### STATE OF WISCONSIN WISCONSIN ELECTIONS COMMISSION

### IN THE MATTER OF the Certificate of Sufficiency of Recall Petition of Town of Westfield Town Chair Sharon Galonski,

### SHARON GALONSKI,

Complainant,

**v.** 

Case No. \_\_\_\_\_

BRENDA PETERSEN,

Respondent.

### **VERIFIED COMPLAINT**

1. This Verified Complaint is brought against the Town Clerk of the Town of Westfield, Brenda Petersen ("Clerk Petersen"), pursuant to and in accordance with Wis. Stat. §§ 5.06, 9.10, Wis. Admin. Code §§ EL 2.05, 2.09, 2.11, and other Wisconsin laws governing elections and election campaigns.

2. Clerk Petersen abused her discretion and acted contrary to law in certifying the sufficiency of the recall petition brought by Terry L. Johnson ("Johnson") against Town of Westfield Chairperson Sharon Galonski ("Chairperson Galonski"), thereby allowing the recall election to proceed. No date has yet been scheduled for the recall election.

3. Complainant respectfully requests that the Wisconsin Elections Commission ("WEC" or the "Commission") require Clerk Petersen to (a) reject the recall petition as invalid and (b) disallow the recall election.

### JURISDICATIONAL STATEMENT

4. Complainant Sharon Galonski is a qualified elector and resident of the State of Wisconsin. Galonski resides at N6904 2nd Court, Westfield, Wisconsin, 53964. Galonski was elected as the Town Chair of the Town of Westfield in April, 2023, and is currently the incumbent elected official holding that office.

5. Respondent Brenda Petersen is a resident of Wisconsin, who, upon information and belief, resides at 201 Frederick Drive, Westfield, Wisconsin, 53964. Clerk Petersen is the Town Clerk of the Town of Westfield.

6. Chairperson Galonski is an elector of the Town of Westfield and is thus an elector of the jurisdiction served by Clerk Petersen.

7. Terry L. Johnson filed a Recall Petition against Chairperson Galonski, which Chairperson Galonski received on July 26, 2024.

8. Chairperson Galonski filed a written, verified challenge to the recall petition on August 2, 2024.

9. Clerk Petersen denied Chairperson Galonski's challenge to the Recall Petition on August 13, 2024, and issued a Certificate of Sufficiency.

10. This action is therefore brought under Wis. Stat. § 5.06 and challenges Clerk Petersen's August 13, 2024, Certificate of Sufficiency of the recall petition made against Chairperson Galonski.

11. This Verified Complaint is timely filed with WEC on August 19, 2024, which is prompt and within ten (10) days of the issuance of the Certificate of Sufficiency. Wis. Stat. § 5.06(3).

### BACKGROUND

12. The mandatory procedures that must be followed to initiate a recall of an incumbent elective official holding a town office are set forth in Wisconsin Statutes section 9.10. The statutorily prescribed procedures require a qualified elector seeking to recall an elected official to "first file[] a registration statement under s. 11.0902 with the filing officer with whom the petition is filed." Wis. Stat. § 9.10(2)(d). Certain materials must be appended to the registration statement. *Id.* 

13. The statutes further provide that "[n]o petitioner may circulate a petition for the recall of an officer prior to completing registration." *Id*.

14. The registration statement that must be filed in accordance with section 11.0902 is a Wisconsin Ethics Commission Campaign Finance Committee/Conduit Registration Statement (Committee Registration), Wisconsin Ethics Commission Form CF-1. *See* https://ethics.wi.gov/Resources/CF-1%20Registration%20Statement%20Fillable.pdf.

15. To complete the registration statement for a recall, the person forming the committee must place a check mark in one of two circles that appear in box C3 on the second page of the registration statement : either the circle next to the word "Support," indicating that the committee is being formed to support the recall of an incumbent elective official; or the circle next to the word "Oppose," indicating that the committee is being formed to oppose the recall of the recall of the official.

16. Johnson filed a Registration Statement on May 31, 2024, with Clerk Petersen. On the Registration Statement she submitted on May 31, Johnson checked the circle beside the word "Oppose," indicating that she was creating a committee to "Oppose" the recall of Galonski. (Exhibit A at 2)

17. At the same time, Johnson filed with Clerk Petersen the Statement of Intent to Circulate Recall Petition, Wisconsin Elections Commission Form EL-170i. (Exhibit B)

18. Johnson then filed with Clerk Petersen a recall petition on July 15, 2024, which included 151 signatures in support of the recall. (Exhibit C)

19. Chairperson Galonski was aware of the filing of the recall petition on July 15, and repeatedly requested copies of the complete recall petition from the Town Clerk. Despite those requests, Chairperson Galonski did not receive a copy of the recall petition (including the Registration Statement and Statement of Intent until 9:26 PM on July 25, 2024. (Exhibit D)

20. On July 30, the Clerk sent a letter to Galonski and her legal counsel informing them that she would "consider whatever information you may provide on or before August 5, 2024" with respect to the recall petition. (Exhibit E) Galonski filed a verified challenge to the petition with the Clerk on August 2, 2024. (Exhibit F) As grounds for her challenge, Chairperson Galonski argued two primary defects:

- a. that the committee Registration Statement, Form CF-1, contains a materially false statement—it states that the recall committee was being created to "Oppose" the recall of Chairperson Galonski, not to "Support" the recall effort; and
- b. that deficiencies in the individual signatures and the certifications of circulator rendered 100 individual signatures invalid, and the petition therefore did not contain a sufficient number of signatures.

21. On August 8, 2024, Johnson filed a response to the verified challenge to the petition and then provided its referenced attachments the following day on August 9, 2024. (Exhibit G) In response, Johnson alleged the following:

- a. Johnson claimed the misstatement on the Registration Statement "was done in error," and that she "corrected the page" and "attached it to [the August 8, 2024] response." She continued to argue the petition "should be processed in the spirit of the law" because, although "[m]istakes were made", the "law allows for correction."
- b. As to the deficiencies in the certifications of circulator and individual signatures allegations, Johnson submitted an affidavit from one circulator and addressed factual allegations in kind.

22. In addition to these responses to Chairperson Galonski's challenge, Johnson claimed that Chairperson Galonski's challenge was untimely.

23. Chairperson Galonski filed with the Clerk a verified reply to Johnson's response to the verified challenge to the petition on August 10, 2024. (Exhibit H) She reiterated her claims and highlighted Johnson's apparent admission in the August 8, 2024, response that the Registration Statement contained incorrect information and that the challenged certifications of circulator were insufficient. Chairperson Galonski further argued that the "corrected" Registration Statement and corrections to the circulations of circulator that Johnson submitted with the response were untimely and could not cure the fatal insufficiencies of the petition.

24. As to Johnson's claim that Chairperson Galonski's challenge was untimely, Chairperson Galonski argued her challenge was timely and complied with deadlines established by the Clerk, given the nine-day delay in notifying Chairperson Galonski of the filed recall petition.

25. In her reply, Chairperson Galonski also argued that Johnson's August 8, 2024, response should be rejected in its entirety because it was not verified.

26. On August 13, 2024, Clerk Petersen determined the recall petition was sufficient, accompanied by varying findings supporting the determination, and directed the petition to the Town Board to set a recall election. (Exhibit I) As to each claim, the Clerk reached the following conclusions:

- a. The Registration Statement was sufficient because the checkbox that contained the materially false information is "arguably ambiguous, and regardless the intent of the registration for recall was clear." Exhibit I at 2.
- b. The four certifications of circulator Gary Schaeffer were sufficient because petitioner Johnson submitted an affidavit of circulator Schaeffer in the August 8, 2024 response to Chairperson Galonski's challenge that "corrected the errors regarding his address." The Clerk determined the submission of the affidavit was timely and proper under "Wisconsin Statutes Section 9.10(4)(a), 9.10(2)(e) and (r)." *Id.*
- c. The two pages circulated by Virginia Dagel, containing 18 individual signatures, were invalid because circulator Dagel provided an incorrect address, which she did not correct by "affidavit pursuant to Wis. Admin. Code Section EL 2.05(4)." *Id.*
- d. The certifications of circulators Marotz and Murray were sufficient after they corrected them by completing their addresses on updated circulation pages in the August 8, 2024 response of petitioner Johnson, "as prescribed by Wis. Stat. § 9.10(2)(e) and (r)." *Id.*
- e. The certification of circulator James Johnson ("Mr. Johnson") was entitled to a presumption of validity under section EL 2.05(4). Accordingly, the allegation that

Mr. Johnson did not himself complete the certification required additional proof to overcome that presumption. *Id.* 

f. And that, after rejecting all but one challenge to the individual signatures, there are 131 valid signatures, 21 more than the 110 signatures that are required under Wis. Stat. § 9.10(1)(b). *Id.* at 3-4.

### ARGUMENT

# I. Johnson's response to Chairperson Galonski's challenge was not verified as required by law.

27. As a threshold matter, Johnson's response was not verified as required by Wisconsin law and therefore should have been rejected by Clerk Petersen. "Except as expressly provided" in Wis. Admin. Code § EL 2.11, standards for determining challenges to election petitions, including recall petitions, are generally the same standards applied to determining the sufficiency of nomination papers, as provided in section EL 2.07. Wis. Admin. Code § EL 2.11(1). Just as the complaint challenging the sufficiency of nomination papers and the response thereto must be verified (Wis. Admin. Code § EL 2.07(2)), so too must the complaint challenging a recall petition and the response thereto be verified. Wis. Admin. Code § EL 2.11. To be sure, section EL 2.11(3) expressly provides for different timing for the filing of a response (*i.e.*, the three-day deadline of section EL 2.07(2) does not apply to section EL 2.11), but it does not expressly provide that the response *need not* be verified. Wis. Admin. Code § EL 2.11(3).

28. In addition to the incorporation of section EL 2.07(2)(b)'s requirement that a response be verified, the cross-reference to chapter EL 20 in section EL 2.11 confirms that a response to the complaint challenging a recall petition must be verified. "The form of the complaint, the filing of the complaint and the legal sufficiency of the complaint shall comply with the requirements of ch. EL 20." Wis. Admin. Code § EL 2.11(2)(a). Section EL 20.04(3)

expressly requires a verified response to a complaint. Although section EL 2.11(2)(a) provides that "the procedure for resolving the complaint, including filing deadlines" is governed by Section EL 2.11, not chapter EL 20, verification is tied to the legal sufficiency of the response—in other words, its evidentiary value—and is not properly characterized as procedure.

29. Verification requires that the party filing the response swear upon oath before a notary public or other person authorized to administer oaths that said party personally read the response and the allegations contained therein are true and correct, based on personal knowledge. Wis. Admin. Code § EL 20.03(1), (5). A statement to that effect was required be at the bottom of the response to Chairperson Galonski's challenge. Here, Johnson signed the response but failed to do so under oath, as required by law. (Exhibit G) It follows that the response, including both the amended Registration Statement and the corrected certifications of circulator, was insufficient and should have been rejected by Clerk Petersen.

# II. Johnson's Registration Statement contained a materially false representation that invalidated the subsequent recall petition.

30. The Registration Statement that Johnson submitted to Clerk Petersen on May 31, 2024, was ineffective to allow Johnson to circulate a petition for recalling Chairperson Galonski because it misrepresented the purpose of the Committee: although the Committee was formed to *support* the recall of Chairperson Galonski, Johnson represented in the Registration Statement that the Committee *opposed* the recall effort. Clerk Petersen should have immediately rejected the Registration Statement because it was materially false and, consequently, registration was not completed. Instead, Johnson circulated the recall petition for signatures before a compliant registration statement was filed, in violation of section 9.10(2)(d). Further, the purportedly "corrected" Registration Statement that Johnson filed with her August 8, 2024, response to Chairperson Galonski's challenge cannot lawfully correct the initial invalidity of the Registration

Statement filed on May 31. Not only was the supposedly "corrected" Registration Statement untimely, but the handwritten notations and striking out of certain information and inclusion of other information is not certified; only Johnson's original certification of the May 31, 2024, Registration Statement appears on the document.

31. Because the May 31 Registration Statement was invalid, Johnson circulated the recall petition against Chairperson Galonski before "completing registration." Consequently, the signatures she obtained by circulating the recall petition based on an invalid Registration Statement are themselves invalid, and the recall petition must be rejected by Clerk Petersen. Wis. Stat. § 9.10(2)(d).

# A. Johnson's May 31 Registration Statement contained materially false information and is invalid.

32. First, the Registration Statement that Johnson filed contains a materially false representation that entirely invalidates the petition.

33. State law prohibits the circulation of a recall petition before registration of a recall committee is properly completed. Wisconsin Statute section 9.10(2)(d) expressly provides that "[n]o petitioner may circulate a petition for the recall of an officer prior to completing registration."

34. Wisconsin Statute section 11.0101(27) defines a recall committee as "a committee formed for the purpose of *supporting or opposing the recall* of" an incumbent holding local office.

35. The Wisconsin Ethics Commission makes the registration form available. *See* <u>https://ethics.wi.gov/Resources/CF-1%20Registration%20Statement%20Fillable.pdf</u>. Per the form directions, only recall committees designate their support or opposition of the recall effort. *Id.* at 3.

36. Johnson filled out and on May 31, 2024, submitted to Clerk Petersen a Registration Statement.

37. State law requires that the individual filing the registration statement provide a certification: "The individual responsible for filing or amending a recall committee's registration statement . . . *shall certify that <u>all information</u> contained in the statement, form, or report is true, correct, and complete*." Wis. Stat. § 11.0903(2) (emphasis added).

38. However, the Registration Statement that Johnson submitted makes clear that the recall committee, registered with the name "Terry L. Johnson," was created to *oppose* a recall effort launched against Chairperson Galonski. Exhibit A.

SECTION C: RECALL COMMITTEES		
C1. Name of Official Subject to Recall	C2. Office of Official Subject to Recall	C3. O Support
Sharon L. Galonski	Town of Westfield Chair	Oppose

39. Yet Johnson circulated for signature and obtained signatures on a petition seeking to initiate a recall of Town Chairperson Galonski, *i.e.* in *support* of the recall.

