



**BRYAN A. CHARBOGIAN**  
Assistant City Attorney

July 9, 2021

Wisconsin Elections Commission  
212 East Washington Avenue  
Third Floor P.O. Box 7984  
Madison, WI 53707

Re: EL 21-30: Brian Thomas et al. v. Meagan Wolfe et al.

Dear Commissioners,

I write to supplement the Answer of Respondents Antaramian and Krauter. I recently discovered some additional documents that the Commission should be made aware of. Accompanying this letter is the Second Affidavit of Matt Krauter, with three attached exhibits.

Complainants Mary Magdalen Moser and Matthew Augustine were both election officials in the City of Kenosha during the 2020 Fall General Election. Though the CTCL grant was accepted months prior to the election, in Exhibits A and B, each of them had signed certifications stating “that the election was held in accordance with the laws of the State.”

Also, as part of the Kenosha County Board of Canvassers, in Exhibit C, Complainant Matthew Augustine certified that the votes tallied in Kenosha County “are correct and true[.]”

By the Complainants’ own words, there was nothing unlawful about how the City of Kenosha conducted the election. Despite their signed certifications, the Complainants now allege that the City of “Kenosha failed to comply with state laws” regarding the election. Verified Complaint at 2-3. The Commission should consider these exhibits in its analysis of this election complaint.

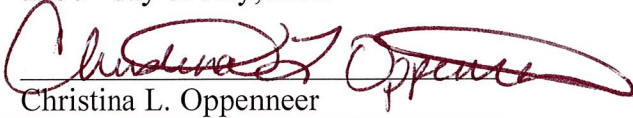
Sincerely,

\_\_\_\_\_  
Bryan A. Charbogian  
Assistant City Attorney, #1113801  
City of Kenosha  
625 52<sup>nd</sup> Street, Room 201  
Kenosha, WI 53140  
(262) 652-4170  
bcharbogian@kenosha.org

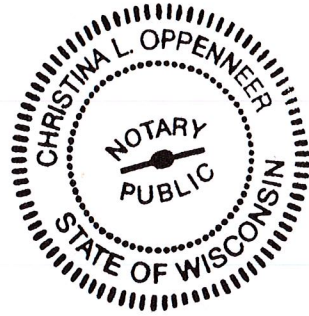
I, Bryan A. Charbogian, being first duly sworn on oath state that I personally read the above letter, and that the above information is true based on my personal knowledge and, as to that stated on information and belief, I believe them to be true.

CC: All Counsel

Subscribed and sworn to before me  
this 9<sup>th</sup> day of July, 2021



Christina L. Oppeneer  
Notary Public, Kenosha County, WI.  
My Commission expires on July 16, 2023



**STATE OF WISCONSIN  
BEFORE THE ELECTIONS COMMISSION**

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BRIAN THOMAS, TAMARA WEBER, MATTHEW  
AUGUSTINE, KEVIN MATHEWSON, MARY  
MAGDALEN MOSER, PAMELA MUNDLING,

Complainants,

v.

MEAGAN WOLFE, in her capacity as Administrator  
of the Wisconsin Elections Commission, JOHN M.  
ANTARAMIAN, in his capacity as Mayor of the City  
of Kenosha, MATT KRAUTER, in his capacity as the  
City Clerk/Treasurer of the City of Kenosha

Respondents.

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**SECOND AFFIDAVIT OF MATT KRAUTER**

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STATE OF WISCONSIN )  
  : SS  
COUNTY OF KENOSHA )

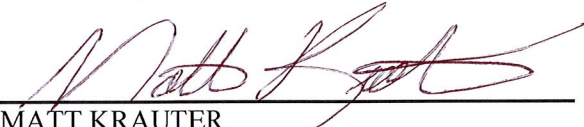
Matt Krauter, being sworn, states:

1. I am employed as the Clerk/Treasurer for the City of Kenosha, Wisconsin (herein "City") and in such capacity I am the Department head of the City of Kenosha Clerk/Treasurer's Office.
2. The City Clerk/Treasurer's Office maintains records from the 2020 Fall General Election. Exhibits A and B are true and accurate copies of such documents.
3. A true and accurate copy of the Voting Results Report from the 2020 Fall General Election for City Wards 11 and 12 is attached as Exhibit A.
4. A true and accurate copy of the Voting Results Report from the 2020 Fall General Election for City Wards 26, 29, and 30 is attached as Exhibit B.

