

Subject: EXTERNAL : Journal Sentinel questions re contract and Green Bay letter
Date: Thursday, January 13, 2022 at 10:08:18 AM Central Standard Time
From: Marley, Patrick
To: 1, Coms
Attachments: Outlook-1509664648.png, 2022 01 13 - Subpoena Response.pdf

Justice Gableman:

Do you have a new contract with Speaker Vos and if so can you please provide a copy?

Green Bay in the attached letter argues that you cannot continue your investigation without a new contract. It also says it won't turn over private information about voters and source code for voting software.

What's your response to the letter? Why are you seeking private information on voters?

In addition, the city says your latest subpoenas seek some information that you already have received. Why did you ask for that information again? Have you reviewed all the material that was provided earlier?

Thanks.

Patrick Marley
State Capitol reporter

Mobile: 608.235.7686
patrick.marley@jrn.com
[@patrickmarley](#)
www.jsonline.com

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Meeting with Justice Gableman, Friday 9/3 4:00 pm CT

Jordan Moskowitz <jordan.moskowitz23@gmail.com>
 To: "Luis.Cornello" <luis.cornello@protonmail.com>

Thu, Sep 2, 2021 at 9:51 PM

Hey Luis-

Thanks for organizing all of this. Below is the list of issues I intend to cover. Some are discussion based, while others have handouts. Much of this work has been completed or partially done and will need more manpower to look into further if deemed worthy to. My resume is attached, but it is not updated to list the current description of the role.

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2. Looking at discrepancies in reporting done by WEC regarding the number of Absentee/Early in-person votes and Election Day votes, as well as the total number of voters reported vs the total number of ballots reported. This compares the raw WEC file on (1/25/2021) vs the 2020 General Election Voting and Registration Statistics Report (formerly EL-190F) on (5/10/2021). **(document attached to email)**
3. Indefinitely Confined (IC) voters - I am sure there is going to be a larger discussion on this issue, but one of the things I want to bring up specifically are these IC voters who voted for the first time in November 2020 (25,452 in total). We thought the lowest hanging fruit on this list would be those whose Delivery Point Validation (DPV) was not confirmed. We hand looked up all the voters whose DPV label was listed as 'N' and about 20% of those who were listed as 'D'. For the most part, many of these addresses checked out at first glance, however, we did run into a handful of cases where people were voting from businesses, restaurants, etc.

Below are the definitions the USPS uses for their DPV and the associated counts on these first time IC voters.

First Time Indefinitely Confined Voters by DPV		
DPV Label	Description	Count by DPV
Y	Address was DPV confirmed for both primary and (if present) secondary numbers.	23,838
D	Address was DPV confirmed for the primary number only, and Secondary number information was missing.	190
S	Address was DPV confirmed for the primary number only, and Secondary number information was present but unconfirmed.	1,387
N	Both Primary and (if present) Secondary number information failed to DPV Confirm.	37
Grand Total		25,452

4. WEC poor/improper guidance on IC Clean Up process - According to Wisconsin State Statute 6.86.2(b), any Indefinitely Confined (IC) elector who fails to cast and return their IC absentee ballot must be notified, in writing, that they will be removed from the IC list unless the clerk receives a renewal of the application within 30 days of the notification. If an elector does not respond to this notice within the 30 day period, that elector shall be removed from the IC list. Likewise, if an elector who requested an IC absentee ballot, but instead opted to vote in-person, that elector would fall under this category of not having returned their absentee ballot and therefore be required to receive a notice of renewal from the IC list.

Wisconsin State Statute 6.86.2

(a) An elector who is indefinitely confined because of age, physical illness or infirmity or is disabled for an indefinite period may by signing a statement to that effect require that an absentee ballot be sent to the elector automatically for every election. The application form and instructions shall be prescribed by the commission, and furnished upon request to any elector by each municipality. The envelope containing the absentee ballot shall be clearly marked as not forwardable. If any elector is no longer indefinitely confined, the elector shall so notify the municipal clerk.

(b) The mailing list established under this subsection shall be kept current through all possible means. If an elector fails to cast and return an absentee ballot received under this subsection, the clerk shall notify the elector by 1st class letter or postcard that his or her name will be removed from the mailing list unless the clerk receives a renewal of the application within 30 days of the notification. **The clerk shall remove from the list the name of each elector who does not apply for renewal within the 30-day period.** The clerk shall remove the name of any other elector from the list upon request of the elector or upon receipt of reliable information that an elector no longer qualifies for the service. The clerk shall notify the elector of such action not taken at the elector's request within 5 days, if possible.

