

## **Contents of Jay Stone's WEC Sworn Complaint**

- 1. Notarization of Jay Stone's Sworn Complaint**
- 2. Jay Stone's 27 Page Sworn Complaint**
- 3. List of 167 Exhibits**
- 4. 167 Exhibits Numbered in Sequential Order**
- 5. Thumb Drive in Pocket with All documents in PDF for Safe Viewing**

**State of Wisconsin**  
***Elections Commission***

COMPLAINT FORM

**RECEIVED**

AUG 28 2020

Name: Jay Stone

Address: 10501 82nd. St. Pleasant Prairie, WI 53158

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E-mail: [jayjoelstone@gmail.com](mailto:jayjoelstone@gmail.com)

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

The Complaint of Jay Stone, Complainant against, Green Bay Mayor Eric Genrich, Kenosha Mayor John M. Antaramian, Madison Mayor Satya Rhodes-Conway, Milwaukee Mayor Tom Barrett, and Racine Mayor Cory Mason and Green Bay Clerk Kris Teske, Kenosha Acting City Clerk, Madison Clerk Maribeth Witzel-Behl, Milwaukee Election Commissioners Stephanie D. Findley Chair, Carmen C. Cabrera and Jess Ripp and Racine Clerk Tara Coolidge, Respondents whose addresses and phone numbers are as follows:

Green Bay Mayor Eric Genrich

100 North Jefferson Street

Green Bay, WI 54301

Phone: 920-448-3000

Kenosha Mayor John M. Antaramian

625 52nd Street Room 300

Kenosha, WI 53140

262.653.4000

Madison Mayor Satya Rhodes-Conway  
210 Martin Luther King Jr Blvd, Room 403  
Madison, WI 53703  
Phone: (608) 266-4611

Milwaukee Mayor Tom Barrett  
City Hall, 200 E. Wells Street, Room 201,  
Milwaukee, WI 53202  
414-286-2200

Racine Mayor Cory Mason  
730 Washington Avenue  
Racine, Wisconsin 53403  
(262) 636-9101

Green Bay Clerk Kris Teske  
100 North Jefferson Street  
Green Bay, WI 54301  
Phone: 920-448-3000

Clerk Maribeth Witzel-Behl  
210 Martin Luther King Jr Blvd Room 103,  
Madison, WI 53703

Milwaukee Election Commissioners  
Stephanie D. Findley Chair  
Carmen C. Cabrera  
Jess Ripp  
City Hall, 200 E. Wells Street, Room 201,  
Milwaukee, WI 53202

414-286-2200

Kenosha Acting City Clerk

625 52nd Street,

Kenosha, WI 53140

262.653.4020

Racine Clerk Tara Coolidge

730 Washington Avenue

Racine, Wisconsin 53403

(262) 636-9101

This complaint is Statute §§.5.06( 1). I, Jay Stone, allege that Green Bay Mayor Eric Genrich, Kenosha Mayor John M. Antaramian, Madison Mayor Satya Rhodes-Conway, Milwaukee Mayor Tom Barrett, and Racine Mayor Cory Mason violated Wisconsin Statute §§.5.06( 1) by acting contrary to law and/or abuse of their power of discretion regarding election administration and conduct of election for the November 3. 2020 presidential election because their acceptance of the Center for Tech and Civic Life's \$6.3 grant artificially inflates Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe Biden's chances of winning Wisconsin's 10 electoral votes.

Green Bay Clerk Kris Teske, Kenosha Acting City Clerk, Madison Clerk Maribeth Witzel-Behl, Milwaukee Election Commissioners Stephanie D. Findley, Chair, Carmen C. Cabrera and Jess Ripp , and Racine Clerk Tara Coolidge also violated Wisconsin Statute §§.5.06( 1) by acting contrary to law and/or abuse of their power of discretion regarding election administration and conduct of election for the November 3. 2020 presidential election because their acceptance of the Center for Tech and Civic Life's \$6.3 grant artificially inflates Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe Biden's chances of winning Wisconsin's 10 electoral votes.

The remainder of this 27 page complaint and 167 exhibits are enclosed in this three ring notebook.

(Set forth in detail the facts that establish probable cause to believe that a violation has occurred. Be as specific as possible as it relates to dates, times, and individuals involved. Also provide the names of individuals who may have information related to the complaint. Use as many separate pages as needed and attach copies of any supporting documentation.)

Date: August 27, 2020 Jay Stone  
Complainant's Signature

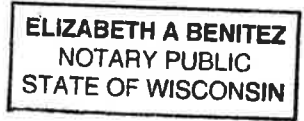
I, JAY Stone, being first duly sworn, on oath, state that I personally read the above complaint, and that the above allegations are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

Jay Stone  
Complainant's Signature

STATE OF WISCONSIN

County of Kenosha  
(county of notarization)

Sworn to before me this 27<sup>th</sup> day of August, 2020.



Elizabeth Benitez  
(Signature of person authorized to administer oaths)

My commission expires 01/16/2023, or is permanent.

Notary Public or N/A  
(official title if not notary)

**Please send this completed form to:**

Mail: Wisconsin Elections Commission  
P.O. Box 7984  
Madison, WI 53707-7984

Fax: (608) 267-0500

Email: [elections@wi.gov](mailto:elections@wi.gov)

## Sworn WEC Complaint

### Statement of Facts

Green Bay Mayor Eric Genrich, Kenosha Mayor John M. Antaramian, Madison Mayor Satya Rhodes-Conway, Milwaukee Mayor Tom Barrett, and Racine Mayor Cory Mason violated Wisconsin Statute §§.5.06( 1) by acting contrary to law and/or abuse of their power of discretion regarding election administration and conduct of election for the November 3. 2020 presidential election because their acceptance of the Center for Tech and Civic Life's \$6.3 grant artificially inflates Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe Biden's chances of winning Wisconsin's 10 electoral votes.

Green Bay Clerk Kris Teske, Kenosha Acting City Clerk, Madison Clerk Maribeth Witzel-Behl, Milwaukee Election Commissioners Stephanie D. Findley, Chair, Carmen C. Cabrera and Jess Ripp , and Racine Clerk Tara Coolidge also violated Wisconsin Statute §§.5.06( 1) by acting contrary to law and/or abuse of their power of discretion regarding election administration and conduct of election for the November 3. 2020 presidential election because their acceptance of the Center for Tech and Civic Life's \$6.3 grant artificially inflates Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe Biden's chances of winning Wisconsin's 10 electoral votes.

Mayor Genrich, Mayor Antaramian, Mayor Satya Rhodes-Conway, Mayor Barrett, and Mayor Mason are the mayors of the five largest cities in Wisconsin. On July 6, 2020 the five mayors sent out a joint Press Release (Exhibit 1) announcing that their cities were accepting a \$6.3 million grant from an alleged nonpartisan organization named Center for Tech and Civic Life (CTCL). The distribution of CTCL's grant money is as follows: Milwaukee, \$2,154,500; Madison, \$1,271,788; Green Bay, \$1,093,400, Kenosha, \$862,779, and Racine, \$942,100.

In the 2016 presidential election, President Donald J. Trump won Wisconsin's 10 electoral votes by a margin of .77% or by 22,748 votes. CTCL's \$6.3 million grant targets voters in the five largest Wisconsin cities because these five cities produce the most Democrat votes. Wisconsin will assign all 10 of its electoral votes to the presidential candidate who receives the most statewide votes. CTCL specifically targeted its grant money to Wisconsin's five largest cities because CTCL's grant increases Democrat Joe Biden's statewide Wisconsin vote total and enhances Joe Biden's chances of winning Wisconsin's 10 electoral votes.

CTCL providing \$6.3 million to only Wisconsin's largest and most Democratic cities to increase voter participation is a partisan political contribution to Joe Biden. The actual value of CTCL's \$6.3 million "in-kind contribution" is more like a \$30 million campaign donation because election officials from Wisconsin's five largest cities have access to the voters and voting mechanisms that the Biden campaign doesn't have.

In CTCL's Rural Grants Program article, CTCL said Congress distributed \$400 million for state and local elections in 2020 (Exhibit 2). CTCL claimed experts believe \$4 billion is needed to successfully administer safe elections in 2020. When CTCL granted \$6.3 million to the five largest and most Democratic Wisconsin cities, CTCL knew that Wisconsin's 185 other cities also needed funding to hold a safe November 3, 2020 presidential election. In spite of CTCL knowing about 185 other Wisconsin cities in need of funding for the impending election, CTCL concentrated its money and resources on cities with the highest Democratic vote.

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

The five mayors and four city clerks of Wisconsin's five largest cities are Democrats. CTCL Executive Director Tiana Epps-Johnson and CTCL Director of Government Services Whitney May are both lifelong and hardcore Democrats that the mayors and clerks could have easily discovered if they properly vetted the \$6.3 million grant before they accepted it.

CTCL Executive Director Epps-Johnson interned at the Young Democrats of America (Exhibit 3). Epps-Johnson also wrote CTCL's "Action Plan" for her two year Obama Foundation fellowship that she completed three months before her CTCL organization granted \$6.3 million to Wisconsin's five largest cities (Exhibit 4). From 2012 to 2015 CTCL Executive Director Epps-Johnson was "the election administration director of the New Organizing Institute, a Democratic grassroots election training group" (Exhibit 164). The executive director at the New Organizing Institute when Epp-Johnson worked there was Ethan Roeder, who was President Obama's 2008 and 2012 campaign's data director.

Epps-Johnson and May's Facebook posts, Twitter tweets and retweets listed below show Epps-Johnson and May despise President Trump and other Republicans while they admire and support all things Democrat.

The July 6, 2020 Press Release subheading is the "Mayors of Wisconsin's 5 Largest Cities Team Up with Nonpartisan to Invest in Safe Elections During COVID" (Exhibit 1). Hence, the five mayors acknowledge that they and CTCL formed a single unit or team for CTCL's \$6.3 million grant. The mayors of Wisconsin's five largest cities either wittingly or unwittingly conspired with CTCL to increase Joe Biden's overall Wisconsin vote total so that Joe Biden wins Wisconsin's 10 electoral votes on November 3, 2020.

On the City of Green Bay's Grant Tracking Form, it says the "Name of the Grant/ Funding Source" is CTCL "(though the City of Racine's efforts (Exhibit 166)." According to Green Bay's Grant Tracking Form, it appears that Racine is directly responsible for



Green Bay's CTCL Grant. Because CTCL's grant is for an expected close Wisconsin presidential election, the City of Racine's involvement in the City of Green Bay's CTCL election grant is highly suspicious.

### **Jay Stone's Good Standing in this Sworn Complaint**

Jay Stone is not an elector in any of the Wisconsin's five largest cities that received CTCL's \$6.3 million grant. Mr. Stone is an elector whose vote will count towards Wisconsin's total presidential vote and the 10 electoral votes that goes to the November 3, 2020 presidential candidate who gets the most Wisconsin votes. The mayors of five Wisconsin's largest cities acceptance and utilization of CTCL's \$6.3 million grant will directly influence the outcome of Wisconsin's presidential election and Mr. Stone's vote. As a Wisconsin elector for the President of the United States on November 3, 2020, Mr. Stone has standing in his sworn complaint.

Mr. Stone is an elector for the United State House Representative, 1st Wisconsin District. CTCL granted the City of Kenosha, \$862,779, and the City of Racine, \$942,100. The cities of Kenosha and Racine are using CTCL's grant money for the November 3, 2020 election. Kenosha and Racine electors will cast votes for the House Representative, 1st Wisconsin District. The Kenosha and Racine mayors who accepted and utilized CTCL's \$1.8 million grant have unduly influenced the outcome for the election of United States of House Representative, 1st Wisconsin District and Mr. Stone's vote. As a Wisconsin elector for the November 3, 2020 United States of House Representative, 1st Wisconsin District election, Mr. Stone has standing in his sworn complaint.

### **Why CTCL Chose to Grant \$6.3 Million to Wisconsin's Five Largest Cities Instead of the Counties**

CTCL purposely granted \$6.3 million to the five Wisconsin cities because the highest percentage of Democratic electors live and vote in the five cities. The City of

Milwaukee is heavily Democratic. In the August 2020 primary, 85% of the Milwaukee ballots cast were Democratic and 14% were Republican. CTCL granted the City of Milwaukee \$2,154,500. The amount of money granted to the City of Milwaukee is nearly doubled the amount of money CTCL granted to the next two highest cities, Madison and Green Bay. The City of Milwaukee received more CTCL grant money than the four other Wisconsin cities because Milwaukee is the city where CTCL's grant money will secure the most Biden votes. CTCL's \$2,154,500 grant to the City of Milwaukee substantially increases presidential candidate Biden's chances of winning Wisconsin's 10 electoral votes.