40. Because Johnson registered to "Oppose" a recall of Town Chairperson Galonski, yet circulated a recall petition to *support* the recall of Town Chairperson Galonski, the Registration Statement she submitted was falsely certified, rendering the committee registration itself invalid and incomplete. A legal process (here, Johnson's registration of her committee) cannot be "complete" when it is invalid. Consequently, Johnson failed to "complete" registration of her committee seeking to recall Chairperson Galonski.

41. Moreover, because Johnson circulated the recall petition seeking to recall Chairperson Galonski before "completing registration" of her committee to support a recall effort, the recall petition that Johnson submitted to Clerk Petersen on July 15 is invalid and must be rejected by Clerk Petersen. Wis. Stat. § 9.10(2)(d).

# B. Johnson's submission of a "corrected" Registration Statement does not save the recall petition.

42. That Johnson filed a "corrected" Registration Statement with her Response to

Chairperson Galonski's challenge to the recall petition is of no consequence for four reasons:

- It is not properly certified as of the date of the "corrections" as required by Section G—"Certification"—of the Registration Statement.
- It was untimely because it was provided *after* the Petition was circulated for signatures and filed.
- It was untimely because it was provided after the ten-day amendment period clearly provided for by Wis. Stat. § 11.0903(3) and on the form document itself.
- It was untimely because it did not conform to the provisions of Wis. Admin. Code § EL 6.02 and Wis Admin. Code § ETH 6.02.

43. *First*, as a threshold matter, Johnson did not file a new, correct Registration Statement; instead, she simply made handwritten notations on her May 31 Registration Statement, filling in the circle next to the word "Support" and indicating in handwriting: "Intended to support recall; wrong circle checked." (Exhibit G at 7) But those handwritten notations are insufficient to act as a proper amendment to the Registration Statement, at the very least because Johnson failed to certify in any way that the "corrected" Registration Statement was timely and accurate as of the date of the "corrections," as required by Section G—"Certification"—of the Registration Statement. The "corrected" Registration Statement she submitted still bears only Johnson's signature certifying the Registration Statement as of May 31, 2024.

44. **Second**, an amendment to an insufficient registration statement that is submitted after the Petition is circulated for signatures and filed fails to remedy the violation of Wis. Stat.  $\S 9.10(2)(d)$ . Here, despite the untimely "correction," the Petition was nevertheless circulated 45. Third, the registration form itself and section 11.0903(3) clearly state that "[t]he recall committee shall report any change in information previously submitted in a registration statement within 10 days following the change." Wis. Stat. § 11.0903(3); Exhibit A at 2. Johnson, however, did not file a valid Registration Statement within the ten-day window to provide the true and correct purpose of the recall committee—*i.e.*, to support the recall of Town Chairperson Galonski. Johnson filed the Registration Statement on May 31, 2024, and at that time, the purpose of the Committee was incorrectly stated on the form, as explained above. But the purpose of the Committee was not changed to reflect that it was created to "Support" the recall until Johnson submitted a "corrected" Registration Statement with her August 8, 2024 response to Chairperson Galonski's challenge. (Exhibit A at 2; Exhibit G at 4) Thus, Johnson did not report the true and correct purpose of the Committee within ten days of May 31, 2024, as required by section 11.0903(2). Even so, as demonstrated above, Johnson's "corrected" Registration Statement is invalid because it was not properly certified.

46. *Fourth*, Johnson's submission of a "corrected" Registration Statement with her August 8, 2024 response to Chairperson Galonski's challenged was untimely under Wis. Admin. Code § EL 6.02 and Wis Admin. Code § ETH 6.02.

a. Both Wisconsin's Elections and Ethics Codes provide that committee registration statements that are "insufficient as to essential form, information or attestation *shall* be rejected" and are "not effective." Wis. Admin. Code § EL 6.02(1) (emphasis added); Wis. Admin. Code § ETH 6.02(1). The purpose of a recall committee—i.e., whether it supports or opposes the recall—is indeed essential information. Here, the Registration Statement was invalid because it incorrectly represented the purpose of the Committee, stating that it opposed the recall effort

45. Second, the registration form itself and section 11.0903(3) clearly state that "[t]he recall committee shall report any change in information previously submitted in a registration statement within 10 days following the change." Wis. Stat. § 11.0903(3); Exhibit A at 2. Johnson, however, did not file a valid Registration Statement within the ten-day window to provide the true and correct purpose of the recall committee—*i.e.*, to support the recall of Town Chairperson Galonski. Johnson filed the Registration Statement on May 31, 2024, and at that time, the purpose of the Committee was incorrectly stated on the form, as explained above. But the purpose of the Committee was not changed to reflect that it was created to "Support" the recall until Johnson submitted a "corrected" Registration Statement with her August 8, 2024 response to Chairperson Galonski's challenge. (Exhibit A at 2; Exhibit G at 4) Thus, Johnson did not report the true and correct purpose of the Committee within ten days of May 31, 2024, as required by section 11.0903(2). Even so, as demonstrated above, Johnson's "corrected" Registration Statement is invalid because it was not properly certified.

46. *Third*, Johnson's submission of a "corrected" Registration Statement with her August 8, 2024 response to Chairperson Galonski's challenged was untimely under Wis. Admin. Code § EL 6.02 and Wis Admin. Code § ETH 6.02.

a. Both Wisconsin's Elections and Ethics Codes provide that committee registration statements that are "insufficient as to essential form, information or attestation *shall* be rejected" and are "not effective." Wis. Admin. Code § EL 6.02(1) (emphasis added); Wis. Admin. Code § ETH 6.02(1). The purpose of a recall committee—i.e., whether it supports or opposes the recall—is indeed essential information. Here, the Registration Statement was invalid because it incorrectly represented the purpose of the Committee, stating that it opposed the recall effort

when, in reality, the Committee was formed to support the recall. Accordingly, Clerk Petersen should have rejected the Registration Statement when it was filed on May, 31, 2024, and required Johnson to refile a valid registration statement before circulating a recall petition for signatures.

- b. Moreover, even if the support/oppose box on the registration statement were not considered essential information, Johnson's "corrected" registration statement was still untimely under Wisconsin Elections and Ethics Codes. Section EL 6.02(2) does allow for the amendment of a registration statement filed under chapter 9, "which is insufficient or incomplete in some manner but substantially complies with law." Wis. Admin. Code § EL 6.02(2); see also Wis. Admin. Code § ETH 6.02(2) (providing a substantively identical regulation). But section EL 6.02(2) provides that the filing officer who accepts the insufficient registration statement "shall then promptly notify the registrant indicating the nature of the ... insufficiency" and give the registrant "15 days from the date of such notice to rectify the problem." Wis. Admin. Code § EL 6.02(2).
- c. Here, Clerk Petersen needed to notify Johnson of the defect in the Registration Statement promptly after it was filed on May 31, 2024. Within fifteen days of notice and before circulating the petition for signatures, Johnson in turn needed to submit a corrected registration statement to Clerk Petersen, stating that the Committee *supported* the recall of Chairperson Galonski. Consequently, Johnson's submission on August 8, 2024, of a "corrected" Registration Statement—accompanying her response to Chairperson Galonski's challenge and after all signatures were collected—does not rectify the insufficient registration

statement according to the procedure of Wis. Admin. Code § EL 6.02(2). Furthermore, the untimely "correction" of the Registration Statement does not change the fact that the recall petition was circulated before the Committee submitted a sufficient registration statement to Clerk Petersen, in violation of section 9.10(2)(d).

47. All signatures collected "prior to completing registration" are invalid. Since Johnson still has not completed registration of her committee to support the recall of Chairperson Galonski, none of the signatures she has collected to date on the recall petition she submitted to Clerk Petersen are valid.

# III. Due to insufficiencies in the certifications of circulator, the recall petition failed to supply the statutorily required number of elector signatures.

48. A recall petition must "be signed by electors equal to at least 25 percent of the vote cast for the office of governor at the last election within the same district or territory as that of the officeholder being recalled." Wis. Stat. § 9.10(1)(b).

49. It is Chairperson Galonski's understanding, and the Clerk's Certificate of Sufficiency confirms, that the signatures (and correct address information) of 110 eligible Town of Westfield electors must appear on the recall petition for the recall election of Chairperson Galonski to proceed. (Exhibit I at 4)

50. Chairperson Galonski challenged nine certifications of circulators, containing a total of 75 individual signatures. (Exhibit F)

51. Clerk Petersen properly did not count the 18 signatures on pages 7 and 8 of the Petition because circulator Dagel "did not correct her mistake by affidavit pursuant to Wis. Admin. Code Section EL 2.05(4)." (Exhibit I at 2)

52. On the other hand, Clerk Petersen abused her discretion and acted contrary to sections 9.10, EL 2.05, and EL 2.09 in accepting the correcting affidavit of circulator Schaeffer and the corrections of circulators Marotz and Murray that Johnson submitted with the August 8, 2024 response. Clerk Petersen acknowledged that the pages of these three circulators were insufficient because of mistakes or omissions in the addresses provided in the certifications of circulators. (Exhibit I)

- a. Circulator Schaeffer certified four pages (Pages 1, 2, 3, and 13) that contained a total of 32 signatures. (Exhibit F) These pages contained insufficiencies as to circulator Schaeffer's address. In the Certificate of Sufficiency, Clerk Petersen concluded that the pages were sufficient based on the affidavit of circulator Schaeffer that Johnson submitted with the August 8, 2024 response to Chairperson Galonski's challenge. (Exhibit I at 2)
- b. Circulator Murray certified Page 19 containing 9 signatures. (Exhibit C at 19)
- c. Circulator Marotz certified Page 14 containing 9 signatures. (Id. at 14)
- d. In the Certificate of Sufficiency, Clerk Petersen concluded that the certifications of circulators Murray and Marotz were sufficient after they corrected the initial insufficiencies (the municipality of residence was omitted): circulators Murray and Marotz updated the incomplete addresses on their circulation pages, unsupported by affidavits, and Johnson submitted these pages with the August 8, 2024 response. (Exhibit I at 2)

53. In sum, the pages of circulators Schaeffer, Murray, and Marotz contained 50 individual signatures that Clerk Petersen should not have counted, as set forth below; when added to the 18 signatures on the insufficient pages of circulator Dagel, 68 signatures must not

be counted due to insufficient certifications of circulator. This drops the number of valid signatures to 83, well below the 110 signatures of electors that are required for the recall to proceed.

# A. The correcting affidavit of circulator Schaeffer was untimely and cannot serve to correct the four insufficient pages that he circulated and certified.

54. In the August 8, 2024 response, Johnson submitted the affidavit of Circulator Schaeffer to correct the insufficiencies in the address that he provided on the four pages he circulated. (Exhibit G) Clerk Petersen accepted the affidavit, allowed it to correct the insufficiencies on the four pages Schaeffer circulated, and counted the 32 votes on those pages. (Exhibit I at 2, 4)

55. Section 9.10(r) provides that "[a] petitioner may file affidavits or other proof correcting insufficiencies, including . . . [f]ailure of the circulator to include all necessary information. Wis. Stat. § 9.10(r)(5). Additionally, section EL 2.05(4), which is incorporated by reference to recall petitions in section EL 2.09(1), provides further guidance on the timing and procedure for correcting insufficiencies by affidavit. It provides that "the correcting affidavit *shall be filed with the filing officer not later than three calendar days* after the applicable statutory due date for the nomination papers." Wis. Admin. Code § EL 2.05(4) (emphasis added).

56. The statutory due date for nomination papers, however, does not determine the applicable due date for recall petitions. Further, sections 9.10 and EL 2.09 do squarely address the issue. Thus, precisely when the three-day window in which to file an affidavit correcting a recall petition commences is subject to two reasonable constructions. Under either construction, Schaffer's affidavit is untimely.

- a. *First*, the due date of a recall petition for the purposes of submitting correcting affidavits may be construed as the date of filing. In that case, the three-day window to submit a correcting affidavit began when Johnson filed the Petition on July 15, 2025, and it closed on July 18, 2025. (*See* Exhibit C.) Under this construction, the submission of a correcting affidavit with Johnson's August 8, 2024 response was fatally late. Consequently, the affidavit cannot correct the insufficiencies of Schaeffer's circulation pages, and the signatures on those pages must not be counted.
- b. Second, it is reasonable to infer from section EL 2.09(2), which addresses the timeliness of a petition, that the due date for a recall petition is the date by which the petition must be filed under section 9.10. Under this construction, "[t]he last date that a petition for the recall of an officer may be offered for filing is 5 p.m. on the 60th day commencing after registration." Wis. Stat. § 9.10(2)(d). Since the registration was filed on May 31, 2024, the 60<sup>th</sup> day after registration is Tuesday, July 30, 2024. Three days after this statutory due date is August 2, 2024. Once again, under this construction, the submission of a correcting affidavit with Johnson's August 8, 2024 response was fatally late. Consequently, the affidavit cannot correct the insufficiencies of Schaeffer's circulation pages, and the signatures on those pages must not be counted.

57. Under both reasonable constructions of the due date of Johnson's petition, and the ensuing three-day window to file a correcting affidavit under section EL 2.05(4), the submission of Schaeffer's affidavit on August 8, 2024 was fatally late.

58. Given its express limitation on the submission of correcting affidavits to a threeday window, it simply cannot be that section EL 2.05(4) grants a recall petitioner a second chance to properly complete the certifications of circulator well after the third day following the due date of the petition—only in response to a challenge that identifies the insufficiencies in the certifications of circulator. Clerk Petersen abused her discretion and acted contrary to sections 9.10, EL 2.05(4), and EL 2.09 in allowing the affidavit to correct the insufficiencies in the certifications of circulator Schaeffer. Accordingly, the 32 signatures on the four insufficient pages that Schaeffer circulated must not be counted.

# B. The corrections to the certifications of circulators Murray and Marotz cannot cure the insufficiencies because they were untimely and unsupported by affidavit or other sufficient proof.

59. As explained above in the case of the affidavit of circulator Shaeffer, the corrections to the insufficient pages of circulators Murray and Marotz were untimely because they were submitted with Johnson's August 8, 2024 response—well after the three-day window to make corrections, following the due date of the petition. *See* Wis. Admin. Code § EL 2.05(4). For this reason alone, Clerk Petersen abused her discretion and acted contrary to law in allowing the corrected pages to rectify the insufficiencies and, consequently, counting the votes on the circulators' pages.

