

**State of Wisconsin  
Before the Wisconsin Elections Commission**

**The Verified Complaint of**

1. Jay Stone  
10501 82nd St.  
Pleasant Prairie, WI 53158

**Against Complaint Respondent**

1. Meagan Wolfe  
Wisconsin Elections Commission  
212 East Washington Avenue, Third Floor  
P.O. Box 7984  
Madison, Wisconsin 53707-7984

This complaint is made under Wisconsin Statutes § 5.06.

**Administrator Meagan Wolfe's False Claims About Wisconsin Statute § 5.06(1)**

Complainant filed a WEC complaint on August 28, 2020 (click [here](#) and see Stone v. Genrich, et al). Administrator Wolfe denied Complainant's August 28, 2020 complaint in part because according to Wolfe, Complainant did "not reside in any of the municipalities cited in the complaint" (click [here](#)).

Since Complainant expected a challenge to his August 28, 2020 WEC filing, he included a section on standing in his complaint (Click [here](#) and see "Jay Stone's Good Standing in this Sworn Complaint," page 4). Administrator Wolfe's September 11, 2020 denial letter to the Complainant failed to state why the Complainant's position that he had proper standing to file his complaint was incorrect (click [here](#)). Complainant's maintains it was Wolfe, not the Complainant, who misunderstood Wisconsin Statute § 5.06(1).

In Wolfe's denial of Complainant's August 28, 2020 complaint, Wolfe twice stated that she could not accept Complainant's complaint because the Complainant did not reside in the officials'

municipalities with whom his complaint was lodge against. In Wolfe's first paragraph she wrote, "Complaints filed under Section 5.06 are filed by individuals that are served by local election officials, but you do not reside in any of the municipalities cited in the complaint."

Wolfe other reference to municipalities is, "Your complaint states that you are not a resident of any of the municipalities referenced in the complaint and therefore you are not served by any of the officials you have named."

Wisconsin Statute § 5.06(1) does not include the word "municipalities" as Wolfe stated twice in her letter. Wis. Statute § 5.06(1) does not restrict a complaint to an elector's municipality as Wolfe falsely claimed.

Instead of using the word municipality, Wis. Statute § 5.06(1) uses the words, "jurisdiction" and "district." The word jurisdiction may apply to the whole state of Wisconsin, such as the governor and attorney general of Wisconsin have jurisdiction over the entire State of Wisconsin. The word district may apply to a congressional district, school district, state senate district, or state representative district. Jurisdiction and district are often significantly larger in area and population than a municipality that Wolfe stated in her September 11, 2020 letter.

The elected offices on the November 3, 2020 ballot when the Complainant filed his WEC complaint were the president of the United States and representatives for eight Wisconsin congressional districts. Complainant was an elector for both president and Wisconsin's first congressional district congressman. As an elector, Complainant's jurisdiction for the president of the United States was the entire State of Wisconsin. There are currently eight Wisconsin congressional districts, and each congressional jurisdiction is approximately one-eighth of Wisconsin's population. Since the Complainant was only an elector in Wisconsin's first congressional district, Complainant may only file a complaint against a congressional election official in the first congressional district where he is an elector.

Wis. Statute § 5.06(1) starts with the words, “Whenever any elector of a jurisdiction or district served by an election official ...” Elector means a right to vote in an election. Wisconsin legislators and Wis. Statute § 5.06(1) gave electors the right to file a WEC complaint against an election official in any election that the electors vote in. As an elector for Wisconsin’s 10 presidential electoral votes, election officials across the entire state served as election officials for the Complainant.

Because the Complainant was an elector for the office of president and the president’s jurisdiction is the entire State of Wisconsin, according to Wis. Statute § 5.06(1), Complainant had a right to file a WEC complaint against any Wisconsin election official who served the November 3, 2020 presidential election, regardless of the Complainant or election official’s principle municipality. Because Complainant was an elector for the first congressional district, he had a right file a WEC complaint against a Wisconsin first congressional district election official even if the election official was not in the Complainant’s Pleasant Prairie municipality.