The City of Madison is in Dane County. Both Madison and Dane County are heavily Democratic. In the 2016 Presidential election, Dane county voted overwhelmingly for Democratic candidate Hillary Clinton, 70.4% to 23.0% for Donald Trump. There is a higher concentration of Democratic voters in the City of Madison compared to Dane County's suburban and rural areas. CTCL granted \$1,271,788 to the City of Madison because more than 70% of Madison voters who will vote in the November 3, 2020 presidential election are Democratic Biden voters. CTCL's \$1,271,788 grant to the City of Madison increases the Madison and statewide vote for Democrat presidential candidate Biden. CTCL's \$1,271,788 grant to the City of Madison also enhances Democrat Biden's chances of winning Wisconsin's 10 electoral votes.

City of Green Bay mayor Eric Genrich is a Democrat. Mayor Genrich won his April 2019 election with 58% of the vote. Green Bay is in Brown County. 52.1% of Brown County voters cast Republican ballots, 41.4% vote Democratic, and 6.5% vote Independent. The City of Green Bay has a Democratic majority, but suburban and rural Green Bay has a majority of Republican voters. Instead of a Brown County grant, CTCL granted \$1,093,400 to the Democratic majority who live in Green Bay because CTCL's grant increases the Green Bay votes for Biden and increases Biden's overall State of Wisconsin vote. CTCL's \$1,093,400 Green Bay grant improves Democrat Biden's chances of winning Wisconsin's 10 electoral votes.

Racine Mayor Cory Mason is a Democrat. Mayor Mason won his 2019 election with 72% of the vote. The City of Racine is in Racine County. 49.5% of the people in Racine County vote Republican, 45.2% of the people vote Democrat, and 5.3% vote Independent. The City of Racine votes mostly Democratic, but the majority of voters in suburban and rural Racine County are Republicans. CTCL \$942,100 grant targets the majority of Democratic voters who live in the City of Racine because CTCL's grant increases Democratic votes for Biden in both the City of Racine and across the State of Wisconsin. CTCL's \$942,100 grant to the City of Racine also increases Democrat Biden's chances of winning Wisconsin's 10 electoral votes.

City of Kenosha Mayor John M. Antaramian is a democrat. Because Mayor Antaramian ran unopposed, he won his April 2020 election with 98% of the vote. In the City of Kenosha's April 2020 presidential primary, Democratic voters cast 69% of the vote and Republican voters cast 31% of the vote. Kenosha County voters are 47.2% Republican, 46.9% Democrat and 5.9% Independent. The City of Kenosha is heavily Democratic, but in suburban and rural Kenosha County there is a Republican majority. CTCL \$862,779 grant targets the majority of Democratic voters who live in the City of Kenosha because CTCL's grant increases Democratic votes for Biden in both the City of Kenosha and across the State of Wisconsin. CTCL's \$862,779 grant to the City of Kenosha also increases Democrat Biden's chances of winning Wisconsin's 10 electoral votes.

CTCL's \$6.3 million grant to the five largest Wisconsin cities was not accidental or random. CTCL collects and analyzes election data for local, state and federal offices as part of its normal business operation. CTCL also trains and works with "political geography specialists." Given CTCL's knowledge and expertise in collecting and analyzing geopolitical election data, CTCL executives know in advance of the November 3, 2020 election that their \$6.3 million grant to the five largest Wisconsin cities will automatically inflate the Democratic vote for Joe Biden in those five municipalities and across the State of Wisconsin. Given CTCL's vast experience and expertise in geopolitical election data, CTCL knows in advance of the November 3, 2020 election

that their \$6.3 million grant significantly increases the odds of presidential candidate Joe Biden winning Wisconsin's 10 electoral votes.

### **President Barack and First Lady Michelle Obama Provided Contacts and Funding for CTCL's \$6.3 million grant to Wisconsin's Five largest Cities**

CTCL Director Epps-Johnson has strong Democratic ties that extend from her youth to the present. Epps-Johnson chose the Young Democrats of America to intern (Exhibit 3). CTCL Executive Director Epps-Johnson was an original Obama Foundation fellow from April, 2018 until April, 2020. Epps-Johnson was also a director at a Democratic organization named New Organizing Institute for three years before she started CTCL.

Epps-Johnson wrote CTCL's Action Plan while she was an Obama Foundation fellow because the Obama Foundation required her to do so (Exhibit 4). CTCL's \$6.3 million grant to the five largest Wisconsin cities is directly related to Epps-Johnson's training and work that she did at the Obama Foundation. Because of President Barack and First Lady Michelle Obama's very public support for Democrat Joe Biden, the mayor's of the five largest Wisconsin cities should not have accepted a \$6.3 million voting grant from someone who had just finished training at the Obama Foundation a few months earlier.

A picture captured the close relationship between CTCL Director Epps-Johnson and President Obama (Exhibit 5). Ms. Epps-Johnson and President Obama's photo appeared on the front page of the May 17, 2018 of the Chicago Tribune.

Ms. Epps-Johnson and her other 19 Obama Foundation fellows had a round table with President Obama first and then had a second round table with the former First Lady Michelle Obama. President Obama said, "These folks don't need inspiration, they need money. They need contacts, they need space to develop their ideas (Exhibit 6)." As for the space CTCL needed to develop, CTCL moved its offices into the same building at 233 N. Michigan, Chicago, IL 60601 that Barack Obama used when he launched his

run for president in 2008. Several other nonprofits and/or businesses use the same mailing address and suite number as CTCL.

President Obama made good on his promise to provide Epps-Johnson with contacts and money. In 2018 CTCL listed its total revenue on its Form 990 as \$1.4 million (Exhibit 7). Based on CTCL's grants and operating budget, CTCL's 2020 revenue increased ten-fold or more in the same year Epps-Johnson completed her Obama Foundation fellowship. President Barack and First Lady Michelle provided contacts and funding for CTCL's \$6.3 million grant to Wisconsin's five largest Cities. Since the Obama's have vowed to defeat President Trump, their help in funding CTCL's grants to Wisconsin's five largest cities creates doubts about CTCL's nonpartisanship.

On April 17, 2015 CTCL Director Epps-Johnson was invited to the first White House Tech Meetup (Exhibit 8). President Obama sponsored the Tech event. In the same year President Obama was accused of exploiting the use of technology in his 2012 presidential campaign. Because President Obama successfully used tech and voter data research to win his 2008 and 2012 presidential elections, President Obama knows the value of tech, voter data, and political savvy leaders like CTCL Director Epps-Johnson.

In 2015 the Government Accountability Institute lodged a Federal Election Commission complaint against the Obama Campaign. The lawsuit stated, "Moreover, the Obama Campaign assembled the most talented team of data and technology specialists ever employed by a presidential campaign. This team of specialists produced and used extensive information gathering software and multiple data basis and cross-referencing systems to ensure the Obama Campaign knew as much about every potential voter or donor as possible including substantial information about the potential voter's network of friends, relatives and co-workers" (Exhibit 9).

The Obama Campaign cross-referenced data from its website with information collected from Facebook and Google to determine precisely the identity of each

Obama website visitor, the visitor's political biases, and issues important to the individual voter. CTCL lists both Facebook and Google as corporate sponsors (Exhibit 10). CTCL is free to sell the data it collects about candidates, voters and elections to Facebook, Google and other the tech companies who in turn provide the information to political campaigns for the purpose of tailoring a message to each specific voter.

For the last five years President Obama groomed CTCL Executive Director Epps-Johnson to work for him, and the Democratic Party. President Obama recruited, trained, connected and funded CTCL's Executive Director Epps-Johnson. Epps-Johnson is not a nonpartisan executive director of a not-for-profit organization. CTCL Director Epps-Johnson is a Democratic partisan and loyal to her greatest benefactor President Obama and Obama's choice for president—Joe Biden.

### **CTCL's Deviation from Its Stated Mission**

Included in CTCL's Form 990 is a page with the title Additional Data, Form 990, Part III, Line 4a (Exhibit 7). CTCL's additional data describes CTCL's mission as "educates the public about government and democracy ...." CTCL states that the organization achieves its mission "primarily by disseminating information." CTCL's granting of money to aid election boards and voters is not described in CTCL's mission statement of educating the public about government and democracy through the dissemination of information. The purpose of CTCL's \$6.3 grant is to get more Wisconsin Democratic than Republican electors to vote on November 3, 2020 so that Joe Biden wins Wisconsin's 10 electoral votes.

The mayors of five largest cities Press Release explained the four uses of CTCL's \$6.3 million grant. CTCL's \$6.3 million grant was split between 1. Support Early In-Person Voting and Vote by Mail, \$2,572,839 2. Launch Poll Worker Recruitment, Training & Safety Efforts, \$1,810,028 3. Ensure Safe, Efficient Election Day Administration, \$876,700. and 4. Expand Voter Education & Outreach Efforts: \$1,065,000.

The fourth use of CTCL's \$1,065,000 million for voter education as stated in the July 6, 2020 Press Release has nothing to do with voter education. The five largest Wisconsin cities are using the \$1,065,000 million intended for voter education "to remind voters to verify and update their addresses, or other voter registration information prior to the election (Exhibit 1)." Collectively all of CTCL's \$6.3 million Wisconsin Safe Voting grant falls outside the description of CTCL's mission, and the actual expenditures of CTCL's \$6.3 million is not part of CTCL's mission of educating the public about government and democracy through the dissemination of information.

After the Obama Foundation infused CTCL with cash, CTCL exploited COVID 19 as an excuse to provide its \$6.3 million grant to five Wisconsin cities that have a history of voting overwhelming for Democrats. All of CTCL's \$6.3 million expenditures will increase voter turnout in Wisconsin cities that are heavily Democratic and increase the likelihood that Democrat Joe Biden will win Wisconsin's 10 electoral votes.

### **CTCL's \$2.2 Million Grant to a Democratic Stranglehold in Another Battleground State**

As with Wisconsin's five largest cities receiving a CTCL grant, recently CTCL provided a second grant that enhances the chances Joe Biden winning the electoral votes in another 2020 presidential battleground state. CTCL gave a \$2.2 million grant to Delaware County, Pennsylvania (Exhibit 11). Delaware County is a suburban Democratic County near Philadelphia. President Trump won the State of Pennsylvania by a margin of .72%. However, in 2016 Hillary received 59.4% of the Delaware County vote and Donald Trump received 37.4% of the vote. As with CTCL's \$6.3 million grant to Wisconsin five most Democratic cities, CTCL granted \$2.2 million to Delaware County for the purpose of winning Pennsylvania's 20 electoral votes by increasing the total number of Pennsylvania votes for Democrat Joe Biden.

CTCL grants follow a pattern. Two times CTCL granted millions of dollars in battleground states. Both CTCL battleground grants used the unfounded reason of

safe voting as the excuse to grant money directly to a local government. The real purpose of CTCL grants is to increase the Democratic turnout in battleground states for the November 3, 2020 election. Both of CTCL's grants greatly enhance Democrat Joe Biden's chances of winning the electoral votes in two key battleground states.

Remember CTCL claimed that \$4 billion was necessary to conduct a safe November 3, 2020 presidential election (Exhibit 2). CTCL's grants to the five largest Wisconsin cities and Delaware County Pennsylvania total \$8.5 million. CTCL's grants of \$8.5 million is an infinitesimal fraction of the \$4 billion that CTCL claims is necessary for a safe election. CTCL doesn't need \$4 billion to tip the election in favor of Democrat Joe Biden. CTCL grants of \$8.5 million to a heavily Democratic Pennsylvania county and five Wisconsin cities can easily swing the presidential election in two key battleground states in favor of Democrat Joe Biden.

### **CTCL's Executive Director Epps-Johnson's Pro-Democratic and Anti-Republican Tweets and Retweets**

CTCL Executive Director Epps-Johnson tweeted or retweeted 61 political tweets. Epps-Johnson mentioned Republicans in 36 of her tweets and retweets. All 36 of Epps-Johnson's Republican tweets and retweets were derogatory and negative. Epps-Johnson mentioned Democrats in 25 of her tweets and retweets. All 25 of Epps-Johnson's Democratic tweets and retweets were flattering and positive. Below is a list that summarizes the content of Epps-Johnson's tweet and retweets.