WEC Guidance in January subverted current statutes and confused municipal clerks **(document attached to email)**. It is believed that WEC has not given out any guidance on this 30-day IC elector notice but has instead developed their own guidance (attached to email) on an "IC Request Confirmation Process" that is not outlined in state statutes like the 30-day notice is that we believe is designed to subvert state statutes and confuse clerks into thinking that this is the required process in dealing with IC electors.

The two biggest statements that WEC makes in this memo that is in direct contradiction with state statutes is (1) the process to clean up their IC electors list is optional (2) if an IC elector does not respond to this outreach, then it is not required for the clerk to remove these IC electors from the

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(b) The mailing list established under this subsection shall be kept current through all possible means. If an elector fails to cast and return an absentee ballot received under this subsection, the clerk **shall** notify the elector by 1st class letter or postcard that his or her name will be removed from the mailing list unless the clerk receives a renewal of the application within 30 days of the notification. **The clerk shall remove from the list the name of each elector who does not apply for renewal within the 30-day period.** The clerk shall remove the name of any other elector from the list upon request of the elector or upon receipt of reliable information that an elector no longer qualifies for the service. The clerk shall notify the elector of such action not taken at the elector's request within 5 days, if possible.

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Table with 3 columns: DPV Label, Description, Count by DPV. Rows include Y (23,838), D (190), S (1,387), N (37), and Grand Total (25,452).

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Justice Gableman

Coms <Coms@wispecialcounsel.org>

Wed 3/2/2022 10:29 AM

To: HaleyG@newsmax.com <HaleyG@newsmax.com>

Can I please have your phone number for a conversation?

Get [Outlook for iOS](#)

Re: EXTERNAL : Re: OSC Final Report

Coms <Coms@wispecialcounsel.org>

Tue 3/1/2022 1:41 PM

To: Joe Giganti <joe.giganti@mwcradio.com>

It is released

Get [Outlook for iOS](#)

From: Joe Giganti <joe.giganti@mwcradio.com>

Sent: Tuesday, March 1, 2022 10:05:41 AM

To: Coms <Coms@wispecialcounsel.org>

Subject: EXTERNAL : Re: OSC Final Report

Thanks Zak.

Is this embargoed? If so, until when?

Live Life Boldly,

Joe

Joe Giganti

The Regular Joe Show

Weekdays 8:30 – 11am

AM 1360 | 97.5 FM WTAQ

AM 550 | 95.1 FM | 99.9 FM WSAU

AM 1330 | 101.5 FM WHBL

(920) 406-1360 Call In Line

(888) 455-1360 Call In Line

Text: 79-489

Twitter: @regjoeshow

FB: @regjoeshow

On Mar 1, 2022, at 9:46 AM, Coms <Coms@wispecialcounsel.org> wrote:

Good Morning Joe,

Please see the attached Final Report from the Office of the Special Counsel.

Very Respectfully,

Zakory Niemierowicz

WI Special Counsel

Please be aware any communications sent to and from Wispecialcounsel.org email domains may be subject for review in response to Wisconsin open records statutes.

<OSC Second Interim Report.pdf>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

MICHAEL D. DEAN, LLC
ATTORNEYS AT LAW

MAILING ADDRESS:
P.O. BOX 2545
BROOKFIELD, WI 53008

Telephone: (262) 798-8044
Telefax: (262) 798-8045
Email: miked@michaelddeanllc.com

February 24, 2022

Hon. Michael J. Gableman
Office of the Special Counsel

Re: *Elections Commission et al vs. Wisconsin State Assembly et al*
Dane County Case Number 2021CV002552 Wisconsin

STATEMENT

FEES

Date	Description
2/1	Review and revise response to motion for intervene and file. Teleconf. with counsel.
2/3	Emails with counsel re order for intervention and responsive pleadings. Emails and teleconfs. with counsel.
2/3	Research and memos re options after intervention.
2/4	Emails with counsel re reply drafts.
2/9	Review and edit reply draft. Multiple emails and teleconfs. with counsel.
2/10	Teleconf. with counsel. Review filings.
2/14	Email and Zoom conf. with counsel.
2/16	Emails with counsel re Voces subpoena. Research re causes of action and government sanctions.
2/22	Review Assembly filings re reply.

