additional overtime costs ($100,000) for staff processing of absentee ballots and other election-related tasks. **Total: $210,000**

- **Milwaukee:** Given its tremendous volume of absentee ballot requests and processing tasks which far exceeds that of the other municipalities, Milwaukee would like to completely automate and expedite the assembly and mailing of requested absentee ballots. The City would like to purchase a high-speed, duplex printer, a top-of-the-line folding machine, and a high-quality folding and inserting machine. This would reduce staff costs and eliminate the use of absentee labels, by enabling the City to print directly onto inner and outer envelopes. This would also allow the City to have a small 2D barcode that the inserter machine would be able to scan to ensure that the outer envelope is for the same voter; increasing quality controls. This automation would enable the City to eliminate the assembly delay no matter the volume of daily absentee requests, allowing experienced election workers and previously trained election temporary employees to be re-deployed to early voting sites as supervisors and lead workers. **Total: $145,000**

- **Racine:** To process absentee ballot requests in April, the City estimates that it will need seven additional full-time employees to process fall election requests. These employees will be needed full-time for one month prior to the August Election (approximately $17,000) and seven weeks prior to the November election (approximately $30,000). **Total: $47,000**

**Total: $658,000**

### 4. Expand In-Person Early Voting (Including Curbside Voting)

For a variety of reasons, many voters in our municipalities do not want to vote by mail and prefer to vote in-person. As a result of the coronavirus, far more voters are interested in early, in-person absentee voting (EIPAV) than we’ve seen in previous elections, wishing to avoid lines or crowds on Election Day. All five municipalities would like to have resources to accommodate these early, in-person voters. Expanding access to early, in-person voting also will lessen lines at polling places on Election Day and allow for proper social distancing and other pandemic precautions to be uniformly implemented.

Curbside and drive-thru voting have been very popular with residents of our municipalities, particularly for those with health concerns who can remain in the cars and have a virtually contact-less voting process. For example, Milwaukee previously operated in-person early voting for one week leading up to the April election at three sites and then transitioned to one site of drive-thru voting. 11,612 cast ballots through these options: 5,571 via in-person and 6,041 at drive-thru, and these numbers represent a 46% increase over April 2016 “early voting” totals. However, it is slow-moving and
labor-intensive. Additionally, particularly in the larger cities among us, it requires law enforcement and traffic control assistance to help manage traffic.

- **Green Bay:** The City would like to expand and establish at least three EIPAV sites in trusted locations, ideally on the east (potentially UWGB) and west sides (potentially NWTC or an Oneida Nation facility) of the City, as well as at City Hall. The City is planning to offer early voting starting two weeks before each election, with several weekdays available until 6:30pm and Saturdays 10am-4pm. They would like to staff these early voting sites with election inspectors who are bilingual and would like to increase the salary rate for these bilingual election inspectors to assist with recruitment and retention, as well as in recognition of their important role at these sites. The City also will need to print additional ballots, signage, and materials to have available at these early voting sites. **Total: $35,000.**

- **Kenosha:** The City plans to have one early voting location, at City Hall, and plans to hold early voting two weeks before the August election, with no weekend or evening hours planned, and 4 weeks before the November election, with access until 7pm two days/week and Saturday voting availability the week before the election. If City Hall is still closed to the public, they will explore offering early drive thru voting on City Hall property. Resources are needed for staffing (approximately $40,000), PPE ($1,050), signage ($200), laptops, printers, and purchase of a large tent ($8,789) to utilize for drive thru early voting. Staff could see voters ID, print their label, hand them their ballot, and then collect the completed envelope. This would also allow staff to help voters properly do certification and provide witness signatures if necessary. The City could do this for one full week before elections. **Total $50,039.**

- **Madison:** The City would like to provide 18 in-person absentee voting locations for the two weeks leading up to the August election, and for the four weeks leading up to the November election. Their original plan was to offer in-person absentee voting at all nine library locations, the City Clerk’s Office, a city garage, Edgewood College, two Madison College locations, and four UW-Madison locations. Due to weather uncertainties, they will need to purchase and utilize tents ($100,000) for the curbside voting locations in order to protect the ballots, staff, and equipment from getting wet and will also need large feather flags to identify the curbside voting sites. (Additional staff costs covered by the earlier question re. Absentee ballot processing.) The City would also like to get carts ($60,000) for our ExpressVote accessible ballot marking devices so we can use the ExpressVote for curbside voting to normalize the use of ExpressVote to help voters with disabilities feel less segregated during the voting process. **Total: $160,000.**

- **Milwaukee:** The City would like to set up 3 in-person early voting locations for two weeks prior to the August election ($150,000) and 15 in-person early voting
locations and 1 drive-thru location, potentially at a central location like Miller Park, for four weeks prior to the November election ($450,000). (Establishing this many EIPAV sites requires a significant investment in IT equipment, an additional ballotar printer, tents, signage, and traffic control assistance. Milwaukee would also like to offer evening and weekend early voting hours which would add additional costs for both August ($30,000) and November ($75,000). Total: $705,000.

- **Racine:** The City would like to offer a total of 3 EIPAV satellite locations for one week prior to the August election, as well as offering in-person early voting - curbside, if City Hall is still closed to the public - at the Clerk's office for 2 weeks prior to the August election. For the November election, Racine would like to offer EIPAV at 4 satellite locations two weeks prior to the election and at the Clerk's office (again, potentially curbside) 6 weeks prior. The City would need to obtain PPE, tents, supplies and cover staff time and training ($40,000). Racine would also like to have all satellite locations available for half-day voting the two Saturdays ($17,000) and Sundays ($17,000) prior to the November election, and the library and mall locations would be open until 8pm the week prior to the Election. Additional resources needed include one-time set-up fee per location ($7,500), laptops and dymo printers ($10,000), training ($1,100), and signage ($12,000.) As well, the City would like to host at least one drive-thru Voter Registration Day, where City Hall would be set up for residents to come get registered, curbside, and get their voting questions answered by Clerk's staff. Newly registered voters could also get assistance requesting absentee ballots for upcoming elections while they're there. ($8,000) Total: $112,600

**Total:** $1,062,639.00

**Recommendation:** Total for All Strategies to Encourage and Increase Absentee Voting by Mail and Early, In-Person: $2,572,839.00
Recommendation II: Dramatically Expand Voter & Community Education & Outreach, Particularly to Historically Disenfranchised Residents

All five municipalities expressed strong and clear needs for resources to conduct voter outreach and education to their communities, with a particular emphasis on reaching voters of color, low-income voters without reliable access to internet, voters with disabilities, and voters whose primary language is not English. This outreach is particularly necessary given the voter confusion that ensued in the lead-up to the April election, and voters’ concerns and questions about voting during the COVID-19 pandemic. We understand that our communities of color do not necessarily trust the voting process, and that we need to work to earn that trust. We want to be transparent and open about what happens behind the scenes in elections, and what options are available for casting a ballot. We also want to make sure we are listening to groups that have historically been disenfranchised and groups that are facing obstacles with voting during this pandemic, and working with them to effectively respond to their concerns.

Voter outreach and education is also needed to encourage and explain new voter registration, and to encourage voters to verify and update their address or other voter registration information to do so prior to the Election. None of our communities have sufficient resources budgeted or available for the strategic, intentional, and creative outreach and education efforts that are needed in our communities over the summer and into the fall.

We all want our communities to have certainty about how the voting process works, trust in our election administration’s accuracy, and current, accurate information on what options are available to vote safely in the midst of the pandemic. Significant resources are needed for all five municipalities to engage in robust and intentional voter education efforts to reduce confusion; encourage and facilitate new voter registration and registration updates; provide clear, accessible, and accurate information; address voters’ understandable pandemic-related safety concerns; reassure voters of the security of our election administration; and, ultimately, reduce ballot errors and lost votes and enhance our residents’ trust and confidence in our electoral process.

- **Green Bay**: Would like to reach voters and potential voters through a multi-prong strategy utilizing “every door direct mail,” targeted mail, geo-fencing, billboards, radio, television, and streaming-service PSAs, digital advertising, and automated calls and texts ($100,000 total). The City would also like to ensure that these efforts can be done in English, Spanish, Hmong, and Somali, since roughly 11% of households in the Green Bay area speak a language other than English. Ideally, the City would employ limited term communications staff or engage communications consultants ($50,000) from August through the November election to design these communications and design and launch paid advertising on Facebook, Twitter, and Instagram, also in multiple languages. The City would also like to directly mail to residents who are believed to be eligible but not registered voters, approximately 20,000 residents. It would require both
considerable staff time to construct that list of residents and directly mail a professionally-designed piece (in multiple languages) to those voters. ($50,000 total for staffing, design, printing, and postage). To assist new voters, the City would also like resources to help residents obtain required documents (i.e. birth certificates) which are needed to get a valid state ID needed for voting. These grant funds ($15,000) would be distributed in partnership with key community organizations including churches, educational institutions, and organizations serving African immigrants, LatinX residents, and African Americans. **Total: $215,000**

- **Kenosha:** Would like to directly communicate to all Kenosha residents via professionally-designed targeted mail postcards that include information about the voter’s polling location, how to register to vote, how to request an absentee ballot, and how to obtain additional information. The City would have these designed by a graphic designer, printed, and mailed ($34,000). The City would also like resources for social media advertising, including on online media like Hulu, Spotify, and Pandora ($10,000) and for targeted radio and print advertising ($6,000) and large graphic posters ($3,000) to display in low-income neighborhoods, on City buses, and at bus stations, and at libraries ($5,000). **Total: $58,000**

- **Madison:** Would like to engage the City's media team to produce videos to introduce voters to the election process, voting options, and to explain the safety precautions taken at polls and early voting sites. These videos would then be shared in numerous ways, including through partner organizations and on the City’s social media platforms. The City would also like to partner with community organizations and run ads on local Spanish-language radio, in the Spanish-language newspapers, on local hip hop radio stations, in African American-focused printed publications, and in online publications run by and for our communities of color (advertising total $100,000). Additionally, the City has many poll workers who are from historically disenfranchised communities. The City would like to pay those poll workers ($75,000) to conduct voter outreach and additional poll worker recruitment activities. **Total: $175,000.**