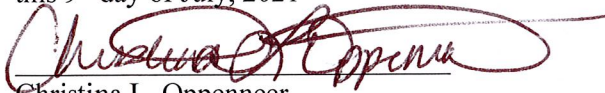
5. I made a public record request to the Kenosha County Clerk for the Summary Statement of the Board of Canvassers for Kenosha County's 2020 General Election. A true and accurate copy of the document the Kenosha County Clerk provided in response to my public record request is attached as Exhibit C.

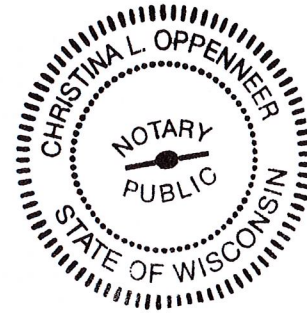
I, Matt Krauter, being first duly sworn on oath state that I personally read the above affidavit, and that the above statements are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

Dated this 9<sup>th</sup> day of July, 2021.

  
MATT KRAUTER  
City of Kenosha Kenosha Clerk/Treasurer

Subscribed and sworn to before me  
this 9<sup>th</sup> day of July, 2021

  
Christina L. Oppeneer  
Notary Public, Kenosha County, WI.  
My Commission expires on July 16, 2023



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# Kemper Center W 11 + 12 Results

\*\*\* VOTING RESULTS REPORT \*\*\*

08:11 PM November 03, 2020

Unit Serial Number: 0314350061

Kenosha County

2020 Fall General Election

SOUTHPORT City of Kenosha W 11, 12

Election Date: November 03, 2020

Poll Opened Date: November 03, 2020

Poll Opened Time: 06:22 AM

Poll Closed Date: November 03, 2020

Poll Closed Time: 08:09 PM

Public Count: 321

Protected Count: 9025

Precinct Voting Report

Unit Serial Number: 0314350061

City of Kenosha W 11

Total Paper Sheets: 167

President / Vice President

Number to Vote For 1

DEM Joseph R. Biden / Kamala D 86

REP Donald J. Trump / Michael 77

CON Don Blankenship / William 0

LBP Jo Jorgensen / Jeremy Spik 4

ASP Brian Carroll / Amar Patel 0

Write-in 0

Over Votes 0

Under Votes 0

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Total Votes 167

Representative in Congress

Number to Vote For 1

DEM Roger Polack 80

REP Bryan Steil 81

Write-in 1

Over Votes 0

Under Votes 5



Total Votes 167

State Senator District 22

Number to Vote For 1

DEM Robert W. Wirch 111

Write-in 9

Over Votes 0

Under Votes 47

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Total Votes 167

Representative to the Assembly District 6  
5

Number to Vote For 1

DEM Tod Ohnstad 86

REP Crystal J. Miller 71

Write-in 1

Over Votes 0

Under Votes 9

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Total Votes 167

District Attorney

Number to Vote For 1

DEM Mike Graveley 103

Write-in 9

Over Votes 0

Under Votes 55

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Total Votes 167

County Clerk

Number to Vote For 1

DEM Regi Bachochin 109

Write-in 7

Over Votes 0

Under Votes 51

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Total Votes 167

County Treasurer

Number to Vote For 1

DEM Teri Jacobson 110

Write-in 6

Over Votes 0

Under Votes 51

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Total Votes 167

Register of Deeds	
Number to Vote For	1
DEM JoEllyn Storz	109
Write-in	7
Over Votes	0
Under Votes	51

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Total Votes	167
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Referendum	
Yes	101
No	43
Over Votes	0
Under Votes	23

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Total Votes	167
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Referendum City of Kenosha

Yes	118
No	35
Over Votes	0
Under Votes	14

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Total Votes	167
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Unit Serial Number: 0314350061

City of Kenosha W 12

Total Paper Sheets: 154

President / Vice President	
Number to Vote For	1
DEM Joseph R. Biden / Kamala D	63
REP Donald J. Trump / Michael	87
CON Don Blankenship / William	1
LBP Jo Jorgensen / Jeremy Spik	3
ASP Brian Carroll / Amar Patel	0
Write-in	0
Over Votes	0
Under Votes	0

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Total Votes	154
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Representative in Congress	
Number to Vote For	1

DEM Rnger Polack	55
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Number to Vote For	1
DEM Roger Polack	55
REP Bryan Steil	94
Write-in	0
Over Votes	0
Under Votes	5

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Total Votes	154
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State Senator District 22

Number to Vote For	1
DEM Robert W. Winch	98
Write-in	9
Over Votes	0
Under Votes	47

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Total Votes	154
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Representative to the Assembly District 6  
5

Number to Vote For	1
DEM Tod Ohnstad	58
REP Crystal J. Miller	92
Write-in	0
Over Votes	0
Under Votes	4