Fees Total	\$2,022.50	Hours: MDD 6.4 DJC 1.50
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AMOUNT DUE	\$2,022.50
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PRIOR BALANCE	\$43,483.50
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TOTAL
DUE

\$2,022.50
\$43,483.50
\$45,506.00

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Email: miked@michaelddeanllc.com

January 31, 2022

Hon. Michael J. Gableman
Office of the Special Counsel

Re: *American Oversight v. Assembly Office of Special Counsel*
Dane County Case Number Case No. 2021 CV 003007

STATEMENT

FEES

Date	Description
12/23	Review docketing statements and related cases. Emails with counsel.
12/29	Emails with counsel.
1/3	Teleconfs. and emails with counsel. Review docket and local rules.
1/5	Emails with counsel.
1/6	Review of petition and exhibits.
1/7	Emails and teleconfs. with counsel. Draft and file pro hac vice motions.
1/10	Review docket. Multiple emails and teleconfs. with counsel. Review pleadings and research. Memo to counsel.
1/11	Review docket and motion to consolidate. Emails and teleconfs. with counsel. Emails with court re scheduling conference.
1/12	Multiple emails and teleconfs. counsel.
1/13	Video conf., emails and teleconfs. with counsel, preparation for hearing. Hearing on motion for consolidation. Review pro hac vice filings for Petitioner.
1/15	Review and service affidavit.
1/17	Multiple teleconfs. and emails with counsel. Work on motion to amend scheduling order. Teleconf. and email to opposing counsel.
1/18	Multiple teleconfs. and emails with all counsel. Edit and file motion for continuance.
1/19	Multiple teleconfs. and emails with counsel. Review petition and draft response. Research. pleadings. Research definitions of authority and record. Research and draft motion and affidavit re personal jurisdiction.
1/20	Multiple emails and teleconfs. with counsel. Finish and file motion, brief, affidavit. To conf. with client. Review Assembly respondents submissions. Draft and file pro hac vice motion for added counsel.

1/21 Review all filings. Draft and file amended notice of motion. Emails with counsel. Research re argument issues.

1/22 Teleconfs. with counsel. Notes to file. Additional research. Memo to file.

1/24 Emails and teleconfs. with counsel. File document per court order. Order hearing transcript.

1/25 Review scheduling order and calendar.

1/26 Multiple emails and teleconfs. with counsel. Letter to court. Research and draft motion and response brief sections and in camera submission issues. Research production requirements. Work on document production.

1/27 Multiple emails and teleconfs. Review, revise and file motion for reconsideration. Conf. with client office. Work on document production.

1/28 Work on document production. Teleconf. and emails with counsel and client. Review decision and Petitioner opposition to motion.

1/29 Teleconf. with counsel and client. Continue research and work on document production.

1/30 Research and draft objection and motion.

1/31 Emails and teleconfs. with counsel and client. Complete document production and archive. Multiple teleconfs. to court re instructions for e-filing. To court, file documents under seal. Review court instruction letter. Draft confidential records cover sheet, motion, proposed order and file.

Fees Sub-Total **\$21,052.50** Hours: MDD 70.7 DJC 9.20

COSTS

1/21 \$76.05 Mileage to Madison

1/21 \$6.00 Parking

1/31 \$76.05 Mileage to Madison

1/31 \$3.00 Parking

1/31 \$20.55 WI Courts E-file Opt-in Fee

Costs Sub-Total **\$181.65**

AMOUNT	\$21,052.50	Fees
DUE	<u>\$181.65</u>	Costs
	\$21,234.15	

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Office of the Special Counsel

Re: *Elections Commission et al vs. Wisconsin State Assembly et al*
Dane County Case Number 2021CV002552 Wisconsin

STATEMENT

FEES

Date	Description
1/3	Teleconfs. and emails with counsel. Research and memo re interlocutory appellate process. Review correspondence for Plaintiff counsel.
1/10	Zoom conf. with counsel.
1/11	Zoom conf. with counsel.
1/12	Teleconfs. and emails with counsel re responsive pleadings.
1/13	Teleconf. with counsel.
1/15	Review complaint. Draft responsive pleadings.
1/19	Emails re appeal.
1/20	Review Assembly responsive pleadings. Continue work on Special Counsel responsive pleadings. Emails with counsel.
1/22	Review Assembly interlocutory appeal.
1/24	Emails and teleconfs. with counsel. Research. Revise and file responsive pleadings. Review and research motion to intervene.
1/25	Emails with counsel. Research re intervention issues.
1/27	Teleconfs. and emails with counsel.
1/28	Emails and teleconfs. with counsel and client. Review intervenor filings. Research.
1/31	Teleconfs. and emails with counsel. Review draft of brief opposing intervention.
Fees Sub-Total	\$3,877.50 Hours: MDD 14.1