- **Milwaukee:** Would like to partner with other City divisions to develop mailings and door hangers ($10,000) that could accompany water bills, be distributed by the Department of Neighborhood Services, or hung on trash receptacles by sanitation staff. The City would also like to revamp current absentee voting instructions to be more visual, address issues specific to the pandemic such as securing a witness signature, prepare it in English and Spanish, and print 150,000 color copies (estimated total $15,000). The Election Commission would also like to produce a short video ($5,000) with visuals showing voters how to apply for an absentee ballot and how to correctly complete and return the ballot. Additionally, the Election Commission would like to hire a communications firm to prepare and implement a comprehensive voter outreach communications plan.
($250,000). This communications effort would include numerous voter education ads and PSAs on radio, billboards, buses, with some using local celebrities like Milwaukee Bucks players. This communications effort would focus on appealing to a variety of communities within Milwaukee, including historically underrepresented communities such as LatinX and African Americans, and would include a specific focus on the re-enfranchisement of voters who are no longer on probation or parole for a felony. Additionally, this campaign would include an edgy but nonpartisan and tasteful communications campaign to harness the current protests’ emphasis on inequity and ties that message to voting. The video, the ads, and the PSAs could all also be placed on social media, the Election Commission and City websites, and GOTV partner websites and social media. **Total: $280,000**

- **Racine:** The City would like to retain a communications firm to design and implement a comprehensive voter outreach communications plan ($80,000). This would include ads on Facebook, Instagram, and Snapchat. The City would also like to rent billboards in key parts of the City ($5,000) to place messages in Spanish to reach Spanish-speaking voters. The City would also like to do targeted outreach aimed at City residents with criminal records to encourage them to see if they are not eligible to vote; this outreach will be accomplished with the production, editing, and sharing of a YouTube video ($2,000) specifically on this topic shared on the City’s website, social media channels, and through community partners. Racine would also like to purchase a Mobile Voting Precinct so the City can travel around the City to community centers and strategically chosen partner locations and enable people to vote in this accessible (ADA-compliant), secure, and completely portable polling booth on wheels, an investment that the City will be able to use for years to come. (Estimated cost $250,000). **Total: $337,000**

**Recommendation II Total For All Strategies to Dramatically Expand Strategic Voter Education and Outreach Efforts, Particularly to Historically Disenfranchised Residents: $1,065,000.00**
Recommendation III: Launch Poll Worker Recruitment, Training, and Safety Efforts

The pandemic made conducting Election Day activities extremely challenging. Most poll workers in Wisconsin are retirees doing their civic duty to help facilitate the election. Given the increased risk for the elderly if exposed to COVID-19, many experienced poll workers opted out. Milwaukee had so many poll workers decline to serve that the City went from 180 polling locations to five polling locations. Green Bay, facing a similar exodus of poll workers, went down to two polling locations. Racine usually relies on nearly 190 poll workers for a spring election; only 25 of those experienced poll workers were under the age of 60.

As fears about the coronavirus increased in mid-late March and early April, poll workers in all five municipalities declined to work the election, leaving cities scrambling to quickly recruit enough bodies to keep polling locations open. All cities were appreciative of the last minute assignment of hundreds of Wisconsin National Guard members to assist with Election Day activities, and all of our cities re-assigned City staff from other departments to serve as poll workers and election officials and to assist with the myriad of tasks related to Election Day administration. The remainder of positions were staffed by high school students, college students, and members of the National Guard. Many of our poll workers had never worked an election before.

- **Green Bay**: The City needs to hire a total of 380 workers per election (total $112,660). The City would like to pay poll workers more than they have previously received, to signify their importance in the process and to acknowledge the extra challenge it represents to serve as an election official during a pandemic. The City would like to increase poll worker salaries by 50% (additional $56,330). All poll workers will be trained through the Wisconsin Elections Commission website and the City’s own training manual ($6,000). **Total: $174,990**

- **Kenosha**: The City needs to hire 350 poll workers per election ($100,000). They would like to offer hazard pay to increase pay to $160/worker and $220/chief inspectors ($10,840). To aid in recruitment efforts, the City would like to hire a recruiter and liaison position for poll workers ($35,000). **Total: $145,840**.

- **Madison**: The City utilizes the election toolkit available through the MIT Technology Project to determine the staffing levels needed to ensure that voters will not have to wait in line for more than 15 minutes. In addition to the one Chief Inspector per polling location, Madison also has additional election officials who are certified as the Absentee Lead at each polling location. Madison estimates that if 75% of votes cast are absentee, the City will need 1,559 election officials at the polls in August. The City envisions a robust and strategic poll worker recruitment effort, focusing on people of color, high school students, and college students. The City would like to have resources for hazard pay for poll workers this fall at a rate comparable to what the U.S. Census is paying in the area.
($369,788). The City has also found it challenging to convince facilities to host a polling location in the midst of a pandemic, and would like to provide each facility with a small amount of funds to compensate for their increased cleaning and sanitization costs ($750/location, $138,000 total). Total: $507,788

- **Milwaukee**: The City plans to have 45 voting locations in August and to keep open as many of the normal 180 polling places as possible in November. August will require 3 chief inspectors per site and 20 election workers per site, for a total of 1200 election workers minimum and 150 chief inspectors. The City has a goal of recruiting 1,000 new election workers. The City would like to add an additional $100 per worker in hazard pay to the poll workers’ stipends of $130 ($460,000 additional for both elections) and $100 hazard pay to chief inspector stipends of $225 ($87,750 additional for both elections). Additionally, the City of Milwaukee utilizes a Central Count of absentee ballots, which necessitates 15 chiefs and 200 election workers per election at Central Count ($50,000/day for 2- days each election for a total of $200,000). Total payroll for both elections will reach $750,000 based upon these calculations. The City will launch a recruitment campaign for a new generation of election workers to sign up and be involved in their democracy, and hopes this effort can be included in the above request for resources for a marketing firm. Recruiting new and younger poll workers means that the Election Commission will need to innovate in election training. The Commission would like to produce polling place training videos ($50,000) with live small-group, socially distanced discussions and Q&A sessions. These videos will augment existing training manuals. Total: $800,000

- **Racine**: The City needs approximately 150 poll workers for August and 300 for November, in addition to 36 Chief Inspectors, and would like to pay all workers a $100/election hazard pay ($118,000 total payroll for both elections). City notes that its desire to have more early voting locations and hours is directly impacted by its ability to hire and train election officials. To that end, the City would like to launch a recruitment campaign that includes radio ads ($1,000), ads on social media platforms ($10,000), billboards in strategic City locations ($5,000), and film videos for high school students in history/government classes ($500). The City would also like to enlist a communication firm to: create a training video for election officials, develop an online quiz, detailed packets for election officials, and a PPE video filmed by a health professional about necessary COVID-19 precautions during all voting operations ($22,000 total). Racine would also like to hire a liaison position to schedule, training and facilitate poll workers. ($35,000) Total: $181,500.

**Recommendation III Total for All Strategies to Launch Poll Worker Recruitment, Training and Safety Efforts: $1,810,028.00**
Recommendation IV: Ensure Safe & Efficient Election Day Administration

It is no small task to mitigate risk of a lethal pandemic at all polling locations and throughout all required Election Day processing. Municipal clerks must ensure they have done everything possible to comply with public health guidelines and mitigate the risk of COVID-19 for all of the election officials, poll workers, observers, and voters. Our five municipalities are in need of numerous resources to both ensure seamless processing of voters on the upcoming Election Days, procure Personal Protective Equipment (PPE), disinfectant, and cleaning supplies to protect election officials and voters from the coronavirus, and to aid in processing of an expected high volume of absentee ballots. Additionally, as several of our municipalities move to add or expand drive-thru voting on Election Days, those expansions come with additional unbudgeted expenses for signage, tents, traffic control, publicity, and safety measures. All of our municipalities need resources to ensure that the remaining 2020 Election Days are administered seamlessly and safely.

- **Green Bay:** Green Bay would like to purchase 135 electronic poll books ($2,100/each for a total of $283,500) to reduce voter lines, facilitate Election Day Registrations and verification of photo ID. The City would also like a high speed tabulator ($62,000) to count absentee ballots on Election Day, a ballot opener and ballot folder ($5,000), and additional staff to process absentee ballots on Election Day ($5,000). The City also needs masks, gloves, gowns, hair nets, face shields ($15,000), cough/sneeze guards ($43,000), and disinfectant supplies ($3,000). **Total: $426,500**

- **Kenosha:** The City would like to purchase automatic hand sanitizer dispensers for all polling locations ($14,500) as well as PPE (gloves, masks, disinfectant, etc.) for all poll workers and voters ($15,200). Kenosha would also like to be able to offer elderly residents and people with disabilities who wish to vote in person on Election Day two-way transportation, utilizing a local organization such as Care-A-Van ($2,000). The City also needs resources for technology improvements to include a ballot opener, a ballot folder, 12 additional laptops and dymo printers, and high-speed scanner tabulators ($172,000 total) to expedite election day processing and administration. **Total: $203,700**

- **Madison:** The City needs hand sanitizer for all poll workers and voters, disinfectant spray, plexi-glass shields to allow poll workers to split the poll books, face shields for curbside election officials, and face masks for all poll workers and observers ($20,000) as well as renting additional space to safely and accurately prepare all supplies and practice social distancing at the public test of election equipment ($20,000). If the new voter registration form is not translated by the state into both Spanish and Hmong, Madison plans to translate the form ($500). **Total: $40,500**
- **Milwaukee**: The City will be purchasing 400 plexiglass barriers ($55,000) for election workers at all polling location receiving and registration tables. Additionally, the Milwaukee Election Commission will need to acquire 400 face shields for workers not staffed behind plexiglass ($4,000), gloves for all poll workers ($3,000), masks on hand for election workers and members of the public ($5,000), hand sanitizer ($2,000) and disinfectant ($2,000). Additionally, since Milwaukee also plans to offer curbside voting as an option at all polling places, updated, larger, more visible signage is necessary ($5,000). Total: **$76,000**

- **Racine**: Racine plans to issue all 36 wards its own PPE supply box which will each include masks, cleaning supplies, pens for each voter, gloves, hand sanitizer, safety vests, goggles, etc. ($16,000). The City also needs large signs to direct and inform voters printed in English and Spanish ($3,000). Additionally, the City would like to deploy a team of paid trained EDR Specialists for each polling location ($10,000, including hourly pay, training expenses, and office supplies). As well, Racine would like iPads with cellular signal for each polling location to be able to easily verify voters’ registration status and ward ($16,000). The City would like to equip all wards with **Badger Books ($85,000)**. Racine began using electronic poll books in the February 2020 election and has found they dramatically increase and facilitate EDR, verification of voters’ photo ID, expedite election processes, and reduce human error. Total: **$130,000**

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<th>Recommendation IV</th>
<th>Total for All Strategies to Ensure Safe &amp; Efficient Election Day Administration: $876,700.00</th>
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**Conclusion**

As Mayors in Wisconsin’s five largest cities, we are committed to working collaboratively and innovatively to ensure that all of our residents can safely exercise their right to vote in 2020’s remaining elections in the midst of the COVID-19 pandemic. The April 2020 election placed two of our most sacred duties in conflict: keeping our residents safe and administering fair, free, and inclusive elections. This Wisconsin Safe Voting Plan 2020 represents a remarkable and creative comprehensive plan, submitted collaboratively by all five of our cities. With sufficient resources, all five municipalities will swiftly, efficiently, and effectively implement the recommended strategies described in this plan, to ensure safe, fair, inclusive, secure, and professional elections in all of our communities this year.
Grant from the Center for Tech and Civil Life (Grant Control Number 00306)

Resolved, that the Mayor and City Clerk be authorized to accept the funds from the Center for Tech and Civil Life in the amount of $942,100.00 to help facilitate the Wisconsin Safe Voting Plan for 2020. (Grant Control Number 00306)

Fiscal Note: No city match is required.
City of London, England — 2020

Clerk to send to all those who have a valid email address: A Notice of Election for the Community Council Chair has been issued.