Wolfe wrote to the Complainant, ““Complaints filed under Section 5.06 are filed by individuals that are served by local election officials ...” The word “local” and the term “local election officials” do not appear in Wis. Statute § 5.06(1). Because Wolfe added the words “local” and “local election officials,” she arbitrarily and incorrectly changed the provisions for an elector to file a complaint.

Wis. Statute § 5.06(1) has no restriction that limits complaints to local election officials only as Wolfe falsely claimed. Wis. Statute § 5.06(1)’s only restrictions are that the election officials must serve in the elector’s jurisdiction or district. This is why Complainant may file a WEC complaint against any election who serves his Wisconsin first congressional district, but he cannot file a WEC complaint against an election official who serves Wisconsin’s seven other congressional districts. According to Wis. Statute § 5.06(1), Complainant had a right to file a complaint against any election official as long as the election official served in the jurisdiction or district where the elector had a right to vote.

Complainant filed his August 28, 2020 Complaint against Green Bay Clerk Kris Teske, Kenosha Acting City Clerk who was unknown at the time, Madison Clerk Maribeth Witzel-Behl, and Racine Clerk Tara Coolidge. Complainant also filed a Complaint against Milwaukee Election Commissioners Stephanie D. Findley, Chair, Carmen C. Cabrera and Jess Ripp. The WI 5 clerks and election commissioners all served the November 3, 2020 presidential election in which their election jurisdiction was the entire State of Wisconsin. Because the WI 5 clerks and the Milwaukee election commissioners were election officials who served the presidential election jurisdiction in which the Complainant was an elector, Complainant had the lawful right to file his WEC election complaint against them.

Complainant's interpretation of Wis. § 5.06(1) makes sense, Wolfe's does not. The legislative intent of Wis. § 5.06(1) is to allow electors to file a complaint against any election official who served as an election official in which the elector has a right to vote. Legislators intended to provide electors with a complaint process against any election official who served in their elections. According to Complainant's interpretation of Wis. § 5.06(1), electors can seek accountability and corrective action if electors perceive an election official in their jurisdiction or district acting in violation of Wis. § 5.06(1).

According to Wolfe's interpretation of Wis. § 5.06(1), an elector may only file a complaint against his or her *local* municipal election officials. Because state rep, state senate, congressional and county elections exceed the boundaries of local municipalities, according to how Wolfe defines Wis. § 5.06(1), electors cannot file a complaint or seek a cure against the majority of election officials who are officiating their elections. Wolfe's interpretation of Wis. § 5.06(1) is ridiculous and unAmerican. According to Wolfe's view, electors can't hold election officials accountability outside their municipality although the election officials are determining the outcome of the elections in which the electors voted.

**Administrator Wolfe's False Claims About Complainant's August 28, 2020 Complaint**

Administrator Wolfe wrote the following: “Your complaint is related to the acceptance of grant funds by municipalities, but the complaint does not allege any violations of election law that the Commission has authority over to enforce or investigate” (click [here](#)).

Wolfe also said, “Your complaint also fails to state what election law or laws under the jurisdiction of the Wisconsin Elections Commission (Chapters 5-10 and 12, Wis. Stats.) that the named local officials have violated or have abused their discretion in administering.” ...

“Notably, while you state that the acceptance of grant funds are contrary to law and/or an abuse of power or discretion regarding election administration and conduct of the November 3, 2020 election, there is not a citation to an election law that you alleged has been violated or will be violated by these officials” (click [here](#)).

Wolfe’s statements that the Complainant did not state a potential violation of law is a blatant lie. Complainant stated that the WI 5 Respondents allegedly violated Wis. statute § 5.06(1) three times in his complaint (click [here](#)). Furthermore, Wolfe’s above statements implies that the Complainant must submit a violation of another law besides Wis. statute § 5.06(1). As stated in the following paragraph, the WEC accepted five complaints for Compliance Review that cited Wis. statute § 5.06 like the Complainant’s as the reason for the complaints.

