

Official Election Complaint Form



STEP 1

Complaint Type

Please select the statutory process that governs your complaint:

Note: you should choose only one statutory process per complaint; if you feel that your allegations fall under more than one statutory process, you should submit separate complaints under each process.

5.05 (Election Law Violation)

● 5.06 (Violations by Election Officials or Appeals of Decisions of Election Officials)

5.061 (Help America Vote Act Violation)

STEP 2

Complainant Contact Information

Please provide the following information about yourself.

Note: Anyone filing this complaint with you can add their information on a separate page (see page 4).

First Name

Kenneth

Last Name

Wolfe

Residential Address

7933 Fredricksburg Court, Unit 102, Bristol, WI 53104

Mailing Address (if different)

Telephone (optional)

Email

kenw723@yahoo.com

STEP 3

Respondent

Please provide the following information about the individual or individuals whom you allege violated or improperly administered election laws:

Note: For 5.06 complaints, each respondent must be an election official. If there are multiple respondents, you can add their information on a separate page (see page 5).

Respondent Name

Renee Brickner

Respondent Title (5.06 complaints)

Village of Bristol Clerk

Mailing Address

Telephone (if available)

262-857-2368

Email (if available)

STEP 4

Applicable Statutes

Please cite each statute within Chapters 5 to 10 and 12 of the Wisconsin Statutes, as well as any other laws relating to elections, other than laws relating to campaign financing, that you allege were violated or improperly administered.

Note: The Commission cannot accept a complaint that does not cite specific provisions, including the correct subsections, of election law.

Wis. Stats. §:

5.35(3), 6.78(1m), 6.03(1)(b), 6.29(2)(am), 7.15(1)(a), 7.15(1)(c), 7.15(1)(cm), 7.15(1)(c), 7.15(14), 5.25(4)(a),

STEP 5

Allegations

Set forth in detail the facts that establish probable cause to believe that a violation occurred. Be as specific as possible as it relates to dates, times, individuals, and actions involved. Use as many separate pages as needed and attach copies of any supporting documentation, evidence, or affidavits.

Please see attached document entitled "Wolfe-WECcomplaint12-13-24.pdf"

STEP 6

Sign

Each complainant must complete **either** step 6a, "Unsworn Statement," or Step 6b "Sworn Statement." For either option, you may enter your digital signature by clicking the box and following the instructions, or you may print the form and sign it.

STEP 6a

Unsworn Statement

I declare under penalty of false swearing under the law of Wisconsin that

the foregoing is true and correct. Signed on the day of ,

at

(city or other location and state or country).

Printed Name

Signature

STEP 6b

Sworn Statement (to be completed in the presence of a notary)

I, 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.

Complainant's Signature

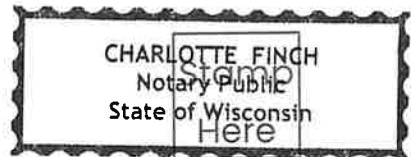
Note: Each complainant listed above in section 6b must have this form sworn before a notary or other official able to swear oaths.

STATE OF WISCONSIN

County of, (county of notarization)

Sworn to before me this day of, .

(Signature of person authorized to administer oaths)



My commission expires on , or is permanent.

Notary Public or (official title if not notary)

FACTS

I, Kenneth Wolfe, am a Chief Election Inspector for the Village of Bristol, Wisconsin and was assigned to the First Christian Church (Wards 4-7) at 13022 Wilmot Road, Kenosha, WI 53142 for the November 5, 2024 General Election.

Renee Brickner is the Village Clerk for the Town of Bristol and the municipal official in charge of administering elections for the Town of Bristol.

The poll workers at First Christian Church polling location recorded a total of 1,881 ballots cast for the November 5, 2024 General Election on Election Day: 883 in-person Election Day voters and 998 absentee ballots.

All of the following took place during the November 5, 2024 General Election unless otherwise noted.

ALLEGATIONS

1. Clerk Brickner refused to give me the keys to open the First Christian Church polling location on Election Day and refused to give me the keys to operate the ES&S DS-200 scanner tabulator. Clerk Brickner arrived at the First Christian Church polling location at 6:40AM, but she did not have the keys to the location.

Clerk Brickner then left to get the keys to the building, but when she returned, she did not have the keys to the DS-200 or the election program activation code to start the DS-200.