COSTS

1/31	\$20.55	WI Courts E-file Opt-in Fee
Costs Sub-Total	\$20.55	
AMOUNT DUE	\$3,877.50	Fees
	<u>\$20.55</u>	Costs
	\$3,898.05	
PRIOR BALANCE	\$39,585.55	
TOTAL DUE		\$3,898.05
		<u>\$39,585.55</u>
		\$43,483.50

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Re: *American Oversight v. Assembly Office of Special Counsel*
Dane County Case Number Case No. 2021 CV 003007

STATEMENT

FEEES

Date	Description
2/1/2022	Teleconf. with counsel. Review new docket filings.
2/2/2022	Teleconfs. and emails with counsel. Teleconfs. with OSC staff and counsel. Review proposed order.
2/2/2022	Work on responsive pleadings.
2/3/2022	Work on responsive pleadings.
2/4/2022	Emails with counsel. Edit and file responsive pleadings.
2/7/2022	Research memo. Emails with counsel.
2/8/2022	Research and work on motion for review and stay. Emails and teleconfs. with counsel.
2/9/2022	Continue research and work on motion briefing. Emails and teleconfs. with counsel.
2/10/2022	Continue research and work on motion briefing. Emails and teleconfs. with counsel.
2/15/2022	Teleconf. and emails with opposing counsel re motion to seal submissions. Continue research and work on motion briefing. Emails with counsel re motion and drafts.
2/16/2022	Emails with counsel. Research and edit motion and briefing for review and stay. Emails with opposing counsel re motions to seal. Review e-file disclosures and follow up.
2/17/2022	Emails with opposing counsel re motion to seal papers. File motion and brief for review and stay. Review party filings.

Fees Sub-Total **\$8,050.00** Hours: MDD 28.0 DJC 2.0

AMOUNT **\$8,050.00**
DUE

**PRIOR
BALANCE**

\$21,234.15


**TOTAL
DUE**

\$8,050.00
\$21,234.15
\$29,284.15

Phone



Today

 John Irving 1:11 PM

 Zak Niemierowicz Work 1:09 PM

 Clint Lancaster 1:05 PM

< **Clint Lancaster**
+15017863593



Friday, March 4, 2022



5018230965

12:04 PM



FW: Trouble.

Coms <Coms@wispecialcounsel.org>

Sun 2/27/2022 12:32 PM

To: 7 <7@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>; 4 <4@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>; Erick Kaardal <kaardal@mklaw.com>; 'Kevin@kevinscottlaw.com' <kevin@kevinscottlaw.com>
Andrew told me we will all have the freshest draft from him by 1:30 CST.

I think we are all getting a little nervous.

And so Andrew, I would ask that you send whatever you have by 1:30. **It will be that document that we will all use as a reference point when we come together again at about 3:30 CST to go over the draft as a group.**

Thanks,

Mike

Sent from [Mail](#) for Windows

From: [Z](#)

Sent: Sunday, February 27, 2022 12:23 PM

To: [Coms](#)

Subject: Trouble.

I made the list for Ch. 1 like you asked, but it is just a list of the changes I made yesterday. don't see where any of the serious edits to Ch. 1 that you or I did last night made it into CH. 1. It is still 40 something pages.

Unless something comes together soon, we are going to have a long night or we are in trouble on making the deadline.

--

Clinton W. Lancaster, Esq.

OFFICE OF THE SPECIAL COUNSEL

P.O. Box 510766

New Berlin, WI 53151

7@wispecialcounsel.org

www.WiFraud.com

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EXTERNAL : Re: Power Point for Tuesday

James Bopp Jr <jboppjr@aol.com>

Sun 2/27/2022 12:22 PM

To: Coms <Coms@wispecialcounsel.org>

Call me.

Sent from the all new AOL app for Android

On Sun, Feb 27, 2022 at 12:49 PM, Coms <Coms@wispecialcounsel.org> wrote:

Here is a draft of our power point for Tuesday.

I send it for two reasons: (1) to garner suggestions for its improvement and (2) so that we will compare its contents with that of the report to find any inconsistencies or areas that might be bolstered in one or the other.

Thanks,

Mike

Sent from Mail for Windows

From: jay stone

Sent: Sunday, February 27, 2022 11:34 AM

To: Coms

Subject: EXTERNAL : Presentation Draft

see attached.

Why People Doubt the 2020 Election.pdf

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EXTERNAL : Presentation Draft

jay stone <jayjoelstone@gmail.com>

Sun 2/27/2022 11:34 AM

To: Coms <Coms@wispecialcounsel.org>

see attached.