Since Complainant filed his WEC complaint, the WEC accepted five complaints under the same Wis. Statutes § 5.06 as the Complainant cited in his August 28, 2020 complaint. The first line of these five complaints is, “This complaint is made under Wisconsin Statutes § 5.06.” (to view complaints, click on [Liu et al v. Wolfe et al](#), [Werner et al. v. Wolfe et al.](#), [Thomas et al. v. Wolfe et al.](#), [Prujansky et al. v. Wolfe et al.](#), and [Carlstedt et al. v. Wolfe et al](#)).

Besides the Complainant alleging Respondents violated Wis. statute § 5.06(1) in his August 28, 2020 complaint, Complainant alleged Respondents violated the U.S. Constitution’s First and Fourteenth Amendments. Complainant wrote this in his WEC complaint: “CTCL’s \$6.3 million

grant offer and the five Wisconsin cities acceptance of CTCL's grant violates the First Amendment rights of candidates and voters as well as their equal protection rights that the 14th Amendment guarantees. The voters in Wisconsin's 185 other cities won't have the same level of protection against COVID-19 and voting resources as the five largest Wisconsin cities who received CTCL's grant money. CTCL's \$6.3 million grant to Wisconsin's five largest cities places its hand on the scale to tip the election in favor of Democrat Joe Biden" (click [here](#)).

WEC Administrator Wolfe announced WEC's Subgrant Program on June 17, 2020 (to view announcement, click [here](#)). Wolfe wrote, "The Elections Commission authorized a \$4.1 million WEC CARES subgrant program for municipalities to offset pandemic-related elections costs. The approved WEC CARES Subgrant program provides a \$200 base amount plus an additional \$1.10/per registered voter."

WEC Administrator Wolfe made sure all Wisconsin municipalities, counties, and election commissions received a fair or equal share of the WEC's \$4.1 million subgrant. Wolfe made sure the WEC's \$4.1 million grant distribution met the Fourteenth Amendment equal distribution clause.

Administrator Wolfe offered and distributed *equal* shares of a \$4.1 election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL offered and awarded a \$6.3 million grant to only five Wisconsin cities which Complainant claimed was *unequal* protection in violation of the U.S. Constitution's First and Fourteenth amendments. Furthermore, Wolfe's equal distribution of the \$4.1 million Cares subgrant demonstrates Wolfe's knowledge of her constitutional duty to distribute grant money equally to all Wisconsin municipalities and counties who administer Wisconsin elections. When it came to equal distribution of CTCL's grant money, Wolfe ceded her constitutional duty.

As with the Complainant's August 28, 2020 complaint alleging U.S. Constitution violations, the five WEC complaints of Liu et al v. Wolfe et al, Werner et al. v. Wolfe et al., Thomas et al. v. Wolfe et al., Prujansky et al. v. Wolfe et al., and Carlstedt et al. v. Wolfe et al also claimed possible violations of the U.S. Constitution. Since the Complainant and the five other WEC complaints alleged violations of Wis. statute § 5.06 and the U.S. Constitution, why did WEC Administrator Wolfe only reject the Complainant's August 28, 2020 complaint? Could it be Wolfe denied Complainant's use of Wis. statute § 5.06 because the complaint was filed before the election, and the Commission accepted the five other Wis. statute § 5.06 complaints because the complaints were filed after the election?

Administrator Wolfe wrote, "Notably, while you state that the acceptance of grant funds are contrary to law and/or an abuse of power or discretion regarding election administration and conduct of the November 3, 2020 election, there is not a citation to an election law that you alleged has been violated or will be violated by these officials." Again, Administrator Wolfe lied about Complainant not citing alleged violations of law. Complainant stated possible violations of Wis. statute § 5.06 three times and violations of the U.S. Constitution's First and Fourteenth Amendments which all Wisconsin election laws and elections must abide by.

### **Administrator Wolfe Failed to Identify the Complaint's Most Obvious Defect**

EL 20.04(2) states, "If the complaint does not meet the standards under sub. (1), the administrator shall promptly return the complaint to the complainant, without prejudice unless otherwise provided by law, specifying both the defect in the complaint and the information appropriate to cure the defect."