Please refer to the Election Notice for details.

[Notice of Election for the Community Council Chair]

Clerk to email to all those who have a valid email address: A Notice of Election for the Community Council has been issued.

Please refer to the Election Notice for details.

[Notice of Election for the Community Council]

Clerk to email to all those who have a valid email address: A Notice of Election for the Community Council Vice-Chair has been issued.

Please refer to the Election Notice for details.

[Notice of Election for the Community Council Vice-Chair]

Clerk to email to all those who have a valid email address: A Notice of Election for the Community Council Secretary has been issued.

Please refer to the Election Notice for details.

[Notice of Election for the Community Council Secretary]

Clerk to email to all those who have a valid email address: A Notice of Election for the Community Council Treasurer has been issued.

Please refer to the Election Notice for details.

[Notice of Election for the Community Council Treasurer]
Mobile Voting Precinct

Resolved, that formal bidding, sole source, may be waived and the Mayor and City Clerk are authorized and directed to enter into an agreement with Burlington RV to purchase a mobile voting precinct.

Fiscal Note: Funds available from the Center for Tech and Civic Life Safe Elections Grant not to exceed $250,000.00.
August 31, 2020

City of Racine

Dear Mayor Mason,

I am pleased to inform you that the Center for Tech and Civic Life ("CTCL") has decided to award you a grant to support the work of the City of Racine.

The following is a description of the grant:

AMOUNT OF GRANT:  Six Hundred Fifty-Seven Thousand US Dollars (USD $657,000).

PURPOSE:  The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration in the City of Racine in accordance with the Wisconsin Safe Voting Plan 2020 and the attached "Additional Resources Requested for November 3rd, 2020 General Election."

Before we transmit these funds, we ask that you sign this agreement promising to use the grant funds in compliance with United States tax laws. Specifically, by signing this letter you agree to the following:

1. The City of Racine is a local government unit or political subdivision in the meaning of 26 USC 170(c)(1).

2. This grant shall be used only for the public purpose described above, and for no other purposes.

3. The City of Racine shall not use any part of this grant to give a grant to another organization unless CTCL agrees to the specific grant in writing.

4. The City of Racine has produced a plan for safe and secure election administration in 2020 and a supplement to such plan, including an assessment of election administration
needs, budget estimates for such assessment, and an assessment of the impact of the plan on voters. This supplemental plan is attached to this agreement. The City shall expend the amount of this grant for purposes contained in this plan by December 31, 2020.

5. The City of Racine shall produce a report documenting how this grant has been expended in support of the activities described in paragraph 4. This report shall be written and sent to CTCL by January 31, 2021 or in any other format approved by CTCL.

6. The City of Racine shall not reduce the budget of the City Clerk of Racine ("the Clerk") or fail to appropriate or provide previously budgeted funds to the Clerk for the term of this grant. Any amount reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.

7. CTCL may discontinue, modify, withhold part of, or ask for the return all or part of the grant funds if it determines, in its sole judgment, that (a) any of the above conditions have not been met or (b) it must do so to comply with applicable laws or regulations.

8. The grant project period of June 15, 2020 through December 31, 2020 represents the dates between which covered costs may be applied to the grant.

Your acceptance of these agreements should be indicated below. Please have an authorized representative of The City of Racine sign below, and return a scanned copy of this letter to us by email at grants@techandciviclife.org

On behalf of CTCL, I extend my best wishes in your work.

Sincerely,

Tiana Epps Johnson
Executive Director
Center for Tech and Civic Life
Additional Resources Requested for November 3rd, 2020 General Election

- **Post Office Liaison- ($20,000)**
  - A post office liaison who will be the representative to the post office regarding sending and receiving mail. This position will begin as soon as ballots are available and will assist in the day to day operations of the mail service. This will include but not limited to posting and mailing absentee ballots and election mailers, picking up the mail from the post office daily, sorting ballots, and helping to correct incomplete absentee certifications via means of the mail.

- **Absentee Ballot Certification Liaison (2 positions) ($40,000)**
  - Absentee ballot contact tracers will be responsible for correcting absentee ballot certifications by making appointments to greet voters (curbside) at their house or at a designated location to witness the ballot, confirm signatures, and confirm dates are properly filled out.
  - Absentee ballot contact tracers will also make appointment with voters to meet curbside at their residence to assist voters in completing their absentee ballot they received by mail.

- **Advertising for Ballot Certification Liaison to meet at your residence ($20,000)**

- **15 Extra Ballot Drop Off Boxes to be placed around the City ($90,000)**
  - This will include the cost of purchasing the drop boxes, installing the drop boxes, and security cameras

- **Hazard Pay/ Overtime for City Employees to work the November 3rd Election ($180,000)**
  - This will secure enough City employees to work the Election and provide additional election officials as necessary to safely and properly complete the November Election
  - This will include overtime and hazard pay for regular City Clerk’s Office Staff to preform additional duties outside of job descriptions and regular work hours

- **Ballot Box Liaisons (40 positions or 2 liaisons per ballot drop off box) ($200,000)**
  - The ballot box liaisons will be responsible for attending to the ballot drop off boxes to assist voters in confirming their absentee ballot has a complete certification prior to submitting their ballot.

- **Election Official Scheduler ($25,000)**
  - This position will be solely responsible scheduling all election officials, voter ambassadors, ballot box liaisons, and all other election official scheduling.
  - This position will also be responsible to track and document all hours worked for the above listed positions.

- **Absentee Barcode Scanner ($1,000)**
  - We need additional scanners to help streamline the process of recording and tracking absentee ballots

- **City Hall Vote Today Banner (2) ($10,000)**
  - Two large banners to hang across City Hall that will promote voting.

- **Ways to Vote Mailer In English and In Spanish ($30,000)**
  - Outsource a mailer to all registered voters to provide information on the different ways to vote in both English and in Spanish.
- 10 iPads with Hotspots ($15,000)
  - iPads will be used to communicate absentee ballots on Election Day that are returned to the polling location
- Secure Ballot Auxiliary Boxes (20) ($3,000)
  - To be used on Election Day for voters to securely vote curbside
- Sign Towers (14) ($3,000)
  - For additional sign towers to provide Spanish directions in wards that are predominantly bilingual.
- Social Distancing Supplies ($20,000)
  - Additional social distancing supplies for Absentee Early Voting and Election Day

Total: $657,000
AFFIDAVIT OF KRIS TESKE

STATE OF WISCONSIN        )
COUNTY OF BROWN           )SS.

1, Kris Teske, being first duly sworn, swear and state as follows:

1. I am employed as the City Clerk by the City of Green Bay, Wisconsin (herein “City”).

2. The City applied for a grant from the Center for Tech and Civic Life (herein “CTCL”) in the amounts and for the purposes listed in the attached Grant Agreement and Wisconsin Safe Voting Plan (collectively “Agreement”) attached hereto as Exhibit A.

3. The City received notification that it was awarded a grant by CTCL in the amount of $1,093,400.00.

4. At its meeting on July 21, 2020, the City of Green Bay Common Council accepted award of the grant and the approved the Wisconsin Safe Voting Plan and the recommendations contained therein.
5. I have examined the Agreement, which awards CTCL grant funds to the City and sets rules for how the funds are to be spent.

6. Pursuant to the Agreement, the City must use the CTCL grant funds exclusively for the purpose of planning and operationalizing safe and secure election administration in the City in accordance with the Wisconsin Safe Voting Plan.

7. The Chief of Staff, in conjunction with other Clerk’s Office, is charged with administering the CTCL grant for the City.

8. All of the CTCL grant money that has been spent, or that will be spent, has been and will be in accordance with the rules given in the Agreement.

9. None of the CTCL grant money has been or will be spent to engineer a certain election result or for a partisan purpose.

10. The CTCL grant money is being used City-wide to protect the right to vote and accommodate the safety of voters during the COVID-19 pandemic.

Dated at Green Bay, Wisconsin, this 9th day of October, 2020.

Respectfully submitted,

/s/ Kris Teske
Kris Teske, City Clerk
City of Green Bay

Subscribed and sworn to before me this 9th day of October, 2020.

/s/ Electronically signed by Lindsey Belongea
Notary Public, Brown County, WI.
My Commission expires 01/17/23
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

Wisconsin Voters Alliance, et al.

Plaintiff,

v.

City of Racine, et al.

Defendants.

Civil Action No: 1:20-cv-01487

AFFIDAVIT OF DIANA ELLENBECKER

STATE OF WISCONSIN  )
COUNTY OF BROWN  )SS.

I, Diana Ellenbecker, being first duly sworn, swear and state as follows:

1. I am employed as the Finance Director for the City of Green Bay.

2. The Finance Department is charged with recording the expenditures of a $1,093,400.00 grant the City received from the Center for Tech and Civic Life.

3. This grant’s uses as of October 8, 2020 are itemized on the Grant Expenditures attached hereto as Exhibit A.

4. The City has paid $161,850.16, has incurred but not yet paid $931,549.84 and has $0 remaining of this grant as of 10/9/2020.

Dated at Green Bay, Wisconsin, this 9th day of October, 2020.

Respectfully submitted,

s/ Diana Ellenbecker
Diana Ellenbecker, Finance Director
City of Green Bay
Subscribed and sworn to before me
this 9th day of October, 2020.

/ Electronically signed by Lindsey Belongea
Notary Public, Brown County, WI.
My Commission expires 01/17/23
Wisconsin Voters Alliance, et al.

Plaintiff,

v.

Case No. 1:20-cv-01487-WCG

City of Racine, et al.