CTCL Executive Director Epps-Johnson tweets and retweets clearly show her political bias in favor of Democrats and opposition against Republicans. On issues of abortion, Black Lives Matter, Defund the Police, immigration, kneeling during the National Anthem, policing, gun control and voting rights, CTCL Executive Director Epps-Johnson is clearly pro-Democrat and Anti-Republican. Epps-Johnson's strong pro-Democrat public support makes her unfit to provide a nonpartisan grant that artificially inflates the number of Democratic Joe Biden votes in Wisconsin's five largest cities and across the state.



In Epps-Johnson's first entry of her Twitter bio, she said she was CTCL's founder and executive director (Exhibit 48). By naming herself CTCL's founder and executive director first and foremost, Epps-Johnson made sure her Twitter followers knew she was in charge of CTCL when she tweeted or retweeted. Most of Epps-Johnson's tweets and retweets involved political issues that had nothing to do with voting or the election process.

Exhibit	Description	Date
<b>CTCL Director Epps-Johnson's Derogatory and Negative Tweets about President Trump, the Trump Administration, and Republican Party</b>		
12	President Trump's Election Disinformation	6/22/2020
13	President Trump Defying 1997 Court Agreement	9/6/2018
14	Criticism of President Trump Immigration Policy	7/9/2018
15	Criticism of President Trump's election fraud commission	1/3/2018
16	Criticism of President Trump's Tweets	11/28/2017
17	President Trump can't cancel or postpone the election	5/8/2020
18	President Trump Accused of Rape	6/21/2019
19	Criticism of President Trump's Haitian Immigration Policy	11/22/2017
20	Criticism of President Trump's Immigration Policy	8/3/2018
21	Complaint that the White House is attacking Dem. Senate Candidate	6/4/2018
22	President Obama's Attorney General Sally Yates says President Trump is embracing Putin	11/11/2017
23	Dem. Senator Durbin criticizes President Trump	7/31/2018
24	Dem. Congressman Adam Schiff's criticizes the Trump Administration	6/21/2018
25	Dem. Sen. Richard Blumenthal criticizes President Trump's Immigration Policies	7/6/2018

Exhibit	Description	Date
26	President Trump Doesn't Have the Authority to change election date	7/30/2020
27	Neg. Post about the diversity of President Trump's staff	8/13/2018
28	Vice President Pence wants to kill gay people	10/18/2017
29	Criticism of Republican Party	12/7/2017
30	Criticism of the Republican Party #2	12/3/2017
31	Criticism of Trump Campaign Manager	6/19/2018
32	Criticism of Republican Senate Candidate	12/10/17
33	Dem. Sen. Durbin calls GOP Tax Scam	12/1/2017
34	Gloating over Gen. Flynn's Guilty Plea	12/1/2017
35	Neg. Comments about Michael Cohen and Paul Manafort	8/21/2018
36	Republican Senator Flake Harassed during Kavanaugh confirmation hearing	9/28/2018
37	Nicki Haley Criticism and Defund the Police	12/6/2019
38	Criticism of Kavanaugh SCOTUS Appointment	10/6/2018
39	Dem. Rep. Speier criticism of Immigration	7/13/2019
40	Trump Administration handled Immigration Poorly	2/3/2020
41	Derogatory Comments about Justices Thomas and Kavanaugh	9/27/2018
42	Accusations Against Federal Law Enforcement	7/17/2020
43	Dem. Rep Elijah Cummings Immigration Criticism	7/6/2018
44	Negative comments about St. Louis Couple who pointed guns at BLM trespassers	7/11/2020
45	Wrong for NFL team's kneeling for national anthem to discipline players	7/19/2018
46	Democratic Congressman Bass' Immigration Comments	7/24/2018
47	Democratic Congresswoman Madeleine Dean Immigration Comments	7/1/2019

Exhibit	Description	Date
	<b>CTCL Director Epps-Johnson's Flattering and Positive Tweets about Democrats and the Democratic Party</b>	
48	Tiana Epps-Johnson bio with her as CTCL's founder and Executive Director	
49	Black Women Save Democratic Party	11/7/2017
50	Every Democrat's Black Agenda Ranked	2/28/2020
51	Democratic Primaries are about Delegate Math	2/11/2020
52	Ranking of Localities that best represent CTCL	8/26/2019
53	Goal is to reach all election offices in the country	6/24/2020
54	Dem. Senator Kamala Harris Health Care Comments	12/3/2017
55	Dem. Rep Alexandria Ocasio-Cortez Message on Voting	6/28/2018
56	Dem. Rep Alexandria Ocasio-Cortez Speech	7/23/2020
57	Dem. Rep John Lewis get out the vote tweet	7/3/2018
58	Dem. Rep John Lewis get out the vote tweet 2	6/30/2018
59	Democratic Presidential Debate Discussion	10/15/2019
60	Dem. Senator Durbin and Dem Governor Pritzker Messages	3/19/2020
61	Dem. Rep. Elijah Cummings Praised	10/27/2019
62	Dem. Sec. of State Hillary Clinton retweet	11/8/2017
63	First Lady Michelle Obama Praised	4/18/2019
64	Democrat Presidential Candidate Elizabeth Warren Praised	3/5/2020
65	Obama Foundation Praise of Tiana Epps-Johnson	4/2/2020
66	Obama Foundation Statement	9/24/2019
67	Support for Dem. Governor Candidate Stacy Abrams	7/26/2019
68	Support for Democratic Congressional Candidate	8/7/2018
69	Support for Florida Democratic Governor Candidate	8/30/2018
70	Support for Dem. Senate Candidate Doug Jones	11/9/2017

Exhibit	Description	Date
71	Dem. Senator Doug Jones Elected	12/12/2017
72	Kamala Harris VP Picked Praised	8/11/2020

### **CTCL Executive Director Epps-Johnson's Pro-Democratic and Anti-Republican Facebook Posts**

CTCL Executive Director Epps-Johnson donated money to Planned Parenthood and two organizations that support immigrants and those with DACA status. The goals of the three charities that Epps-Johnson donated to are completely opposite to President Trump and the Republican's perspective. The polar opposite ideologies between Epps-Johnson and the Republicans led CTCL and Epps-Johnson to donate \$6.3 million dollars to increase the Wisconsin statewide Democratic vote for Joe Biden so that Democrat Biden wins Wisconsin's 10 electoral votes.

Post	Description	Date
73	Epps-Johnson posts 20% of Trump voters disagree with freeing slaves	2/24/2016
74	Epps-Johnson Donated to Planned Parenthood	8/2/2018
75	Epps-Johnson Donated to RAICES, Immigration Support Organization	6/20/2018
76	Epps-Johnson Donated to United We Dream Network for DACA	5/4/2018

### **CTCL Director of Government Services Whitney May's Pro-Democratic and Anti-Republican Tweets and Retweets**

CTCL Director of Government Services Whitney May tweeted or retweeted 61 political tweets. May mentioned Republicans in 50 of her tweets and retweets. All 50 of May's Republican tweets and retweets were derogatory and negative. May mentioned Democrats in 11 of her tweets and retweets. All 11 of May's Democratic tweets and

retweets were flattering and positive. Below is a list that summarizes the content of May's tweet and retweets.

<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
	<b>CTCL Director of Government Services May's Negative Tweets about President Trump, the Trump Family and Administration</b>	
77	Trump is a Fucking Sociopath 1	2/16/2017
78	Trump is a Fucking Sociopath 2	2/16/2017
79	Trump's "Bogus Election Panel"	9/12/2017
80	Trump's Appearance Mocked	2/13/2017
81	Trump is "gas lighting America"	12/10/2016
82	Go After Trump's Lies	2/16/17
83	Derogatory Image of President Trump	2/7/2017
84	Accuses Trump of Plagiarism	1/20/2017
85	Criticism of Trump's Fund Raising	1/12/2017
86	Complaint about Trump pardoning Sheriff Joe Arpaio	9/5/2017
87	Mocking President Trump with Photo	5/30/2018
88	Whitney May says. "Trump ego is the most fragile"	1/11/2017
89	Trump Family called out of touch Hollywood Elitest	1/5/2017
90	President Trump accused of targeting Nordstrom's	2/8/2017
91	Whitney May mocks President Trump	1/11/2017
92	Whitney May Attacks Trump U	1/18/2017
93	Democrat Attorney General Eric Holder's Criticisms of Trump's DOJ's Criminal Justice Policies	5/12/2017
94	Cheap Shot at Ivanka Trump	2/13/2017
95	Cheap Shot at Jared Kushner	9/27/2017
96	Harsh Criticism of President Trump	1/14/2017
97	Nancy Pelosi criticizes President Trump	1/17/2019

<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
98	Protests over President Trump's Travel Ban	1/28/2017
99	Excuses/lies from Trump administration and other Republicans	1/21/2017
100	Maxine Waters calls Trump a "bum" and a "disgrace"	9/23/2017
101	Congressional Black Caucus Complaints about Trump	2/16/2017
102	Criticism of Trump's Muslim Travel Ban	2/24/2017
103	Congressional Black Caucus Complaints about President Trump's Vote Fraud Panel	6/30/2017
104	Dem. Rep. Maxine Waters desire to impeach President Trump	2/3/2017
105	Doubts about President Trump's Kobach Commission Report	1/29/2017
106	Whitney May calls VP Pence "Sad"	1/20/2017
107	White House Advisor Kellyanne Conway Attacked	2/9/2017
108	Senate Republicans Mistreated President Obama's SCOTUS Nominee Merrick Garland	1/31/2017
109	GOP Criticized for people with disabilities treatment	11/2/2018
110	White House Interview with Sean Spicer denigrated	2/9/2017
111	Criticism of Montana GOP Party Chairman	2/22/2017
112	Dem. Rep Luis Gutierrez Complains about ICE meeting	2/16/2017
113	Dem. Sen. Dick Durbin says Republicans Can't Listen	2/7/2017
114	Dem. Senator Kamala Harris calls for investigation of Trump-Russian Collusion	2/14/2017
115	Whitney May says "GOP campaign office firebombed because it was weak"	1/11/2017
116	Dem. Congressman John Dingell's disbelief Trump was elected	1/26/2017
117	WH Press Sec. Sean Spicer is lying	1/31/2017
118	Dem. Senator Tim Kaine says he is appalled by President Trump's Administration's Cruelty	1/28/2017
119	Swipe at Republican Senate Candidate Roy Moore	11/13/2017

<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
120	Republican Rep Dana Rohrabacher is a "fool"	6/3/2017
121	Republican Media Pundit Ann Coulter is a racist	6/3/2017
122	Dem. Sen. Elizabeth Warren Impugns Jeff Sessions	2/8/2017
123	Mocking Republican Rep. Jason Chaffetz	3/7/2017
124	Dem. Rep. Maxine Waters says FBI has no credibility regarding Trump Investigation	1/13/2017
125	President Trump White House Press Secretary Lies about Crowd Turnout	1/21/2017
126	Chicago Reacts to President Trump's EPA Announcement	5/9/2017
<b>CTCL Director of Government Services May's Positive Tweets about Democrats and the Democratic Party</b>		
127	Obama Foundation announces Tiana Johnson Epps as Original Fellow	4/16/2018
128	Whitney May's Praise for President Obama	1/11/2017
129	Whitney May's Praise for Michelle Obama	1/6/2017
130	Praise for President Obama's ACA	1/14/2017
131	President Obama sets record with 1,715 commutations	1/19/2017
132	Praise for Hillary Clinton	1/13/2017
133	President Obama Retweet	8/29/2018
134	Support for Chicago Dem. candidate for mayor	10/16/2018
135	Whitney May's Fax Receipt to Mitch McConnell	2/8/2017
136	Democratic Candidate for IL Governor Highlighted	4/5/2017
137	Run for City and County Clerks	2/21/2019

**CTCL Director of Government Services May's Pro-Democratic and Anti-Republican Facebook Posts**

CTCL Director of Government Services Whitney May posted political Facebook posts 22 times. Eleven of May's posts were about the Trump Family, President Trump, and Republicans. All eleven of May's Republican related posts were derogatory, demeaning and negative. May posted eleven Facebook posts about Democrats and Democratic issues. All eleven of May's Democratic related posts were flattering and positive.