Administrator Wolfe had the duty to specify the defects in the Complainant's complaint and provide specific information to cure the defects. Wolfe omitted the most obvious defect. Complainant filed his complaint against the WI 5 mayors of Green Bay Mayor Eric Genrich,

Kenosha Mayor John M. Antaramian, Madison Mayor Satya Rhodes-Conway, Milwaukee Mayor Tom Barrett, and Racine Mayor Cory Mason.

Wis. statute § 5.06(1) states, “Whenever any elector of a jurisdiction or district served by an election official ....”

According to Wis. statute § 5.02(4e) “‘Election official’ means an individual who is charged with any duties relating to the conduct of an election.”

Wisconsin Statute § 7.15 - Municipal Clerks (1) states, “Supervise Registration and Elections: Each municipal clerk has charge and supervision of elections and registration in the municipality.”

Wisconsin Statute 62.09 (8) provides Wisconsin mayors with their power and duties. Wisconsin statute 62.09 (8) does *not* provide Wisconsin mayors with the power or duty to supervise voter registration and elections in their cities.

Admittedly Complainant made a mistake when he used Wis. statute § 5.06(1) against the WI 5 mayors of Antaramian, Barrett, Rhodes-Conway, Genrich, and Mason in his August 28, 2020 complaint because the WI 5 mayors are not election officials according to Wis. statute § 5.02(4e).

Administrator Wolfe deliberately failed to include the WI 5 mayors are not election officials as one of the Complainant’s defects. Only recently did Complainant learn the WI 5 mayors have no charge to supervise elections. Since learning the WI 5 mayors do not supervise elections, Complainant filed two WEC complaints, Stone v. Obama et al. and Stone v. Barrett et al., against the WI 5 mayors for performing election administration duties without statutory authority. Wolfe’s failure to inform Complainant about the defect that WI 5 mayors are not election officials delayed Complainant’s complaints for nearly a year.



### **Administrator Wolfe Did Not Provide a Specific Cure for the Complaint**

As with identifying the defects of the Complainant's complaint, EL 20.04(2) required Administrator Wolfe to provide Complainant with appropriate and specific information to cure the defects in his complaint. Wolfe used vague and general language as a way to avoid specifying a cure to Complainant. EL 20.04(2) states, "specifying both the defect in the complaint and the information appropriate to cure the defect." Specifying means identifying clearly and definitely. Wolfe failed to clearly and definitely identify the cures for the Complainant's complaint.

No thanks to Wolfe, Complainant on his own discovered a specific cure to his complaint.

Wisconsin statutes 5.68 (1) and (2) state the following for the costs of elections: "The cost of acquisition of ballot boxes and voting booths, voting machines or electronic voting systems and regular maintenance thereof shall be borne by the municipalities in which the boxes, booths, machines or systems are used. (2) Except as otherwise expressly provided, all costs for ballots, supplies, notices and any other materials necessary in preparing or conducting any election shall be paid for by the county or municipality whose clerk or board of election commissioners is responsible for providing them." Because Center for Tech and Civic Life paid the WI 5 election expenses in alleged violation of Wisconsin statutes 5.68 (1) and (2), Complainant filed a WEC complaint against CTCL that is still pending.

Without Wolfe's help Complainant discovered another specific cure for his complaint. Wisconsin statute 12.09 (2) states, "No person may personally or through an agent, by abduction, duress, or any fraudulent device or contrivance, impede or prevent the free exercise of the franchise at an election." Complainant applied Wisconsin statute 12.09 (2) in his pending WEC complaint against the WI 5 mayors, CTCL, and CTCL's directors Tiana Epps Johnson and Whitney May (Stone v. Barrett et al.).

Wolfe's failure to identify specific cures to Complainant's complaint caused Complainant unnecessary delays in filing additional complaints. Complainant alleges that Wolfe's failure to identify specific cures was deliberate, not accidental.