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Total Votes	154
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District Attorney

Number to Vote For	1
DEM Mike Graveley	95
Write-in	10
Over Votes	0
Under Votes	49

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Total Votes	154
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County Clerk

Number to Vote For	1
DEM Regi Bachochin	96
Write-in	10
Over Votes	0
Under Votes	48

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Total Votes	154
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County Treasurer

Number to Vote For	1
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Number to Vote For	1
DEM Teri Jacobson	95
Write-in	9
Over Votes	0
Under Votes	50

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Total Votes 154

Register of Deeds

Number to Vote For	1
DEM JoEllyn Storz	95
Write-in	7
Over Votes	0
Under Votes	52

-----  
Total Votes 154

Referendum

Yes	104
No	32
Over Votes	0
Under Votes	18

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Total Votes 154

Referendum City of Kenosha

Yes	106
No	38
Over Votes	0
Under Votes	10

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Total Votes 154

WE, THE UNDERSIGNED, DO HEREBY CERTIFY THAT THE ABOVE RESULTS ARE A TRUE AND ACCURATE ACCOUNT OF ALL BALLOTS COUNTED AND THAT ALL COUNTERS WERE ZERO (0) WHEN THE POLLS OPENED AND THAT THE ELECTION WAS HELD IN ACCORDANCE WITH THE LAWS OF THE STATE.

*M. M. W. ...*  
*A. ...*  
*all ...*  
*...*

Total Votes

154

WE, THE UNDERSIGNED, DO HEREBY CERTIFY THAT THE ABOVE RESULTS ARE A TRUE AND ACCURATE ACCOUNT OF ALL BALLOTS COUNTED AND THAT ALL COUNTERS WERE ZERO (0) WHEN THE POLLS OPENED AND THAT THE ELECTION WAS HELD IN ACCORDANCE WITH THE LAWS OF THE STATE.

*M. M. W. or*  
-  
*A. J. R.*  
-  
*dec 11/12*  
-  
*Kenosha*  
-  
-  
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SOUTHPORT City of Kenosha W 11.12  
Unit Serial Number: 0314350061

\*\*\* END OF REPORT \*\*\*

Boys + Girls Results  
26, 29, 30 ~~Records~~

\*\*\* VOTING RESULTS REPORT \*\*\*  
08:14 PM November 03, 2020  
Unit Serial Number: 0314341151

Kenosha County  
2020 Fall General Election  
BGCLUB City of Kenosha W 26, 29, 30  
Election Date: November 03, 2020  
Poll Opened Date: November 03, 2020  
Poll Opened Time: 06:47 AM  
Poll Closed Date: November 03, 2020  
Poll Closed Time: 08:12 PM  
Public Count: 489

Protected Count: 5579  
Precinct Voting Report

Unit Serial Number: 0314341151

City of Kenosha W 26

Total Paper Sheets: 163

President / Vice President

Number to Vote For	1
DEM Joseph R. Biden / Kamala D	67
REP Donald J. Trump / Michael	91
CON Don Blankenship / William	0
LBP Jo Jorgensen / Jeremy Spik	4
ASP Brian Carroil / Amar Patel	0
Write-in	0
Over Votes	1
Under Votes	0

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Total Votes 163

Representative in Congress

Number to Vote For	1
DEM Roger Polack	75
REP Bryan Steil	76
Write-in	0
Over Votes	2
Under Votes	10

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Total Votes 163



State Senator District 22  
Number to Vote For 1

DEM Robert W. Winch 104  
Write-in 3  
Over Votes 1  
Under Votes 55

-----  
Total Votes 163

Representative to the Assembly District 6  
5

Number to Vote For 1

DEM Tod Ohnstad 73  
REP Crystal J. Miller 72  
Write-in 0  
Over Votes 0  
Under Votes 18

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Total Votes 163

District Attorney  
Number to Vote For 1

DEM Mike Graveley 103  
Write-in 4  
Over Votes 0  
Under Votes 56

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Total Votes 163

County Clerk  
Number to Vote For 1

DEM Regi Bachochin 100  
Write-in 4  
Over Votes 1  
Under Votes 58

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Total Votes 163

County Treasurer  
Number to Vote For 1

DEM Teri Jacobson 106  
Write-in 2  
Over Votes 0  
Under Votes 55

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Total Votes 163

Register of Deeds  
Number to Vote For 1

DEM JoEllyn Storz	102
Write-in	2
Over Votes	0
Under Votes	59

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* Total Votes	163
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Referendum

