06 (1) does not  
20 contain the word "municipality."

21 In the *Teigen* case, the justices wrote, "Courts are not permitted to read words  
22 into a statute that the legislature did not insert itself." Wolfe was duty bound to apply  
23 Wis. Stat. § 5.06 (1) to Stone's complaint without adding the word "municipality" to  
24 her decision. The plain language of Wis. Stat. § 5.06 (1) permitted an elector like  
25 Stone to file a WEC complaint for the jurisdiction and district where he is an elector,

1 not the municipality where he resides that Wolfe incorrectly stated in her dismissal  
2 letter.

3 Wolfe assigned Stone's complaint against her to her subordinate, staff attorney  
4 Nathan Judnic. Stone said Wolfe assigning a complaint against her to her  
5 subordinate was "a serious conflict of interest." When Judnic refused to recuse  
6 himself from reviewing a complaint against his boss, Stone filed a complaint against  
7 Judnic. Administrator Wolfe assigned Stone's complaint against Judnic to another  
8 one of her subordinates, James Witecha. Of course, both of Wolfe's subordinates  
9 ruled in favor of Wolfe and in support of their boss. Stone maintains that Wolfe  
10 deliberately chose two of her subordinates to review his complaints because Wolfe  
11 was using her underlings to cover-up her alleged misdeeds and involvement with  
12 CTCL and CTCL's partners.

13 ***Article 9. Administrator Wolfe Failed to Include CTCL's grants in Her***  
14 ***Sept. 2020 Report of How Wisconsin was Preparing for the 2020 Election***

15 WEC published a 125-page report called, "How Wisconsin is Ready for the  
16 November 3, 2020 Election." Meagan Wolfe created the report in response to  
17 Congressional Committee members and WEC commissioners questions. Wolfe only  
18 asked the cities of Green Bay, Madison, and Milwaukee to provide their specific  
19 preparation plans for the November 2020 election. However, the cities of Green Bay,  
20 Madison, and Milwaukee are very significant because these three cities were part of  
21 the five Wisconsin cities that initially received \$6.3 million in CTCL funding.

22 It's not what Administrator Wolfe wrote in her "How Wisconsin is Ready for the  
23 November 3, 2020 Election" report; it's what Wolfe did not write. CTCL is not  
24 mentioned once in the 125-page report.

1           The Zuckerberg 5 cities described how they were using CTCL's \$6.3 million  
2 grant money in their "Wisconsin Safe Voting Plan." If the Wisconsin Safe Voting Plan  
3 was so significant for preparing for the election, why didn't Wolfe include a copy of  
4 the Wisconsin Safe Voting Plan in her report? Wolfe took an eraser to erase all  
5 references to CTCL, CTCL grants, CTCL partners, and their employees in her 2020  
6 election preparedness report.

7           In Wolfe's August 17, 2020, email, Wolfe gave Green Bay until August 20, 2020,  
8 to explain how Green Bay was preparing for the impending election. Green Bay  
9 deliberately timed its August 30, 2020, addendum so it would not appear in Wolfe's  
10 September 1, 2020, report. More significantly, the cities of Madison and Milwaukee  
11 failed to mention CTCL one time when they submitted their preparedness report.

12           Wolfe's report had a section on grants and subgrants. CTCL's \$10.4 million in  
13 Wisconsin election administration grants was equal to about two-thirds of the \$15.3  
14 million that Wisconsin received in federal grants and local subgrants. However,  
15 unlike the federal grants and local subgrants, Wolfe's report did not speak of CTCL's  
16 grant money or how the CTCL money was spent.

17           At the Assembly committee hearing, Wolfe claimed she did not find out about  
18 CTCL's funding until a city submitted an addendum to a report. Wolfe neither named  
19 the city who submitted the addendum, nor did Wolfe say what was the date she  
20 learned of the CTCL grants. Given Green Bay's emails, we'll assume the city was  
21 Green Bay. However, Wolfe was receiving emails from CTCL and its partners six  
22 weeks before she published her report.