### **Administrator Wolfe Deliberately Ignored Complainant's Probable Cause**

After Administrator Wolfe rejected Complainant's August 28, 2020 complaint, Complainant filed a Federal Election Commission complaint alleging a similar set of facts and allegations as he did in his WEC complaint (Exhibit 1). Complainant's FEC complaint named CTCL, CTCL's directors Tiana Epps Johnson and Whitney May as Respondents. Complainant's FEC complaint did not name the WI 5 clerks or mayors as Respondents.

The FEC's initial response to complaints is similar to the WEC's: "The Office of General Counsel (OGC) reviews each complaint to determine whether it states a violation within the FEC's jurisdiction and satisfies the criteria for a proper complaint. If the complaint does not meet these requirements, OGC notifies the complainant of the deficiencies. Once a complaint is deemed sufficient, OGC assigns it a Matter Under Review (MUR) number, acknowledges receipt of the complaint and informs the complainant that the Commission will notify him or her when the entire case is resolved" (Click [here](#) and scroll down to "Early stages of the complaint process").

Since the FEC sent Complainant a MUR letter in November, 2020, the FEC is already reviewing the Complainant's FEC complaint ( Exhibit 2). Whereas Complainant's WEC complaint focused on the WI 5 clerks and mayors receiving CTCL's election administration grant money, Complainant's FEC complaint concentrated on Mark Zuckerberg, Priscilla Chan (Mark Zuckerberg's wife), and CTCL who provided the grant money to the WI 5 cities.

If Complainant's FEC complaint with nearly the same facts and allegations as his WEC complaint met the FEC's requirement for review, why wasn't Complainant's WEC complaint good enough for the Administrator Wolfe to review?

The probable cause for a WEC Compliance Review that was in the Complainant's August 28, 2020 complaint or Complainant's exhibits that Administrator Wolfe rejected are as follows:

- CTCL's unequal distribution of its \$6.3 million election administration grants to only the WI 5 cities were alleged violations of the Constitution's First and Fourteen Amendments
- The WI 5 mayors admitted their election administration involvement in their Wisconsin Safe Voting Plan and press release though the WI 5 mayors have no statutory authority for election administration (Stone v. Genrich et al, Exhibit 1)
- CTCL chose the WI 5 cities over the Wisconsin counties to receive grants because more Democrats live and vote in the WI 5 cities than the counties
- CTCL Executive Director Tiana Epps Johnson completed her Obama Foundation Fellowship less than one month before she contacted Racine Mayor Cory Mason to start the WI 5 grant process.
- Democratic President Barrack and Michelle Obama provided contacts and money to CTCL and its Executive Director Johnson
- CTCL granted \$6.3 million to cities that only had Democratic mayors
- CTCL Directors Johnson and May were biased Democrats and anti-Republican as evidenced by Johnson and May's 125 social media posts that the Complainant submitted as exhibits with his complaint
- CTCL election administration grants deviated from the mission CTCL stated on its IRS tax forms
- CTCL had no employee, board or advisory member who was medical doctor or infectious disease expert at the time CTCL awarded its WI 5 election administration grants to protect against COVID 19
- CTCL used COVID 19 as a ruse to distribute partisan political grants to the WI 5 cities

- CTCL's grant process was allegedly fraudulent and deviated from the norm
- CTCL also awarded its election administration grants to only heavily Democratic cities and counties outside the state of Wisconsin at the time Complainant filed his complaint
- The WI 5 mayors failed to perform their due diligence before they applied and accepted CTCL's \$6.3 million grant
- The WI 5 mayors held their WI 5 mayors meetings to plan their CTCL grant application in secret (compare the WI 5's secret grant application to Administrator Wolfe's grant announcement that she sent to all Wisconsin election commissioners, municipal, and county clerks)
- The WI 5 mayors submitted one election administration plan for all the WI 5 cities though the first line of the Wisconsin Election Administration Manual states, "Elections in Wisconsin are conducted at a local level"

**Conclusion: Wolfe Abused Her Discretion in Violation of Wis. Statute § 5.06**

The stated purpose of Wis. statute § 5.06 is a "Compliance Review." At most the result of Complainant's complaint was Administrator Wolfe would have conducted a Compliance review of the WI 5 Respondents' election administration. Administrator Wolfe set an unreasonable and unreachable probable cause standard for Complainant's Compliance Review request. Wolfe expected Complainant to provide probable cause that the law requires for an arrest warrant, search warrant, or bail hearing. Having election officials and election jurisdictions transitioning from noncompliance to compliance would have been WEC's severest penalty had Wolfe accepted Complainant's August 28, 2020 Compliance Review request.