60. Moreover, corrections to insufficiencies such as the "[f]ailure of the circulator to include all necessary information" require that a petitioner "file affidavits or other proof." Wis. Stat. § 9.10(r). Johnson failed to submit affidavits to correct the insufficiencies on the pages of circulators Murray and Marotz. Circulators Murray and Marotz purportedly added their addresses, with their initials, to the previously completed and signed certifications, which Johnson then submitted with the August 8, 2024 response. Such an informal method of correction falls well short of the standard of a sworn and notarized affidavit or other sufficient

proof, as required by sections 9.10(r) and EL 2.05(4). For this reason too, Clerk Petersen abused her discretion and acted contrary to law in allowing the corrected pages to rectify the insufficiencies and counting the votes on the circulators' pages.

61. Thus, the combined 18 signatures on the two pages of circulators Murray and Marotz must not be counted because the insufficiencies were not corrected according to law for two independently sufficient reasons.

### CONCLUSION

62. The recall petition was insufficient from its inception because Terry L. Johnson formed a committee to oppose the recall of Sharon L. Galonski. The Committee was barred by Wisconsin law from circulating the petition for the collection of signatures "prior to completing registration," which *still* has not been accomplished. The non-verified response and the untimely submission of a supposedly "corrected" (but non-certified) registration statement—after all signatures were collected—did not rectify this insufficiency. Consequently, all signatures gathered on the recall petition are invalid.

63. Additionally, the insufficient certifications of circulators Schaeffer, Dagel, Murray, and Marotz were not corrected according to statute and the Administrative Code of the Elections Commission. The combined 68 individual signatures on the pages of those circulators must not be counted. Rejecting those 68 signatures brings the number of individual signatures to just 83 electors, well below the twenty-five percent (25%) threshold of 110 signatures.

64. Clerk Petersen therefore abused her discretion and acted contrary to law in certifying the sufficiency of the recall petition, thereby allowing the recall election to proceed.

65. For the forgoing reasons, Chairperson Galonski respectfully requests that Commission require Clerk Petersen to (a) reject the recall petition as insufficient and (b) disallow the recall election.

Dated August 19, 2024.

Complaint prepared by:

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### LIST OF EXHIBITS

- Exhibit A: Johnson's May 31, 2024 Wisconsin Ethics Commission Campaign Finance Committee/Conduit Registration Statement
- Exhibit B: Johnson's May 31, 2024 Statement of Intent to Circulate Recall Petition
- Exhibit C: Johnson's July 15, 2024 Recall Petition
- Exhibit D: July 25, 2024 Email from Petersen
- Exhibit E: July 30, 2024 Email and Letter from Petersen
- Exhibit F: Galonski's August 2, 2024 Verified Challenge to Recall Petition
- Exhibit G: Johnson's August 8, 2024 Response to Verified Challenge and August 9, 2024 Attachments with Response to Verified Challenge
- Exhibit H: Galonski's August 10, 2024 Verified Reply to Challenge
- Exhibit I: Petersen's August 13, 2024 Certificate of Sufficiency of Recall Petition and Findings in Support of Certificate of Sufficiency

### VERIFICATION

Sharon Galonski, being first duly sworn, on oath, deposes and says that she has read the foregoing Verified Complaint and avers that the same is true and correct to the best of her knowledge, except as to those matters therein stated upon information and belief or based upon exhibits filed in support of this Verified Complaint, as to which matters she believes them to be true.

Signed at <u>Marquette Count</u> Wisconsin, this <u>19</u><sup>+ h</sup> day of August, 2024. Sharon Galonski

Subscribed and sworn to before me this 19th day of August, 2024.

**REBECCA S WULF** NOTARY PUBLIC STATE OF WISCONSIN

Notary Public, State of Wisconsin

My commission expires: 8.17.26



### CAMPAIGN FINANCE COMMITTEE/CONDUIT REGISTRATION STATEMENT

STATE OF WISCONSIN

te: An amended registration statement must be filed within 10 days of any changes in information.

1. Is this an Amendment?	•No I	OYes If yes	s, please enter	your con	nmittee numb	er:	Committe	e Number
SECTION A: GENERAL	. INFO	RMATION						
AL Committee/Conduit Name Terry L. Johnson				O Can	strant Type (Cho didate ORefer	endum	• Recall	*
A3. Email kmjohnson@maqs.n	et	A4. Phone (608) 547-	-9689	_	tical Action (PA tical Party O1	_		
A5. Mailing Address N5656 County Road	А		A6. City Westfield				A7. State MI	A8. Zip 53964
A9. Institution Name BMO Bank		A10. Street Addr. 203 Main		1	ALL City Westfield		MI2. SI	ate A13. Zip 53964
Treasurer/Administrator Informatio	n	4010	A15. Email			A16. P	hone	
N/A								
A17. Mailing Address			A18. City				A19. State	A20. Zip
Other Officers (Optional) Independent and local non-partisan ca	ndidates: .	Indicate by an asteris	k (*) which officers	are authoris	zed to fill a vacant	cy in non	nination due i	to death of candidate.
A21. Name N/A	A22. Ti	tle	A23. Email			A2	4. Phone	
A25. Name N/A	A26. Ti	tle	A27. Email			A2	8. Phone	
Filing Exemption Registrants that will not accept contrib amount of more than \$2,500 in a cale reports. For committees registering w dar year in which it is granted. Those exempt must renew each year. Local contributions, making disbursements \$2,500 in a calendar year may claim This exemption applies until the loc threshold, amends its registration, or it	idar year o ith the Co committee candidate or incur an exemp al candid	are eligible for exemp minission, exempt sta is registering with the committees that do ne ring obligations in tion from filing camp ate committee exceed	ntion from filing can tus is effective only c Commission that w ot anticipate accept an aggregate amo, paign finance report	npaign finar for the cale vant to remain ing or making unt exceeding is at any the	nce en- ain ing ing ne.	his regis	strant is elig	ible for exemption. ligible for exemption.
SECTION B: CANDIDA	TE CO	MMITTEES						
B1. Office Sought (include District/I	franch)			B2.	Political Party		<b>B3.</b> E.	ection Date
Candidate Information					:8		and the strain	
B4. Name N/A			B5. Email			B6. Pł		
B7. Mailing Address			B8. City				B9. State	B10. Zip

An individual who holds a state or local elective office may establish a second candidate **O** Yes, this is my only candidate committee in Wisconsin. O No, this is my second candidate committee in Wisconsin.

B12. Other Office Held or Sought (include District/Branch) Only complete B12 if you responded "No" to B11, N/A

Second Candidate Committee

committee to pursue another state or local office.

B11. Is this your only registered candidate committee in Wisconsin?



## CAMPAIGN FINANCE COMMITTEE/CONDUIT REGISTRATION STATEMENT

STATE OF WISCONSIN

Note: An amended registration statement must be filed within 10 days of any changes in information.

SECTION C: RECALL COMM		2. Office of Official Su	biect to Recall		C3. O Support
C1. Name of Official Subject to Recall Sharon L. Galonski		Town of Wes			Oppose
SECTION D: PAC, IEC, AND	CONDUITS	*			
D1. Sponsoring Organization	D2.	Email	D:	3. Phone	
D4. Mailing Address	D5.	City		D6. State	D7. Zip
SECTION E: POLITICAL PA	RTY & LEGISLAT	IVE CAMPAIG	N COMMITTI	ES	
E1. Political Party or Legislative Campaign N/A			Fund?		nittee have a Segregate ) Yes
Segregated Fund Depository Institution Info E3. Institution Name N/A	E4. Street Address		E5. City	F.6. S	
SECTION F: REFERENDA C	OMMITTEES				
F1. Nature of Referendum (if applicable) N/A					F2, O Support O Oppose
SECTION G: CERTIFICATIO	)N				
Accurate Information J certify that I am an authorized represent is true, correct, and complete.	ntative of the registrant an	d that to my knowledg	e all of the informat	tion contained w	vithin this registratio
Timely Amendments I am aware of the requirement to amena requirement to register within 10 days of	t this registration statemet f meeting the requirements	at within 10 days of an to register under Cha	ny change of inform pter 11 of Wisconsi	ution contained n Statutes.	within, as well as th
Records Retention I acknowledge the duty to maintain reco which this registrant participates. If reg manner for the three-year period preser	ords in an organized and le istering a candidate comm ibed in s.11.0201(4).	egible manner for thre litee, I acknowledge th	e years from the da se duty to maintain i	te of the most re records in an or	ecent election in ganized and legible
<b>Ongoing Compliance</b> This registrant shall continue to mainta Statutes.	in its registration and con	nply with all applicabl	le reporting require.	inents under Cl	hapter 11 of Wiscons
Treasurer/Administrator		37		• 1 × 1 × 2	SER
GI. Printed Name Terry L.Johnson	G2. Signate Jerry	T. Johnse	m		G3. Date 5/31/24
Candidate (If applicable)	GR. TE O				G6. Date
G4. Printed Name	G5. Signat	ure			

STATE OF WISCONSIN

Name of County

Marquette

Name of Municipality Town of Westfield

### STATEMENT OF INTENT TO CIRCULATE RECALL PETITION

THE UNDERSIGNED RECALL PETITIONER,\_ Terry L. Johnson (Print Name)

STATES HIS/HER INTENT TO CIRCULATE, PURSUANT TO Wis. Stat. § 5.9.10

OF THE WISCONSIN STATUTUES, A PETITION TO RECALL.

Sharon L. Galonski, Chairperson of Town of Westfield

(Indicate the name of, and office held by, the official being recalled).

FOR THE FOLLOWING REASON OR REASONS RELATED TO THE OFFICIAL

RESPONSIBILITIES OF THE OFFICIAL SOUGHT TO BE RECALLED:

Sharon Galonski was not truthful during her election campaign or while in office

Sharon initiated the process of termination of the Town of Westfield Fire Dept. without contacting the the Town Board

Sharon ignored all citizen comments regarding termination of the Town Fire Dept.

Sharon consistantly acts on behalf of the Town Board without authorization.

Sharon exceeded Town budget authority in spending

Sharon overspent taxpayer funds in attorney fees for out of county attorney exceeding budgeted amount.

Sharon denied certain board members access to Town of Westfield Property

(This statement should be appended to the Campaign Registration Statement (ETHCF-1) filed with the filing officer.)

Dated this 31 day of May, 2024 Jury L. Johnson (Signature of Peritoner)

(Notary Not Required)

EL-1701 (Rev. 2017-07 (Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984 (608-261-2028) web: elections.wi.gov lemail: elections@wi.gov

ruch 5/31/24 BP

Exhibit A, Page 3 of 3

STATE OF WISCONSIN	Name of County	Name of Municipality
	Marquette	Town of Westfield

### STATEMENT OF INTENT TO CIRCULATE RECALL PETITION

lerry L. Johnson (Print Name) THE UNDERSIGNED RECALL PETITIONER

STATES HIS/HER INTENT TO CIRCULATE, PURSUANT TO Wis. Stat. § S.9.10

OF THE WISCONSIN STATUTUES, A PETITION TO RECALL,

Sharon L. Galonski, Chairperson of Town of Westfield

(Indicate the name of, and office held by, the official being recalled),

FOR THE FOLLOWING REASON OR REASONS RELATED TO THE OFFICIAL

**RESPONSIBILITIES OF THE OFFICIAL SOUGHT TO BE RECALLED:** 

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Dated this 31\_ day of May, 2024 Jury L. Johnson (Signature of Petitioner)

(Notary Not Required)

EL-1701 | Rev. 2017-07 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984 (608-261-2028) web: elections.wi.gov lemail: elections@wi.gov

rucid 5/31/24 BP.

Exhibit B, Page 1 of 1

Brenda Peterson, Clerk of Town of Westfield		. We, the undersigned qualified elected	Gunsdiction or distric	t of officeholder)
(official with whom nominat	ion popers or declaration of candidacy for the office is filed)	from office pursuant to Article XIII, Section	n 12 of the Wisconsin Constitution and §.9.10 of	the Wisconsin St
tion for the recall of Sharon L. Galonski, C				
mason for recall must be stated on petitions		more the related to the official responsibilities of the officerofuer.	No statement of reason is required to initiate the recently	and deal Plant
vas not trutniul during her election campaign of	Sharpo extended Town of Westfield budget authority in s	of the Town of Westfield Fire Department without contacting the town ocaru was pending. Sharon overspent tax payers funds in attorney fees for out of county at	torney exceeding budgeted amount. Sharon denied der am boar	
senalt of the Town board watrout abtrioticator		MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE NA STREET & NUMBER OF RURAL ROUTE	ME OF THE MUNICIPALITY OF RESIDENCE MUS	DATE O
	PRINTED NAME OF ELECTORS	STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	Indicate Town, City, or Village	SIGNIN
SIGNATURES OF ELECTORS			avilage WESTFIELD	6924
How Martin	DAVID MARTIN	1.28385 Jud. RD.	West Field	671-
IK JAN	KOY KWIN	HIJOHIL EIK Ave	"Village Westfield	6.11.
harryn	DACEMYLT	1 SIZ NER AUR	Willage Westfield	6-11-2
Limms	Jim Ems	W8630 A Eliz AUR	ovrage Westfield	6-11-
Lista Emp	tisa cost	MODO ELE AND	Without Westfield	8-11-
They par	RISKI WIT	W8050 CIRNE	aviliage (1) octfield	6-11-
Jennifer Program	Jennifer Provenzar	WEDD'T COUNTY NOT E	Lettown Lettown Lettown Lettown Lettown Lettown Lettown	6.17-2
Thomas Ems	Thomas Emp	W860 EIK AUE	Sections Diviliage ( 1-000	6-17-2
Dominique Gar	Sommare Cons	WOW FIX The	acity we charled	6.22.
abrahan'	Debra Schaeffer	Nb3toCaurdy Kg H Certification of Circutator	acity Westfield	
GARYJ. SCHAE	FFER, certif	y: I reside at <u>NG360</u> County Road	A OXFORD WI 5395	

the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each period the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each period the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each period the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each period the signatures of the signature of the Page No.