Exhibit	Description	Date
	<b>CTCL Director of Government Services May's Derogatory and Negative Facebook posts about President Trump, the Trump Family and Republicans</b>	
138	May says, "Don't Vote for Trump	9/16/2016
139	May again says, "Don't vote for Trump"	9/21/2016
140	May says, "Hillary is superior to Trump. I'm voting for her."	7/25/2016
141	Trump family embodies a very old sexist hypocrisy	7/21/2016
142	May's Criticizes How Trump is seeking a fair election	10/4/2016
143	May's easy decision to support Democrats over Republicans	8/4/2016
144	Donald Trump Calls for extreme vetting of immigrants	8/19/2016
145	Trump Criticizes Flint, Michigan Pastor	9/15/2016
146	May is against Republican Senate Candidate Roy Moore	9/28/2016
147	May celebrates Ohio Trump Chair's Resignation	9/23/2016
148	Melania Trump plagiarized Michelle Obama	7/19/2016
	<b>CTCL Director of Government Services May's Flattering and Positive Facebook Posts about Hillary Clinton and support for the Democratic Party Platform</b>	
149	May's support of Hillary Clinton	9/29/2016
150	May Encourages people to vote for Hillary Clinton	9/29/2016



Exhibit	Description	Date
151	May's Push for Clinton	9/8/2016
152	May support for Clinton-Kaine Ticket	9/17/2016
153	Hillary Clinton has presidential look	10/20/2016
154	Another May Endorsement for Clinton	9/26/2016
155	"endorsement of Clinton and rejection of Trump"	10/5/2016
156	May says, "I'm Voting for Elizabeth Warren"	3/1/2020
157	Michelle Obama was right as Clinton accepts the Democratic nomination for president	7/26/2016
158	May wants to ban assault rifles	6/12/2016
159	May supports gun control	6/22/2016

### **The 5 Wisconsin Mayors and 4 Wisconsin Clerks lack of Due Diligence**

Milwaukee Mayor Tom Barrett, Madison Mayor Satya Rhodes-Conway, Kenosha Mayor John M. Antaramian, and Racine Mayor Cory Mason all failed to perform their fiduciary duty and due diligence to investigate the intent and purpose of CTCL's \$6.3 million grant. When CTCL offered each of the five Wisconsin mayors a million dollars or more, they had the duty to make sure CTCL's grant was legitimate and without a hidden agenda.

It would have taken only a minimal effort to discover CTCL Executive Director Epps-Johnson and Director of Government Services May were Democratic partisans. A computer, Internet connection and a few minutes were all that was needed to discover Epps-Johnson and May only backed Democratic politicians and policies. Though the five Wisconsin Mayors are Democrats, the five mayors still have the obligation to remain nonpartisan for their official duties relating to November 3, 2020 presidential election.

The five Wisconsin mayors initial Press Release (Exhibit 1) mentioned that CTCL was nonpartisan three times. Secretary of State Mike Pompeo said it is America's policy to "trust, but verify." The five Wisconsin mayors should have trusted CTCL's executives, but they should have also verified CTCL's executives were truly nonpartisan. The mayors of five largest Wisconsin cities failure to perform their fiduciary duty and due diligence before receiving CTCL's \$6.3 million grant has imperiled the outcome of the November 3, 2020 Wisconsin presidential election.

The public announcement of CTCL providing \$6.3 million to five Wisconsin cities was made on July 6, 2020 (Exhibit 1). Six times Epps-Johnson tweeted or retweeted tweets that were critical of President Trump shortly before or after the five mayors' July 6 public announcement. Before the five mayors accepted CTCL's \$6.3 million grant, they should have investigated CTCL Executive Director Epps-Johnson's social media comments.

CTCL Executive Director Epps-Johnson tweeted on May 8, 2020 (Exhibit 17) that the president cannot postpone the election or stay in office past January 20, 2021. Epps-Johnson misrepresented President Trump. President Trump never said he unilaterally planned to delay the election. For Epps-Johnson to imply President Trump was planning to postpone the November 3, 2020 presidential election is false and misleads the public into thinking President Trump intended to violate the Constitution and other federal laws. Epps-Johnson retweet was meant to discredit President Trump and turn voters against him. This Epps-Johnson anti-Trump retweet was done 9 weeks before it was announced CTCL was donating \$6.5 million to the five largest Wisconsin cities.

On June 22, 2020 (Exhibit 12) Epps-Johnson retweeted a tweet that said, "I do not retweet disinformation— what our American President is saying about elections is FALSE." Epps-Johnson neither says what is the disinformation that President Trump is spreading in her retweet, nor does Epps-Johnson reveal the false election information that President Trump supposedly said. Epps-Johnson's retweet was baseless and deliberately done to impugn President Trump and lessen the president's chance of

winning the November 3 election. This Epps-Johnson anti-Trump retweet was done two weeks before it was announced CTCL was donating \$6.3 million to the five largest Wisconsin cities.

On July 30, 2020 (Exhibit 26) Epps-Johnson retweeted that the president doesn't have the authority to change the election date or extend the presidential term past January 20, 2020. Epps-Johnson once again implied that President Trump intended to violate the law and postpone the election. Because Epps-Johnson's retweet insinuated President Trump considered delaying the election and remaining in office, Epps-Johnson's retweet was meant to inflame Epps-Johnson's fellow Democrats and turn Trump voters into Biden voters. This Epps-Johnson anti-Trump retweet was done two weeks after it was announced CTCL was donating \$6.5 million to the five Wisconsin cities

On July 17, 2020 (Exhibit 42) Epps-Johnson tweeted that "Federal law enforcement officers are driving up to people, detaining individuals with no explanation of why they are being arrested and driving off." President Trump is in charge of federal officers and the federal government's response to rioters who damage federal buildings. Democratic politicians and voters bashed President Trump for using Border Patrol, Federal Protective Service, and Homeland Security agents to protect federal buildings. Epps-Johnson was critical of President Trump and his policy of using federal law enforcement officers to protect federal buildings. This Epps-Johnson anti-Trump retweet was done 10 days after it was announced CTCL was donating \$6.3 million to the five Wisconsin cities

On July 11, 2020 (Exhibit 44) Epps-Johnson retweeted a story about the St. Louis couple who pointed their guns at hundreds of BLM protestors who were trespassing and verbally threatening them. Previously on February 17, 2018 Epps-Johnson retweeted a tweet about an anti-gun rally which sought more gun restrictions. Epps-Johnson's tweets and retweets indicate she is anti-gun rights and pro gun control. Epps-Johnson position on guns is opposite to President Trump and Trump supporters

who believe in upholding the Second Amendment and the rights of gun owners. This Epps-Johnson anti-Trump retweet was done four days after it was announced CTCL granted \$6.5 million to the five largest Wisconsin cities.

On August 11, 2020 (Exhibit 72) Epps-Johnson retweeted Nikole Hannah-Jones tweet that cheered the selection of Kamala Harris for vice-president. Hannah-Jones is known for starting the 1619 project that revises the history of American slavery. The Epps-Johnson retweet that hailed the naming of Kamala Harris as Joe Biden's running mate occurred five weeks after CTCL's \$6.3 million grant to Wisconsin's five largest cities.

### **Democratic CTCL Directors and the Five Democratic Wisconsin Mayors Exploited COVID 19 to Make It Appear the \$6.3 Million Grant was Necessary**

COVID 19 is the reason the July 6, 2020 Wisconsin Safe Voting Plan Press Release justifies CTCL's \$6.3 million grant to the five largest Wisconsin cities. The Press Release contains significant omissions, misinformation and irrelevant information. The lack of pertinent information is meant to mislead the public and instill fear so the public accepts CTCL's \$6.3 million grant as necessary and unquestionable.

The Press Release's false information starts with the headline at the top of the document (Exhibit 1). The headline is "Wisconsin Safe Voting Plan." It is not the Wisconsin Safe Vote Plan as the Press Release states. The only safe voting plans contained in the Press Release were for the City of Milwaukee, City of Madison, City of Green Bay, City of Kenosha, and City of Racine. Wisconsin Safe Voting headline makes it appear all Wisconsin voters benefit from CTCL's \$6.3 million grant instead of a Safe Voting Plan that only covers the five most Democratic cities of Wisconsin 190 cities.

The Press Release said voters were, "subjected to exposure to a dangerous virus" when they voted in the Spring election on April 7, 2020. What the Press Release doesn't say is voters have also been subjected to a dangerous virus every time they leave their homes or shop at grocery stores, big box stores, and mom and pop stores.

The Press Release doesn't claim voters were at an increased risk of getting COVID 19 by voting in a polling place. Hence, without a claim that polling place voting caused more COVID 19 cases in the five Wisconsin cities receiving CTCL's \$6.3 million grant, there is no justifiable medical reason for CTCL's selective grant to the five Wisconsin cities.

Three separate studies, including a CDC study, concluded Milwaukee did not have a surge of COVID 19 cases after voters went to the polls on April 7, 2020 (Exhibit 160). A Milwaukee physician performed one study after the COVID incubation period in late April. This information was available to the five mayors before they accepted CTCL's Safe Voting grant (Exhibit 160). The Press Release failed to mention there was no Milwaukee COVID 19 spike after Milwaukee's April 7, 2020 election. The Press Release's omission about no COVID spike after in-person voting was deliberate because this information eliminates the medical necessity for CTCL's \$6.3 grant.

The Press Release cherry picked selective COVID 19 information as grounds for the five largest Wisconsin cities receiving CTCL's \$6.3 million grant. For example, the Press Release quoted a July 2, 2020 Milwaukee Journal-Sentinel article: "The coronavirus is accelerating again in Wisconsin with 20% of the state's total cases having been reported in the last two weeks, state public health officials announced Thursday. (Exhibit 1)" The Press Release doesn't project the number of COVID cases for the five largest Wisconsin cities for the November 3, 2020 election date that was four months from the date the five mayors sent out their Press Release. The Press Release fails to mention that death and hospitalization rates for COVID 19 are decreasing. Researchers and doctors will know so much more about COVID 19 and how to treat the disease when voters head to the polls. None of these inconvenient facts were mentioned in the Wisconsin Safe Voting Press Release.

The Press Release contained three footnotes and links. One footnote was linked to a Wisconsin Watch Tweet that said, "Significant numbers of Milwaukee voters were dissuaded from voting on April 7 by the sharp reduction in polling places and the threat

of the COVID-19 pandemic—with the biggest effects seen among Black voters, according to a new study (Exhibit 161).” The actual Brennan Center for Justice study said the polling place consolidation reduced overall turnout by about 8.5 points and reduced Black Population turnout by about 10.2 points (Exhibit 162). Thus, the difference between overall turnout reduction and Black Population turnout reduction was less than 2 points. Furthermore and of the highest importance, *the Press Release makes no claim that a reduction of voting changed the outcome of any election held on April 7, 2020.*

The Brennan Center for Justice study did not consider the candidates and contests on the ballot as part of its voter turnout analysis. Joe Biden had already secured the Democratic nomination for president by the time Milwaukee residents voted. Had there been a hotly contested presidential primary between two strong candidates like Barack Obama and Hillary Clinton during the April 7, 2020 election, then there would have been many more voters casting ballots during Milwaukee’s primary.

The Brennan Center for Justice study did not interview voters to ask them why they did or did not turn out to vote. The study looked at Milwaukee and surrounding cities’ voting data instead of actually talking to voters to determine what led them to vote or not vote. Finally, the Brennan study was only limited to Milwaukee. CTCL’s granted \$4 million to the cities of Madison, Green Bay, Kenosha and Racine; the Brennan study did not examine COVID 19’s impact on voting for these four cities that are receiving CTCL’s grant.

In conclusion, the five mayors’ July 6, 2020 Press Release made it appear that objective science required the five largest Wisconsin cities to accept CTCL’s \$6.3 million grant. However, contrary to what the Wisconsin mayors want us to believe, there is no medical need that required only the five largest cities out of 190 Wisconsin cities to receive CTCL’s \$6.3 million grant. The offer and acceptance of CTCL’s \$6.3 million was done for pure political reasons and for the purpose of helping Joe Biden win

Wisconsin's 10 electoral votes by increasing his Wisconsin statewide vote total on November 3, 2020.

### **CTCL's Fraudulent Grant Process**

CTCL's August 7, 2020 website article ends with, "Stay tuned to learn more about the grants, recipients, and how the funds have been utilized by local election officials (Exhibit 2)." CTCL does not tell its website readers how to apply for its Safe Voting grants, its grants' applications' start and end date, or who is eligible for its grants. CTCL did not follow the proper protocols for issuing grants because CTCL solely sought to use its grants in Wisconsin and Pennsylvania to tip the presidential election in favor of Joe Biden.