History proves Wolfe's failure to conduct a Compliance Review when Complainant initially requested one was cowardly and unprofessional. Since Wolfe denied Complainant's request for a Compliance Review, the WEC has received six more and separate on-going complaints ( click on Liu et al v. Wolfe et al, Werner et al. v. Wolfe et al., Thomas et al. v. Wolfe et al., Prujansky et al. v. Wolfe et al., Carlstedt et al. v. Wolfe et al., and Stone v. Barrett et al.). Wolfe is named as a

Respondent in five of the six aforementioned complaints. This complaint makes the sixth complaint that Wolfe is a Respondent. Had Wolfe started a Compliance Review in August 2020 when Complainant asked for one, the WEC would not be in the position to adjudicate these six pending WEC complaints against Wolfe.

When Complainant filed his initial August 28, 2020 complaint, Complainant had no WI 5 emails or internal documents; nevertheless, there was already enough probable cause for a Compliance Review. Given that two months earlier Wolfe offered an equal amount of grant money to every Wisconsin election jurisdiction, CTCL's unequal grant distribution to only the WI 5 cities should have met the probable cause standard by itself for a Compliance review. Furthermore, Wis. statute § 5.06(4) provides the WEC the authority and power to investigate any election administration matter. Because the private funding of public elections had never occurred before in the history of Wisconsin and the United States, the WEC should have reviewed CTCL's grants even if a complaint did *not* request one.

Complainant estimates that the WI 5 have released only 40% of their CTCL election administration grant related emails, correspondences, and documents to the public. The more the WI 5 election administration documents become available, the more it appears there was election administration misconduct. So far WI 5 emails revealed the following: The WI 5 mayors held four secret meetings that were most likely in violation of Wisconsin's open meeting law; WI 5 mayors without legal authority took over election administration duties from the municipal clerks; The WI 5 mayors signed agreements with CTCL that allowed CTCL to impose its election agenda and will upon the WI 5 cities; The WI 5 cities allowed organizations and people from outside the State of Wisconsin to influence and participate in the election administration of the WI 5 cities because the WI 5 benefactor, CTCL requested it.

The 12 reasons below explain how Administrator Wolfe abused her discretion in violation of Wis. statute § 5.06 when she rejected the complaint that the Complainant submitted on August 28, 2020. In addition, Wolfe's failure to investigate Complainant's Complaint led to Wisconsin

candidates and voters having their First and Fourteenth Amendment rights violated because of CTCL's biased election grant process and unequal distribution of Wisconsin election administration grants.

1. Administrator Wolfe added her own words of "local election officials" to Wis. statute § 5.06 and then used her fictitious statute that she created to deny Complainant's standing in his complaint.
2. Wolfe incorrectly stated the Complainant did not alleged any violation of law although the Complainant alleged violations of Wis. statute § 5.06 three times in his complaint, and he also alleged violations of candidates and voters First and Fourteenth Amendment rights.
3. The WEC has subsequently accepted five other complaints with the same citation of Wis. statute § 5.06 that the Complainant stated in his August 28, 2020 complaint.
4. The FEC is reviewing a complaint from the Complainant that is similar in facts and allegations as the complaint he filed with the WEC.
5. Administrator Wolfe distributed *equal* shares of a \$4.1 million election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL's \$6.3 million grant going to only five Wisconsin cities was *unequal* protection in violation of the U.S. Constitution's First and Fourteenth amendments.
6. Administrator Wolfe wrote Complainant submitted no probable cause for a Compliance Review while Complainant claims he submitted more than 10 probable causes.
7. Administrator Wolfe failed to include the WI 5 mayors' election administration as a defect in her September 10, 2020 letter to the Complainant.
8. Administrator Wolfe used vague and general language to recommend her cure though Wis. statute § 5.06 requires the Administrator to provide specific cures.
9. Administrator Wolfe failed to recommend the most obvious cure of Wisconsin statutes 5.68 (1) and (2), Costs of Elections since the WI 5 publicized CTCL's \$6.3 million grant money paid for the WI 5's election costs.