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### **RECALL PETITION**

	We, the undersigned qualified electors of the Town of Westfield	<u>x</u> 1
I U: Brenda Peterson, Grenco I Town of Westheid		The indication of district of the
(official with whom nomination papers or declamation of candidacy for the office is filed)	from office pursuant to Article XIII, Section 12 of the Wisconsin C	onstitution and §.9.10 of the Wisconsin Statutes.
petition for the recall of Sharon L Galonski, Chairperson of Town of Westifield	from office parsuant to Article Att, Section 12 of the Wisconsin of	

(name of officeholder to be recalled and office).

### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, Sharon was not truthful during her election campaign or while in office. Sharon intiated the process of termination of the Town of Westfield Fire Department without contacting the town board first. Sharon ignored all citizen comment regarding termination of the town fire dept. Sharon consistantly

acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in attorney tees for out of county attorney accessing budgeted amount. Sharon denied cetrain board members access to town property.

SIGNATURES OF ELECTORS	FRINTED NAME OF ELECTORS	UNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE STREET & NUMBER OF FURAL ROUTE Rural address must also include box or fire mo.	Indicate Town, City, or visions	SIGNING
hi. amm	GLORIN J. MENAMARA		D'Village WESTFIELD	6/7/24
promp: pipma	FRANCIS E. MCNAMA		UVilege WESTFLELD	4/24
an Fullan	Jane Fullmer	NUI25 CH RAFA	Dividage West FIELD	6/7 /24
A I F Chi en	RAY H. FULL MER	NG125 CTH-ROA	D Villago D City WEST FIELD	6-7.24
Hay - Vallan	Leslie Russ	N6353 Cty Rd A	aviage westfield	6-8-20
Pay le Rid	Carilee Russ	N6353 CHIRDA	a vilage West field	6.8.24
Dai Mums	DAN CUMMINGS	N5521 CTY RD A	Willigo WESTFIELD	6-8-24
Con BAN	Dan Rakow	0.6765_3101 Rol	a villinge West Field	6-9-2
-mass org	MARK HONEY	W7981 COUNTY RDE	Ovilage WESTFIELD	6,9.2
"that Honey	YVETTE HONEY	W7981 COUNTY RDE	O VARGE WESTFIELD	6.9.2

I further certify I am citizen a galified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally citizen and personally obtained each of the state would not be disqualified from voting under Wis. Stat. § 6.03. I personally citizen at the resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally citizen at the resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally citizen at the resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally citizen at the resident of the state of the resident of the resident of the state of the resident of the resident of the state of the resident of the resident of the state of the resident the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am aware that falsifying this certification is punishable under § 12.13(3)(a), Wis. Stats. Page No. 2

24

EL-170 (Rev. 2019-09) The information on this form is required by Wis. Stats. §§ 8.40 and 9.10. This form is prescribed by the Wisconsin Elections Commission | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 | web: http://zlections.wi.cov



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### **RECALL PETITION**

TO; Brenda Peterson, Clerk of Town of Westfletd		(jurisdiction or district of officeholder)
(official with whom nomination papers or declaration of candidacy for the office is filed)	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitu	tion and \$ 9 10 of the Wisconsin Statutes.
netition for the recall of Sharon L. Georges, Chairperson of Yown of Westfield	from office pursuant to Article XIII, Section 12 of the wisconsin Constitu-	aton and gistro of the thistorian characteristic

### (name of officeholder to be recalled and office).

6.

### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on pelitions for city, village, lown, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Sharon was not truthful during her election campaign or while in office. Sharon initiated the process of termination of the Town of Westfield Fire Department without contacting the town board first. Sharon ignored all citizen comment regarding termination of the town fire dept. Sharon consistantly acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtrain board members access to town property.

SIGNATURES OF ELECTORS	FRINTED NAME OF ELECTORS	IUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. TH STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
Marma Lugar	Merna Frozene	N6495 Co.R.J. M	Or Town Village Westfield	8/2/24
7 Lopela	Jim SOBIA	116069 YTH AVE	DUNADE STAILLD	6/224
June DD. Peter	Pamella leterson	W79DI Mallard Ct	a Vilage Westfield,	6/2/24
la Mas Abetero	Annies Ret . vsc	11/2021 Northand CH	Uvitage Westfickel	6/2/24
ti Arouni Di Osm	Stohanie Wilson	W1952 Co Rd E	Unap Westfield	6-2-24
Josefa Becky	Dorothy Becker	N68643rd Rd	Wisge Westfield	6-2-2
Eline Rake	Thomas Becker	N6864 3. J.R.d	Urilage Westfield	6-2-27
D Deiso	Steve Reisel	W6878 3 RD RD	Diage WeSTF-it(D	6/2/24
Brubara Rus	Barbara Reisel	N6878 3rd RD.	Division Westfield	622
Secol Vilson	Jacob Wilson	W7952 6E	Oxford	6/3/24

OUNTY N6363

(circulator's residence - include number, street, and municipality) (vance or circulator) the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this potition. I know that cach person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am aware that falsifying this construction is punishable under § 12,13(3)(a), Wis. Stats.

Page No. Z

24 (date)

Ι,

GARY J SCHAETFER

of circulator) scribed by the Witcontin Elections Commission | P.O. Box 7984, Madison, WI 53707-7984 (608-266-8005 [web: http://elections.wi.ucr/ | email: elections@wi.gov EL-170 (Rev 2010-09) The information on this form is required by Wis Stats §§ 8.40 and 9.10. This form is p

certify: I reside at

enda Peterson, Clerk of Township of West	eid in papers or declaration of candidacy for the office is filed)			listnet of officeholder) of the Wisconsin Statutes
on for the recall of Sharon L. Galonski,	Chairperson of Township of Westfield	from office pursuant to Article XIII, So	ection 12 of the Wisconsin Constitution and §.9.10	
		STATEMENT OF REASON FOR RECALL	No	ll of state, convressional,
seen for recal) must be stated on petitions	for city, village, town, and school district officials. T	STATEMENT OF REASON FOR RECALL he reason must be related to the official respons bilities of the officeh	older. No matement of reason is required to manage the reason	
tive Judicial or county officials.)	in encoder and the second construction at the Torm of Westfield	Fire Dent without contacting the town board first. Sharon ignored all chizen comment regarding	D USUUTINSTOLL OF COMPLETE IN IN Delive	No. 1
	the Sharts and and Treas history a thoray in contribut Sharon	spers \$28,000.00 of tax payers funds in allomay tiols for but of county address of the		
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SIGNATURES OF ELECTORS	FRINTED NAME OF ELECTORS	STREET & NUMBER OR RUEAL ROUTE Rural address must also include box or fire no.	Included: sound, city, or Finage	SIGNING
1 PILL	DAVING & COUDANK	WTTIS COUNT. ROADE	acay WES/ PAtes	3 JUNE 20
Maryon L. Art Philude	Parlor 14iss	N 6670 4 1 AVE	a vilage	3 JONE &
KORAN A WIXON	R. M.U.	N6897 3rd RI	a village westfield	6/03/200
Jupen Plan	Kyan I lenke	INTRS County RdE	DVIlage INESTFIELD	6-3-24
thut	THING WASH		Uvilage Westfield	6/4/24
John C. Wipon	- ABAN C	NT0708 4th Ave	UVIAGO WESTReild	0/8/24
splannahler	Shanna beir	N7746 ROPE	Divilage W PStrok	060870
Con MAN	Suban M. Not	FI. TTHE Conderl AF	Writege Wathall	06-0824
	Deserver Deserver	1.19744 C. to Num	E Oringe Westfield	4/27/2
tinge and	LINDA SADRE	WITT County Poly	Ovinge Westfield	06/22/21
Mulla and	1 inder Lanson	Certification of Circulator	re. Westfield WI	
	NEX JA	y: I reside at <u>NGC D</u> T were a resident of this state, would not be disqualified from voting hed by the officeholder named in this perition. I know that each person here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of this state, would not be disqualified from voting here a resident of the state of th	(circulator's residence - include number, street, and municipality) under Wis. Stat. § 6.03. I personally circulated this recall per on signed the paper with full knowledge of its content on the	ition and nersonally obtained

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(anno) EL-170 (Rev. 2019-09) The information on this form is required by Wia. Stats: §§. 8.40 and 9.10. This form is prescribed by the Wisconsin Elections Commission | P.O. Box 7984, Madison, WT 53707-7984 | 608-266-8005 | web: http://decidons.wi.gov

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### **RECALL PETITION**

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on consistently acts on behalf of the Town Board without authout	Advancer. Shason exceeded Town budget authority in spending. Sharon s	pent \$25,000.00 of tax payers funds in alterney frees for out of county alterney enceeding to MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. T STREET & NUMBER OR RURAL ROUTE	HE NAME OF THE MUNICIPALITY OF RESIDENCE	MUST ALWAYS BE LISTED. DATE OF
SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	Rural address must also include box or fire no.	Indicate Town, City, or Village	SIGNING
Circulate Or	Cassie Schuler	WITID Cty Rd E	iviliage Westfield	6/21/24
M	Rommy	NG997 3 Rd Rd	- Westfield	-6/25/24
Carl Inthe	Firtz Menky	N6896 3-2 Rd	avisage Lesfeld	6126/24
Cherned Mente	Ingrid Menke	N6896 3rd Rel	acty Westfield	6-26-24
STUDIE COLORIS	1		D Town Village D City	
6.	2 CB = 12 E = 221	al- we change and a second	C Tiwn C Vilage C City	e e e e e e e e e e e e e e e e e e e
7.	and the second have		C Town C Village C City	640 ( <sup>1</sup> . 19 <sup>3</sup> ) 10.00 (12)
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(e)		RECALL PETITION		
TO: Brenda Peterson, Clerk of Yown of Westfield				
	tion papers or declaration of candidacy for the office is filed)		•	strict of officeholder)
etition for the recall of Sharon L. Galonski, C		from office pursuant to Article XIII, Sectio	n 12 of the Wisconsin Constitution and §.9.10 of	of the Wisconsin Statute
	(name of officeholder to be recalled and office).	STATEMENT OF DEACON FOR DECALL		
be mason for recall must be stated on petitions		STATEMENT OF REASON FOR RECALL e reason must he related to the official responsibilities of the officeholder.	1	
gislative, judicial, or county officials.)	a wir ong, tinnige, wwir, and achoor district ornolais. The	e reason must be related to the official resp. isonantes of the officenoider.	. No succement of reason is required to initiale the recail	oj state, congressional,
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on behalf of the Town Board without authorization.	Sharon exceeded Town of Westfield budget authority in sp	ending. Sharon overspent tax payers funds in attorney fees for out of county a	ttomev exceeding budgeted amount. Sharon denied catrain b	nard members access to town
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SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	Rural address must also include box or fire no	Indicate Town, City, or Village	DATE OF SIGNING
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1 - 0-	1. 0	LINES I ON	avilage Watcheld	11
- Porne Man	JONNE QUINT	N6715 30 Kg	ocity esticald	6-1-2
30 1/ -			A Town	1
"(ma haster	Chris Kaster	N6837 3rd Kd	acity Westfield	6-25-24
+A - DA+	D'DUL		Ovitage ALL TO RA	1 01 01
Dand Rasher	Naus Rasta	NIGAT 324 RD	OCH Werkell	6-26-26
50	S. II	i line and Di	DVage / 1 1 1 1 2 1 1	1 2
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EL-170 (Rev. 2019-209) The information on this form is required by Wis. Stats. §§. 8.40 and 9.10. This form is prescribed by the Wisconsin Elections Commission | P.O. Box 7984, Madison, WI 51707-7984 | 608-266-8005 [web: http://elections.vis.gov | email: elections@wigov

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Page No.

### **RECALL PETITION**

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		We, the undersigned qualified e	lectors of the Town of Westfield	trict of officeholder)
kenda Peterson, Clerk of Town of Westfield	ion papers or declaration of candidacy for the office is filed)		(juradelice of the first constitution and §.9.10)	of the Wisconsin Statut
on for the recall of Sharon L Galonski, C	Insirparson of Town of Westfield	from office pursuant to Article XIII, See	ction 12 of the Wisconsin Constitution and sources	
	the state officials Th	STATEMENT OF REASON FOR RECALL te reason must be related to the official responsibilities of the officeho	Ider. No statement of reason is required to initiate the recol	of state, congressional,
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signatures on this paper. I know that the si	gners are electors of the jurisdiction or control represent to a support this recall petition. Lamoware that falsify	ing this certification is punishable under she 13(3)(a), Wis. Stats.		Page No-

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(dis) (dis) EL-170 (Rev 20 [0.40]) The information on this form is required by Wis Stats. §5. 8.40 and 9.10. This form is predibed by the Wisconsin Elections Commission [P.O. Box 7994, Madison, WI 53707-7984] 608-266-8005 [web: http://elections/gwi.gov

3.

### **RECALL PETITION**

#### \_. We, the undersigned qualified electors of the Town of Westflett TO: Brenda Peterson, Clerk of Town of Westfield (jurisdiction or district of officeholder) (official with whom nomination popers or declaration of candidacy for the office is filed)

petition for the recall of Sharon L. Galonski, Chairperson of Town of Westfield

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

(name of officeholder to be recalled and office).

### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Sharon was not truthful during her election campaian or while in office. Sharon initiated the process of termination of the Town of Westfield Fire Department without contacting the town board first. Sharon ignored all clizen comment regarding termination of the town fire dept. Sharon consistantly acts on behalt of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in allorney fees for out of county attorney exceeding budgeted amount. Sharon denied cetrain board members access to town property.

SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	IUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE NA STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
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(name of curvisors) (name of curvisors) (reinculate's insidence-include number, street, and municipality)
1 further certify I am either a qualified cleator of Wisconsin, or a U.S. citizen, app-18 or older who, if I were a resident of this state, would not be disgualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this paper. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective postdeneces given. I support this recall petition 1 and wave that fulsifying the certification is providable under \$12.13(3)(a), Wis Stats. Page No.