23           Most likely Wolfe learned of CTCL's grants in early July because when the  
24 Zuckerberg 5 cities announced their \$6.3 million in CTCL grants, it was widely  
25 reported in radio, TV, and print news sources. For Wolfe to claim she first learned

1 of CTCL's grants after she wrote her "How Wisconsin is Ready for the November 3,  
2 2020 Election" report is just not believable. Furthermore, Wolfe could have written  
3 a "How Wisconsin is Ready for the November 3, 2020 Election" CTCL grant  
4 addendum after she submitted her report just like Green Bay did.

5 **Article 10. Administrator Wolfe Failed to Report CTCL and the**  
6 **Zuckerberg 5 Clerks for Creating Their Own Uniform Instructions for**  
7 **Absentee Voters in Alleged Violation of Wisconsin Election Law**

8 Wis. Stat. § 6.869 states the following: "Uniform instructions. The commission  
9 shall prescribe uniform instructions for municipalities to provide to absentee  
10 electors." There are about 80 emails between CTCL, Center for Civic Design (CCD),  
11 Zuckerberg 5 clerks, and Milwaukee Election Commission Executive Director  
12 Woodall-Vogg that discussed the creation and printing of the Zuckerberg 5's English  
13 and Spanish absentee ballot instructions. The municipal election officials creating  
14 their own absentee ballot instructions violated Wis. Stat. § 6.869 since the statute  
15 only allows WEC to provide uniform absentee voting instructions.

16 In an email from CTCL's Whitney May, the Zuckerberg 5 clerks were asked to  
17 provide feedback for the ballot instructions and ballot envelopes. Administrator  
18 Wolfe sent out an update for Uniform Instructions for Absentee Voters on August 18,  
19 2020. Wolfe admonished the clerks, "Per the Commission's directive, these  
20 instructions are to be used for all absentee voters moving forward, beginning with  
21 the absentee ballots that clerks will be sending for the November 3rd General  
22 Election."

23 On the same day Wolfe issued her uniform instructions for absentee voters,  
24 CTCL's Whitney May sent an email to the Zuckerberg 5 clerks that said the following:  
25 "CTCL is putting the brakes on operation envelope with the WI-5 because: WEC

1 wants everyone in the state using the same formats, WEC wants to complete new  
2 envelope design work next year, WEC shared uniform instructions today.” How did  
3 Whitney May learn what WEC wanted? How did Whitney May discover that WEC  
4 was providing uniform absentee ballot instructions? May’s email failed to state that  
5 CTCL, CCD, and the Zuckerberg 5 clerks’ creation of their own absentee ballot  
6 instructions violated Wis. Stat. § 6.869.

7 Wolfe’s August 18, 2020, memo made it clear that the uniform absentee ballot  
8 instruction were to be used for absentee voters. Madison Clerk Maribeth  
9 Witzel-Behl sent a September 17, 2020, email to Whitney May and the other  
10 Zuckerberg 5 clerks with an attachment for absentee ballot instructions in Spanish.  
11 Wis. Stat. § 6.869 doesn’t differentiate between English or Spanish absentee ballots  
12 instructions. The statute states in plain language that whether it’s in English or  
13 Spanish “the commission shall prescribe uniform instructions for municipalities to  
14 provide to absentee electors.” Wolfe’s memo clearly stated that the uniform absentee  
15 ballot instruction were to be used for absentee voters from August 18, 2020, moving  
16 forward. It is unclear why 30 days after Wolfe’s memo Witzel-Behl would produce  
17 and send Spanish absentee ballot instructions in direct conflict to Wolfe’s memo and  
18 Wis. Stat. § 6.869. Whether or not any of the Zuckerberg 5 cities sent their version  
19 of absentee ballot instructions in Spanish to voters in violation of Wis. Stat. § 6.869  
20 should be investigated.

21 This cause shows how CTCL and its partners manipulated Wisconsin election  
22 officials during the run-up to the 2020 election. Although the Zuckerberg 5 clerks  
23 never sent out their absentee ballot instructions, the mere fact that created one is  
24 more than likely unlawful. One thing is for sure, Administrator Wolfe failed to hold  
25 CTCL, CCD, Zuckerberg 5 clerks, or Milwaukee Election Commission’s Claire

1 Woodall-Vogg accountable for creating their own absentee ballot instructions in  
2 violation of Wis. Stat. § 6.869.

3 (END)