

**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,

Case No. EL 21-30

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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**SUR-REPLY AFFIDAVIT OF BRYAN A. CHARBOGIAN**

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STATE OF WISCONSIN )  
  : SS  
COUNTY OF KENOSHA )

Bryan A. Charbogian, being sworn, states:

1. I am an Assistant City Attorney for the City of Kenosha, and our office represents Respondents John M. Antaramian and Matt Krauter in the above-captioned matter.
2. Attached hereto as Exhibit A is a true and correct copy of the decision *Pennsylvania Voters Alliance v. County of Centre*, 2020 WL 9260183 (3<sup>rd</sup> Cir. 2020).
3. Attached hereto as Exhibit B is a true and correct copy of the decision in *Pennsylvania Voters Alliance v. County of Centre*, 141 S.Ct. 1126 (2021).
4. Attached hereto as Exhibit C is a true and correct copy of the decision in *Minnesota Voters Alliance v. City of Minneapolis*, 2020 WL 6119937 (D. Minn. 2020).

5. Attached hereto as Exhibit D is a true and correct copy of the decision in *Iowa Voter Alliance v. Black Hawk County*, 2020 WL 6151559 (N.D. Iowa 2020).
6. Attached hereto as Exhibit E is a true and correct copy of the decision in *Election Integrity Fund v. City of Lansing*, 2020 WL 6605987 (W.D. Mich. 2020).
7. Attached hereto as Exhibit F is a true and correct copy of the decision in *Election Integrity Fund v. City of Lansing*, 2020 WL 6605985 (W.D. Mich. 2020).
8. Attached hereto as Exhibit G is a true and correct copy of the decision in *Wisconsin Voters Alliance v. Pence*, No. CV 20-3791, 2021 WL 686359 (D.D.C. Feb. 19, 2021).
9. Attached hereto as Exhibit H is, on information and belief, a true and correct copy of the Wisconsin Supreme Court's order in *Wisconsin Voters Alliance v. Wisconsin Elections Commission*, No. 2020AP1930-OA (Dec. 4, 2020).
10. Attached hereto as Exhibit I is a true and correct copy of the Seventh Circuit's order denying injunctive relief in *Wisconsin Voters Alliance v. City of Racine*, No. 20-3002 (Oct. 23, 2020).
11. Attached hereto as Exhibit J is an email I received from the United States Supreme Court informing me that a new docket entry, "Application (20A75) denied by Justice Kavanaugh." has been added, and Exhibit K is a true and correct copy of the United States Supreme Court's display of that case status on their website, at <https://www.supremecourt.gov/search.aspx?filename=/docket/DocketFiles/html/Public/20A75.html>.
12. Attached hereto as Exhibit L is a true and correct copy of the decision disposing of the appeal in *Wisconsin Voters Alliance v. City of Racine*, No. 20-3002, 2021 WL 9254456 (Nov. 6, 2020).

13. Attached hereto as Exhibit M is a true and correct copy of the decision in *American Federation of State, Municipal and County Employees v. Wisconsin Law Enforcement Association*, 2008 WL 516738 (Ct. App. 2008).

I, Bryan A. Charbogian, 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 27<sup>th</sup> day of September, 2021.

*Bryan A. Charbogian*

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BRYAN A. CHARBOGIAN  
Assistant City Attorney  
City of Kenosha

Subscribed and sworn to before me  
this 27<sup>th</sup> day of September, 2021

*Kirsten DeVries*  
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Kirsten DeVries  
Notary Public, Kenosha County, WI.  
My Commission expires on March 27, 2022