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E1-170 (Rev.2019-69) The information on this form is required by Wis Stats §§. 8.40 and 9.10. This form is ion P.O. Dax 7984, Madison, WI 53 707-7984 | 608-266-8005 |web: http://eloctipus.wi.gov | email: elections@wi.gov ibed by the Wisconsin Elections Commiss

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TO: Brenda Peterson, Clerk of Town of Westfield		RECALL PETITION	alesters of the Tour of Westerly	
(official with whom nomina	ation papers or declaration of candidacy for the office is filed)			istrict of officeholder)
etition for the recall of Sharon L Galonski,		from office pursuant to Article XIII.	ection 12 of the Wisconsin Constitution and §.9.10	
	(name of officeholder to be recalled and office).	in on the paradate to ratione ratio	constitution and g.9.10	of the wisconshi Statu
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ther certify 1 am either a qualified elector of V	Visconsiu, or a U.S. citizen, are la prolder who is A	re a resident of this state, would not be disqualified from voting up	(circulator's residence - include number, street, and numicipality)	
gnatures on this paper. I know that the signer	rs are electors of the jurisdiction or district represented	The a resident of this state, would not be disqualified from voling un by the officeholder named in this petition. I know that each person this certification is punishable under § 12.13(3)(a), Wis Stats.	signed the paper with full knowledge of its content on the date	and personally-obtained ea
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#### TO: Brenda Peterson, Clerk of Township of Westfield

We, the undersigned qualified electors of the Township of Westfield

(official with whom nomination papers or declaration of candidacy for the office is filed)

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

(jurisdiction or district of officeholder)

petition for the recall of Sharon L. Galonski, Chairperson of Township of Westfield (name of officeholder to be recalled and office).

#### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Sharon was not trutted during her election campaign or while in affica. Sharon initiated the process of termination of the Town of Westfield Fire Dept, without contacting the town board first. Sharon ignored all citizen comment regarding termination of town Fire Dept.

Sharen consistently acts on behalf of the Town Board without authorization, Sharon exceeded Town budget authority in spending. Sharon spent \$28,000.00 of tax payers funds in attorney fees for out of exumy atomic second of the travel authority in spending.

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SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
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10			□ Town □ Village □ City	

Charles Charpentier

(name of circulator)

certify: I reside at US971 2nd Ave, Town of Westfield, Marguette Co WI (circulator's residence - incle

(under of common) (under of common) (under of common) (under stratence - active number, tried, and number) (under of num

-2 (date)

Page No

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TO: Brenda Peterson. Clerk of Town of Westfleki	, We, the undersigned quantied electors of the town is vessel. (jurisdieton or district of officeholder)
(official with whom nomination papers or declaration of candidacy for the office is filed)	
petition for the recall of Sharon L Galonski, Chaliperson of Town of Westfield	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.
(name of officeholder to be recalled and office).	

#### STATEMENT OF REASON FOR RECALL

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acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied certrain board members access to town property.

PRINTED NAME OF ELECTORS	STREET & NUMBER OR BURAL ROUTE Rural address must also include box or fire no.	ME OF THE MUNICIPALITY OF RESIDENCE MUS MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
101, BALLAUR Spen	cer N5967-2nd AUC.	Daily Westfield	7-5-24
TERRY SPENCER	N 5967 - 2nd AVE.	Conv WESTFIELD	7-5-24
	N5971 Znd Ave	City Westfield	7-5-24
	W8519 Elk tue	Dividege WESTFICIA	7-5-24
Shamomeclain	W8519ELK AVE	Bothy Westfield	7-5-24
Marlene Crissip	W8519 EIK ANE	Bogy Westfield	7/5/24
Greg Lewis	W8430 Lake Pf Ct	City Westfield	7/5/20
michelle Lewis	W8430LakePtCt	City Westfield	7/5/24
GAIZY Weihert	W8448 Lake Pt. Ct	a sty Westfield	7/5/24
PAUL KOSZAREK	N 6010 200 AVE.	D Village WESTFIELD	7/5/24
	241 Balbara Spen JERRY SPENCER Charles Charpenter Edward TCrissip Sharon McClain Marlene Crissip Greg Lewis Michelle Lewis GAZY Weihert	241 Balbara Spencer N5967-2nd AUC. JERRY SPENCER N5967-2nd AVE. Charles Charpenter N5971 2nd Ave Edward T Crissip W8519 Elk AUE Sharoo McClain W8519 ELK AVE Marlene Crissip W8519 ELK AVE Marlene Crissip W8519 ELK AVE Marlene Crissip W8519 ELK AVE Greg Lewis W8430 Lake Pt Ct michelle Lewis W8430 Lake Pt Ct Gazy Weihert W8448 Lake Pt. Ct	Chi Bubbura Spencer N5967-2nd AUC. JERRY SPENCER N5967-2nd AVE. Charles Charpenter N5971 2nd Ave Charles Charpenter N5971 2nd Ave Edward T Crissip W8519 Elk Ave Sharpo McClain W8519 ELK Ave Manlene Crissip W8519 ELK Ave Greg Lewis W8430 Lake Pt Ct Greg Lewis W8430 Lake Pt Ct Garzy Weihert W8448 Lake Pt. Ct PAVL KoszARFK N6010 2 <sup>WD</sup> AVE. PAVL KoszARFK N6010 2 <sup>WD</sup> AVE. Greg WESTFIELD Greg WESTFIELD Greg WESTFIELD Greg WESTFIELD Greg WESTFIELD Manlene Crissip W8448 Lake Pt. Ct Greg WESTFIELD Greg WESTFIELD

Charles Charpentier

(name of circulator) (circulator) residence - include number, street, and municipality) I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the storatory on this paper. Leave that the circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am awaye that faisitying this certification is punishable under § 12.13(3)(a), Wis. Stats. Page No

(signature of coulator) (datc)

EL-170 (Rev 2019-69) The information on this form is required by Wis. Stats. §§. 8.40 and 9.10. This form is prescribed by the Wisconsin Elections Commission | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 [web: http://elections.vi.utv/ email: elections@wi.gov

TO: Brenda Peterson, Clerk of Town of Westfield	. We, the undersigned qualified electors of the Town of Westfield
(official with whom nomination popers or declamation of candidacy for the office is filed)	(jurisdiction or district of officeholder)
	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

petition for the recall of Sharon L. Galonski, Chairperson of Town of Westfield (name of officeholder to be recalled and office).

#### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Sharon was not truthful during her election campaign or while in office. Sharon initiated the process of termination of the Town of Westfield Fire Department withour contacting the town board first. Sharon ignored all citizen comment regarding termination of the town fire dept. Sharon consistantly acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in actorney fees for out of county attorney exceeding budgeted amount. Sharon denied cetrain board members access to town property

SIGNATURES OF ELECTORS	FRINTED NAME OF ELECTORS	MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
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soon all	Logan Mills	NS779 2nd Ave	D Village WRStfre/6	7-5-24
illo Janleen	Alken Jankerr.	V 8407 Ember Ave	Village Westfield	7-5-24
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(name of circulator) I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know that respective residences given. I support this recall petition. I an aware that falsifying this certification is punishable under § 12.3(3)(a). Wis Stats.

Page No. 12

EL-170 (Rev. 2019-09) The information on this form is required by Wis. Stats. §5. 8.40 and 9.10. This form is prescribed by the Wiscodsin Elections Commission | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-2005 |web: http://elections.wi.cov | email: elections@wi.gov

TO: Brenda Peterson, Clark of Town of Westfield	. We, the uncersigned quantical electors of the water of the (jurisdation or district of efficeholder)
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petition for the recall of Staros L. Galorsti, Chairperson of Town of Westfield (name of officeholder to be recalled and office).	

(The reason for recall must be stated on petitions for city, village, lown, and school district officials. The reason must be related to the official responsibilities of the official despondent. No statement of reason is required to initiate the recall of state, congressional, registrative, your using the source of the town land the process of termination of the Town of Westfield Fire Department without contacting the town board lingt. Sharon landred all clicken comment regarding teraination of the town fire dept. Sharon consistantly Sharon was not truthful during the released lingt. Sharon landred all clicken comment regarding teraination of the town fire dept. Sharon consistantly

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GARY J. SCHAETFER

\_ certify: I reside at \_\_\_\_\_ A 6360 CTT Rd A UXFORD WI

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(circulator's nutidence - include number, street, and manicipality)

(cance of concentration (concentration of wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. 1 personally circulated this recall petition and personally obtained each of I further certify 1 am enter a quantice execute or reasonable or dots, structure are to dot or dots who, in work a restance or use state, work on the carsonable or work of the paper with fail knowledge of its content on the date indicated opposite his or her the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with fail knowledge of its content on the date indicated opposite his or her the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with fail knowledge of its content on the date indicated opposite his or her the signatures on this paper. the signatures on mis paper. I know that the super a me per this recall petition. I am aware that folsifying this certification is punishable under § 12.13(3)(a), Wis Stats.

Page No. 13

6 -24 E1-170 (Iter 2010-01) The information on this form is required by Wis Stats. §5. 8.40 and 9.10. That form is prescribed by the Wiscensin Elections Commission [P.O. Ber 7984, Madison, WI 51707-7984 [608-266-8005 [web: http://televis.tvi.cov/ ornait/elections@vi gov

#### TO: Brenda Peterson, Clerk of Township of Westfield (official with whom nomination papers or declaration of candidacy for the office is filed)

(jurisdiction or district of officeholder)

petition for the recall of Sharon L. Galonski, Chairperson of Township of Westfield

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

(name of officeholder to be recalled and office).

#### STATEMENT OF REASON FOR RECALL

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4. MM Mymul	Michael 5 Seymons	NG239 County rough M	Divinage Westfred	6-22-24
5. Darent Schutz	Daryl Schultz	N6248 county & M	Utage Westfield	6-22-24
6. Tarrely Asperto	-Tenlow Scholte	MAGG CTY od M	Uvilage	10-2029
Canot Sailusan	Juneye Sullivan	NO284 ctyl	Utilage Westfield	7-8-29
" Roth Sultur	Bober Sullivan	N6286217 M	active Westfield	1-8:24
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10.			□ Town □ Village □ City	
I Tim Marote	, certify: 1	reside at	(classified) as idence - include number stand and municipality)	

I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am aw atification is punishable under § 12.13(3)(a), Wis. Stats. Page No.

-8-2024 (date)

ibed by KWisconsin Elections Commission | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 |web: http://elections.wr.sov | email: elections@wi.gov EL-170 (Rev.2019-09) The information on this form is required by Wis. Stats. §§. 8,40 and 9.10. This form is present

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#### We, the undersigned qualified electors of the Town of Westfield TO: Brenda Peterson, Clerk of Town of Westfield (jurisdiction or district of officeholder) (official with whom nomination papers or declaration of candidacy for the office is filed)

petition for the recall of Sharon L Galonski, Chairperson of Town of Westfield

(name of officeholder to be recalled and office).

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

#### STATEMENT OF REASON FOR RECALL

• (The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Sharon was not truthiul during her election campaign or while in office. Sharon initiated the process of lermination of the Town of Westlield Fire Department without contacting the town board first. Sharon ignored all clizen comment regarding termination of the town fire dept. Sharon consistantly acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celrain board members access to town property.

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N5460 5th Rd Westheld WI 53964 certify: I reside at (circulator's residence - include number, street, and municipality)

I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.0.1. Stated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named tertify Petition. Show that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petiting I am aware at falsifying this certification is punishable under \$2,13(3)(a), Wis. Stats.

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(signature of circulator)

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rescribed by the Wisconsin Elections Commission P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8805 |web: http://dections.wi.opy | email: elections@wi.gov. EL-170 (Rev.2019-09) The information on this form is required by Wis Stats. §§. 8.40 and 9.10. This form is p

Page No.

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TO: Brenda Peterson, Clerk of Town of Westfield

(official with whom nomination papers or declaration of candidacy for the office is filed) petition for the recall of Sharon L Galonski, Chaiperson of Town of Westfield

(jurisdiction or district of officeholder)

thing for the recall of Sharon L Galonski, Chaleperson of Town of Westfield from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

#### STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

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" and a men	Lucas Nelson	W7366 FAWN ANTS	Uvillage Westfield	7-8-24
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MathSlower	Matida Slowey	N5245 County 2d.A	Dillage Westfield	7/8. 2024
OPPO	Alex Sover	NS245 GK, RD A	a city	7/8/24
	1		□ Town □ Village □ City	
).			□ Town □ Village □ City	

# Lacey Baumann certify: I reside at N5460 5th Rd WestField WI 53964

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1 further certify 1 am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03, I personally circulated this recall petition and personally obtained each of the signatures on this paper, I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his certification is punishable under § 12.13(3)(a), Wis. Stats.

0812024 07 Page No. 16 (date) (signature of circulator) EL-170 (Rev. 2019-09) The information on this form is required by Wis. Stats. §§. 8,40 and 9,10. This form is prescribed by the Wisconsin Elections Commission |P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 [web: http://elections.wi.gov | email: elections@wi.gov 1. 12

TO: Brende Peterson, Clerk of Town of Westfield	. We, the undersigned qualified electors of the Town of Westflet
(official with whom nomination papers or declaration of candidacy for the office is filed)	(jurisdiction or district of officeholder)
netition for the recall of Sharon L. Galonski, Chaliperson of Town of Westfield	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

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(name of officeholder to be recalled and office).

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Lindsay Baumann	N5375 5th Rd	Boy Westfield	6/12/24
Dawn Slowey	N5331 County Rd A	Car Westfield	6/12/24
AIAN SLOWEN	N5331 lount RDA	DOLY WESTTIELO	6/12/24
Kitty Schnell	N5313 5th Rd	City Westfield	6/12/24
Lori Baumann	N5313 5th Rd	Pulage Westfield	6/12/24
Distin Schwell	W7040 EMBERDR	City Westfield	6/12/24
Jackie Benner	w69910 Ember Dr.	City Westfield	4/12/24
Peron Jurgenberg	46996 Ember Dr.	City Westfield	6/12/24
Frank Traina	NS67 contylet	City	06/12/202
Lacey Baumann	N5460 SHARD	Westfield	07/08/2024
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(same of circulator) I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition is an avare that falsifying this certification is punishable under § 12.13(3(a), Wis Stats. Page No.