Defendants.

DECLARATION OF CAROL STANCATO

I, Carol Stancato, hereby declare:

1. I am employed as the Finance Director for the City of Kenosha.

2. The Finance Department is charged with recording the expenditures of a $862,799.00 grant the City received from the Center for Tech and Civic Life ("CTCL").

3. As of the morning of October 9th, 2020 the grant’s funds, paid and encumbered, as submitted to the Finance Department under the CTCL grant are recorded on the attached CTCL Expenses Spreadsheet.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of October, 2020.

Carol Stancato
Finance Director
City of Kenosha
I, John Morrissey, hereby declare:

1. I am employed as the City Administrator for the City of Kenosha, Wisconsin (herein “City”).

2. The City was awarded a grant from the Center for Tech and Civic Life (herein “CTCL”) in the amounts and for the purpose listed in the attached Grant Agreement and Wisconsin Safe Voting Plan (Exhibit A).

3. My Office is supervisory over the City Clerk-Treasurer’s Office and the City Finance Department, and these are the primary offices tasked with expending and recording the expenditures of the CTCL grant, respectively. This declaration is made with knowledge gained from these offices and my own.

4. The City has received a grant in the amount of $862,799.00 from CTCL.

5. I have examined Exhibit A, which awards CTCL grant funds to the City and sets the purpose guiding how the funds are to be spent.
6. Pursuant to Exhibit A, the City must use the CTCL grant funds "exclusively for the public purpose of planning and operationalizing safe and secure election administration in the City of Kenosha in accordance with the Wisconsin Safe Voting Plan."

7. I have examined the attached CTCL Expenses Spreadsheet (Exhibit B), and believe the items recorded therein to comply with the purpose set out in Exhibit A.

8. None of the CTCL grant money will be spent to engineer a certain election result or for a partisan purpose. Future uses of the CTCL grant will be used in accordance with the purpose set out in Exhibit A.

9. The CTCL grant money is being used City-wide to protect the right to vote and accommodate the safety of voters during the COVID-19 pandemic.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of October, 2020.

[Signature]
John Morrissey
City Administrator
City of Kenosha
I hereby declare, under penalty of perjury, that the information which follows below is true and correct:

1. I am employed as the City Clerk by the City of Madison, Wisconsin (herein "City"). I have held this position since 2006.

2. The City applied for a grant from the Center for Tech and Civic Life (herein "CTCL") in the amounts and for the purposes listed in the Grant Agreement and Wisconsin Safe Voting Plan (collectively "Agreement"). A copy of the signed Agreement is attached to this Declaration as Exhibit "A".

3. The City has received a grant in the amount of $1,271,788.00 from CTCL.

4. I have examined the Agreement, which awards CTCL grant funds to the City and sets rules for how the funds are to be spent.

5. Pursuant to the Agreement, the City must use the CTCL grant funds exclusively for the purpose of planning and operationalizing safe and secure election administration in the City in accordance with the Wisconsin Safe Voting Plan.

6. My office is charged with administering the CTCL grant for the City.
7. The City has spent $256,815.28, has incurred but not yet spent $78,430.20, and has $936,542.52 remaining of this grant as of October 7, 2020.

8. All of the CTCL grant money that has been spent, or that will be spent, has been and will be in accordance with the rules given in the Agreement.

9. None of the CTCL grant money has been or will be spent to engineer a certain election result or for a partisan purpose.

10. Rather, the CTCL grant money is being used City-wide to protect the right to vote and provide for the safety of voters during the COVID-19 pandemic. For example, the City of Madison is using grant funds for the following purposes: rent for polling places in the community to replace free public places unavailable due to pandemic closures, plexiglass safety screens, hand sanitizer and equipment for workers at polling places, secure ballot bags, and public advertising to encourage members of the public to have a voting plan and inform them of their options.

11. In addition, the City has committed to spend but has not yet spent, grant monies to pay for Covid stipends as follows: $750 to each of 92 expected polling places and $8.17/per hour of Covid hazard pay in addition to the regular hourly wage to each of approximately 6,000 poll workers.

12. Based upon my 14 years of experience as City Clerk, my training and understanding of my duties under Wisconsin law, all of the uses to which Madison is putting the grant funds are within my authority and part of my duties pursuant to Wis. Stats. Sec. 7. 15, a copy of which is also attached to this Declaration as Exhibit “B”.

Executed pursuant to 28 U.S.C. Sec. 1746 at Madison, Wisconsin, this 7th day of October, 2020.

/s/ Maribeth Witzel-Behl
Maribeth Witzel-Behl, City Clerk
City of Madison
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

Wisconsin Voters Alliance, et al.

Plaintiff,

v.

Civil Action No: 20-CV-01487

City of Racine, et al.

Defendants.

DECLARATION OF S. CLAIRE WOODALL-VOGG

I, S. Claire Woodall-Vogg, hereby declare:

I make this declaration based on my personal knowledge and, if called to testify, I could and would so competently as follows.

1. I am the Executive Director of the Election Commission by the City of Milwaukee, Wisconsin (herein “City”). In my capacity as Executive Director, I administer elections for the City’s voters.

2. The City applied for a grant from the Center for Tech and Civic Life (herein “CTCL”) in the amounts and for the purposes listed in the attached Grant Agreement and Wisconsin Safe Voting Plan (collectively “Agreement”) attached as Exhibit A.

3. The City has received a grant in the amount of $2,154,500.00 from CTCL.

4. I have examined the Agreement, which awards CTCL grant funds to the City and sets rules for how the funds are to be spent.

5. Pursuant to the Agreement, the City must use the CTCL grant funds exclusively for the purpose of planning and operationalizing safe and secure election administration in the City in accordance with the Wisconsin Safe Voting Plan.

6. My office is charged with administering the CTCL grant for the City.
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

10. Rather, the CTCL Grant money is being used city-wide to protect the right to vote and for a partisan purpose.

9. None of the CTCL Grant money has been or will be spent to influence a certain election result or in accordance with the rules given in the Agreement.

8. All of the CTCL Grant money that has been spent, or that will be spent, has been and will be in accordance with this agreement.

7. The City has paid $766,560.86, has incurred but not yet paid $1,033,000 and has $334,939.14 remaining of this Grant as of 10/8/20.

S. Claire Woodall-Vogg

Executed this 8th day of October, 2020.
have been added to WIsVote by this point. Please let us know if you need assistance with adding any contests and we can assist. Thanks again for your patience.

Here is the ballot order and candidate names for President/VP that lists how each name should appear on the ballot and their political party.

Ballot order for Office of the President and Vice President:

1. Joseph R. Biden / Kamala D. Harris (Democratic)
2. Donald J. Trump / Michael R. Pence (Republican)
3. Don Blankenship / William Mohr (Constitution)
4. Jo Jorgensen / Jeremy Spike Cohen (Libertarian)
5. Brian Carroll / Amar Patel (American Solidarity)

Thanks again for all of your hard work.

Let me know if you have any further questions and I will be happy to assist.

Best,

Richard Rydecki  
Assistant Administrator  
Wisconsin Elections Commission  
212 East Washington Avenue, Third Floor  
Madison, WI 53703  
Phone: (608)261-2015

Follow Us on Facebook and Twitter!
FW: Door County Ballots

Hi Yvonne –

We reviewed the ballots you sent for proofing and we received WEC’s blessing on layout. I am holding off until at least tomorrow pending WEC certification before making any bold moves. With the West/Tidball court appeal I’m not certain just when I’ll be ready to send to Scot for printing (I will reach out to him). I’m waiting patiently for WEC to send out something with a bit of guidance...

So at this point, at least what we do have, should be good to go. Now it’s a wait and see for a day or two or more....

Thanks,

Jill
FW: [EXTERNAL] Door County Ballots

From: Yvonne Cai <yvonne.cai@dominionvoting.com>
Sent: Monday, August 31, 2020 9:48 AM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Re: [EXTERNAL] Door County Ballots

I think their advice was to print at your own risk... but let's hope they just deal with the Kanye west thing ASAP

Thanks Jill!

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Monday, August 31, 2020 10:45:41 AM
To: Yvonne Cai <yvonne.cai@dominionvoting.com>
Subject: [EXTERNAL] Door County Ballots

Hi Yvonne —

We reviewed the ballots you sent for proofing and we received WEC’s blessing on layout. I am holding off until at least tomorrow pending WEC certification before making any bold moves. With the West/Tidball court appeal I’m not certain just when I’ll be ready to send to Scot for printing (I will reach out to him). I’m waiting patiently for WEC to send out something with a bit of guidance...

So at this point, at least what we do have, should be good to go. Now it’s a wait and see for a day or two or more....

Thanks,

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov
The United States Constitution

State Legislature

1. Under the U.S. Constitution, the state legislature enacts the Wisconsin laws by which federal elections are administered.

Wisconsin Elections Commission

2. The state legislature, by law, has delegated to the Wisconsin Elections Commission general authority to administer and implement the Wisconsin laws by which federal elections are administered.

Private Activists

Municipal Clerks

3. The State legislature, by law, has delegated to the municipal clerk's charge and supervision of federal elections with their respective municipalities.
State of Wisconsin
Before the Wisconsin Elections Commission

The Verified Complaint of

Martin Prujansky
1635 College Ave
Racine WI 53403

Mary Imhof Prujansky
1635 College Ave
Racine WI 53403

Kenneth Brown
217 Gaslight Circle
Racine WI 53403
Mailing address:
341 Main Street #8
Racine WI 53408

Brooke Hesse
3920 16th Street
Racine WI 53405

Dale Giles
2218 Jerome Blvd.
Racine WI 53403

Against Complaint Respondents

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

Hon. Cory Mason
Mayor
City of Racine
730 Washington Ave
Racine, WI 53403
This complaint is made under Wisconsin Statutes § 5.06.

We, the complainants Martin Prujansky, Mary Imhof Prujansky, Kenneth Brown, Brooke Hesse and Dale Giles allege, based on personal knowledge or upon information and belief, that:

Introduction

The Wisconsin Legislature expressly assigned to the Wisconsin Elections Commission “the responsibility for the administration of ... laws relating to elections,” Wisconsin Statutes § 5.05(1). Trump v. Wisconsin Elections Commission, 983 F.3d 919, 927 (7th Cir. 2020). The Commission’s Administrator, Meagan Wolfe, even as recently as March 31, 2020, before the General Assembly’s Campaigns and Elections Committee, publicly supported Wisconsin cities adopting private corporate conditions on state and federal elections without the Commission’s prior determination of the legality of imposing private corporate entity conditions upon existing state and federal election laws.¹

In the November 2020 general election, the City of Racine adopted private corporation conditions on the election process affecting state and federal elections. In this case, Racine involved private corporations and their employees in the City’s state and federal

election administration. By doing so, Racine failed to comply with state laws, including obtaining from the Commission a prior determination of the legality of the private corporate conditions in the election process, and failed to comply with the U.S. Constitution’s Elections and Electors Clauses which guarantee the state Legislature the exclusive role in approving Wisconsin’s legal conditions relating to federal elections.

