



# Wisconsin Elections Commission

212 East Washington Avenue | Third Floor | P.O. Box 7984 | Madison, WI 53707-7984  
(608) 266-8005 | [elections@wi.gov](mailto:elections@wi.gov) | [elections.wi.gov](http://elections.wi.gov)

May 3, 2021

Meagan Wolfe  
WEC  
212 E. Washington Ave.  
Madison, WI 53707-7984

Hon. John M. Antaramian  
City of Kenosha Mayor  
625 52<sup>nd</sup> Street, Room 300  
Kenosha, WI 53140

Matt Krauter  
Kenosha City Clerk  
625 52<sup>nd</sup> Street, Room 105  
Kenosha, WI 53140

**Sent via Email:** [meagan.wolfe@wisconsin.gov](mailto:meagan.wolfe@wisconsin.gov); [mayor@kenosha.org](mailto:mayor@kenosha.org); [clerk@kenosha.org](mailto:clerk@kenosha.org)

**Re: Complaint Filed with Wisconsin Elections Commission**  
EL 21-30: Brian Thomas et al. v. Meagan Wolfe et al.

Dear Collective Respondents:

Enclosed with this letter, please find a sworn Wisconsin Statute § 5.06 complaint filed with our office by Brian Thomas and several other consolidated complainants. The complaint pertains to the City of Kenosha's alleged legal violations relating to the delegation/corporatization of elections responsibilities.

As you may be aware, individuals that believe the actions of an election official were contrary to an election law or were an abuse of discretion in applying an election law may file a complaint with our office. To process this complaint, I ask that you provide a sworn written response to the complaint within 10 business days of receipt of this letter and complaint. Your response should address the allegations raised in the complaint.

After you file your response, the complainants will be afforded the opportunity to file a reply to your response within 10 business days of receipt of your response. Please note that Wisconsin Elections Commission Staff Attorneys, including myself, will be recusing themselves from the consideration of this matter. Once all the allowable filings have been made, the Commission will review the various filings and potential findings with outside legal representation that will soon be assigned to this matter. The Commission will determine the appropriate finding, and Commissioners will be given an opportunity to request a special meeting if they so choose.

You may file your response via email addressed to the Commission's outside advisor, Attorney Jon Axelrod, at [jpa@dewittllp.com](mailto:jpa@dewittllp.com) so long as it is clear that the original document has been in fact sworn before an individual that can administer oaths, like a notary public. You may also file the response by regular mail to the address listed in the header above, or to an address provided by Attorney Axelrod.

*Wisconsin Elections Commissioners*

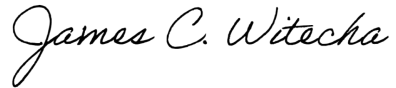
Ann S. Jacobs, chair | Marge Bostelmann | Julie M. Glancey | Dean Knudson | Robert Spindell | Mark L. Thomsen

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Administrator  
Meagan Wolfe

If you have any additional questions on this, please feel free to contact me at (608) 266-0136.

**WISCONSIN ELECTIONS COMMISSION**

A handwritten signature in cursive script that reads "James C. Witecha".

Jim Witecha  
Staff Attorney

Enclosure