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(circulator) (circ the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given 1 support this recall petition. Jam aware that falsifying this certification is punishable under § 12.13(3)(a), Wis. Stats. Page No. 18

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mission | P.O. Box 7984, Madison, W1 53707-7984 | 608-266-8005 |web: <u>http://cleations.wi.gov</u> | email: elections@wi.gov Wis Stats. §§. 8.40 and 9.10. This form is prescribed by the Wind EL-170 (Rev.2019-69) The information on this form is required by

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TO: Brende Péterson, Clerk of Town of Wastfield	We, the undersigned qualified electors of the lowing westing
(official with whom nomination papers or declaration of candidacy for the office is filed)	(jursdiction or district of officeholder)
petition for the recall of Sharon L Galoriski, Chairperson of Town of Westfield	_from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

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3 Cincli Thalack	h Cyndi Thalacker	NK411 Ctr rel MI	Division Westfield WL	6/10/2024
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(circulator's residence - include number, street, and municipality) I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper, I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her

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Page No. 19

sion | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 |web: http://elections.wi.gov | email: elections@wi.gov EL-170 (Rev 2019-(4) The information on this form is required by Wis. Stats. §§. 8.40 and 9.10. This form is prescribed by the Wisconsin Elections Com

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(date)

): Brenda Peterson, Clerk of Township of West	field	We, the undersigned qualified	d electors of the Township of Westfield	
(official with whom nonunation the recal) of Sharon L. Galonski,	(name of officeholder to be recalled and office).	from office pursuant to Article XIII,		istrict of officeholder) of the Wisconsin Statute
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EL-170 (Rev. 2019-09) The information on this form is required by Wis. Stats. \$5. 8.40 and 9.10. This form is pre ibed by the Wisconsin Elections Con ssion | P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 [web: http://elections.wi.gov | email: elections@wi.gov

Page No.

20

From:	clerk@townofwestfieldwi.com
Sent:	Thursday, July 25, 2024 9:26 PM
То:	Douglas Poland
Cc:	chairperson@townofwestfieldwi.com; Eric Larson; Kiley Lloyd
Subject:	[External] - RE: Town of Westfield - Recall Petition against Town Board Chairperson
	Sharon Galonski
Attachments:	We sent you safe versions of your files

Mimecast Attachment Protection was unable to create safe copies of your attachments.

#### Hello All

I am attaching the signature pages for the recall petition. I sent the actual recall petition in a previous email. I do question the statement I have highlighted below. Sharon was aware of the recall petition every step of the way since May. I believe I am fulfilling my duties going through this process. I out of consideration have kept Sharon informed step by step and Sharon was aware on July 15th that i was handed the signature pages.

Thank you Brenda Petersen

-----Original Message-----From: "Douglas Poland" <dpoland@staffordlaw.com> Sent: Thursday, July 25, 2024 12:56pm To: "clerk@townofwestfieldwi.com" <clerk@townofwestfieldwi.com> Cc: "Sharon Galonski" <sharonIgalonski1957@gmail.com> Subject: Town of Westfield - Recall Petition against Town Board Chairperson Sharon Galonski

Good afternoon, Town Clerk Petersen. Thank you for speaking with me by phone this morning. I know that your role as Town Clerk is a part-time position, and I appreciate you taking the time to return my call. As I mentioned to you when we spoke earlier today, I have been retained to represent incumbent Town of Westfield Board Chairperson Sharon Galonski with respect to a recall petition that Chairperson Golonski understands has been filed against her. Please note that I have cc'd Chairperson Galonski on this email.

Town Chairperson Galonski learned of this recall petition for the first time yesterday when you informed her that she has until today (July 25) to file a challenge to the recall petition. I understand from our conversation today that the Marquette County Clerk informed you that the ten-day deadline to file a challenge to the recall petition is today, July 25, because by statute (Wis. Stat. § 9.10(4)(a), the ten days runs from the date on which the recall petition is filed with the Town Clerk, which I assume means that the recall petition was filed with you on July 15.

Chairperson Galonski has not received a copy of the recall petition filed (presumably) on July 15. She has requested a copy of the Statement of Intent to Circulate Recall Petition and a copy of every Recall Petition submitted, but she has not yet received copies of the Statement of Intent, Recall Petition(s), or any documents relating to a recall petition filed against her in the month of July. She has a copy of a one-page Statement of Intent to Circulate Recall Petition dated May 2, 2024, and the first page of a Campaign Finance Committee/Conduit Registration Statement (CF-1) that is undated. But Chairperson Galonski is unable to evaluate any current recall petition because she has not yet been furnished with a copy.

As you and I discussed by phone, you intend to scan the recall petition tonight and provide a copy of the scanned recall petition (I note that each page that contains signatures states "Recall Petition" at the top) to Chairperson Galonski. Chairperson Galonski further requests that you scan and provide to her copies of any other documents that relate to the recall petition, including but not limited to any Statement of Intent to Circulate Recall Petition filed <u>after</u> May 2, 2024, and a full copy of any Campaign Finance Committee/Conduit Registration Statement filed by the Petitioner. Please confirm that Chairperson Galonski will have ten days from the date on which you provide her with a copy of the recall petition to file a challenge under Wis. Stat. § 9.10(4)(1), and that the five-day time period for the Petitioner to file a rebuttal, if any, and the

ensuing two-day time period for Chairperson Galonski to file a reply, if any, would run from the date on which Chairperson Galonski files a challenge, if any.

Thank you again for taking the time to speak with me today. I appreciate your assistance with this matter. Best regards,

Doug Poland



This is a transmission from the law firm of Stafford Rosenbaum LLP and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify me immediately at the telephone number included above.

From:	clerk@townofwestfieldwi.com
Sent:	Tuesday, July 30, 2024 5:46 PM
То:	Douglas Poland
Cc:	chairperson@townofwestfieldwi.com; Eric Larson; Kiley Lloyd
Subject:	[External] - RE: Town of Westfield - Recall Petition against Town Board Chairperson
	Sharon Galonski
Attachments:	Poland Itr 7.30.24.docx

Good Afternoon-

Please find attached my response to your email. If you have any questions or concerns please to not hesitate to contact me.

Thank you Brenda

Brenda Petersen Town of Westfield, Clerk 608-450-0189 clerk@townofwestfieldwi.com

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-----Original Message-----From: "Douglas Poland" <dpoland@staffordlaw.com> Sent: Friday, July 26, 2024 12:54pm To: "clerk@townofwestfieldwi.com" <clerk@townofwestfieldwi.com> Cc: "chairperson@townofwestfieldwi.com" <chairperson@townofwestfieldwi.com>, "Eric Larson" <elarson@ammr.net>, "Kiley Lloyd" <klloyd@cc.marquette.wi.us> Subject: RE: Town of Westfield - Recall Petition against Town Board Chairperson Sharon Galonski

Clerk Petersen, thank you for your emails yesterday evening, and thank you for providing the recall petition filed with respect to Chairperson Galonski. I acknowledge receipt on behalf of Town Chairperson Galonski as of the time of your emails. Please confirm that Chairperson Galonski will have 10 days from the date on which you provided the recall petition to her—Thursday, July 25—within which to file a challenge pursuant to Wis. Stat. § 9.10. Ten days from July 25 would be Sunday, August 4. In the meantime, please do not hesitate to contact me if you have any questions or issues to raise. If the Town is now represented by legal counsel, please let me know, as the ethical rules do not allow me to communicate directly with a party I know to be represented by counsel. I am sending you this email because I have not been informed that the Town is, in fact, represented by counsel, so if it does retain counsel, I need to know that. Thank you again, and best regards,

Doug Poland



This is a transmission from the law firm of Stafford Rosenbaum LLP and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify me immediately at the telephone number included above.

From: clerk@townofwestfieldwi.com <clerk@townofwestfieldwi.com>

Sent: Thursday, July 25, 2024 9:26 PM

To: Douglas Poland <dpoland@staffordlaw.com>

Cc: chairperson@townofwestfieldwi.com; Eric Larson <elarson@ammr.net>; Kiley Lloyd <klloyd@co.marquette.wi.us> Subject: RE: Town of Westfield - Recall Petition against Town Board Chairperson Sharon Galonski

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

#### Hello All

I am attaching the signature pages for the recall petition. I sent the actual recall petition in a previous email. I do question the statement I have highlighted below. Sharon was aware of the recall petition every step of the way since May. I believe I am fulfilling my duties going through this process. I out of consideration have kept Sharon informed step by step and Sharon was aware on July 15th that i was handed the signature pages.

Thank you Brenda Petersen

-----Original Message-----From: "Douglas Poland" <<u>dpoland@staffordlaw.com</u>> Sent: Thursday, July 25, 2024 12:56pm To: "<u>clerk@townofwestfieldwi.com</u>" <<u>clerk@townofwestfieldwi.com</u>> Cc: "Sharon Galonski" <<u>sharonIgalonski1957@gmail.com</u>> Subject: Town of Westfield - Recall Petition against Town Board Chairperson Sharon Galonski

Good afternoon, Town Clerk Petersen. Thank you for speaking with me by phone this morning. I know that your role as Town Clerk is a part-time position, and I appreciate you taking the time to return my call. As I mentioned to you when we spoke earlier today, I have been retained to represent incumbent Town of Westfield Board Chairperson Sharon Galonski with respect to a recall petition that Chairperson Golonski understands has been filed against her. Please note that I have cc'd Chairperson Galonski on this email.

Town Chairperson Galonski learned of this recall petition for the first time yesterday when you informed her that she has until today (July 25) to file a challenge to the recall petition. I understand from our conversation today that the Marquette County Clerk informed you that the ten-day deadline to file a challenge to the recall petition is today, July 25, because by statute (Wis. Stat. § 9.10(4)(a), the ten days runs from the date on which the recall petition is filed with the Town Clerk, which I assume means that the recall petition was filed with you on July 15.

Chairperson Galonski has not received a copy of the recall petition filed (presumably) on July 15. She has requested a copy of the Statement of Intent to Circulate Recall Petition and a copy of every Recall Petition submitted, but she has not yet received copies of the Statement of Intent, Recall Petition(s), or any documents relating to a recall petition filed against her in the month of July. She has a copy of a one-page Statement of Intent to Circulate Recall Petition dated May 2, 2024, and the first page of a Campaign Finance Committee/Conduit Registration Statement (CF-1) that is undated. But

Chairperson Galonski is unable to evaluate any current recall petition because she has not yet been furnished with a copy.

As you and I discussed by phone, you intend to scan the recall petition tonight and provide a copy of the scanned recall petition (I note that each page that contains signatures states "Recall Petition" at the top) to Chairperson Galonski. Chairperson Galonski further requests that you scan and provide to her copies of any other documents that relate to the recall petition, including but not limited to any Statement of Intent to Circulate Recall Petition filed <u>after</u> May 2, 2024, and a full copy of any Campaign Finance Committee/Conduit Registration Statement filed by the Petitioner. Please confirm that Chairperson Galonski will have ten days from the date on which you provide her with a copy of the recall petition to file a challenge under Wis. Stat. § 9.10(4)(1), and that the five-day time period for the Petitioner to file a rebuttal, if any, and the ensuing two-day time period for Chairperson Galonski to file a reply, if any, would run from the date on which Chairperson Galonski files a challenge, if any.

Thank you again for taking the time to speak with me today. I appreciate your assistance with this matter. Best regards,

## Doug Poland



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July 30, 2024

Attorney Douglas M. Poland Stafford Rosenbaum LLP 222 West Washington Avenue, Suite 900 Madison, Wisconsin 53701-1784

Re: Recall Petition Against Town Board Chair

Dear Attorney Poland:

I received your email messages regarding the above-noted matter. You asked me to provide addition al time for you to raise a challenge to the petition. I am writing you today to inform you that I will make my decision on the validity of the petition pursuant to applicable laws. I received the recall petition on July 15, 2024, and have 31-days to issue my final determination of sufficiency or insufficiency. I am neither granting nor denying your request for addition al time, but I am reserving the right to consider whatever information you may provide on or before August 5, 2024. If you do so, I reserve the right to allow the petitioner to respond, and if time allows, for you to reply.

If you should have any questions or concerns regarding this matter, please do not hesitate to contact me.

Very truly yours,

TOWN OF WESTFIELD

Bunda Peterson

**Brenda Petersen** 

EJL/BTC/em Cc: Eric Larson, Town Attorney Sharon Galonski, Town Chair StaffordRosenbaumue

Douglas M. Poland

222 West Washington Avenue, Suite 900 P.O. Box 1784 Madison, WI 53701-1784 DPoland@staffordlaw.com 608,259,2663

August 2, 2024

# **BY HAND DELIVERY**

Ms. Brenda Petersen, Clerk Town of Westfield W7703 Ember Ave P.O. Box 157 Westfield, Wisconsin 53964

Re: Verified Challenge of Town Chairperson Sharon L. Galonski to Recall Petition Filed July 15, 2024

We represent Town Chairperson Sharon L. Galonski with respect to the recall petition filed with your office on July 15, 2024. We are in receipt of the petition and the related recall committee registration statement, which was filed on May 31, 2024. Chairperson Galonski received a copy of the recall petition on July 26, 2024, and by your letter of July 30, 2024, we understand that you may consider information that we provide on or before August 5, 2024, allow the petitioner to respond, and allow us to reply. Having now reviewed the recall petition and related documents, we write on behalf of Chairperson Galonski to describe why the effort to initiate a recall election is deficient for multiple reasons.

*First*, the registration statement contains a materially false representation that entirely invalidates the petition. Wisconsin's Ethics Code provides that committee registration statements that are "insufficient as to essential form, information or attestation *shall* be rejected" and are "not effective." Wis. Admin. Code ETH § 6.02(1) (emphasis added). Page two of the registration statement makes clear that the recall committee, registered with the name "Terry L. Johnson," was created to *oppose* a recall effort launched against Chairperson Galonski. The registration statement form, Form CF-1, contains a "Section C: Recall Committees." The registration statement submitted by Terry L. Johnson identifies "Sharon L. Galonski" as the "Name of the Official Subject to Recall" in box C1; identifies the disputed office as "Town of Westfield Chair" in box C2; and in box C3, checks the option that Terry L. Johnson "*Oppose*" (rather than the other available option, "Support") the recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski. Because the Terry L. Johnson Recall Committee registered to "*Oppose*" a recall of Town Chairperson Galonski, yet circulated a recall petition to

#### Madison Office

222 West Washington Avenue P.O. Box 1784 Madison, Wisconsin 53701-1784 608.256.0226 888.655.4752 Fax 608.259.2600 www.staffordlaw.com

#### **Milwaukee Office**

1200 North Mayfair Road Suite 430 Milwaukee, Wisconsin 53226 3282 414.982,2850 888.655.4752 Fax 414.982,2889 www.staffordlaw.com

support the recall of Town Chairperson Galonski, the registration statement was falsely certified, rendering the committee registration itself invalid.