Yes	94
No	36
Over Votes	0
Under Votes	33

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Total Votes	163
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Referendum City of Kenosha

Yes	117
No	31
Over Votes	0
Under Votes	15

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Total Votes	163
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Unit Serial Number: 0314341151

City of Kenosha W 29

Total Paper Sheets: 156

President / Vice President

Number to Vote For	1
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DEM Joseph R. Biden / Kamala D	86
REP Donald J. Trump / Michael	64
CON Don Blankenship / William	0
LBP Jo Jorgensen / Jeremy Spik	2
ASP Brian Carroll / Amar Patel	0
Write-in	1
Over Votes	2
Under Votes	1

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Total Votes	156
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Representative in Congress

Number to Vote For	1
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DEM Roger Polack	83
REP Bryan Steil	69
Write-in	0

Write-in 0  
Over Votes 0  
Under Votes 4

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Total Votes 156

State Senator District 22  
Number to Vote For 1

DEM Robert W. Winch 100  
Write-in 1  
Over Votes 0  
Under Votes 55

-----  
Total Votes 156

Representative to the Assembly District 6  
5  
Number to Vote For 1

DEM Tod Ohnstad 87  
REP Crystal J. Miller 63  
Write-in 0  
Over Votes 0  
Under Votes 6

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Total Votes 156

District Attorney  
Number to Vote For 1

DEM Mike Graveley 92  
Write-in 6  
Over Votes 0  
Under Votes 58

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Total Votes 156

County Clerk  
Number to Vote For 1

DEM Regi Bachochin 97  
Write-in 2  
Over Votes 0  
Under Votes 57

-----  
Total Votes 156

County Treasurer  
Number to Vote For 1

DEM Teri Jacobson 102  
Write-in 1  
Over Votes 1  
Under Votes 52

Write-in	1
Over Votes	1
Under Votes	52
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Total Votes	156
Register of Deeds	
Number to Vote For	1
DEM JoEllyn Storz	97
Write-in	1
Over Votes	0
Under Votes	58
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Total Votes	156
Referendum	
Yes	95
No	25
Over Votes	0
Under Votes	36
-----	
Total Votes	156
Referendum City of Kenosha	
Yes	112
No	22
Over Votes	0
Under Votes	22
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Total Votes	156
*****	
*****	
Unit Serial Number:	0314341151
City of Kenosha W 30	
Total Paper Sheets:	170
President / Vice President	
Number to Vote For	1
DEM Joseph R. Biden / Kamala D	105
REP Donald J. Trump / Michael	60
CON Don Blankenship / William	1
LBP Jo Jorgensen / Jeremy Spik	2
ASP Brian Carroll / Amar Patel	0
Write-in	2
Over Votes	0
Under Votes	0
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Under Votes 0

Total Votes 170

Representative in Congress  
Number to Vote For 1

DEM Roger Polack 100  
REP Bryan Steil 66  
Write-in 0  
Over Votes 0  
Under Votes 4

Total Votes 170

State Senator District 22  
Number to Vote For 1

DEM Robert W. Wirch 127  
Write-in 4  
Over Votes 0  
Under Votes 39

Total Votes 170

Representative to the Assembly District 6  
5

Number to Vote For 1

DEM Tod Ohnstad 105  
REP Crystal J. Miller 60  
Write-in 0  
Over Votes 0  
Under Votes 5

Total Votes 170

District Attorney  
Number to Vote For 1

DEM Mike Graveley 118  
Write-in 9  
Over Votes 0  
Under Votes 43

Total Votes 170

County Clerk  
Number to Vote For 1

DEM Reg: Bachochin 122  
Write-in 5  
Over Votes 0  
Under Votes 43



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Total Votes 170

County Treasurer  
Number to Vote For 1

DEM Teri Jacobson 123  
Write-in 4  
Over Votes 0  
Under Votes 43

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Total Votes 170

Register of Deeds  
Number to Vote For 1

DEM JoEllyn Storz 119  
Write-in 4  
Over Votes 0  
Under Votes 47

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Total Votes 170

Referendum

Yes 111  
No 40  
Over Votes 0  
Under Votes 19

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Total Votes 170

Referendum City of Kenosha

Yes 129  
No 26  
Over Votes 0  
Under Votes 15

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Total Votes 170

WE, THE UNDERSIGNED, DO HEREBY CERTIFY  
THAT THE ABOVE RESULTS ARE A TRUE AND  
ACCURATE ACCOUNT OF ALL BALLOTS COUNTED  
AND THAT ALL COUNTERS WERE ZERO (0) WHEN  
THE POLLS OPENED AND THAT THE ELECTION  
WAS HELD IN ACCORDANCE WITH THE LAWS OF  
THE STATE.