Why People Doubt the 2020 Election.pdf

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Need the Freshest Draft

Coms <Coms@wispecialcounsel.org>

Sun 2/27/2022 11:31 AM

To: Coms <Coms@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>; 7 <7@wispecialcounsel.org>; 4 <4@wispecialcounsel.org>; 'Kevin@kevinscottlaw.com' <kevin@kevinscottlaw.com>

Andrew,

There is a lot of pressure on you.

We all need—soon—a uniform draft that we can all get together on; to read individually and then come back collectively and go over.

I am sorry to state the obvious but we really need this.

Mike

Sent from [Mail](#) for Windows

Agreement

Coms <Coms@wispecialcounsel.org>

Sun 2/27/2022 11:28 AM

To: Coms <Coms@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>; 4 <4@wispecialcounsel.org>; 7 <7@wispecialcounsel.org>; 'kevin@kevinscottlaw.com' <kevin@kevinscottlaw.com>

Maybe at the end of the first partial para on p. 12, (collectively, "the Agreeemnt" or "the Zuckerberg Agreement").

Sent from Mail for Windows

Not WSVP

Coms <Coms@wispecialcounsel.org>

Sun 2/27/2022 11:24 AM

To: 6 <6@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>; Erick Kaardal <kaardal@mklaw.com>; 4 <4@wispecialcounsel.org>; 6 <6@wispecialcounsel.org>; 7 <7@wispecialcounsel.org>; 'kevin@kevinscottlaw.com' <kevin@kevinscottlaw.com>

Throughout the document, we refer to the agreement for collusion as the Wisconsin Safe Voter Plan," or "WSVP."

I hate calling it that because it is a grotesque mischaracterization of what it actually is.

Let's just refer to it as "the Agreement," or "the Zuckerberg Agreement." -Or something like that

Mike

Sent from [Mail](#) for Windows

RE: EXTERNAL : Re: Rough Draft Second Interim Report

Coms <Coms@wispecialcounsel.org>

Sun 2/27/2022 11:20 AM

To: James Bopp Jr <jboppjr@aol.com>

That means a lot, Jim. Thank you.

Sent from Mail for Windows

From: James Bopp Jr

Sent: Sunday, February 27, 2022 11:19 AM

To: Coms; cmilbank@boppplaw.com

Subject: EXTERNAL : Re: Rough Draft Second Interim Report

I got commitments with grandchildren now and for a few more hours so I will complete looking at this later. But so far WOW, very well done. persuasive and comprehensive. it should be very helpful to the Assembly in making legislative fixes. Jim

In a message dated 2/27/2022 11:54:36 AM US Eastern Standard Time, Coms@wispecialcounsel.org writes:

Good Morning Jim and Courtney,

Here is a rough draft and I would appreciate your thoughts.

Thanks,

Mike

Sent from Mail for Windows

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RE: FINAL REPORT CH. 4 EDIT_cw12

4 <4@wispecialcounsel.org>

Sun 2/27/2022 11:04 AM

To: 7 <7@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>; 1 <1@wispecialcounsel.org>

Cc: 6 <6@wispecialcounsel.org>

My suggestions on Ch 4 here, as well. I added a section on Trent Jameson toward the end (while keeping his name out of it).

- John

Sent from Mail for Windows

From: 7 <7@wispecialcounsel.org>

Sent: Sunday, February 27, 2022 11:39:34 AM

To: Coms <Coms@wispecialcounsel.org>; 1 <1@wispecialcounsel.org>; 4 <4@wispecialcounsel.org>

Cc: 6 <6@wispecialcounsel.org>

Subject: FINAL REPORT CH. 4 EDIT_cw12

--

Clinton W. Lancaster, Esq.

OFFICE OF THE SPECIAL COUNSEL

P.O. Box 510766

New Berlin, WI 53151

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RE: FINAL REPORT CH. 4 EDIT_cwI2

4 <4@wispecialcounsel.org>

Sun 2/27/2022 11:04 AM

To: 7 <7@wispecialcounsel.org>; Coms <Coms@wispecialcounsel.org>; 1 <1@wispecialcounsel.org>

Cc: 6 <6@wispecialcounsel.org>

My suggestions on Ch 4 here, as well. I added a section on Trent Jameson toward the end (while keeping his name out of it).

- John

Sent from [Mail](#) for Windows

From: 7 <7@wispecialcounsel.org>

Sent: Sunday, February 27, 2022 11:39:34 AM

To: Coms <Coms@wispecialcounsel.org>; 1 <1@wispecialcounsel.org>; 4 <4@wispecialcounsel.org>

Cc: 6 <6@wispecialcounsel.org>

Subject: FINAL REPORT CH. 4 EDIT_cwI2

--

Clinton W. Lancaster, Esq.