In March of 2021, Wisconsin Open Records Act (Wisconsin Statutes §19.31, et seq.) requests relating to Wisconsin election administration and Wisconsin legislative hearing testimony relating to election administration, revealed to the Complainants that Racine officials, responsible for the election process and procedures, adopted and implemented private corporate conditions, including direct corporate and corporate employee engagement in the administration of the general election.² Moreover, Complainants found that Racine Mayor Cory Mason, in his official capacity as Mayor, recruited four other cities—Milwaukee, Madison, Kenosha and Green Bay—to place the same corporate conditions on their election administration. The five cities and the private corporations began to refer to themselves as the “Wisconsin Five.”

The State Legislature never gave municipalities the authority to adopt or accept private corporate conditions affecting existing state election laws. The Commission, as the responsible entity in the administration of election laws, never opined on the legality of

²App. 1-482. Subsequent page references are to the appendix unless otherwise noted. The appendix has been provided because virtually all of the complaint’s allegations are based on information found in government documents produced by Racine and other Wisconsin municipalities. For the purposes of the complaint, the complainants have presumed the government’s documents are authentic. The complaint’s inferences from the emails are based upon information and belief.
private corporate conditions affecting existing election laws. The Complainants allege that the Administrator’s and Racine’s actions violate state law and the U.S. Constitution’s Elections and the Electors Clauses because they diverted constitutional authority of the State Legislature and the Commission to private corporations and the approving municipality of Racine. Further, the Complainants allege that Racine and certain Racine officials may have violated state and federal laws when they accepted and adopted private corporate conditions and when they approved Racine’s engagement of private corporations and their employees into Racine’s election administration. The Commission must act to correct and restrain the Administrator and Racine from the Administrator’s legal position that the Commission has no role when a municipality’s actions could or do directly modify the conditions of the municipality’s state and federal elections.

First, the Commission should declare that the Commission indeed has a role in the administration of election laws whenever a municipality seeks to adopt as policy or enter into an agreement of any kind with a private corporate entity that imposes conditions in exchange for moneys involving the election process and administration.

Second, the Commission should reiterate that the Administrator may not render a decision without the approval of the Commission related to the legality of any agreement between private corporate entities and municipalities related to imposing private corporate conditions on the administration of election laws.

Third, the Commission should investigate the circumstances and factual allegations asserted in this Complaint regarding the legality of Racine’s acts and actions juxtaposed against state and federal election laws to ascertain whether those election laws were violated.
Fourth, the Commission should consider any further prosecutorial investigation be directed to the proper local or state authorities.

Finally, if the Commission determines that election laws were violated or that the law is unclear to provide the Commission itself with the ability to determine the legalities of private corporate conditions directly or indirectly affecting the election process and administration, the Commission should make recommendations to the State Legislature for changes to state election laws to ensure the future integrity of the election process.

Complainants

1. Mattin Prufansky is a Wisconsin elector residing at 1635 College Avenue, Racine, Wisconsin 53403.

2. Mary Imhof Prufansky is a Wisconsin elector residing at 1635 College Avenue, Racine, Wisconsin 53403.

3. Kenneth Brown is a Wisconsin elector residing at 217 Gaslight Circle, Racine, Wisconsin 53404 with a mailing address of 341 Main Street #8, Racine WI 53408.

4. Brooke Hesse is a Wisconsin elector residing at 3920 16th Street, Racine, Wisconsin 55405.

5. Dale Giles is a Wisconsin elector residing at 2218 Jerome Blvd., Racine, Wisconsin 53403.

Respondents

6. Meagan Wolfe is the Administrator of the Commission.

7. Respondent Cory Mason is the Mayor of the City of Racine.

8. Respondent Tara Coolidge is the Racine City Clerk.
Statement of Facts

9. The Wisconsin Legislature expressly assigned to the Commission “the responsibility for the administration of ... laws relating to elections,” Wisconsin Statutes § 5.05(1). *Trump v. Wisconsin Elections Commission*, 983 F.3d 919, 927 (7th Cir. 2020).

10. Under Wisconsin Statutes § 7.15(1), the municipal clerk has “charge and supervision” of federal elections within a municipality:

   (1) SUPERVISE REGISTRATION AND ELECTIONS. Each municipal clerk has charge and supervision of elections and registration in the municipality...

11. The Commission and its municipal clerks, in administering elections in Wisconsin’s municipalities, are constitutionally obligated to follow the legal conditions set by the state legislature. Wis. Stat. §§ 5.05(1), 7.15(1).

12. The Elections Clause of the U.S. Constitution states that the state legislatures and Congress set the conditions for Congressional elections:

   The Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof; but the Congress may at any time by Law make or alter such Regulations, except as to the Places of chusing Senators.


13. The Electors Clause of the U.S. Constitution states that the state legislatures exclusively set the conditions for choosing Presidential Electors:

   Each State shall appoint, in such Manner as the Legislature thereof may direct, a Number of Electors, equal to the whole Number of Senators and Representatives to which the State may be entitled in the Congress.

U.S. Const., Art. II, § 1, cl. 2.
14. The Elections Clause and the Electors Clause provide no power to municipal governments to adopt private corporate conditions on federal elections or to introduce private corporations and their employees into federal election administration. U.S. Const., Art. I, § 4, cl. 1 and Art. II, § 1, cl. 2.

15. The City of Racine is incorporated under Wisconsin Statutes chapter 62.

16. Wisconsin cities are created by state statute and cannot exercise any power unless specifically provided for by statute:

   The legislative power in this state is lodged in the legislature. When it exerts that power, it exerts it on behalf of and in the name of the people of the State of Wisconsin.” Van Gilder v. City of Madison, 222 Wis. 58, 67, 267 N.W. 25 (1936). Conversely, “cities are creatures of the state legislature [that] have no inherent right of self-government beyond the powers expressly granted to them.” Black v. City of Milwaukee, 882 N.W.2d 333, 342–43 (Wis. 2016).

17. The Center for Tech and Civic Life (CTCL) is a private non-profit organization providing federal election grants to local governments, headquartered in Chicago, Illinois. (001-002)

18. For the 2020 federal election, CTCL was funded by private donations of more than $300 million that were in turn used as conditional private grants to local governments.3

19. Nationally, CTCL funded local governments, cities and counties, with conditional private grants that were used for the 2020 general election. (001-002)

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20. Certain urban local governments receiving CTCL grants agreed to the conditions of the grant in exchange for receiving CTCL moneys. (017-018; 393-394; 419-420)

21. These grants are contracts between each local government and CTCL. (017-018; 393-394; 419-420)

22. These conditional grants to the local government required reporting back to the private non-profit corporation, CTCL, regarding the moneys used for the 2020 general election. (018; 393; 419)

23. These conditional grants to the local government included claw-back provisions, requiring the local government to return the moneys to the private non-profit corporation, CTCL, if the private non-profit corporation disagreed how those moneys were spent in the conduct of the 2020 election. (018; 393; 419)

24. Upon information and belief, Racine Mayor Cory Mason communicated with CTCL about Racine and other Wisconsin cities accepting private corporate conditions on state and federal elections. (393-394)

25. Upon information and belief, Racine Mayor Cory Mason coordinated on accepting private corporate conditions on state and federal elections with Green Bay Mayor Genrich, Kenosha Mayor John Antaramian, Madison Mayor Satya Rhodes-Conway and Milwaukee Mayor Tom Barrett by having virtual meetings on the following days: May 16, 2020; June 13, 2020; and August 14, 2020. (464-482)
26. After the Wisconsin Five mayors began meeting, in early July 2020, CTCL issued a $100,000 grant to the City of Racine to recruit other Wisconsin cities to join what the other four recruited cities and Racine would refer to as the “Wisconsin Safe Voting Plan.” (393-394)

27. Upon information and belief, Racine Mayor Cory Mason communicated with Mayors of other Wisconsin cities, including Green Bay, Madison, Milwaukee and Kenosha, about the $100,000 grants and accepting private corporate conditions on state and federal elections. (393-394)

28. CTCL authorized the City of Racine to distribute from the $100,000 grant, $10,000 to each of the four recruited cities (keeping $60,000 for itself), as an incentive for the Wisconsin Five Cities to participate in the CTCL conditional grants. (393-394).

29. The four cities Racine and its Mayor successfully recruited were Green Bay, Madison, Milwaukee, and Kenosha. (393-394; 395-415)

30. The so-called “Wisconsin Safe Voting Plan” was a grant application designed for the recruited five cities, Green Bay, Racine, Madison, Milwaukee, and Kenosha to request CTCL grant funding to support election administration activities during the COVID-19 pandemic. (395-415).

31. The “Safe Voting Plan” was developed “in the midst of the COVID-19 Pandemic” to ensure voting could be “done in accordance with prevailing public health requirements” to “reduce the risk of exposure to coronavirus.” Further, it was intended to assist with “a scramble to procure enough PPE to keep polling locations clean and disinfected.” (395-415).
32. The Cities of Madison, Green Bay, Racine, Kenosha and Milwaukee entered into the conditional grant agreements with CTCL. (395-415)

33. CTCL referred to the Cities of Madison, Green Bay, Racine, Kenosha and Milwaukee as the “WI-5” or the “Wisconsin Five” cities. (139-141).

34. However, it is the Commission that can provide “aid” to cities and counties for the administration of elections. Wis. Stat. §5.05(11).

35. Specifically, under Wisconsin Statutes §5.05(10), the Commission may render assistance to municipalities and counties via the state election administration plan that meets the requirements of the Help America Vote Act (Public Law 107–252) to enable participation by Wisconsin in federal assistance programs relating to elections.

36. As previously stated, with respect to elections, the Wisconsin State Legislature under Wisconsin Statutes § 5.05(1) delegated general authority to the Commission for the responsibility of administration of Wisconsin elections.

37. Whether moneys are received from other sources directly or indirectly related to the administration of elections, specifically wherein those moneys are conditional affecting existing election laws, the general authority and the jurisdiction of the Commission is engaged.