[grant.gov](http://grant.gov) has thousands of grant announcements on its website. You can pick any grant on [grant.gov](http://grant.gov) and each grant has standard information, namely the grant's post date, grant's close date, grant's eligibility, and a grant description. Exhibit 163 is a typical grant request. Unlike CTCL's Safe Voting grants, Exhibit 163 follows the industry standard for grants.

If CTCL followed the proper protocols for its \$6.3 million Wisconsin grant and \$2.2 million Pennsylvania grant, then CTCL will be able to provide the following three pieces of information.

1. CTCL can provide information of how it publicized its grants and solicited applicants for its \$6.3 million grant to Wisconsin's five largest cities and the \$2.2 million grant to Delaware County, Pennsylvania.
2. CTCL can provide the names of other organizations or governments who applied at the same time as Wisconsin's five largest cities and Delaware County applied.

3. CTCL can provide the applications of all the organizations who applied for CTCL's \$6.3 million and \$2.2 million grants that eventually went to Wisconsin's five largest cities and Delaware County Pennsylvania.

If CTCL cannot provide the three pieces of standard grant information listed above, then there is only one conclusion: CTCL preselected its \$6.3 million grant to Wisconsin's five largest cities and \$2.2 million grant to Delaware County, Pennsylvania for the purpose of winning Wisconsin's 10 electoral votes and Pennsylvania's 20 electoral votes by artificially inflating the number of Democrat Joe Biden's votes in Wisconsin and Pennsylvania.

### **Philadelphia Pennsylvania's \$10 Million CTCL Grant**

After the complainant completed this sworn complaint, he learned late today that CTCL granted Philadelphia, Pennsylvania \$10 million for the impending November 3, 2020 presidential election (Exhibit 167). CTCL's \$10 million grant to Philadelphia follows CTCL's pattern of granting money to Democratic strongholds.

In Philadelphia's last primary, 92.1% of the voters were Democrats, and 7.9% were Republicans. By going after Philadelphia's Democratic voters, CTCL again targeted a Democratic stronghold for its financial grant. CTCL's two Pennsylvania grants will artificially inflate Democratic vote in the City of Philadelphia and Delaware County. Ultimately CTCL's grants will lead to a significant increase in Pennsylvania's statewide vote for Democrat Joe Biden and make it more likely that Joe Biden will get Pennsylvania's 20 Electoral votes.





## **Sworn WEC Complaint Exhibits**

- 1.** July 6, 2020 Wisconsin Safe Voting Plan Press Release
- 2.** August 7, 2020 CTCL Announces COVID-19 Response Rural Grants Program
- 3.** CTCL Director Epps-Johnson Interned at Young Democrats of America
- 4.** CTCL Director Epps Johnson Named Obama Foundation Fellow.
- 5.** Photo of CTCL Director Epps-Johnson and President Obama
- 6.** Obama Gathers his first group of fellows
- 7.** CTCL's Form 990 from 2018
- 8.** CTCL Epps-Johnson invited to Obama White House Tech Meetup
- 9.** FEC complaint against Obama Campaign pages 8-9
- 10.** Screenshot of CTCL Corporate Sponsors
- 11.** Delco accepts \$ 2.2M grant to assure safe voting options
- 12.** President Trump's Election Disinformation
- 13.** President Trump Defying 1997 Court Agreement
- 14.** Criticism of President Trump Immigration Policy
- 15.** Criticism of President Trump's election fraud commission
- 16.** Criticism of President Trump's Tweets
- 17.** President Trump can't cancel or postpone the election
- 18.** President Trump Accused of Rape
- 19.** Criticism of President Trump's Haitian Immigration Policy
- 20.** Criticism of President Trump's Immigration Policy
- 21.** Complaint that the White House is attacking Dem. Senate Candidate
- 22.** President Obama's Attorney General Sally Yates says President Trump is embracing Putin
- 23.** Dem. Senator Durbin criticizes President Trump
- 24.** Dem. Congressman Adam Schiff's criticizes the Trump Administration
- 25.** Dem. Sen. Richard Blumenthal criticizes President Trump's Immigration Policies
- 26.** President Trump Doesn't Have the Authority to change election date
- 27.** Neg. Post about the diversity of President Trump's staff

28. Vice President Pence wants to kill gay people
29. Criticism of Republican Party
30. Criticism of the Republican Party #2
31. Criticism of Trump Campaign Manager
32. Criticism of Republican Senate Candidate
33. Dem. Sen. Durbin calls GOP Tax Scam
34. Gen. Flynn's Plead to Making False Statements
35. Neg. Comments about Michael Cohen and Paul Manafort
36. Republican Senator Flake Harassed
37. Nicki Haley Criticism and Defund the Police
38. Criticism of Kavanaugh SCOTUS Appointment
39. Dem. Rep. Speier criticism of Immigration
40. Trump Administration handled Immigration Poorly
41. Derogatory Comments about Justices Thomas and Kavanaugh
42. Accusations Against Federal Law Enforcement
43. Dem. Rep Elijah Cummings Immigration Criticism
44. Negative comments about St. Louis Couple who pointed guns at BLM trespassers
45. NFL team's kneeling for national anthem discipline
46. Democratic Congressman Bass' Immigration Comments
47. Democratic Congresswoman Madeleine Dean Immigration Comments
48. Tiana Epps-Johnson bio with her as CTCL's founder and Executive Director
49. Black Women Save Democratic Party
50. Every Democrat's Black Agenda Ranked
51. Democratic Primaries are about Delegate Math
52. Ranking of Localities that best represent CTCL
53. Goal is to reach all election offices in the country
54. Dem. Senator Kamala Harris Health Care Comments
55. Dem. Rep Alexandria Ocasio-Cortez Message on Voting
56. Dem. Rep Alexandria Ocasio-Cortez Speech
57. Dem. Rep John Lewis get out the vote tweet
58. Dem. Rep John Lewis get out the vote tweet 2

59. Democratic Presidential Debate Discussion
60. Dem. Senator Durbin and Dem Governor Pritzker
61. Dem. Rep. Elijah Cummings Praised
62. Dem. Sec. of State Hillary Clinton retweet
63. First Lady Michelle Obama Praised
64. Democrat Presidential Candidate Elizabeth Warren Praised
65. Obama Foundation Praise of Tiana Epps-Johnson
66. Obama Foundation Statement
67. Support for Dem. Governor Candidate Stacy Abrams
68. Support for Democratic Congressional Candidate
69. Support for Florida Democratic Governor Candidate
70. Support for Dem. Senate Candidate Doug Jones
71. Dem. Senator Doug Jones Elected
72. Kamala Harris VP Picked Praised
73. Epps-Johnson posts 20% of Trump voters disagree with freeing slaves
74. Epps-Johnson Donated to Planned Parenthood
75. Epps-Johnson Donated to RAICES, Immigration Support Organization
76. Epps-Johnson Donated to United We Dream Network for DACA
77. Trump is a Fucking Sociopath 1
78. Trump is a Fucking Sociopath 2
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132. Praise for Hillary Clinton
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147. May celebrates Ohio Trump Chair's Resignation
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156. May says, "I'm Voting for Elizabeth Warren"
157. Michelle Obama was right as Clinton accepts the Democratic nomination for president
158. May wants to ban assault rifles
159. May supports gun control
160. No COVID-19 surge in Milwaukee from Wisconsin's April 7 election, CDC says
161. Wisconsin Watch on April 7 Milwaukee Voters
162. Study: Poll closings, COVID-19 fears, kept many Milwaukee voters away
163. [grant.gov](https://www.grant.gov) sample grant with post date, close date, eligibility, and description
164. Center for Tech and Civic Life: Democratic election operatives masquerading as concerned voters' group, critic says
165. Liberal Organizing Group Implodes In One Tumultuous Afternoon
166. City of Green Bay's Grant Tracking Form
167. CTCL Grants City of Philadelphia \$10 Million



Exhibit  
1

FOR IMMEDIATE RELEASE  
July 6, 2020

CONTACT:  
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262-636-9266

## Wisconsin Safe Voting Plan

### ***Mayors of Wisconsin's 5 Largest Cities Team Up with Nonpartisan Nonprofit to Invest in Safe Elections During COVID***

**Wisconsin** - The mayors of Wisconsin's five largest cities announced today they have successfully secured a combined \$6.3 million in nonprofit grants to fund the "Wisconsin Safe Voting Plan." The grants, awarded by the nonpartisan Center for Tech and Civic Life (CTCL), will help each municipality administer elections this year in the midst of the deadly coronavirus pandemic.

The Wisconsin spring election -- in which voters were subjected to exposure to a dangerous virus, and municipalities scrambled to conduct safe elections -- presented a cautionary tale of precisely how not to run an election during an outbreak of a lethal disease.<sup>1</sup>

The national recession that accompanied the pandemic has now caused devastating budget gaps for municipalities across the country. State and local governments around the nation are now grappling with yawning and unexpected deficits, raising the serious prospect of deep and difficult cuts to core services.<sup>2</sup>

As a result, municipalities are struggling with how to conduct safe and accessible elections -- especially if as predicted a second wave of coronavirus erupts this fall. Already, several states are experiencing spikes in coronavirus cases as the first wave of COVID-19 continues to rage across the country. And according to the *Milwaukee Journal-Sentinel* on 7/2/20 -- "the coronavirus is accelerating again in Wisconsin with 20% of the state's total cases having been reported in the last two weeks, state public health officials announced Thursday."<sup>3</sup>

To meet this extraordinary challenge, the cities of Milwaukee, Madison, Green Bay, Racine and Kenosha have applied for grant funds from CTCL to create the "Wisconsin Safe Voting Plan" and support elections operations. This grant program will enable municipalities to prepare for and operate safe elections by investing in priorities that would otherwise be very challenging to accomplish -- such as securely opening an adequate number of voting sites; setting up drive-thru and drop box locations; providing PPE for poll workers; and recruiting and training a sufficient number of poll workers.

<sup>1</sup> <https://twitter.com/wisconsinwatch/status/1275933511753641985?s=11>

<sup>2</sup> <https://twitter.com/compujramey/status/1278331759822856192?s=12>

<sup>3</sup> <https://www.jsonline.com/story/news/local/wisconsin/2020/07/02/twenty-percent-all-virus-cases-wisconsin-reported-last-two-weeks/5357805002/>



# Exhibit 1

The "Wisconsin Safe Voting Plan" grant applications have been approved in full by CTCL and will soon be awarded to each municipality. Some of the jurisdictions may require approval from their respective city councils to accept the grants.

"The deadly COVID-19 pandemic has triggered a global public health crisis, and seriously impaired the ability of local governments to administer safe and smooth elections," said **Racine Mayor Cory Mason**. "These grants will help each municipality make investments that will ensure smooth, safe and healthy elections in a time of a national health pandemic -- which each municipality otherwise would struggle to do while facing an intense budget shortfall."

"We have seen what can happen to elections in the midst of a dangerous pandemic -- long lines, limited locations, threatened exposure to a deadly disease, and voters concerned about going to the polls due to serious health fears," said **Milwaukee Mayor Tom Barrett**. "These resources will help us address these problems, and I thank the Center for Tech and Civic Life for making these important and wise investments."

"Through an extraordinary effort, Madison was able to pull off a safe election in April, but we spent hundreds of thousands of dollars we hadn't budgeted doing so," said **Madison Mayor Satya Rhodes-Conway**. "As we have seen in Wisconsin and across the nation, COVID-19 is not gone; in fact, it's getting worse in some places. If we are going to meet our obligations as elected leaders to ensure the safe administration of elections during this pandemic, we have to think differently and bring in help where we can. These valuable resources will go a long way to running successful elections this year."

"The coronavirus pandemic has provided a stress test for our democratic institutions, including our elections, and we know we must do better," said **Green Bay Mayor Eric Genrich**. "The support of the Center for Tech and Civic Life will enable us to ensure that all Green Bay citizens can exercise their right to vote safely and securely in August and November."

"These smart investments will allow us to increase safety without burdening taxpayers," said **Kenosha Mayor John Antaramian**. "This is exactly the kind of project that city governments need to pursue in the midst of a pandemic that is still threatening lives."