Clerk Brickner then left again to get the DS-200 keys and the program activation code. Because of Clerk Brickner's actions, the First Christian Church polling location was unable start the DS-200 or to accept completed ballots from voters (we couldn't open the auxiliary compartment on the DS-200 without the keys) until 7:35AM. Clerk Brickner's actions violated Wis. Stats. §§ 5.35(3) [*no secure ballot box for 35 minutes*], and 6.78.(1m) [*poll location hours 7AM—8PM*].

2. The First Christian Church polling location completed approximately 70+ Election Day Voter Registrations. Clerk Brickner failed to provide the poll workers with the Ineligible Voter List for the Election Day Voter Registrations until almost 11AM, after I had called her 2 or 3 times to tell her we needed it to correctly complete the Voter Registration documents. Clerk Brickner's actions violated Wis. Stats. §§ 6.03(1)(b) [*convicted felons are ineligible electors*], 6.29(2)(am) [*Ineligible Voter List must be checked prior to Voter Registration*], and WEC *Election Administration Manual for Municipal Clerks*, August 2024, page 51, Item 3. c. [*The election official must review the Ineligible Voter List to confirm that the elector is eligible to vote on the day of the election.*].

3. Clerk Brickner failed to provide the poll workers with the Absentee Ballot Log (EL-124) until almost 11AM, after I had called her 2 or 3 times to tell her we needed it to process the 998 absentee ballots. Clerk Brickner's actions violated WEC *Election Administration Manual for Municipal Clerks*, August 2024, page 91, Item 7. d. [*The Absentee Ballot Log (EL-124) is sent to the polling place with the absentee ballots on Election Day.*].

Clerk Brickner had neither alphabetized or separated any of the absentee ballots by ward. She also failed to provide the poll workers with any letter openers for the Absentee Ballot envelopes forcing poll workers to use their fingers to open 998 envelopes. Clerk Brickner's actions violated Wis. Stats. §§ 7.15(1)(a) [*Equip polling places.*], and 7.15(1)(c) [*provide other supplies for conducting all elections*].

While processing the Absentee Ballots, poll workers discovered that Clerk Brickner had mailed bal-

lots for the wrong ward to approximately 40 Town of Bristol voters, therefore forcing poll workers to remake those ballots. Clerk Brickner's actions violated Wis. Stat. § 7.15(1)(cm) [*Prepare official (correct ward is implicit here) absentee ballots for delivery to electors requesting them*].

4. Clerk Brickner failed to provide the correct size ballots for the ES&S ExpressVote machine. Clerk Brickner's actions violated Wis. Stats. §§ 7.15(1)(c) [*The municipal clerk shall deliver the ballots to the polling places before the polls open*], 7.15(14) [*Voting accommodations for individuals with disabilities*], and 5.25(4)(a) [*Each polling place shall be accessible to all individuals with disabilities*].
5. Clerk Brickner failed to provide the correctly marked envelopes for Spoiled Ballots or Original (for Remade) Ballots. Clerk Brickner's actions violated Wis. Stat. § 7.15(1)(a) [*Equip polling places*].
6. Clerk Brickner told me that there were no Registered Write-In candidates for this General Election, which was incorrect, because there were 7 Registered Write-In candidates. She also failed to provide the EL-105 forms for us to tally the votes after the closing of the polling location. Clerk Brickner's actions violated Wis. Stat. § 7.15(1)(a) [*Equip polling places*].

By this point—it was 11:30AM and I had made several calls to Clerk Brickner about the issues detailed in Items 4, 5, and 6 of this Complaint only to have her insist that she had provided everything the poll workers needed to run the election—I chose to call Kenosha County Clerk, Regi Waligora, to ask for guidance.

Kenosha County Clerk, Regi Waligora, arrived at the First Christian Church polling location at 1:30PM and brought with her: correctly marked envelopes for the Spoiled and Original (for Remade) Ballots, the correct size ballots for the ES&S ExpressVote machine, the List of the 7 Registered Write-In Candidates, and the EL-105 forms for tallying the Registered Write-In candidate votes, none of which had been provided to the poll workers by Clerk Brickner.