State law prohibits the circulation of a recall petition before registration of a recall committee is completed. Wis. Stat. § 9.10(2)(d). Here, a committee to support a recall effort was not properly registered before the recall petition was circulated for signature, signatures were obtained, and the recall petition was filed. It follows that the recall petition is invalid and must be rejected.

Second, due to deficiencies in the certifications of the circulator, combined with deficiencies in individual signatures, the petition fails to supply the statutorily required number of elector signatures. A recall petition must "be signed by electors equal to at least 25 percent of the vote cast for the office of governor at the last election within the same district or territory as that of the officeholder being recalled." Wis. Stat. § 9.10(1)(b). It is our understanding that the signatures (and correct address information) of one hundred ten (110) eligible Town of Westfield electors must appear on the recall petition for the recall elector signatures on the recall petition fail to comply with the statutory requirements and, therefore, may not be counted. Consequently, the number of valid individual signatures on the petition—51—is well below the 110-signature threshold necessary for the recall election to proceed. The recall petition must be rejected.

A. Certifications of circulator. Only qualified electors of the Town of Westfield may serve as circulators of the recall petition. See Wis. Stat. §§ 9.10(1)(a), (2)(em)2. One of the requirements to be a qualified elector is that a circulator must have been a resident of the Town of Westfield for at least 28 consecutive days before the next election. Wis. Stat. § 6.02. Accordingly, "[n]o signature may be counted when the residency of the circulator cannot be determined by the information given on the [recall petition]." Wis. Admin. Code EL § 2.05(14); Wis. Admin. Code EL § 2.11 (providing that the standards for challenges to nomination papers apply equally to recall petitions); see also Wis. Stat. § 8.40(3). To that end, the instructions in parentheses under the "I reside at" line of the Certification of Circulator on the recall petition state that the circulator should provide their municipality of residence, not their mailing address.

Additionally, a valid certification requires that the circulator—not another individual—state "his or her residence . . . at the bottom of each separate sheet of each petition." Wis. Stat.  $\S$  8.40(2).

The following certifications of circulators of the recall petitions at issue are deficient either because (a) the residency of the circulator cannot be determined by the information provided or (b) the circulator did not *themselves* complete the certification:

1. On pages 1 and 2, in response to the requirement that he provide his "residence," including "number, street, and municipality," circulator Gary J. Schaeffer certifies that he resides at the following address: N6360 County Rd. A, Oxford, WI, 53952. By contrast, on page 20, line 3, Gary Schaeffer certifies the Town of Westfield as his municipality of residence. Mr. Schaeffer *cannot* reside in both the municipality of Oxford *and* the municipality of Westfield. Given this inconsistency, the lawful municipality of residence of circulator Schaeffer for voting eligibility purposes cannot be determined by the address he provided on the recall petition, and consequently, the signatures on both pages must be stricken as having been obtained by the circulator's false certification of his residence. Combined, pages 1 and 2 contain twenty (20) signatures that may not be counted toward the minimum number of signatures necessary to certify the recall.

2. On page 3, circulator Gary J. Schaeffer certifies that he resides at the following address: N6363 County Rd. A, Oxford, WI, 53952. Because this is a non-existent address, the residency of the circulator cannot be determined. Page 3 contains ten (10) signatures that may not be counted toward the minimum number of signatures necessary to certify the recall.

3. On pages 7 and 8, circulator Virginia Dagel certifies that she resides at the following address: W8111 Eagle Dr., Oxford, WI. Individuals with Oxford addresses may or may not be residents of the Town of Westfield for voting purposes. The residency of circulator Dagel therefore cannot be determined by the address she provides on the recall petition, and the signatures of electors that appear on pages 7 and 8 cannot be counted toward the minimum number of signatures necessary to certify the recall. Page 7 contains eight (8) signatures, and page 8 contains ten (10); combined, pages 7 and 8 contain eighteen (18) signatures that must be stricken.

4. On page 13, circulator Gary J. Schaeffer certifies that he resides at the following address: N6360 County Rd. A, Oxford, WI, 53952. Additionally, on page 20, line 3, as shown above, Gary Schaeffer certifies the Town of Westfield as his municipality of residence. Given this inconsistency, the residency of circulator Schaeffer cannot be determined by the address listed on the recall petition. Page 13 contains two (2) signatures, neither of which may be counted toward the minimum number of signatures necessary to certify the recall.

5. On page 14, circulator Tim Marotz certifies that he resides at the following address: N6405 County J. Mr. Marotz fails to provide his municipality of residence, a required element of the circulator residence. Based on this incomplete address, it is not possible to determine the residency of circulator Marotz, and the elector signatures that

appear on page 14 must be stricken and cannot be counted toward the minimum number of signatures required to certify the recall. Page 14 contains nine (9) signatures.

6. On page 18, circulator James M. Johnson did not *himself* complete the certification as required by Wis. Stat. § 8.40—he only signed the certification, which quite clearly was completed by another person. A comparison of the handwriting of James Johnson, on line 1 of page 18, with the handwriting in the certification clearly reveals that another person completed the certification. Moreover, the handwriting in the certification is a close match to that of Terry L. Johnson on line 5 of page 18. The signatures on Page 18 must be stricken and cannot be counted toward the minimum number of signatures required to certify the recall. Page 18 contains seven (7) signatures.

7. On page 19, circulator Richard F. Murray certifies that he resides at the following address: N6498 Cty Rd M. Mr. Murray fails to provide his municipality of residence as required. Based on this incomplete address, it is not possible to determine the residency of circulator Murray. Page 19 contains nine (9) signatures, all of which must be stricken and cannot be counted toward the minimum number of required signatures.

As explained above, if a certification of circulator is defective, no signature on that page may be counted. The improper, false, incomplete, or otherwise deficient certifications of circulators identified above appear on recall petitions that include seventy-five (75) signatures of electors. Those signatures may not be counted.

**B. Individual Signatures.** In addition to the 75 individual signatures that may not be counted for the reasons identified above, the signatures of another 25 electors on the recall petitions contain a variety of defects and cannot be counted. *See* Wis. Stat. § 9.10 (2)(e); Wis. Admin. Code EL § 2.05; Wis. Stat. § 8.40. The ground for each challenge is explained below.

1. Page 1, line 3. The printed last name of the elector is illegible. It is impossible to determine if the person is an elector of the Town of Westfield. See Wis. Stat. §§ 8.40(1), (2).

2. Page 1, line 6. A comparison of the signature and printed name with the address, municipality, and date reveals that another person completed the petition on behalf of Ricki Ritt. Ricki Ritt is a disabled elector who, to the best of Ms. Galonski's knowledge, did not specifically authorize the signing on his behalf. *See* Wis. Admin. Code EL § 2.05(8).

3. Page 1, lines 8-9. A comparison of the handwriting used to supply the municipality of residence and date on both of these entries reveals that the same person completed the petition on behalf of both Thomas Ems and Dominique Ems. Another person may not complete a petition for a signatory. Wis. Admin. Code EL § 2.05(9).

4. Page 2, line 5. From the information available to Ms. Galonski, despite his use of a Town of Westfield mailing address, Leslie Ross resides in the Town of Newton for voting purposes and is not an eligible voter in the Town of Westfield. See Wis. Stat. § 9.10(e)(5); Wis. Stat. § 6.02, 6.10.

5. Page 2, lines 9 and 10 (only one individual signature challenged). Other than the signature, the handwriting is identical on both lines. A person may not sign a petition for his or her spouse. Wis. Admin. Code EL 2.05(9).

6. Page 3, lines 3 and 4 (only one individual signature challenged). Other than the signature, the handwriting is identical on both lines. A person may not sign a petition for his or her spouse. Wis. Admin. Code EL § 2.05(9).

7. Page 3, line 10. Jacob Wilson identifies the Town of Oxford as his municipality of residence. The signature of a resident of Oxford for voting purposes may not be counted in the recall of an elective official from the Town of Westfield. Wis. Stat. § 9.10(e)(5).

8. Page 4, line 6. From the information available to Ms. Galonski, despite her use of a Westfield mailing address, Shanna Weir resides in the Town of Harris for voting purposes and is not an eligible voter in the Town of Westfield. *See* Wis. Stat. § 9.10(e)(5); Wis. Stat. § 6.02, 6.10.

9. Page 7, line 4. This ineligible signature makes it impossible to determine whether Tom Schwarz signed the recall petition. See Wis. Stat. §§ 8.40(1), (2).

10. Page 11, lines 4 and 6. From the information available to Ms. Galonski, as of April 2023, Edward and Marlene Crissip no longer live at the stated Town of Westfield address, and are not eligible to vote in the Town of Westfield. A signature may not be counted if the individual is not a resident of the Town of Westfield for voting purposes. Wis. Stat. § 9.10(e)(5); Wis. Stat. §§ 6.02, 6.10.

11. Page 11, lines 7 and 8. From the information available to Ms. Galonski, Greg and Michelle Lewis are not eligible voters in the Town of Westfield. See Wis. Stat. 8.40(1).

12. Page 12, line 2. From the information available to Ms. Galonski, Logan Mills is not an eligible voter in the Town of Westfield. *See* Wis. Stat. § 8.40(1).

13. Page 12, line 3. The printed last name of the elector is illegible. It is impossible to determine if the person is an eligible elector of the Town of Westfield. See Wis. Stat.

14. Page 12, lines 9 and 10. From the information available to Ms. Galonski, despite their use of a Town of Westfield address, Shania Bowers and Lane Grude are not eligible voters in the Town of Westfield. *See* Wis. Stat.  $\S$  8.40(1).

15. Page 13, line 2. To Ms. Galonski's knowledge, Ruth Mui cannot read and write and does not have the competency to understand and sign a recall petition. *See* Wis. Admin. Code EL § 2.05(15)(e); Wis. Stat. § 6.03(1)(a).

16. Page 14, line 2. From the information available to Ms. Galonski, despite his use of a Town of Westfield address, Jose Gonzalez is not a resident of the Town of Westfield for voting purposes. See Wis. Stat. § 8.40(1). In addition, from a comparison of the handwritten dates on lines 2 and 3, the handwriting is identical on both lines. It appears that the same person completed the petition for signatories on both lines 2 and 3. A person may not complete a petition for another signatory. Wis. Admin. Code EL § 2.05(9).

17. Page 14, line 9. From the information available to Ms. Galonski, despite his use of a Town of Westfield address, Richard Wilderman does not appear to be an eligible elector in the Town of Westfield. See Wis. Stat.  $\S$  8.40(1).

18. Page 15, line 5. The printed name and address are illegible. It is impossible to determine if the person is an elector of the Town of Westfield. See Wis. Stat. §§ 8.40(1), (2).

19. Page 16, line 2. This ineligible signature makes it impossible to determine whether Lucas Nelson signed the recall petition. See Wis. Stat. \$ 8.40(1), (2).

20. Page 19, lines 9 and 10. Someone crossed out the municipality of Oxford and replaced it with Westfield. Neither Keith nor Christine Vandervelde initialed the change (see, for example, page 12, line 8, for a properly initialed change). Moreover, the handwriting appears different than that of either Keith or Christine Vandervelde. The signer must be the one to state his or her municipality, not the circulator. *See* Wis. Stat. §§ 8.40(1).

21. Page 20, lines 1 and 2. The name "David Schaefer" with the same address appears twice, in both lines 1 and 2. Either the same person signed twice, or there are two separate electors named "David Schaefer" living at the same address who have not supplied their full names to distinguish one from the other. Either way, at least one, if not both, signatures should not be counted because the information provided does not establish that both are eligible voters in the Town of Westfield. *See* Wis. Stat. § 8.40(1).

In sum, at least twenty-five (25) individual signatures are insufficient under the statutory requirements and may not be counted.

Together, the challenged certifications of circulator (75 signatures in all) and the challenged individual signatures (25) are enough to bring the petition, which contains one hundred fifty-one (151) signatures, well below the twenty-five percent (25%) threshold of one hundred ten (110) signatures. When the 100 invalid signatures are subtracted from the total number of signatures (151), the remaining number of valid signatures (51) is far less than necessary to certify a recall election.

Finally, Chairperson Galonski has been directly informed by eligible electors in the Town of Westfield of irregularities in the signature collection process for the recall that require further investigation by the Town Clerk and the Town's outside counsel. For example, Chairperson Galonski was told by an elector that they were provided with false information when being solicited to sign the recall petition, to wit: that there is no currently serving Town Chairperson Galonski also was told by an elector that they were approached by someone other than a circulator of a recall petition and asked to sign the recall petition, which they refused to do. Consequently, it appears that signatures of electors were solicited by people other than those who signed as circulators. Again, Chairperson Galonski requests that any such irregularities be investigated and, if found to be true, that the recall petition be rejected.

In conclusion, the recall petition was deficient from its inception because Terry L. Johnson formed a committee to *oppose* the recall of Sharon L. Galonski. Additionally, the defective certifications of circulator and individual signatures bring the number of valid signed electors to just 51 eligible voters, well below the twenty-five percent (25%) threshold of 110 signatures. For the forgoing reasons, we respectfully request that you reject the petition and refuse to schedule a recall election.

Respectfully submitted,

STAFFORD ROSENBAUM LLP

Douglas M. Poland Stephen Goettsche

cc: Sharon L. Galonski, Town Chairperson (by email) Eric Larson (by email) Terry L. Johnson (by U.S. Mail) 8/2/2024 Page 9

# VERIFICATION

I, Sharon L. Galonski, being first duly sworn upon oath, state that I personally read the above Verified Challenge of Town Chairperson Sharon L. Galonski and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.

Signed in <u>WestField</u>, Wisconsin this 2nd day of August, 2024. Marquette County Sharon L. Galonski

Sworn and subscribed to me this 2nd day of August, 2024.