"As a representative of over 100 central city churches, I am proud to be a part of this citywide effort to create a safe and accessible voting process for November 2020," said **Reverend Greg Lewis, Executive Director of Souls to the Polls**. "The Black community has been hard hit by the COVID 19, I myself was hospitalized and we have lost hundreds of Black lives to this virus. It is literally a matter of life and death that our people can vote without risking our health."

The **Center for Tech and Civic Life** is a nationally-recognized, nonpartisan 501(c)(3) nonprofit organization of civic technologists, trainers, researchers, election administration and data experts working to help modernize U.S. elections. CTCL connects election officials with guidance, expertise, tools, and trainings so they can best serve their communities, and ensure that elections are more professional, safe, and secure. CTCL works with the federal government, as well as local and state governments of all sizes across the nation and regardless of partisanship to highlight best practices, create easy-to-use resources for administrators, and develop infrastructure to better operate elections.<sup>4</sup>

"This year, election departments are facing an unprecedented challenge of administering safe and secure elections that provide healthy voting options to the public," said **Center for Tech and Civic Life Executive Director Tiana Epps-Johnson**. "To meet this challenge, CTCL is providing support to Wisconsin election officials so no voter is required to

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<sup>4</sup> <https://www.techandcivicle.org/>

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# Exhibit 1

make a choice between their health and their ability to vote. From ensuring that polling places are open and following the latest public health guidelines, to providing options for voters to easily and securely return absentee ballots, to making certain that the incredible people who step up to serve as poll workers are protected and well compensated for their service, we're proud to partner with the five largest cities in Wisconsin to deliver a smooth voting process that inspires confidence."

## **SUMMARY OF GRANTS**

### ***Total by Municipality***

- City of Milwaukee: \$2,154,500
- City of Madison: \$1,271,788
- City of Green Bay: \$1,093,400
- City of Kenosha: \$862,779
- City of Racine: \$942,100

### ***Total by Use***

- Support Early In-Person Voting and Vote by Mail: \$2,572,839
  - *Expand the number of in-person Early Voting sites (Including Curbside Voting).*
  - *Provide assistance to help voters comply with absentee ballot requests and certification requirements.*
  - *Utilize secure drop-boxes to facilitate return of absentee ballots.*
  - *Deploy additional staff and/or technology improvements to expedite and improve accuracy of absentee ballot processing.*
- Launch Poll Worker Recruitment, Training & Safety Efforts: \$1,810,028
  - *Recruit and hire a sufficient number of poll workers and inspectors to ensure poll sites properly staffed during virus outbreak, utilizing hazard pay where required.*
  - *Provide voting facilities with funds to compensate for increased site cleaning and sanitization costs. Provide updated training for current and new poll workers administering elections in midst of pandemic.*
- Ensure Safe, Efficient Election Day Administration: \$876,700
  - *Procure Personal Protective Equipment (PPE) and personal disinfectant to protect election officials and voters from coronavirus.*
  - *Support and expand drive-thru voting on election day, including covering additional unbudgeted expenses for signage, tents, traffic control, and safety measures.*
- Expand Voter Education & Outreach Efforts: \$1,065,000
  - *Outreach to remind voters to verify and update their address, or other voter registration information, prior to the election.*

###

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Exhibit 2

Election Officials / August 7, 2020

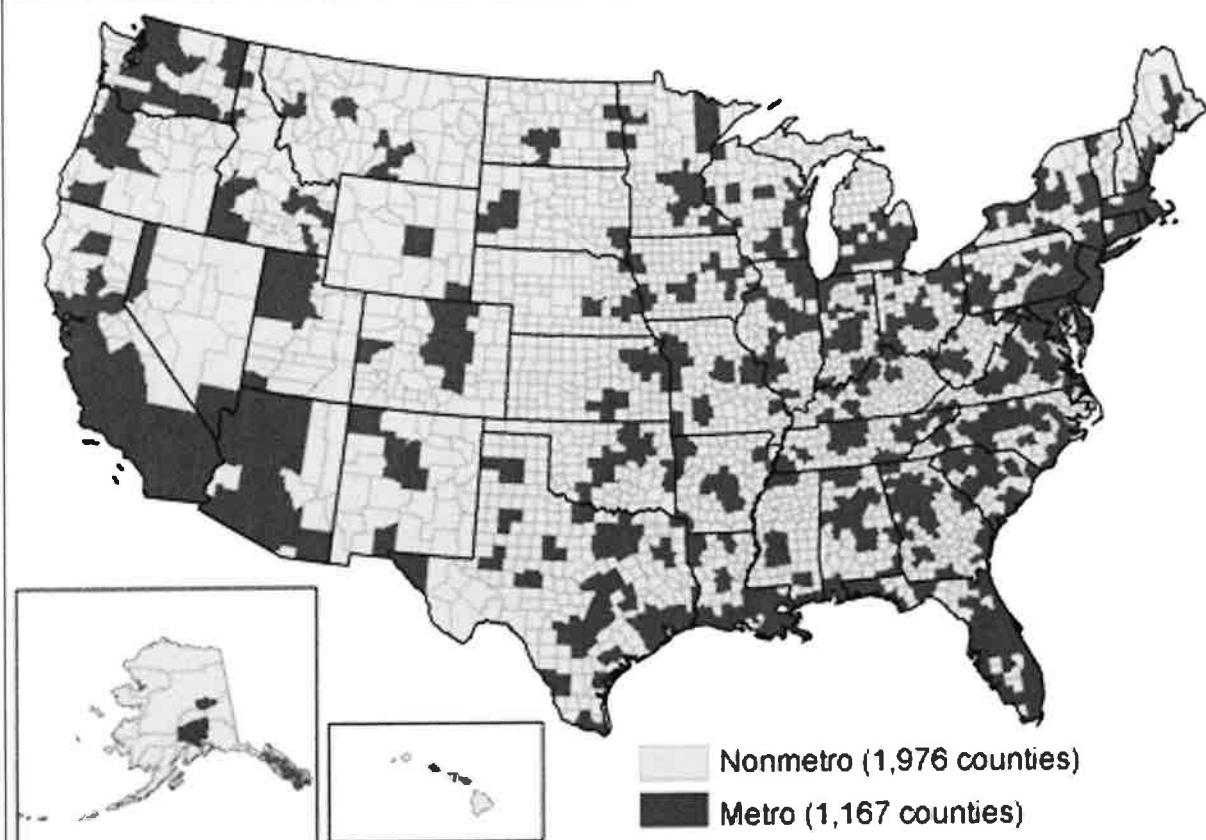
# CTCL Announces COVID-19 Response Rural Grants Program

To date, Congress has distributed \$400 million dollars to states in an effort to support state and local election officials this year. Unfortunately, experts believe that it would take about \$4 billion to successfully administer safe elections in 2020.

With this in mind, the Center for Tech and Civic Life (CTCL) recently provided five Wisconsin cities a total of \$6.3 million for implementing a safe, inclusive, and secure election in November. Recognizing the need for safe voting options in jurisdictions of all sizes across the country, CTCL is now announcing the development of a COVID-19 Response Rural Grants Program.

While rural is not easy to define, CTCL will generally be following the “Metro vs Nonmetro” classification system. As outlined by the United States Department of Agriculture, nonmetro counties include some combination of open countryside, rural towns (fewer than 2,500 people), and urban areas ranging from 2,500 to 49,000 that are not part of larger metro areas. Grants will be open to local election offices in qualifying jurisdictions, whether at the county or municipal level.

#### Metro and nonmetro counties, 2013



Source: USDA, Economic Research Service using data from the U.S. Census Bureau.

Image source: <https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/>

COVID-19 has added another challenge to the already full plate of local election officials this year. In addition to this new facet, many jurisdictions face the added need of communicating rapidly

Exhibit 2

changing policy information or providing information in multiple languages.

These new grants will prioritize rural jurisdictions that also fall into one of two categories. One priority will be jurisdictions that are required to provide language assistance under section 203 of the Voting Rights Act and have a higher percentage of historically disenfranchised residents. The other priority will be jurisdictions in states that have recently changed absentee voting laws or rules in response to COVID-19.

“The COVID-19 Response Rural Grants Program is an extension of CTCL’s history of work with rural jurisdictions across the country. Smaller, rural jurisdictions are often overlooked in the national election landscape and in the media, but remain crucial to our democracy,” said Tiana Epps-Johnson, Executive Director of the Center for Tech and Civic Life. “Like their metropolitan counterparts, rural jurisdictions are facing the unprecedented challenge of administering safe and secure elections and must provide healthy voting options to their communities this year,” she continued.

Exhibit 2



*Tiana Epps-Johnson coaching Marie Hill on election website best practices. Mercer County, WV. 2014.*

Similar to the Wisconsin Safe Voting Plans grants announced in July, the COVID-19 Response Rural Grants Program will provide funds for four main purposes. They include, but are not limited to:

**Ensure Safe, Efficient Election Day Administration**

## Exhibit 2

- Procure Personal Protective Equipment (PPE) and personal disinfectant to protect election officials and voters from COVID-19
- Support and expand drive-thru voting, including purchase of additional unbudgeted signage, tents, traffic control, walkie-talkies, and safety measures

### **Expand Voter Education & Outreach Efforts**

- Publish reminders for voters to verify and update their address, or other voter registration information, prior to the election
- Educate voters on new voting policies and procedures

### **Launch Poll Worker Recruitment, Training & Safety Efforts**

- Recruit and hire a sufficient number of poll workers and inspectors to ensure polling places are properly staffed, utilizing hazard pay where required
- Provide voting facilities with funds to compensate for increased site cleaning and sanitization costs
- Deliver updated training for current and new poll workers administering elections in the midst of pandemic

### **Support Early In-Person Voting and Vote by Mail**

- Expand or maintain the number of in-person early voting sites
- Deploy additional staff and/or technology improvements to expedite and improve absentee ballot processing

Stay tuned to learn more about the grants, recipients, and how the funds have been utilized by local election officials.

Exhibit 3

facebook.com Jay



### Tiana Epps-Johnson

Timeline About Friends Photos Videos More

**Do you know Tiana?**  
To see what she shares with friends, send her a friend request.

**Intro**

- Works at Center for Tech and Civic Life
- Former Junior Specialist at UCSF Center for Tobacco Control Research and Education
- Former Intern at Young Democrats of America
- Worked at Lawyers' Committee for Civil Rights Under Law
- Studied Politics and Communication at London School of Economics and Social Science

Tiana Epps-Johnson is with Whitney May and Donny Bridges April 2

I am so proud to share that Center for Tech and Civic Life is a recipient of the 2020 Skoll Awards for Social Entrepreneurship. A tremendous thank you to The Skoll Foundation for this recognition of CTCL's impact to date and investment in our potential. When we found out that we'd receive the Skoll Award, we knew it would be a game-changer for us. It allows us to grow the size of our staff and in turn grow the work we're able to do to deliver on our mission to make voting mo... See More

er for Tech

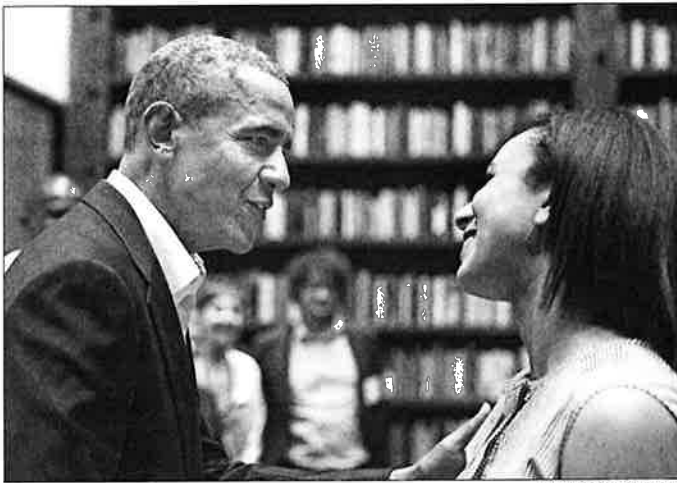






Exhibit 5

Exhibit 5



Former President Barack Obama greets Tiana Epps-Johnson, an Obama Foundation fellow, at Story Island Arts Bank. Story, Page 6

## Trump Jr. mum on much about '16 meeting

He deflected queries regarding session with Russian, transcripts show

By ERIC TUCKER, MARY CLARE JALONICK AND CHAD DAY Associated Press

WASHINGTON — Questioned intensely by a Senate committee, President Donald Trump's eldest son struck a firmly unapologetic tone, deflected many queries and said he didn't think there was anything wrong with meeting a Russian lawyer at Trump Tower in hopes of election-season dirt on Hillary Clinton, according to transcripts released Wednesday.