OFFICE OF THE SPECIAL COUNSEL

P.O. Box 510766

New Berlin, WI 53151

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www.WiFraud.com

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Re: EXTERNAL : New Chapter

Coms <Coms@wispecialcounsel.org>

Fri 2/25/2022 2:54 PM

To: 6 <6@wispecialcounsel.org>

yes its from Erick

WI Special Counsel

Please be aware any communications sent to and from Wispecialcounsel.org email domains may be subject for review in response to Wisconsin open records statutes.

From: 6 <6@wispecialcounsel.org>

Sent: Friday, February 25, 2022 12:27 PM

To: Coms <Coms@wispecialcounsel.org>; 7 <7@wispecialcounsel.org>

Subject: Re: EXTERNAL : New Chapter

Erick drafted this?

From: Coms <Coms@wispecialcounsel.org>

Sent: Friday, February 25, 2022 1:00 PM

To: 6 <6@wispecialcounsel.org>; 7 <7@wispecialcounsel.org>

Subject: Fwd: EXTERNAL : New Chapter

Get Outlook for iOS

From: Erick Kaardal <kaardal@mklaw.com>

Sent: Friday, February 25, 2022 11:43:02 AM

To: Coms <Coms@wispecialcounsel.org>

Subject: EXTERNAL : New Chapter

Erick G. Kaardal
Mohrman, Kaardal and Erickson, P.A.
150 S. Fifth St., Ste. 3100
Minneapolis MN 55402
612-341-1074
f. 612-341-1076

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CHAPTER __

CEIR's Election Officials Legal Defense Network (EOLDN), In the Illegal Drop Box, Election Bribery, Special Voting Deputies and Other Contexts, Violates State Code of Ethics

Wisconsin's election officials have legal problems regarding illegal drop boxes, election bribery, special voting deputies and other subject areas detailed in this report. In process of Wisconsin Statutes § 5.06 administrative corrections and related criminal prosecutions, Wisconsin's election officials will often be represented by government attorneys or government-financed attorneys. Where they are not, Wisconsin's election officials, just like the public, may have to hire and pay their own attorneys to defend themselves.

CEIR's Election Officials Legal Defense Network (EOLDN), announced in December of 2021, is not a solution to these election officials' legal problems. In fact, the election officials accepting EOLDN's legal services may get these election officials into more trouble. It appears that EOLDN's set-up violates Wisconsin Statutes § 19.59 (1)(b) prohibiting such transactions. Wisconsin Statutes § 19.59 (1)(b) provides:

(b) No person may offer or give to a local public official, directly or indirectly, and no local public official may solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to influence the local public official's vote, official actions or judgment, or could reasonably be considered as a reward for any official action or inaction on the part of the local public official.

The problem is that CTCL and CEIR are Zuckerberg-Chan financed entities who worked as essentially a joint venture in the 2020 election. CTCL received \$350 million for the 2020 election. CEIR received \$69 million for the 2020 election. CTCL funded the \$8,800,000 Wisconsin Save Voting Plan (WSP) with the Cities of Milwaukee, Madison, Green Bay, Racine and Kenosha purchased illegal drop boxes and constitutes election bribery under Wisconsin Statutes § 12.11.

EOLDN's three leaders David Becker, Bob Bauer and Ben Ginsberg have different roles regarding Zuckerbergs, CTCL and WSVP. Becker, as President of CEIR, received \$69 million from Zuckerberg-Chan. Bauer is an election law attorney who likely represents or has represented CEIR, CTCL or related entities. Ginsberg, in December of 2020, announced he is represented by Zuckerberg in election-related matters. Not surprisingly, all three—Becker, Bauer and Ginsberg—have publicly supported CTCL's distributions in Wisconsin as lawful. Their legal positions contradict the facts showing illegal drop boxes and election bribery.

EOLDN should know that CTCL and CEIR are potential parties or witnesses to future illegal drop box or election bribery litigation or prosecutions. In turn, CEIR and related entities are disqualified from providing attorneys for Wisconsin election bribery defendants because they are potential parties, potential witnesses or biased due to previous representation of related parties. Further, it appears, EOLDN, on behalf of Zuckerberg and Chan, are improper coordinating legal defenses of election officials to protect CTCL, CEIR, Zuckerberg, Chan and related entities and individuals.

EOLDN providing free legal defense services for election officials in these subject area may violates the first part of Wisconsin Statutes § 19.59 (1)(b) prohibiting such transactions:

“No person may offer or give to a local public official, directly or indirectly, and no local public official may solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to influence the local public official's vote, official actions or judgment.”

