



Wisconsin Elections Commission

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

May 27, 2021

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

Hon. Satya Rhodes-Conway
City of Madison Mayor
210 Martin Luther King Jr. Blvd.
Room 403
Madison, WI 53703

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

Sent via Email: meagan.wolfe@wisconsin.gov; clerk@cityofmadison.com; mayor@cityofmadison.com

Re: Complaint Filed with Wisconsin Elections Commission
EL 21-33: Yiping Liu 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 Yiping Liu and several other consolidated complainants. The complaint pertains to the City of Madison's alleged legal violations relating to the use of a private election consultant and the overall 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 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. I also recommend contacting Attorney Axelrod in the immediate future, as the response deadline may be extended to parallel deadlines for similarly-filed complaints.

Wisconsin Elections Commissioners

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

Administrator
Meagan Wolfe

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

WISCONSIN ELECTIONS COMMISSION

James C. Witecha

Jim Witecha
Staff Attorney

Enclosure