10. Administrator Wolfe ignored the significant political bias of CTCL directors Johnson and May.
11. Administrator Wolfe disregarded Complainant's argument that CTCL employed no medical experts though CTCL claimed the purpose of its grants was to protect election workers and voters from COVID 19.
12. Administrator Wolfe's failure to use Wis. statute § 5.06(4) to initiate a WI 5 Compliance Review of her own shows Wolfe deliberately sought to avoid any scrutiny of the WI 5-CTCL election administration grants.

### **Prayer for Relief**

1. The Commission shall prevent Administer Meagan Wolfe from participating in the adjudication of Complainant's pending WEC complaints of Stone v. Obama et al., Stone v Jarrett et al., Stone v. Barrett et al. and Stone v. Wolfe because Wolfe as a WEC Administrator investigating these complaints and Wolfe as a Respondent in this complaint are conflicts of interest.
2. The Commission shall investigate if Administrator Wolfe abused her discretion in violation of Wis. statute § 5.06 when she returned Complainant's August 28, 2020 complaint without conducting a Compliance Review.
3. The Commission shall determine if Wis. statute § 5.06 applies only to "local election officials" who serve electors as Administrator Wolfe claimed, or if Wis. statute § 5.06 applies to electors' election officials who serve in the jurisdiction or district in which the electors vote as Complainant claimed.
4. The Commission shall investigate why Administrator Wolfe failed to acknowledge Complainant's allegations of Wis. statute § 5.06 violations.
5. The Commission shall investigate why the WEC accepted five separate complaints with alleged Wis. statute § 5.06 violations though Administrator Wolfe would not recognize Complainant's citing violations of the same statute (Wis. statute § 5.06).

6. The Commission shall determine a probable cause standard and provide examples for a Compliance Review when electors alleged violations of Wis. statute § 5.06.
7. The Commission shall determine if a complaint asking for a Compliance Review under Wis. statute § 5.06 can stand on its merit, or must a complainant cite Wis. statute § 5.06 and at least one other violation of law.
8. The Commission shall determine if a complaint may cite U.S. Constitution violations as probable cause for a WEC complaint.
9. The Commission shall investigate if Complainant submitted probable cause for a Compliance Review in his August 28, 2020 WEC complaint.
10. The Commission shall investigate why Administrator Wolfe distributed *equal* shares of a \$4.1 million election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL's \$6.3 million grant going to only five Wisconsin cities was *unequal* and in violation of the First and Fourteenth Amendments.
11. The Commission shall investigate if CTCL's unequal distribution of election administration grants provided probable cause for violations of Wis. statute § 5.06.
12. The Commission shall investigate if the defects and cures that Administrator Wolfe provided in her September 11, 2020 letter were adequate and specific enough according to statute EL 20.04(2).
13. The Commission shall investigate if Complainant adequately showed that CTCL directors Tiana Epps Johnson and Whitney Mays' political bias were grounds for Administrator Wolfe to use as probable cause.
14. The Commission shall investigate if CTCL's failure to have any employees with medical expertise though CTCL claimed the purpose of its grants was to protect election workers and voters from COVID 19 were grounds for Administrator Wolfe to use as probable cause.
15. The Commission shall investigate if Administrator Wolfe's failure to use Wis. statute § 5.06(4) to initiate a WI 5 Compliance Review of her own shows Wolfe deliberately sought to avoid her WEC oversight authority of the \$6.3 Million WI 5-CTCL election administration grants.



## **Exhibits**

1. FEC complaint of Stone v. Center for Tech and Civic Life et al.
2. FEC Matter Under Review (MUR) letter to Complainant