38. For instance, under Section 3 of the HAVA state administration plan, the Commission is “required to conduct regular training and administer examinations to ensure that individuals who are certified are knowledgeable concerning their authority and responsibilities.”
39. Upon information and belief, in May and June, 2020, the Cities of Racine, Madison, Green Bay, Milwaukee and Kenosha entered into a conditional grant agreement with CTCL for $6,324,527. (017-018; 393-394; 419-420)

40. Under the terms of the CTCL conditional grant agreement, the five cities adopting the conditions would be required to remit back to CTCL the entire $6,324,527 if CTCL, at its sole discretion, determined these cities had not complied with CTCL’s terms. (017-018; 393-394; 419-420)

41. The CTCL Agreement provides that the purpose of the funds CTCL provided to the cities was to “be used exclusively for the public purpose of planning safe and secure election administration in the City of Racine in 2020, and coordinating such planning with other cities in Wisconsin.” (017, 393, 419). The CTCL Agreement required these cities to develop a plan for their elections pursuant to the agreement by June 15, 2020. (017-018; 393-394; 419-420)

42. Wisconsin and federal election laws establish the manner in which elections are to be conducted. The administration of those laws is within the jurisdiction of the Commission; however, the administration must also be consistent with legislative or Congressional enactments.

43. On June 15, 2020, the Wisconsin Five cities presented their plan to CTCL. Among other things, these cities entered into agreements with CTCL to use the moneys to:

- Hire additional personnel for elections;
- Increase existing salaries for staff;
- Encourage and Increase Absentee Voting (by mail and early, in-person)
• Provide assistance to help voters comply with absentee ballot requests & certification requirements;

• Utilize secure drop-boxes to facilitate return of absentee ballots

• Deploy additional staff and/or technology improvements to expedite & improve accuracy of absentee ballot processing;

• Expand In-Person Early Voting (Including Curbside Voting); and

• Commit "to conducting the necessary voter outreach and education to promote absentee voting and encourage higher percentages of our electors to vote absentee."

(395-415).

44. These provisions contained in the "Wisconsin Safe Voting Report," which the Cities were required to adhere to, cannot be at or under direction of CTCL, in which case would be contrary to, or in-place of, or in addition to Wisconsin or federal election laws.

45. The "Wisconsin Safe Voting Report" (400-411) specifically provided that these Cities would be "promoting" and "encouraging higher percentages of our electors to vote absentee" which violates Wisconsin Statutes 6.84 (1) in which the State Legislature states:

The legislature finds that the privilege of voting by absentee ballot must be carefully regulated to prevent the potential for fraud or abuse; to prevent overzealous solicitation of absent electors who may prefer not to participate in an election.4

(emphasis added).

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4 The reason for Wisconsin’s policy against voting by mail or by absentee ballot is that they are widely recognized to be occasions for voter fraud. For example, the 2005 Commission on Federal Election Reform chaired by former President Jimmy Carter and former Secretary of State James Baker III concluded: 'Absentee ballots remain the largest source of potential voter fraud," and "vote by mail ... increases the risk of fraud."
46. First, not all Wisconsin cities adopted and received conditional grant moneys to administer their respective 2020 general election.

47. Second, those cities that did adopt and receive conditional grant moneys from CTCL, that is the Wisconsin Five, imposed conditions on the administration of elections from a private corporate entity when other cities had no such conditions. Hence, with the added private conditions on Racine’s election process, the Racine Complainants were within a jurisdictional boundary that affected them as a demographic group.

48. Similarly, by the Wisconsin Five cities contracting with CTCL and allied private corporations, the Wisconsin Five cities chose to favor the Wisconsin Five’s demographic groups of urban voters over all other voters in the State of Wisconsin. By these actions, the “Wisconsin Five” cities favored its urban demographic group over other non-urban Wisconsin voters in federal elections, putting the integrity of the election process in jeopardy—and violating Complainants’ rights to lawful and equal elections.

49. Whitney May, Director of Government Services at CTCL, wrote to Racine City Clerk Tara Coolidge and representatives of the other Wisconsin Five cities on August 18, 2020, stating, “You are the famous WI-5…excited to see November be an even bigger success for you and your teams.” (139-141).

50. Upon information and belief, on about May 28, 2020, the Council approved the CTCL conditional grant in the amount of $100,000 to recruit the other Wisconsin Five cities and to prepare the joint Wisconsin Safe Voting Plan 2020 submitted to Center for Tech and Civic Life on June 15, 2020. (393-394)
51. Upon information and belief, on about June 15, 2020, the Council approved the Wisconsin Safe Voting Plan. (395-415)

52. Upon information and belief, on about August 31, 2020, the Council approved the Wisconsin Safe Voting Plan and adopted the CTCL conditional grant in the amount of $657,000. (419-420)

53. Upon information and belief, the CTCL conditions in the August 31, 2020 CTCL grant agreed to by Racine included:

- “The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration in the City of Racine in accordance with the Wisconsin Safe Voting Plan 2020.” (419)

- Each city or county receiving the funds was required to report back to CTCL by January 31, 2021 regarding the moneys used to conduct federal elections; (420)

- “The City of Racine shall not reduce or otherwise modify planned municipal spending on 2020 elections, including the budget of the City Clerk of Racine (the Clerk) or fail to appropriate or provide previously budgeted funds to the Clerk for the term of this grant. Any amount reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.” (420)

- The City of Racine “shall not use any part of this grant to give a grant to another organization unless CTCL agrees to the specific sub-recipient in advance, in writing.” (419)

- “CTCL may discontinue, modify, withhold part of, or ask for the return of all or part of the grant funds if it determines, in its sole judgement, that (a) any of the above conditions have not been met or (b) it must do so to comply with applicable laws or regulations.” (420)

54. Upon information and belief, despite the stated purpose of helping to assist with a COVID-19 safe election, CTCL’s early communications with the Wisconsin cities
such as Green Bay focused on other, apparently parallel purposes referencing other “resources” to help with: “outgoing and return absentee envelopes,” a “Communications Toolkit” from National Vote at Home Institute, and identifying “voters of color” and “determin[ing] voter sentiment in regards to vote by mail.” (017-018, 037)

55. Upon information and belief, even though the stated purpose of the CTCL grant was only for the “Safe Voting Plan” and “for no other purpose,” CTCL, when working with the Wisconsin Five, had other conditions that had nothing to do with COVID prevention, such as:

- Employing “voter navigators” to help voters “complete their ballots”; (030-031)
- The “voter navigators” would later be “trained and utilized as election inspectors”; (031)
- ”Utilize paid social media” and “print and radio advertising” to direct voters “to request and complete absentee ballots”; (030)
- “enter new voter registrations and assist with all election certification tasks”; (030)
- “reach voters and potential voters through a multi-prong strategy utilizing ‘every door direct mail,’ targeted mail, geo-fencing, billboards radio, television, and streaming-service PSAs, digital advertising, and automated calls and texts,” and direct mail to “eligible but not registered voters”; (032)
- Assist new voters to “obtain required documents” to get valid state ID needed for voting, targeting African immigrants, LatinX residents, and African Americans; (032) and
- “facilitate Election day Registrations and verification of photo ID.” (032)

56. Upon information and belief, based on CTCL’s agenda, most of the action items had nothing to do with bringing about safe, COVID-19 free voting.
57. Upon information and belief, rather than working toward a COVID-19 safe
election, the “projects” that CTCL proposed to the Wisconsin Five were to get the urban
vote out. For example, in Green Bay:

a. Adding satellite locations to “streamline onboarding process for new
   EIPAV [early in person absentee voting] staff [to be conducted by
   CTCL’s partner [The (Elections Group)]];

b. Adding drop boxes;

c. Printing materials for mail ballots;

d. Targeting communities with election information through National
   Vote at Home Institute’s “communication toolkit” to “support
   outreach around absentee voting” and to “share research insights
   about how to engage people who might not trust the vote by mail
   process...”; and

e. Explaining this “targeting” of communications, Celestine Jeffreys
   wrote to Whitney May of CTCL on August 27, 2020 that “There are
   probably 5 organizations that are focused on working with
   disadvantaged populations and/or with voters directly.” (034, 042)

58. Upon information and belief, Racine was offered by the CTCL the same
projects to engage in and did.

59. Upon information and belief, CTCL’s “partners” introduced to the Wisconsin
Five included other private entities. For example, in Green Bay, the following CTCL
partners were introduced:

- The National Vote At Home Institute (“VoteAtHome” or
  “NVAHI”) who was represented as a “technical assistance partner”
  who could consult about among other things, “support outreach
  around absentee voting,” voting machines and “curing absentee
  ballots,” and to even take that duty (curing absentee ballots) off of
  the City of Racine’s hands. (036-049; 051-067) The NVAHI also
  offered advice and guidance on accepting ballots and streaming
  central count during election night and on the day of the count.
  (068-075)

- The Elections Group and Ryan Chew were represented to be able
to provide “technical assistance partners to support your office”
and “will be connecting with you in the coming days regarding drop
boxes” and technical assistance to “support your office,” and worked on “voter outreach.” (076-078, 205, 079-081) Elections Group Guide to Ballot Boxes. (082-0121)

- Ideas42 was represented by CTCL as using “behavioral science insights” to help with communications. (392)

- Power the Polls was represented by CTCL to help recruit poll workers (122) and discuss ballot curing. (123-124)

- The Mikva Challenge was recommended to recruit high school age poll workers (125-126, 404) and then to have the poll workers to “serve as ballot couriers,” and for “ballot drop-off/voter registrations.” (125-127)

- US Digital Response was suggested to help with and then take over “absentee ballot curing,” and to “help streamline the hiring, onboarding, and management” of Racine’s poll workers. (128-136)

- Center for Civic Design to design absentee ballots and the absentee voting instructions, including working directly with the Commission to develop a “new envelope design” and to create “an advertising/targeting campaign.” (137-0155; 190-0201)

- Eric Ming, the Communications Director for CSME, to serve as a “communications consultant to review your [City of Racine] advertising plan for November.” (156-157)

- The Brennan Center which focuses on “election integrity” including “post-election audits and cybersecurity.” (158-160)

- HVS Productions to add “voter navigator” FAQs and Election Countdown Copy for the city of Racine. (161-166)

- Modern Selections to address Spanish language. (167-169)

60. Upon information and belief, Racine was offered by the CTCL the same projects to engage in and did.

61. Upon information and belief, CTCL’s private corporate “partners” assumed aspects of administration of Wisconsin Five’s election processes. For example, in Green
Bay, the private corporations and their employees engaged in the following aspects of election administration.

a. Vote at Home volunteered to take curing of ballots off of a municipality's plate; (179-181);
b. Offered to "lend a hand" to Central Count stations; (182) Elections Group offer; (183)
c. Offered to connect a municipality to "partners like Power the Polls" to recruit poll workers; to partner with CTCL to send out e-mails to recruit poll workers; (184)
d. Advised the City as to using DS200 voting machines; (185-188)
e. Provided a "voter navigator" job description; (189)
f. Advised a municipality regarding moving the "Central Count" from City Hall to a different location, which was wired to provide election results directly to private corporate employees; (270)
g. The Center for Civic Design offered a municipality to design the absentee voting instructions and the absentee envelopes; (190-203)
h. The Elections Group issued a Guide to Ballot Drop Boxes, a report on Planning Drop Boxes, Voter Outreach, and Communication; (204-238)
i. Provided advice about procedures for challenging an elector's ballot; (239-243) and
j. Conservation Voices and curing. (244-247)

62. Upon information and belief, Racine was offered by the CTCL the same projects to engage in and did.

63. Upon information and belief, Racine purchased with CTCL funds a "mobile voting precinct" which is legally unauthorized.