The law applies to the circumstances as follows. The “person” is EOLDN or their attorney. The local public official is the election official receiving free EOLDN legal services. The “anything of value” provided is the free legal defense services provided by EOLDN. The gift of the free legal services could reasonably be expected to influence the election officials’ official actions or judgment. Since EOLDN’s free legal services will have protecting CTCL, CEIR, Zuckerberg and Chan foremost in mind, it will influence the election officials’ official actions and judgment in defending Wisconsin Statutes § 5.06 administrative corrections and related criminal prosecutions. So, all the elements are satisfied for the transaction being prohibited.

EOLDN providing free legal defense services for election officials in these subject areas may violate the second part of Wisconsin Statutes § 19.59 (1)(b) prohibiting such transactions:

“No person may offer or give to a local public official, directly or indirectly, and no local public official may solicit or accept from any person, directly or indirectly, anything of value if it ... could reasonably be considered as a reward for any official action or inaction on the part of the local public official”

The law applies to the circumstances as follows. The “person” is EOLDN or their attorney. The local public official is the election official receiving free EOLDN legal services. The “anything of value” provided is the free legal defense services provided by EOLDN. EOLDN’s or its attorney’s gift of the legal services could reasonably be considered as a reward for the official’s actions regarding the illegal drop boxes, election bribery or violating the special voting deputies law. Recall CTCL, Zuckerberg and Chan financed the illegal drop boxes and election bribery, so EOLDN’s free legal services to the election officials could be reasonably seen as a “reward” for their participation in election illegalities.

EXTERNAL : FW: Statement

Michael Dean <miked@michaelddeanllc.com>

Thu 2/24/2022 9:22 AM

To: Coms <Coms@wispecialcounsel.org>

Zac

Per your call and email, I'm resending prior statements and attaching current statements, so these are everything to date.

The files ending in "WEC" relate to the WEC action to quash the OSC subpoenas.

The files ending in "OA" relate to the American Oversight petition on the open records matters.

The balances carry over, so the current total balances are on the last two statements

WEC \$45,506.00**OA \$29,284.15**

Whatever you can do to expedite would be great. Please let me know if you have any questions.

Thanks much.

Mike Dean
Michael D. Dean, LLC
Attorney at Law
P.O. Box 2545
Brookfield, WI 53008
(262) 798-8044
(262) 798-8045 fax

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From: Michael Dean
Sent: Monday, February 7, 2022 6:55 AM
To: Michael Gableman (wijustice@protonmail.com) <wijustice@protonmail.com>; Coms <Coms@wispecialcounsel.org>
Subject: FW: Statement

Mike

Statements attached. The first one is the one from last month on the WEC matter, the second is on that matter too and carries over the balance from the first.

The third is on the American Oversight matter.

Thank you.

Mike Dean
Michael D. Dean, LLC
Attorney at Law
P.O. Box 2545
Brookfield, WI 53008
(262) 798-8044
(262) 798-8045 fax

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From: Michael Dean
Sent: Thursday, January 6, 2022 12:17 AM
To: Michael Gableman (wijjustice@protonmail.com) <wijjustice@protonmail.com>
Subject: Statement

Mike

Here's the statement. Let me know if you have any questions/comments. Thanks.

Mike Dean
Michael D. Dean, LLC
Attorney at Law
P.O. Box 2545
Brookfield, WI 53008
(262) 798-8044
(262) 798-8045 fax

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MICHAEL D. DEAN, LLC
ATTORNEYS AT LAW

MAILING ADDRESS:
P.O. BOX 2545
BROOKFIELD, WI 53008

Telephone: (262) 798-8044
Telefax: (262) 798-8045
Email: miked@michaelddeanllc.com

December 31, 2021

Hon. Michael J. Gableman
Office of the Special Counsel

Re: *Elections Commission et al vs. Wisconsin State Assembly et al*
Dane County Case Number 2021CV002552 Wisconsin