Asked if he was troubled by the idea that the meeting in June 2016 was part of a Russian government effort to help his father in the presidential race, Donald Trump Jr. said he didn't give it much thought.

"I don't know that it alarmed me, but I like I said, I don't know and I don't know that I was all that focused on it at the time," Trump Jr. told the Senate Judiciary Committee in the closed-door interview last year.

The committee released more than 1,800 pages of transcripts of interviews with Trump Jr. and others who attended the New York meeting at which they expected to receive compromising information about Trump's Democratic opponent. The panel also released more than 700 pages of exhibits including numerous emails, heavily redacted phone logs and court depositions.

Turn to Trump Jr., Page 10

## Obama Foundation makes a final push for support

Plan Commission to hear pitch on proposed Jackson Park redevelopment

By LOLLY BOWMAN Chicago Tribune

They have collected thousands of digital postcards from residents expressing their excitement about placing the Obama Presidential Center in Jackson Park. They have hosted nine public meetings and hundreds of smaller sessions with residents and activists. They have distributed campaign-style placards and released an eight-page document outlining how they say the center would benefit the South Side.

As the Obama Foundation prepares to go before the city's Plan Commission on Thursday morning seeking approval for its proposal to redevelop Jackson Park, its top officials have been in full campaign mode to garner public support for the \$500 million project. The meeting is the first of

**"Our vision is to give to the South Side communities the same type of amenities that folks are enjoying in Lincoln Park, in Millennium Park."**

— David Simas, chief of the Obama Foundation

many hurdles to be cleared before construction begins.

They are leaving nothing to chance, having watched an increasingly emboldened opposition criticize the project as being too big and for not leaving a signed

agreement that steers benefits to area residents.

"Our vision is to give to the South Side communities the same type of amenities that folks are enjoying in Lincoln Park, in Millennium Park," said David Simas, the chief of the foundation who spent more than two hours last weekend knocking on doors in South Shore telling residents how they can make their voices heard.

"For me it was important to put on my old canvassing shoes, get the clipboard out and knock on doors. If people weren't home, leave a little information," he added.

"Basic organizing, which is who we are." The opponents have been organizing too. On Monday, a nonprofit group called Protect Our Parks filed a lawsuit in federal court aiming to block the entire project.

Turn to Obama, Page 6

## Michigan State to pay \$500M in abuse case

Deal covers claims from 332 assaulted by sports doctor

By DAVID EGGERT AND ED WHITE Associated Press

LANSING, Mich. — Michigan State University agreed to pay \$500 million to settle claims from 332 women and girls who said they were assaulted by sports doctor Larry Nassar in the worst sex-abuse case in sports history, officials announced Wednesday.

The deal surpasses the \$100 million-plus paid by Penn State University to settle claims by at least 35 people who accused assistant football coach Jerry Sandusky of sexual abuse.

Michigan State was accused of ignoring or dismissing complaints about Nassar, some as far back as the 1990s. The school had insisted that no one covered up assaults, although Nassar's boss, former medical school dean William Strampel, was later charged with failing to properly supervise him and committing his own sexual misconduct.

"We are truly sorry to all the survivors and their families for what they have been through, and we admire the courage it has taken to tell their stories," said Brian Redin, chairman of Michigan State University.

Turn to Nassar, Page 12

## Restrooms serve as covert epicenter of opioid crisis

Incidents spur security, calls for 'safe consumption sites'

By JOHN KEILMAN Chicago Tribune

It was just before 2 a.m. when Catherine Altop, a 32-year-old woman with a history of drug problems, entered the bathroom at a south suburban White Castle restaurant, locked the door and injected herself with fentanyl-tainted heroin.

Hours passed. Employees knocked but received no response. They tried to unlock the door, but the key didn't work. Finally, about 9:30 a.m., a maintenance man got inside and discovered Altop slumped on the floor, dead from an overdose.

Publicly accessible bathrooms like the one where Altop died last year have become a clandestine epicenter of the opioid crisis, serving as the setting for numerous fatal overdoses and close calls. Just this month, Cook County sheriff's officers revived a man who allegedly overdosed in the bathroom of the Skidoo courthouse, while another man died of a suspected overdose in the restroom of a Downers Grove Starbucks.

Experts say the seclusion afforded by these spaces makes them dangerous, especially as fentanyl has increased the potency of heroin to unpredictably strong levels.

"Using drugs in public bathrooms is a common occurrence because people want some kind of privacy to inject," said

Turn to Opioid crisis, Page 8



Parents and students reunite Wednesday at Dixon High School after police say a former student fired shots and then traded fire with the school resource officer.

## School cop hailed as hero for halting campus gunman

2 traded fire at Dixon High; suspect is only one wounded

By MATTHEW WALBERG Chicago Tribune

DIXON, Ill. — A school resource officer is being lauded as a hero for intervening when a former student at Dixon High School opened fire Wednesday morning near the school gym where students were gathered for a graduation rehearsal, authorities said.

The officer, identified by the city as 15-year department veteran Mark Dallas, shot and wounded the gunman after the suspect fired at the officer while trying to flee, police said.

The suspect, identified as 19-year-old



Dallas

Late Wednesday, officials confirmed that they have charged Milby with felony aggravated discharge of a weapon and set his bond at \$2 million. Illinois State Police said the investigation continues and more charges could be forthcoming.

Officials with the city, which is about 100 miles west of Chicago, said the suspect was being treated at a hospital for injuries that were not considered

Turn to Shooting, Page 7

E x h i b i t 6

# Obama gathers his first group of fellows

Natural class represents vibrant for civic change

By Leah Foxworth  
Chicago Tribune

James Franklin Bush, president of the South Side Community Center, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

At Monday's event, Obama, who signed the center's 100th anniversary program, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.



Obama, center, with James Franklin Bush, president of the South Side Community Center, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

Obama, they are seen in a meeting, surrounded by Obama, Bush, Franklin Bush, and other civic leaders from the South Side of Chicago.

## Foundation says it listened to residents

Obama, top right

Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

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Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

## Old haunts hoping for presidential center jolt

Obama, top right

Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

Obama, top right, is seen in the foreground of the group of 20 civic leaders from the South Side of Chicago.

EXhibit 7

Form 990
Department of the Treasury Internal Revenue Service

Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)
Do not enter social security numbers on this form as it may be made public
Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No 1545-0047
2018
Open to Public Inspection

A For the 2019 calendar year, or tax year beginning 02-01-2018, and ending 01-31-2019

- B Check if applicable
Address change
Name change
Initial return
Final return/terminated
Amended return
Application pending

C Name of organization THE CENTER FOR TECHNOLOGY AND CIVIC LIFE
Doing business as
Number and street (or P.O. box if mail is not delivered to street address) Room/suite
233 N MICHIGAN AVE NO 1800
City or town, state or province, country, and ZIP or foreign postal code
CHICAGO, IL 60601

D Employer identification number 47-2158694
E Telephone number (650) 796-4695
G Gross receipts \$ 1,414,981

F Name and address of principal officer
TIANA EPPS-JOHNSON
233 N MICHIGAN AVE NO 1800
CHICAGO, IL 60601

H(a) Is this a group return for subordinates? Yes No
H(b) Are all subordinates included? Yes No
H(c) Group exemption number

I Tax-exempt status 501(c)(3) 501(c) ( ) (insert no) 4947(a)(1) or 527

J Website: HTTP://WWW.TECHANDCIVICLIFE.ORG/

K Form of organization Corporation Trust Association Other

L Year of formation 2014 M State of legal domicile IL

Part I Summary

1 Briefly describe the organization's mission or most significant activities
INCREASE CIVIC PARTICIPATION BY MODERNIZING ENGAGEMENT BETWEEN LOCAL GOV AND THE PEOPLE THEY SERVE

Table with 2 columns: Description, Amount. Rows 3-7b: Number of voting members, independent voting members, total individuals employed, total volunteers, total unrelated business revenue, net unrelated business taxable income.

Table with 3 columns: Description, Prior Year, Current Year. Rows 8-12: Contributions and grants, program service revenue, investment income, other revenue, total revenue.

Table with 3 columns: Description, Prior Year, Current Year. Rows 13-19: Grants and similar amounts paid, benefits paid, salaries, professional fundraising fees, total fundraising expenses, other expenses, total expenses, revenue less expenses.

Table with 3 columns: Description, Beginning of Current Year, End of Year. Rows 20-22: Total assets, total liabilities, net assets or fund balances.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge

Signature of officer: TIANA EPPS-JOHNSON PRESIDENT
Date: 2019-08-28

Paid Preparer Use Only
Print/Type preparer's name, Preparer's signature, Date, Firm's name, Firm's address, Firm's EIN, Phone no.



**Part VIII Statement of Revenue**

Check if Schedule O contains a response or note to any line in this Part VIII

		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514	
<b>Contributions, Gifts, Grants and Other Similar Amounts</b>	<b>1a</b> Federated campaigns . . . . .	<b>1a</b>				
	<b>b</b> Membership dues . . . . .	<b>1b</b>				
	<b>c</b> Fundraising events . . . . .	<b>1c</b>				
	<b>d</b> Related organizations . . . . .	<b>1d</b>				
	<b>e</b> Government grants (contributions) . . . . .	<b>1e</b>				
	<b>f</b> All other contributions, gifts, grants, and similar amounts not included above . . . . .	<b>1f</b>	560,319			
	<b>g</b> Noncash contributions included in lines 1a - 1f \$ . . . . .					
	<b>h Total.</b> Add lines 1a-1f . . . . .		560,319			
<b>Program Service Revenue</b>	<b>2a</b> PROGRAM SERVICE FEES	Business Code				
		900099	854,088	854,088		
	<b>b</b> . . . . .					
	<b>c</b> . . . . .					
	<b>d</b> . . . . .					
	<b>e</b> . . . . .					
	<b>f</b> All other program service revenue . . . . .					
<b>g Total.</b> Add lines 2a-2f . . . . .		854,088				
<b>Other Revenue</b>	<b>3</b> Investment income (including dividends, interest, and other similar amounts) . . . . .		19		19	
	<b>4</b> Income from investment of tax-exempt bond proceeds . . . . .					
	<b>5</b> Royalties . . . . .					
	<b>6a</b> Gross rents	(i) Real				
		(ii) Personal				
		<b>b</b> Less rental expenses . . . . .				
		<b>c</b> Rental income or (loss) . . . . .				
	<b>d</b> Net rental income or (loss) . . . . .					
	<b>7a</b> Gross amount from sales of assets other than inventory	(i) Securities				
		(ii) Other				
		<b>b</b> Less cost or other basis and sales expenses . . . . .				
		<b>c</b> Gain or (loss) . . . . .				
	<b>d</b> Net gain or (loss) . . . . .					
	<b>8a</b> Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c) See Part IV, line 18 . . . . .	<b>a</b>				
		<b>b</b> Less direct expenses . . . . .	<b>b</b>			
<b>c</b> Net income or (loss) from fundraising events . . . . .						
<b>9a</b> Gross income from gaming activities See Part IV, line 19 . . . . .	<b>a</b>					
	<b>b</b> Less direct expenses . . . . .	<b>b</b>				
	<b>c</b> Net income or (loss) from gaming activities . . . . .					
<b>10a</b> Gross sales of inventory, less returns and allowances . . . . .	<b>a</b>					
	<b>b</b> Less cost of goods sold . . . . .	<b>b</b>				
	<b>c</b> Net income or (loss) from sales of inventory . . . . .					
<b>11a</b> OTHER INCOME	Miscellaneous Revenue	Business Code				
		900099	555		555	
	<b>b</b> . . . . .					
	<b>c</b> . . . . .					
	<b>d</b> All other revenue . . . . .					
<b>e Total.</b> Add lines 11a-11d . . . . .		555				
<b>12 Total revenue.</b> See Instructions . . . . .		1,414,981	854,088	0	574	