64. Upon information and belief, Racine officials began reporting to CTCL of the City's efforts regarding:

a. Voter outreach/education;
b. Drop boxes;
c. Poll books;
d. Community groups; and
e. Badger books

(261-264)
65. WEC Administrator Meagan Wolfe, regarding the Wisconsin Five’s conduct alleged here, has supported the Wisconsin Five cities’ claimed prerogative to adopt private corporate conditions on federal elections without approval by Congress, the state legislature and the Commission. She most recently stated this legal position on March 31, 2021 before the General Assembly’s Campaigns and Elections Committee.

66. The Complainants believe the legal position of WEC Administrator Meagan Wolfe and the rest of the Respondents is incorrect. Only Congress and the state legislature have legal authority to place conditions on federal elections in Wisconsin and to approve private corporations and their employees to engage in federal election administration.

Claim
The Respondents Violated and Will Continue to Violate State Law and the Elections and Electors Clauses

67. The Wisconsin State Legislature under Wisconsin Statutes § 5.05(1) delegated general authority to the Commission for the responsibility of administration of Wisconsin elections.

68. The Wisconsin State Legislature delegates federal election authority to municipal clerks to implement Wisconsin election laws within the respective clerk’s municipality. Wis. Stat. § 7.15(1).

69. In general elections held in Racine, the election authority of Congress, the Wisconsin state legislature, the Commission and Racine City Clerk was and will continue to

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6 Id.
be illegally and unconstitutionally diverted by the Respondents to entities and persons
including Racine’s Common Council, Mayor and private corporations and their employees.

70. Without Commission intervention, Racine’s illegal and unconstitutional
diversion of election authority will continue.

71. Notably, on December 24, 2020, the U.S. Court of Appeals for the Seventh
Circuit, in rejecting the Trump campaign’s Electors Clause arguments in a Wisconsin case,
suggested that the Electors Clause may apply when Wisconsin public officials usurp federal
election administrative powers contrary to state law:

The Wisconsin Legislature expressly assigned to the Commission “the
responsibility for the administration of ... laws relating to elections,”
WIS. STAT. § 5.05(1), just as Florida’s Legislature had delegated a
similar responsibility to its Secretary of State. See Bush, 531 U.S. at 116,
121 S.Ct. 525 (Rehnquist, C.J., concurring). Florida’s legislative scheme
included this “statutorily provided apportionment of
responsibility,” id. at 114, 121 S.Ct. 525, and three Justices found a
departure from that scheme when the Florida Supreme Court rejected
the Secretary's interpretation of state law. See id. at 119, 123, 121 S.Ct.
525. And it was the Minnesota Secretary of State's lack of a similar
responsibility that prompted two judges of the Eighth Circuit to
conclude that he likely violated the Electors Clause by adding a week to
the deadline for receipt of absentee ballots. See Carson, 978 F.3d at
1060.

Trump v. Wisconsin Elections Commission, 983 F.3d 919, 927 (7th Cir. 2020). To be sure, in that
case, the Trump campaign’s 2020 Electors Clause claims regarding “indefinately confined”
voters, endorsing the use of absentee ballot drop boxes, and best practices for correcting a
witness's address on an absentee ballot certificate were dismissed by the federal courts.

72. The claims in this matter relating to the City of Racine are distinguishable
from those facts in the Trump case because these legal claims relate to the Commission’s and
Racine’s diversion of the election law authority of Congress, the Wisconsin State Legislature,
the Commission, and the Racine City Clerk. In this way, the complainants’ Elections Clause and Electors Clause claims are similar to the claim considered by the three Supreme Court justices finding a “departure from that scheme” in the Florida case and the claim considered by the two Eighth Circuit judges to be a “likely” violation of the Electors Clause in the Minnesota case. *Wisconsin Elections Commission*, 983 F.3d at 927.

73. The Respondents’ past and continuing diversion of election authority violated and continues to violate state and federal law.

**Prayer for relief**

WHEREFORE, Complainants respectfully request the Commission

- To investigate the circumstances and factual allegations asserted in this Complaint regarding the legality of Racine’s acts and actions juxtaposed against state and federal election laws to ascertain whether election laws were violated.

- The investigation should employ all of the Commission’s authority by compelling document production, depositions, and testimony of the Respondents, Racine elected officials, Racine election officials, Racine employees, Tiana Epps-Johnson and her employer Center for Tech and Civic Life, Michael Spitzer-Rubenstein and his employer National Vote at Home Institute, Ryan Chew and his employer The Elections Group, Ideas42, Power the Polls, Mikva Challenge, US Digital Response, Center for Civic Design, Eric Ming and his employer CSME, Brennan Center, HVS Productions, and Modern Selections and others involved.
• The Commission should prohibit Respondent Meagan Wolf from any investigatory role because of a conflict of interest due to her being a Respondent.

• The Commission issue an order requiring the Administrator, City of Racine and its City Clerk to conform their conduct to Wisconsin Statutes and the Election and Electors Clauses, restrain themselves from taking any action inconsistent with Wisconsin Statutes and the Election and Electors Clauses and require them to correct their actions and decisions inconsistent with Wisconsin Statutes and the Election and Electors Clauses—including prohibiting the placement of private corporate conditions on state and federal elections and the involvement of private corporation and their employees in election administration.

• The Commission should issue an order declaring that Racine’s private conditions on federal elections and engagement of private corporations and their employees in election administration violated state law and federal law.

• The Commission should also grant any other relief it deems proper, necessary, or just, consistent with the law and under the circumstances of this case.

The requested relief would include, but is not limited to:

• That the Commission reiterate that the Administrator may not render a decision without the approval of the Commission related to the legality of any agreement between private corporate entities and municipalities related to imposing private corporate conditions on its elections or related to private
corporations and their employees being engaged in the administration of
election laws;

- That the Commission consider any further prosecutorial investigation be
directed to the proper local or state authorities; and,

- Finally, if the Commission determines that election laws were violated or that
the law is unclear to provide the Commission itself with the ability to
determine the legalities of private corporate conditions directly or indirectly
affecting the election process and administration, the Commission should
make recommendations to the State Legislature for changes to state election
laws to ensure the future integrity of the election process.

Dated: 4/21, 2021

Erick G. Kaardal, No. 1035141
Mohrman, Kaardal & Erickson, P.A.
Special Counsel for Thomas More Society
150 South Fifth Street, Suite 3100
Minneapolis, MN 55402
Telephone: (612) 341-1074
Facsimile: (612) 341-1076
Email: kaardal@mklaw.com
Email: erickson@mklaw.com
Attorneys for the Complainants
Good Morning Phil –

Do you have contact information for New Life Press? I’m thinking we need to make a printer change.

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jill@co.door.wi.us | Website: www.co.door.wi.gov
Subject: FW: Election Day

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, November 3, 2020 1:42 PM
To: LAU, JILL <jlau@co.doors.wi.us>
Subject: Election Day

Hi Jill,
Just checking in to see how everything is going so far. Any equipment issues?
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MI

Dominion Voting Systems

1201 15TH ST, SUITE 210, DENVER, CO, 80202
1.888.654.8683 | DOMINIONVOTING.COM
FF: City of Sturgeon Bay ICE

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Friday, October 2, 2020 1:08 PM
To: 'Phil Schmidt (phil.schmidt@dominionvoting.com)' <phil.schmidt@dominionvoting.com>
Subject: City of Sturgeon Bay ICE

Hi Phil –

Would you be able to check on the progress of the City of Sturgeon Bay’s machine? It’s been over a month and I’m starting to get nervous.

Thanks,

Jill
From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, October 6, 2020 8:20 AM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Re: [EXTERNAL] City of Sturgeon Bay ICE

Hi Jill,
It looks like you should be getting all 3 RMAS back this week by Thursday 10/8/20.

Town of Gibraltar
Village of Ephraim
City of Sturgeon Bay
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN
Dominion Voting Systems

1201 18TH ST, SUITE 210, DENVER, CO, 80202
1.866.654.8683 | DOMINIONVOTING.COM

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Friday, October 2, 2020 1:07:37 PM
To: Phil Schmidt <phil.schmidt@dominionvoting.com>
Subject: [EXTERNAL] City of Sturgeon Bay ICE

Hi Phil –

Would you be able to check on the progress of the City of Sturgeon Bay’s machine? over a month and I’m starting to get nervous.

Thanks,

Jill
Good Morning Phil –

I don’t know if my head just thinks this but I thought there was a way to test ballots to see if the machine can read them without a full blown public test.....is there?

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov
LAU, JILL

Subject: FW: [EXTERNAL] City of Sturgeon Bay ICE

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Monday, October 12, 2020 9:15 AM
To: 'Phil Schmidt' <phil.schmidt@dominionvoting.com>
Subject: RE: [EXTERNAL] City of Sturgeon Bay ICE

Good Morning Phil —

I received 2 machines back...City of Sturgeon Bay and Ephraim. They were both sent in together. We still have Gibraltar’s machine that is in for repairs. Any chance you can check on the progress of that one?

Thanks,

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, October 6, 2020 8:20 AM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Re: [EXTERNAL] City of Sturgeon Bay ICE

Hi Jill,
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Town of Gibraltar
Village of Ephraim
City of Sturgeon Bay
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN
Dominion Voting Systems
1201 18TH ST, SUITE 210, DENVER, CO, 80202
1.866.654.8683 | DOMINIONVOTING.COM
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Thanks,

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov
Subject: FW: [EXTERNAL] City of Sturgeon Bay ICE

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Tuesday, October 6, 2020 9:08 AM
To: 'Phil Schmidt' <phil.schmidt@dominionvoting.com>
Subject: RE: [EXTERNAL] City of Sturgeon Bay ICE

Awesome! Thanks Phil!