7. After assisting the 883 Election Day voters casting ballots, processing the 998 Absentee Ballots, tallying the 7 Registered Write-In Candidates' votes cast, the First Christian Church polling location modemed its election results to the Kenosha County Clerk's office at 1AM Wednesday, November 7, 2024 and poll workers were finished by 2AM Wednesday, November 7, 2024.

Clerk Brickner never offered to help or came to observe what was happening at the First Christian Church polling location after the polls closed at 8PM.

8. On Wednesday, November 7, 2024 Clerk Brickner called me and said that the number of ballots issued at the First Christian Church polling location was off by one with the number of ballots cast. She told me it was my responsibility as Chief Election Inspector to organize poll workers and to complete a reconciliation immediately.

I was able to get two of my poll workers to agree on such short notice, but I had to ask a poll worker from the City of Kenosha to help because no one else could do this work on Thursday, November 8, 2024 at 2PM.

Upon arrival at the Town of Bristol Village Hall, 19801 83rd Street, Bristol, WI 53104, I was shocked to see sensitive election materials on a cafeteria table in an unsecured area along with the DS-200 which was completely unlocked—including the flash drive receptacle—and the device keys were resting on the machine. Poll workers had to ask Clerk Brickner for the poll books and additional election materials we needed to complete the reconciliation because she had failed to provide it. Not only did the Clerk fail to help us reconcile, she didn't even watch what we did so she could learn what to do. Clerk Brickner's actions violated Wis. Stat. § 7.15(1)(a) [*Equip polling places*], and WEC Election

Administration Manual for Municipal Clerks, August 2024, pages 148, 149, "Secure Storage of Voting Equipment."

The reconciliation took 3.5 hours. During this time, multiple people came and went through the area with the unsecured, sensitive election materials strewn around and the DS-200 completely unlocked.

Also, Clerk Brickner presented me with a "Chain of Custody" document claiming that I had not filled it out on Election Day. I told her that I had never seen this document before, yet she continued to insist that she had provided it on Election Day, which was false. Clerk Brickner's actions violated Wis. Stat. § 7.15(1)(a) [*Equip polling places.*], and WEC *Election Administration Manual for Municipal Clerks, August 2024, page 147, Item 2, "General Electronic Voting System Security Procedures."*

Throughout the entire reconciliation process Clerk Brickner, again, did not offer to assist us in any way with completing this task.

After we had finished Clerk Brickner refused to accept any responsibility for her own errors or alleged violations of Wisconsin statutes and continued to insist that she had provided everything that was necessary on Election Day and that I and my two poll workers who were present were not telling the truth.

9. On Monday, November 11, 2024 I attended the Village of Bristol's Trustee Meeting. Many Bristol poll workers and citizens came to speak to the Trustees during Citizen Comments to express their frustration with the incompetence of Clerk Brickner during the November 5, 2024 General Election. Some called for her to be fired immediately (<https://kenoshacountyeye.com/2024/11/13/bristol-board-meeting-citizens-raise-concerns-over-election-management-and-local-governance/>).

To the best of my knowledge, the Board of Trustees has done nothing to correct any of these problems.

CONCLUSIONS

I am at a loss to explain Clerk Brickner's refusal to co-operate with fellow election officials or to accept her responsibility for failing to abide by Wisconsin State Statutes or follow the procedures in the WEC *Election Administration Manual for Municipal Clerks*. I am frustrated with the Village of Bristol's Board of Trustees unwillingness to even address the problems our poll workers and qualified electors endured during the General Election because of Clerk Brickner's actions.

I hold no personal animosity toward Clerk Brickner, but I sincerely doubt that she is both willing to and capable of administering any future elections for the Town of Bristol.

It is not the Kenosha County Clerk's responsibility to administer the election for the Village of Bristol because Clerk Brickner either cannot or will not. It is not a Chief Election Inspector's responsibility to equip a polling location with letter openers or provide all the appropriate WEC forms and documents because Clerk Brickner either cannot or will not. It is not poll workers' responsibility to stay until 2AM because Clerk Brickner either cannot or will not competently administer an election.

Town of Bristol qualified electors are suffering because of Clerk Brickner and need help. Town of Bristol poll workers are quitting because they will not put up with the lack of support from Clerk Brickner. I implore the Wisconsin Election Commission take action and at a minimum, advise the Town of Bristol Board of Trustees to remove Clerk Brickner.

Thank you for your attention to these matters.