*Matthew C August*  
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WE, THE UNDERSIGNED, DO HEREBY CERTIFY THAT THE ABOVE RESULTS ARE A TRUE AND ACCURATE ACCOUNT OF ALL BALLOTS COUNTED AND THAT ALL COUNTERS WERE ZERO (0) WHEN THE POLLS OPENED AND THAT THE ELECTION WAS HELD IN ACCORDANCE WITH THE LAWS OF THE STATE.

*Matthew C. August*

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BGCLUB City of Kenosha W 26,29,30  
Unit Serial Number: 0314341151

\*\*\* END OF REPORT \*\*\*



ALL CONTESTS  
KENOSHA COUNTY  
2020 General Election

**SUMMARY STATEMENT OF THE BOARD OF CANVASSERS**

The total number of votes cast for the **PRESIDENT OF THE UNITED STATES**  
was **88,738**

of which	<b>Joseph R. Biden / Kamala D. Harris</b>	received	<b>42,193</b>
	<b>Donald J. Trump / Michael R. Pence</b>	received	<b>44,972</b>
	<b>Don Blankenship / William Mohr</b>	received	<b>147</b>
	<b>Jo Jorgensen / Jeremy Spike Cohen</b>	received	<b>1,037</b>
	<b>Brian Carroll / Amar Patel</b>	received	<b>120</b>
	<b>Kasey Wells (write-in)</b>	received	<b>0</b>
	<b>Jade Simmons/Claudelia J. Roze (write-in)</b>	received	<b>0</b>
	<b>President R19 Boddie (write-in)</b>	received	<b>0</b>
	<b>Howie Hawkins / Angela Walker (write-in)</b>	received	<b>35</b>
	<b>Gloria La Riva/Sunil Freeman (write-in)</b>	received	<b>0</b>
	<b>Kanye West / Michelle Tidball (write-in)</b>	received	<b>10</b>
	<b>Mark Charles/Adrian Wallace (write-in)</b>	received	<b>0</b>
	<b>SCATTERING</b>	received	<b>224</b>

The total number of votes cast for the **REPRESENTATIVE IN CONGRESS DISTRICT 1**  
was **86,952**

of which	<b>Roger Polack</b>	received	<b>38,337</b>
	<b>Bryan Steil</b>	received	<b>48,524</b>
	<b>SCATTERING</b>	received	<b>91</b>

The total number of votes cast for the **STATE SENATOR DISTRICT 22**  
was **36,958**

of which	<b>Robert W. Wirch</b>	received	<b>35,571</b>
	<b>SCATTERING</b>	received	<b>1,387</b>

The total number of votes cast for the **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 32**  
was **2,065**

of which	<b>Katherine Gaulke</b>	received	<b>693</b>
	<b>Tyler August</b>	received	<b>1,371</b>
	<b>Jacquelyn Rose Romando (write-in)</b>	received	<b>0</b>
	<b>SCATTERING</b>	received	<b>1</b>

The total number of votes cast for the **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 61** was **29,352**

of which	<b>Samantha Kerkman</b>	received	<b>28,254</b>
	<b>Steve Kundert (write-in)</b>	received	<b>8</b>
	<b>SCATTERING</b>	received	<b>1,090</b>

The total number of votes cast for the **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 64** was **24,300**

of which	<b>Tip McGuire</b>	received	<b>13,659</b>
	<b>Ed Hibsich</b>	received	<b>10,602</b>
	<b>SCATTERING</b>	received	<b>39</b>

The total number of votes cast for the **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 65** was **23,829**

of which	<b>Tod Ohnstad</b>	received	<b>14,356</b>
	<b>Crystal J. Miller</b>	received	<b>9,444</b>
	<b>SCATTERING</b>	received	<b>29</b>

The total number of votes cast for the **KENOSHA COUNTY DISTRICT ATTORNEY** was **60,994**

of which	<b>Mike Graveley</b>	received	<b>58,162</b>
	<b>SCATTERING</b>	received	<b>2,832</b>

**Certification of the Board of Canvassers**

We, the undersigned, certify that we are the members of the Board of Canvassers for KENOSHA County.

We certify that the attached tabular statement of Votes Cast and Summary Statement of the Board of Canvassers, canvassed and prepared by us, are correct and true as compiled from the original returns made to the KENOSHA County Clerk.

**BOARD OF CANVASSERS**

(1) *Matthew G. August* (2) *Mary T. Kubecki*  
 (3) *Dan Stock*

(Date) Wednesday, November 11, 2020