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, October 6, 2020 8:20 AM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Re: [EXTERNAL] City of Sturgeon Bay ICE

Hi Jill,
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Town of Gibraltar
Village of Ephraim
City of Sturgeon Bay
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN

Dominion Voting Systems

1201 18TH ST, SUITE 210, DENVER, CO, 80202
1.866.654.8683 | DOMINIONVOTING.COM

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Jill

JILL M. LAU, CPD, PME  |  DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov
Good Morning Phil –

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Thanks,

Jill

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From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, October 6, 2020 8:20 AM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Re: [EXTERNAL] City of Sturgeon Bay ICE

Hi Jill,
It looks like you should be getting all 3 RMAS back this week by Thursday 10/8/20.
Town of Gibraltar
Village of Ephraim
City of Sturgeon Bay
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN

Dominion Voting Systems

1201 18TH ST, SUITE 210, DENVER, CO, 80202
1.866.654.8683 | DOMINIONVOTING.COM
Hi Phil –

Would you be able to check on the progress of the City of Sturgeon Bay’s machine? It’s been over a month and I’m starting to get nervous.

Thanks,

Jill
Hi Jill,
Here is the information I have on file for them.
New Life Press
2971 9th Avenue
Monroe WI 53566
Phone 608-325-6083
Email: newlifepress777@gmail.com

Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER -- WI & MN
Dominion Voting Systems

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Monday, October 19, 2020 10:39 AM
To: Phil Schmidt <phil.schmidt@dominionvoting.com>
Subject: [EXTERNAL] Ballot Printers

Good Morning Phil –

Do you have contact information for New Life Press? I’m thinking we need to make a printer change.

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2260 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov
Good Morning Phil –

Do you have contact information for New Life Press? I’m thinking we need to make a printer change.

Jill
Good Morning Phil —

I don’t know if my head just thinks this but I thought there was a way to test ballots to see if the machine can read them without a full blown public test.....is there?

Jill
Subject: FW: Election Day Support 11/3/2020

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Thursday, October 29, 2020 9:45 AM
To: LAU, JILL <jlau@co.door.wi.us>
Cc: Pavlik, Barb <bpavlik@co.door.wi.us>
Subject: Election Day Support 11/3/2020

Hello Everyone,

Next week I will be available by phone to help you. If I can’t be reached and you need help ASAP you can also call our Command Center at 1-855-697-3329 it will be staffed starting on Monday 7am-Thursday 7pm.

County Clerks please feel free to share this information with your municipal clerks.

If you have any questions or concerns, please give me a call.

Also, please remember to let me know when you received all the results on election night VIA email, text or phone call.

Thank you!

Phil Schmidt

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN

Dominion Voting Systems

1201 18th St, Suite 210, Denver, CO 80202
1.866.654.8683 | DOMINIONVOTING.COM
Subject: FW: Election Day

From: LAU, JILL <jlau@co.door.wi.us>
Sent: Tuesday, November 3, 2020 1:56 PM
To: 'Phil Schmidt' <phil.schmidt@dominionvoting.com>
Subject: RE: Election Day

Hi Phil –

So far, so good. Fingers crossed!

Jill

JILL M. LAU, CPD, PME | DOOR COUNTY CLERK
Door County Government Center | 421 Nebraska Street | Sturgeon Bay WI 54235
920-746-2200 | Email: jlau@co.door.wi.us | Website: www.co.door.wi.gov

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From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, November 3, 2020 1:42 PM
To: LAU, JILL <jlau@co.door.wi.us>
Subject: Election Day

Hi Jill,
Just checking in to see how everything is going so far. Any equipment issues?
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN
Dominion Voting Systems
1201 18th ST, SUITE 210, DENVER, CO. 80202
1.800.354.5663 | DOMINIONVOTING.COM
Hi Everyone,
Here are some reminders for next week's election.

- This weekend is the time change so on Monday 11/2/2020 I would check to make sure that your servers and workstation computers are still in sync with the correct time. They can be within 5 min of each other.
- Backup and reset the servers of any test results. Everything should be at zero.
- ICE tabulators time change (This must be done manually)

I will also be on call over the weekend so if you have any questions please give me a call.

Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN

Dominion Voting Systems

1201 18th ST, SUITE 210, DENVER, CO, 80202
1.866.654.8683 | DOMINIONVOTING.COM
Hi Jill,
Just checking in to see how everything is going so far. Any equipment issues?
Thanks
Phil
Hi Everyone,
I hope everyone is doing well the company has release the following statement after some false posts have been made on social media.
Please let me know if you have any questions.
Thanks
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER - WI & MN

Dominion Voting Systems
1201 18th St, Suite 236, Denver, CO 80202
1.866.654.3863 | DOMINIONVOTING.COM
A Letter to Dominion Customers from John Poulos, CEO

Dear Election Official:

Thank you for your ongoing support for Dominion and our hard-working employees. We commend you for your unwavering commitment to carrying out a full slate of elections in the midst of a global pandemic with success. As the 2020 cycle comes to a close, I wanted to personally reach out to you and provide an update on the actions that we are taking to respond to the disinformation campaign against the company, and to make you aware of actions that we are taking to stop the spread of false claims and viral rumors.

I have attached an OpEd that I wrote on behalf of the Company that was printed this week in the Wall Street Journal: "Fake Claims about Dominion Voting Systems Do Real Damage."

We recognize that the baseless attacks against our company have done considerable damage to the level of confidence that many Americans have in our election system, and that this impacts our customers. Our company website (www.dominionvoting.com) is being regularly updated in order to help debunk viral rumors and false claims. You are also encouraged to reach out to our Regional Sales and Customer Service Managers (or if preferred directly at media@dominionvoting.com) if you read or hear information that concerns you, or if you want to bring something to our attention.

At Dominion, we believe it is our responsibility during this time to prioritize several important considerations:

- The safety, health and well-being of our customers, our employees and our business partners
- The recognition that our role as an election technology provider requires us – above all – to maintain full support to ongoing election efforts
- Commitment to playing a constructive role in helping election officials and government leaders work to correct misinformation and misconceptions about Dominion and the accuracy of our systems

Through this lens, we will continue to make decisions with care and courage informed by your input and guided by our core company values of accuracy, transparency and accessibility. I want to assure you that we look forward to addressing the inaccurate and misleading accusations in court, where all parties are held under oath and committed to factual inquiry.

We appreciate your understanding during this unprecedented and bizarre time, and we thank you for your support.

JOHN Poulos, CEO
DOMINION VOTING SYSTEMS
Subject: FW: Dominion Voting Systems Updated Memo

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Friday, November 13, 2020 3:26 PM
To: LAU, JILL <jlau@co.door.wi.us>; Pavlik, Barb <bpavlik@co.door.wi.us>
Cc: Dana LaTour <dana.latour@dominionvoting.com>
Subject: Dominion Voting Systems Updated Memo

Dear Jill,

A lot is being said about Dominion in the news, and in attempt to set the record straight, we are attaching our latest document, which can also be attained from our website at www.dominionvoting.com. As things change daily in the news we will keep you updated. If you have any questions, concerns or feedback, please do not hesitate to contact either myself or Dana LaTour - Regional Sales Manager.

Best Regards,
Phil
PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER - WI & MN

Dominion Voting Systems
1201 18th St, Suite 210, Denver, CO 80202
1.866.654.3663 | DOMINIONVOTING.COM
Hi Phil –

So far, so good. Fingers crossed!

Jill

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Tuesday, November 3, 2020 1:42 PM
To: LAU, JILL <jau@co.door.wi.us>
Subject: Election Day

Hi Jill,
Just checking in to see how everything is going so far. Any equipment issues?
Thanks
Phil
Hi Jill,
Here is your invoice for the 11/03/2020 Election Database Programming.
We are now sending all invoices VIA email if you still require a hard copy to be mailed VIA USPS you can request one be sent just reply back to me.
Invoice Due by Date: 12/20/20

Please send Payment To:
Dominion Voting Systems, Inc.
P.O. Box 538214
Atlanta, GA 30353-8214

Thanks
Phil
Hi Yvonne —

I wanted to give you a heads up that Door County will have a primary in February. It looks like it will be Superintendent of Public Instruction, Court of Appeals, and School Board for Gibraltar School.

I will get the info to you as soon as I can.

Thanks,

Jill
Thanks Jill!

I've been on standby ready to make these ballots as I think the turnaround time will be short.

Happy New Year!

Hi Yvonne —

I wanted to give you a heads up that Door County will have a primary in February. It looks like it will be Superintendent of Public Instruction, Court of Appeals, and School Board for Gibraltar School.

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Thanks,

Jill
Subject: FW: Dominion Customer

From: Phil Schmidt <phil.schmidt@dominionvoting.com>
Sent: Friday, January 8, 2021 9:14 AM
To: LAU, JILL <jla@co.dooor.wi.us>
Cc: Pavlik, Barb <bpavlik@co.dooor.wi.us>
Subject: Dominion Customer

Dear Jill,

Today is the first step to restore our good name and faith in elections by holding those responsible to account. Please see attached letter for an update on our legal actions.

We intend to pursue justice vigorously to its rightful end. We will keep you apprised of our ongoing progress.

Warm regards,
Phil

PHIL SCHMIDT | CUSTOMER RELATIONS MANAGER – WI & MN
Dominion Voting Systems

1201 18TH ST, SUITE 210, DENVER, CO 80202
1.866.654.0693 | DOMINIONVOTING.COM
Good afternoon

There is a tremendous amount of disinformation regarding the 2020 General Election. I suspect your office has received a number of calls from your constituents regarding the various rumors. Dominion Voting has updated our website to include a link to the CiSA webpage on election security and a section debunking the various rumors. It is being updated frequently.

Please review the page and perhaps refer your voters to it. If you are receiving inquiries on topics not addressed there, and you need additional information, please let me know. Our office of government affairs will address those concerns and add a response to our webpage if necessary.

Hang in there my election friends.

Dana
Hi Everyone,
Hope you are doing well as we get closer to next year’s Election I was checking to see who will have an February election and if it will be countywide?
We are just looking for an estimate for programming for the 2/16/2021 election.
Thanks
Phil

Happy Holidays!!

PHIL SCHMIDT  | CUSTOMER RELATIONS MANAGER – WI & MN

Dominion Voting Systems
1201 18th St, Suite 210, Denver, CO 80202
1.866.834.9683  | DOMINIONVOTING.COM
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Thanks
Phil

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