STATEMENT

Date	Description
Oct. 24	Teleconfs. and emails with counsel and client. Review pleadings, draft NOA, research.
Oct. 25	Preparation and scheduling conference. Teleconfs. and emails with counsel. Analyze issues, research.
Oct. 26	Confs. with counsel re research assignments.
Oct. 26	Confs. with counsel. Research legislative and commission records.
Oct. 27	Review plaintiffs' briefing. Research legal issues and legislative and agency action. Conf. with counsel and client.
Oct. 27	Teleconfs. with counsel. Research legislative and agency rules and history.
Oct. 27	Teleconf. with counsel. Research legal issues.
Oct. 27	Teleconf. with counsel and client.
Oct. 28	Teleconf. with counsel. Conf. with client.
Oct. 28	Conf. with client and counsel.
Oct. 28	Research.
Oct. 29	Memo and teleconf. with counsel
Oct. 30	Multiple teleconfs. and emails with client and counsel.
Oct. 30	Teleconf. with counsel.
Oct. 31	Conf. with client.
Nov. 1	Teleconfs. with client and counsel. Research.
Nov. 2	Teleconf. with counsel. Research and work on motion to dismiss.
Nov. 2	Review plaintiffs' exhibits, factual allegations, and related information. Research.
Nov. 3	Initial drafts of response brief sections.
Nov. 3	Research.

Nov. 4 Teleconf. with counsel. Research and draft responsive pleadings. Prep for conf. with counsel.

Nov. 5 Conf. with counsel, follow-up emails and teleconfs.

Nov. 5 Conf. and teleconfs. counsel and client.

Nov. 6 Review agency actions, related research.

Nov. 6 Teleconf. with counsel.

Nov. 8 Emails with counsel. Review correspondence and submissions to date. Editing. Work on PHV.

Nov. 9 Conf. with counsel. Continue analysis of submission. Memo on additional research.

Nov. 10 Emails with counsel.

Nov. 11 Emails and teleconfs. with counsel and client. Edits.

Nov. 11 Emails memos with counsel and client.

Nov. 11 Proofread and editing.

Nov. 16 Teleconfs. and conf. with counsel. Research standards.

Nov. 16 Teleconf. with counsel. Research local rules, procedures and standards for plaintiffs' claims.

Nov. 17 Research, memo to counsel. Editing.

Nov. 17 Continue research rules, procedures and standards. Work on memo.

Nov. 18 Conf. with counsel. Review research and memo re agency actions. Research and work on sections of responsive brief, pleadings, motion to dismiss.

Nov. 18 Research and work on submission sections. Prep and conf. with counsel and client.

Nov. 19 Research and drafting.

Nov. 19 Research and drafting.

Nov. 20 Multiple emails and teleconfs. with counsel. Continue research and drafting.

Nov. 20 Review subpoenas and documents at issue. Teleconfs. with counsel.

Nov. 21 Continue drafting re brief sections. Multiple emails with counsel.

Nov. 21 Check and shepardize citations.

Nov. 22 Teleconfs. with counsel. Research additional issues on brief sections. Revisions and multiple emails and teleconfs. with counsel.

Nov. 22 Teleconfs. with counsel. Additional research re agency issues, non-Wisconsin persuasive authority and guidance.

Nov. 23 Multiple emails, teleconfs. and video-confs. with counsel. Additional research, memos and drafting re other response sections and issues.

Nov. 23 Review draft revisions. Read full authority on all citations.

Nov. 24 Continue review of response brief draft, annotations and comments. Memo and emails to counsel. Teleconfs. and conf. with counsel. Work on motion to dismiss.

Nov. 24 Conf. with counsel. Proofread drafts of brief and responsive submissions. Emails and teleconfs. with counsel. Search agency proceedings and history re motion to dismiss.

Nov. 26 Teleconfs. with client and counsel.

Nov. 27 Continue research and drafting.

Nov. 28 Teleconfs. and emails with client and counsel.

Nov. 29 Review related e-filings, archive and emails to counsel.

Nov. 30 Review and forward PHV materials. Emails, teleconfs. and video confs. with client and counsel.

- Dec. 1 Teleconf. with counsel. Research re additional issues and email memo to counsel.
- Dec. 2 Research and emails memos with counsel re complementary non-Wisconsin authority.
- Dec. 3 Teleconfs. and emails with counsel and client. Research, drafting and edits on motion to dismiss.
- Dec. 6 Emails with client and counsel. Edits to motion and briefing.
- Dec. 10 Conf. with counsel.
- Dec. 13 Teleconf. and conf. with client and counsel.
- Dec. 14 Text and email memos with client and counsel.
- Dec. 15 Video conf. re additional research support.
- Dec. 16 Teleconf. re additional research support.
- Dec. 21 Review plaintiffs' response to motions to dismiss.
- Dec. 22 Teleconf. and letter to court re remote appearance. Teleconf. with counsel re hearing.
- Dec. 23 Teleconfs. with court and counsel. Attend hearing remotely.

Fees \$39,565.00 Hours 165.0 MDD 94.3 DJC 70.7

Costs \$20.55 WI Courts E-file Opt-in Fee

Total \$39,585.55
Due