*Exhibit*

# Exhibit 7

**Part IX Statement of Functional Expenses**

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX

	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
<b>Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.</b>				
<b>1</b> Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21				
<b>2</b> Grants and other assistance to domestic individuals. See Part IV, line 22				
<b>3</b> Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, line 15 and 16				
<b>4</b> Benefits paid to or for members				
<b>5</b> Compensation of current officers, directors, trustees, and key employees . . . . .	102,513	65,235	27,492	9,786
<b>6</b> Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) . . . . .				
<b>7</b> Other salaries and wages	638,569	589,866	41,008	7,695
<b>8</b> Pension plan accruals and contributions (include section 401 (k) and 403(b) employer contributions) . . . . .				
<b>9</b> Other employee benefits . . . . .	61,525	55,782	4,696	1,047
<b>10</b> Payroll taxes . . . . .	61,066	54,130	5,558	1,378
<b>11</b> Fees for services (non-employees)				
<b>a</b> Management . . . . .				
<b>b</b> Legal . . . . .	9,174		9,174	
<b>c</b> Accounting . . . . .	11,360		11,360	
<b>d</b> Lobbying . . . . .				
<b>e</b> Professional fundraising services. See Part IV, line 17				
<b>f</b> Investment management fees . . . . .				
<b>g</b> Other (if line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	20,042	4,851	15,191	
<b>12</b> Advertising and promotion . . . . .	817	540	277	
<b>13</b> Office expenses . . . . .	3,212	238	2,974	
<b>14</b> Information technology . . . . .	2,847	1,427	1,420	
<b>15</b> Royalties . . . . .				
<b>16</b> Occupancy . . . . .	55,032	50,237	3,619	1,176
<b>17</b> Travel . . . . .	58,657	38,595	20,062	
<b>18</b> Payments of travel or entertainment expenses for any federal, state, or local public officials . . . . .				
<b>19</b> Conferences, conventions, and meetings . . . . .	7,417	2,995	4,422	
<b>20</b> Interest . . . . .				
<b>21</b> Payments to affiliates . . . . .				
<b>22</b> Depreciation, depletion, and amortization . . . . .	7,407	7,347	45	15
<b>23</b> Insurance . . . . .	6,540	1,818	4,722	
<b>24</b> Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
<b>a</b> DATA SUBSCRIPTIONS	52,332	52,332		
<b>b</b> TRAINING AND STAFF DEVELOPMENT	16,949	949	16,000	
<b>c</b> BAD DEBT	3,900		3,900	
<b>d</b> MISCELLANEOUS	271		271	
<b>e</b> All other expenses				
<b>25</b> <b>Total functional expenses.</b> Add lines 1 through 24e	1,119,630	926,342	172,191	21,097
<b>26</b> <b>Joint costs.</b> Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

Exhibit 7

Part X Balance Sheet		Check if Schedule O contains a response or note to any line in this Part IX <input type="checkbox"/>	
		(A) Beginning of year	(B) End of year
Assets	<b>1</b> Cash-non-interest-bearing . . . . .	359,049	<b>1</b> 767,112
	<b>2</b> Savings and temporary cash investments . . . . .	63,053	<b>2</b> 63,072
	<b>3</b> Pledges and grants receivable, net . . . . .	252,400	<b>3</b> 150,000
	<b>4</b> Accounts receivable, net . . . . .	86,006	<b>4</b> 151,051
	<b>5</b> Loans and other receivables from current and former officers, directors, trustees, key employees, and highest compensated employees Complete Part II of Schedule L . . . . .		<b>5</b>
	<b>6</b> Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing employers and sponsoring organizations of section 501(c)(9) voluntary employees' beneficiary organizations (see instructions) Complete Part II of Schedule L . . . . .		<b>6</b>
	<b>7</b> Notes and loans receivable, net . . . . .		<b>7</b>
	<b>8</b> Inventories for sale or use . . . . .		<b>8</b>
	<b>9</b> Prepaid expenses and deferred charges . . . . .	3,925	<b>9</b> 4,016
	<b>10a</b> Land, buildings, and equipment cost or other basis Complete Part VI of Schedule D	<b>10a</b> 4,448	
	<b>b</b> Less accumulated depreciation	<b>10b</b> 1,284	<b>10c</b> 3,164
	<b>11</b> Investments—publicly traded securities . . . . .		<b>11</b>
	<b>12</b> Investments—other securities See Part IV, line 11 . . . . .		<b>12</b>
	<b>13</b> Investments—program-related See Part IV, line 11 . . . . .		<b>13</b>
	<b>14</b> Intangible assets . . . . .	22,957	<b>14</b> 16,238
	<b>15</b> Other assets See Part IV, line 11 . . . . .	5,138	<b>15</b> 9,188
<b>16</b> Total assets. Add lines 1 through 15 (must equal line 34) . . . . .	795,279	<b>16</b> 1,163,841	
Liabilities	<b>17</b> Accounts payable and accrued expenses . . . . .	58,623	<b>17</b> 79,392
	<b>18</b> Grants payable . . . . .		<b>18</b>
	<b>19</b> Deferred revenue . . . . .	3,137	<b>19</b> 55,679
	<b>20</b> Tax-exempt bond liabilities . . . . .		<b>20</b>
	<b>21</b> Escrow or custodial account liability Complete Part IV of Schedule D		<b>21</b>
	<b>22</b> Loans and other payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons Complete Part II of Schedule L . . . . .		<b>22</b>
	<b>23</b> Secured mortgages and notes payable to unrelated third parties . . . . .		<b>23</b>
	<b>24</b> Unsecured notes and loans payable to unrelated third parties . . . . .		<b>24</b>
	<b>25</b> Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24) Complete Part X of Schedule D		<b>25</b>
	<b>26</b> Total liabilities. Add lines 17 through 25 . . . . .	61,760	<b>26</b> 134,971
Net Assets or Fund Balances	<b>27</b> Organizations that follow SFAS 117 (ASC 958), check here <input checked="" type="checkbox"/> and complete lines 27 through 29, and lines 33 and 34. Unrestricted net assets	709,869	<b>27</b> 1,025,627
	<b>28</b> Temporarily restricted net assets . . . . .	23,650	<b>28</b> 3,243
	<b>29</b> Permanently restricted net assets		<b>29</b>
	<b>30</b> Organizations that do not follow SFAS 117 (ASC 958), check here <input type="checkbox"/> and complete lines 30 through 34. Capital stock or trust principal, or current funds . . . . .		<b>30</b>
	<b>31</b> Paid-in or capital surplus, or land, building or equipment fund . . . . .		<b>31</b>
	<b>32</b> Retained earnings, endowment, accumulated income, or other funds		<b>32</b>
	<b>33</b> Total net assets or fund balances . . . . .	733,519	<b>33</b> 1,028,870
	<b>34</b> Total liabilities and net assets/fund balances . . . . .	795,279	<b>34</b> 1,163,841



Exhibit 7

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION C, LINE 19	THE GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY AND FINANCIAL STATEMENTS OF THE CENTER ARE MADE AVAILABLE TO THE PUBLIC UPON REQUEST

Exhibit 7

See ~~see~~ Complaint section  
"C+CL's Deviation From its stated  
mission."

**Form 990, Part III, Line 4b:**

THE CENTER'S GOVERNMENT SERVICES PROGRAM EDUCATES GOVERNMENT AGENCIES ABOUT THE SKILLS, STRATEGIES, AND TOOLS TO ENGAGE THEIR CITIZENS. THIS IS ACCOMPLISHED THROUGH (1) WRITTEN AND MULTIMEDIA MATERIALS AND (2) IN-PERSON TRAINING SEMINARS FOR LOCAL GOVERNMENT AGENCIES

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Exhibit 7  
Reviewed in CTC's deviation From  
IPS stated mission, page 9

**Additional Data**

**Software ID:**

**Software Version:**

**EIN:** 47-2158694

**Name:** THE CENTER FOR TECHNOLOGY AND CIVIC LIFE

Form 990 (2018)

**Form 990, Part III, Line 4a:**

THE CENTER EDUCATES THE PUBLIC ABOUT GOVERNMENT AND DEMOCRACY IN THE UNITED STATES, FOCUSING PARTICULARLY ON LOCAL GOVERNMENT. THE CENTER DOES THIS BY AGGREGATING AND DISSEMINATING DETAILED INFORMATION ABOUT GOVERNMENT, CANDIDATES FOR OFFICE, ELECTED OFFICIALS, AND VOTING IN THE UNITED STATES IN EASILY ACCESSIBLE "DATASETS". THESE DATASETS INCLUDE INFORMATION THAT HELP THE GENERAL PUBLIC FIND BASIC INFORMATION, INCLUDING WHAT IS ON THEIR BALLOT AND WHO REPRESENTS THEM. THESE DATASETS ARE FREELY AND UNIVERSALLY AVAILABLE TO THE PUBLIC.

Exhibit 8

Facebook browser interface showing a profile for Tiana Epps-Johnson. The profile includes a cover photo, a bio, and a post from April 16, 2015, titled "The Center for Technology and Civic Life invited to first-ever White House Tech Meetup". The post features a video player and several comments from users like Michael Piel and Sharon Vanessa Rose Epps.

**Profile:** Tiana Epps-Johnson

**Post:** Tiana Epps-Johnson via Center for Tech and Civic Life ...  
 April 16, 2015 · 4  
 Can't wait to talk about the work we're doing at CTCL at Tomorrows #WHXTechUp.

**Comments:**

- Michael Piel: Absolute bad asses, I knew it would be so. Good luck. 1
- Sharon Vanessa Rose Epps: This is How you Do it. Go Get me Teedle Weedle 1
- Brandon K. Halton: Go team! 1
- Amal Mimish: Yes! 1

**Page Elements:**

- Photos:** A grid of 6 photos showing Tiana Epps-Johnson at various events.
- Friends:** A section for friends, currently empty.
- Life Events:**
  - Started New Job at Center for Tech and Civic Life February 2015
  - Registered to Vote 2012

**Footer:** Privacy · Terms · Advertising · Ad Choices · Cookies · More · Facebook © 2015

election cycle the Obama Campaign raised at least \$690 million online averaging \$156 per contributor (see Exhibit D). For the election cycle as a whole, the Obama Campaign raised approximately \$234 million in contributions that were under the \$200 threshold, which amounted to approximately forty two percent of total individual contributions received. Meanwhile the Obama Victory Fund raised approximately \$95 million in contributions, which fell under the \$200 threshold, which amounted to twenty-one percent of total contributions. (See Exhibit D)

10. The Obama Campaign created the most complex and innovative system for voter and donor identification ever devised in the history of presidential campaigns. (See Exhibit E) According to the MIT Technology Review, by the spring of 2012 the Obama Campaign was confident of a positive identification of all 69 million Americans who had voted for the President in the 2008 election. (See Exhibit E) This system was used to identify and solicit previous and potential new donors using highly targeted messages. A similarly thorough capability was devised to identify potential or likely donors using pervasive social media outreach and pioneering data mining techniques. (See Exhibits E and F) Despite this advanced technology, and an unprecedented amount of identifying information on potential donors, the Obama Campaign made multiple solicitations of foreign nationals.

11. Moreover, the Obama Campaign assembled the most talented team of data and technology specialists ever employed by a presidential campaign. The Obama Campaign staff was populated with the best and the brightest from industry leaders (Google, Facebook, etc.). (See Exhibit G) This team of specialists produced and used extensive data gathering software and multiple databases and cross-referencing systems to ensure

# Exhibit 9

the Obama Campaign knew as much about every potential voter or donor as possible including substantial information about the potential voter's network of friends, relatives, and co-workers. (See Exhibits E and F) Using tools developed by the specialists, the campaign gathered enough data on most potential voters to be able to predict which of their next-door neighbors would vote, and for whom. (See Exhibits E and F) When a person signed up for the mailing list at the Obama Campaign's website, the data collection technology would cross reference all of the directly collected data from the website with indirectly collected data through other sources such as Facebook and Google to determine more precisely the identity of each visitor, the nature of any political bias, the city and county in which they lived, and what issues were likely to be considered to be of the greatest importance to that specific individual. (See Exhibits E and F) In spite of the great lengths taken to know the precise location and temperament of each potential voter or donor, solicitations were still made directly to probable foreign nationals who had signed up for the mailing list from foreign soil, using a foreign IP address and whose related data from other sources would have confirmed the individual as a likely foreign national. (See Exhibits E and F) Furthermore, there is no indication that any effort was made to determine whether the individuals solicited were qualified to make legal contributions to the Obama Campaign. At the very least there might have been a "check-off box" where the individual being solicited could make some averment to their status as an American citizen or Permanent Resident.

Exhibit 10



These are a few of the organizations who have supported our work over the years:

- Google
- facebook
- Center for Civic Design
- WDN
- cdt
- THE VOTING INFORMATION PROJECT