Notary Public, State of Wisconsin

My commission expires: 3 77 2026

ALEXIS SHANKLIN NOTARY PUBLIC STATE OF WISCONSIN

# August 8, 2024 on August 8, 2024

Brenda Petersen, Clerk Town of Westfield W7703 Ember Ave P.O. Box 157 Westfield, Wisconsin 53964

Re: Petitioner response to Attorney Poland letter dated August 2,2024 regarding recall challenge of Town Chairperson Sharon L. Galonski

As provided in WI Stats 9.10(4)(a), when the petition was filed on July 15, 2024, the challenger had the opportunity to file a written challenge within ten days, being July 26, 2024. Since the August 2, 2024, challenge letter was received after the deadline, the challenge should not be valid, and the petition should be certified. However, we will respond to set the record straight for the qualified electors requesting the recall.

**First,** when I checked the box to oppose the recall, it was done in error. I have corrected the page and have it attached to this response. The recall petition should be processed in the spirit of the law. Failure to do so is in essence telling the electors that their opinion doesn't matter. Mistakes were made but the law allows for correction. The following response will establish that we have the required 110 signatures.

# A. Certification of circulators.

The recall circulators were very careful in collecting signatures from qualified Town of Westfield electors by visiting their homes to validate their age and residence. They were visiting their neighbors and had firsthand experience with where the electors lived.

Items 1-4 - Errors were made when circulators used their 'mailing address' instead of their 'municipal address'. As permitted by WI Administrative Rule EL Ch 2.05(4) and EL Ch 2.09 (1), circulators can make corrections for these errors. The corrections have been made to the petition and the affected pages are attached to this response. Also, see the attached affidavit from Gary Schaeffer for further explanation. The challenged 42 signatures should be valid.

Item 5 - Tim Marotz fixed this error. The corrected page is attached to this response. Nine signatures are now considered valid.

Item 6 – Wis statutes require the circulator to <u>sign</u> the petition and provide other information in legible form. It is common practice to have someone manually provide critical information on a form to ensure that the <u>other information is legible</u> and then the appropriate person can just sign the form. This is what J Johnson did. However, J Johnson added his own statement information. The revised page is attached to this response. The challenged seven signatures are now valid.

Item 7 – Richard Murray fixed this error. The corrected page is attached to this response. Nine signatures are now valid.

In conclusion 75 signatures are again valid.

B. Individual signatures

Per WI Stats 9.10 (1) (g) recall petition information is assumed to be valid unless the challenger proves otherwise. Overall, the challenger made statements but failed to provide the necessary proof. We need to have affidavits or other written documentation to support the statements made by Sharon.

All recall circulators went to elector homes to obtain signatures. This procedure allowed circulators to verify residence before signing the petition. Sharon may have other information but failed to provide the 'affidavit or other supporting evidence demonstrating a failure to comply with statutory requirements' as required by WI Stats 9.10(h). Previous voting records are irrelevant since people can move. Also, other information that cannot be verified by petitioner is not valid for challenging the signature. The statements in the attorney letter for items 4, 8,10, 11, 12, 14, 16 and 17 have the effect of hearsay and the related signatures are valid without the required affidavit or other supporting document. The 11 signatures are again valid.

Wis statutes require the elector to <u>sign</u> the petition. The other provided information needs to be in legible form. It is common practice to have someone manually provide critical information on a form to ensure that the <u>other information is legible</u> and then the appropriate person can just sign the form. This is what happened in items 2, 3, 5 and 6. These four signatures should be considered valid.

Electors used mailing addresses instead of municipal addresses when signing the petition. The recall circulator fixed the error as permitted by WI Administrative Rule EL Ch 2.05(4) and EL Ch 2.09(1). For items 7 and 20 the circulator has fixed the error. The corrected pages are attached to this response. Two signatures are again valid.

Circulators witnessed elector signature and have now made a statement on the recall petition to confirm that they witnessed signatures. The affected recall pages for Items 9 and 19 are attached to this response. Two signatures are again valid.

For items 1 and 13 the circulator reprinted the elector's name to assist you in reading the name. The recall page is attached to this response. These signatures are valid.

Item 15 – This derogatory statement has no evidence to support the statement. Questioning the competence of an individual requires the challenger to prove the individual has 'been adjudicated incompetent in this state.' See WI Stats 6.03 (3). Since this elector signed the petition with the requested other information and there is no proof of incompetency, the signature is valid.

The circulator made a statement to attest to the information on Item 18. The recall page is attached to this response. This signature is valid.

For item 21, a husband and a wife signed the recall petition. Since we have the required signatures, we determined that we will not make any effort to get the signature clarified.

In conclusion, the circulators collected 150 valid signatures which includes the 110 signatures required to request a recall election. Ms. Galonski failed in her effort to challenge the petition. We need to listen to the many people who signed the petition and the others whose signatures were not considered because the time clock expired. The recall election should be scheduled immediately. Or better yet, the Town Chairperson should recognize citizen dissatisfaction and resign.

I expect you to share this response with Ms. Galonski. Also, I will contact you after the two-day rebuttal period required by WI Stats 9.10(4)(a). At that time, I expect your decision regarding your next steps to determine sufficiency of this recall petition. My understanding is your deadline to certify recall sufficiency is August 15,2024.

Sincerely,

Terry Johnson

x 2 P

# August 8, 2024

Brenda Petersen, Cierk Town of Westfield W7703 Ember Ave P.O. Box 157 Westfield, Wisconsin 53964

> Re: Petitioner response to Attorney Poland letter dated August 2,2024 regarding recall challenge of Town Chairperson Sharon L. Gelonski

As provided in WI Stats 9.10(4)(a), when the petition was filed on July 15, 2024, the challenger had the opportunity to file a written challenge within ten days, being July 26, 2024. Since the August 2, 2024, challenge letter was received after the deadline, the challenge should not be valid, and the petition should be certified. However, we will respond to set the record straight for the qualified electors requesting the recall.

First, when I checked the box to oppose the recall, it was done in error. I have corrected the page and have it attached to this response. The recall petition should be processed in the spirit of the law. Failure to do so is in essence telling the electors that their opinion doesn't matter. Mistakes were made but the law allows for correction. The following response will establish that we have the required 110 signatures.

A. Certification of circulators.

The recall circulators were very careful in collecting signatures from qualified Town of Westfield electors by visiting their homes to validate their age and residence. They were visiting their neighbors and had firsthand experience with where the electors lived.

Items 1-4 - Errors were made when circulators used their 'mailing address' instead of their 'municipal address'. As permitted by WI Administrative Rule EL Ch 2.05(4) and EL Ch 2.09 (1), circulators can make corrections for these errors. The corrections have been made to the petition and the affected pages are attached to this response. Also, see the attached affidavit from Gary Schaeffer for further explanation. The challenged 42 signatures should be valid.

Item 5 - Tim Marotz fixed this error. The corrected page is attached to this response. Nine signatures are now considered valid.

Item 6 – Wis statutes require the circulator to <u>sign</u> the petition and provide other information in legible form. It is common practice to have someone manually provide critical information on a form to ensure that the <u>other</u> <u>information is legible</u> and then the appropriate person can just sign the form. This is what J Johnson did. However, J Johnson added his own statement information. The revised page is attached to this response. The challenged seven signatures are now valid.

Item 7 – Richard Murray fixed this error. The corrected page is attached to this response. Nine signatures are now valid.

In conclusion 75 signatures are again valid.

B. Individual signatures

Per WI Stats 9.10 (1) (g) recall petition information is assumed to be valid unless the challenger proves otherwise. Overall, the challenger made statements but failed to provide the necessary proof. We need to have affidavits or other written documentation to support the statements made by Sharon.

All recall circulators went to elector homes to obtain signatures. This procedure allowed circulators to verify residence before signing the petition. Sharon may have other information but failed to provide the 'affidavit or other

supporting evidence demonstrating a failure to comply with statutory requirements' as required by WI Stats 9.10(h). Previous voting records are irrelevant since people can move. Also, other information that cannot be verified by petitioner is not valid for challenging the signature. The statements in the attorney letter for items 4, 8,10, 11, 12, 14, 16 and 17 have the effect of hearsay and the related signatures are valid without the required affidavit or other supporting document. The 11 signatures are again valid.

Wis statutes require the elector to <u>sign</u> the petition. The other provided information needs to be in legible form. It is common practice to have someone manually provide critical information on a form to ensure that the <u>other</u> <u>information is legible</u> and then the appropriate person can just sign the form. This is what happened in items 2, 3, 5 and 6. These four signatures should be considered valid.

Electors used mailing addresses instead of municipal addresses when signing the petition. The recall circulator fixed the error as permitted by WI Administrative Rule EL Ch 2.05(4) and EL Ch 2.09(1). For items 7 and 20 the circulator has fixed the error. The corrected pages are attached to this response. Two signatures are again valid.

Circulators witnessed elector signature and have now made a statement on the recall petition to confirm that they witnessed signatures. The affected recall pages for Items 9 and 19 are attached to this response. Two signatures are again valid.

For items 1 and 13 the circulator reprinted the elector's name to assist you in reading the name. The recall page is attached to this response. These signatures are valid.

Item 15 – This derogatory statement has no evidence to support the statement. Questioning the competence of an individual requires the challenger to prove the individual has 'been adjudicated incompetent in this state.' See WI Stats 6.03 (3). Since this elector signed the petition with the requested other information and there is no proof of incompetency, the signature is valid.

The circulator made a statement to attest to the information on Item 18. The recall page is attached to this response. This signature is valid.

For item 21, a husband and a wife signed the recall petition. Since we have the required signatures, we determined that we will not make any effort to get the signature clarified.

In conclusion, the circulators collected 150 valid signatures which includes the 110 signatures required to request a recall election. Ms. Galonski failed in her effort to challenge the petition. We need to listen to the many people who signed the petition and the others whose signatures were not considered because the time clock expired. The recall election should be scheduled immediately. Or better yet, the Town Chairperson should recognize citizen dissatisfaction and resign.

I expect you to share this response with Ms. Galonski. Also, I will contact you after the two-day rebuttal period required by WI Stats 9.10(4)(a). At that time, I expect your decision regarding your next steps to determine sufficiency of this recall petition. My understanding is your deadline to certify recall sufficiency is August 15,2024.

Sincerely,

Terry Johnson

CAMPAIGN FINANCE COMMITTEE/CONDUIT REGISTRATION STATEMENT

STATE OF WISCONSIN

Note: An amended registration statement must be filed within 10 days of any changes in information.

1. Is this an Amendment?	No	OYes If ye	s, please enter	your comr	nittee numbe	r:	Committe	e Number	
SECTION A: GENERAL							-		
A1. Committee/Conduit Name				A7 Pagiet-	ant Type (Choos	0			
Terry L. Johnson				O Candie	date OReferer	ndum 🔎	Recall	Conduit	
A3. Email		A4. Phone		O Politic	al Action (PAC		enender	it Expenditure (IEC	
kmjohnson@maqs.n	et	(608) 547	-9689	O Politic	al Party OLe	gislative	Campoi	m Committee	
A5. Mailing Address		1,000,047	A6. City						
N5656 County Road	А		Westfield			WA7.	. State	A8. Zip	
Depository Institution Information			vvcsticiu					53964	
A9. Institution Name		A10. Street Add	ress	4	11. City		A12. S	tate   A13. Zip	
BMO Bank		203 Main			Vestfield		WI	53964	
Treasurer/Administrator Informatio	m				- Couloid			00904	
A14. Name	1		A15. Email			A16. Phon	10 Sec. 54		
N/A									
A17. Mailing Address	-		A18. City			414	9. State	420 25-	
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Other Officers (Optional)		· · · · · · · · · · · · · · · · · · ·	J						
Independent and local non-partisan ca	ndidates:	Indicate by an asteris	sk (*) which officers	are authorized	d to fill a vacancy	in nomina	ution due	to death of candidate	
A21. Name	A22. T		A23. Email			A24. P		and the second	
N/A									
A25. Name	A26. T	tie	A27. Email			A28. P	28. Phone		
N/A									
amount of more than \$2,500 in a calen reports. For committees registering wi dar year in which it is granted. Those exempt must renew each year. Local c contributions, making disbursements, \$2,500 in a calendar year may claim This exemption applies until the locu threshold, amends its registration, or is SECTION B: CANDIDA B1. Office Sought (include District/B	ith the Co committee candidate or incur an exemp al candid s terminate	mmission, exempt sta s registering with the committees that do n ring obligations in tion from filing camp ate committee excee ed.	atus is effective only e Commission that w not anticipate accepti an aggregate amou paign finance report.	for the calen- vant to remain ing or making unt exceeding int exceeding	O No, this	registrant	t is not e	ible for exemption ligible for exempti	
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Candidate Information B4. Name			B5. Email			D ( 12			
N/A			DD. Email			B6. Phone			
			De Cla						
B7. Mailing Address			B8. City			B9.	. State	B10. Zip	
Second Candidate Committee An individual who holds a state or loc committee to pursue another state or l	local office			O Yes, th O No, th	nis is my only ca is is my second	andidate o	committ	mmittee in Wiscons ee in Wisconsin. attee in Wisconsin.	
B12. Other Office Held or Sought (i	include D	strict Branch) On	complete B12 (fyov	responded "N	io " 10 B11				
N/A									

CAMPAIGN FINANCE COMMITTEE/CONDUIT REGISTRATION STATES



STATE OF WISCONSIN

ote: An amended registration statement must be filed within 10 days of any changes in inform

SECTION C: RECALL COMMITTE C1. Name of Official Subject to Recall Sharon L. Galonski	C2. Office of Officia	al Subject to Recall /estfield Chair	C3. Support Oppose
SECTION D. PAC. IEC. AND CON	DUITS		
D1. Sponsoring Organization N/A	D2. Email	D3. Phone	
D4. Mailing Address	D5. City	D	6. State D7. Zip
SECTION E: POLITICAL PARTY	& LEGISLATIVE CAMPA	IGN COMMITTEES	
E1. Political Party or Legislative Campaign Comm N/A	ittee	E2. Does the Party of Fund? ON	or <b>Committee have a Segregated</b>
Segregated Fund Depository Institution Informatio	n (if applicable)		
E3. Institution Name E4	4. Street Address	E5. City	E6. State E7. Zip
SECTION F: REFERENDA COMM	4ITTEES		
F1. Nature of Referendum (if applicable) N/A			F2. OSupport Oppose
SECTION G: CERTIFICATION			
Accurate Information I certify that I am an authorized representative is true, correct, and complete.	of the registrant and that to my know	ledge all of the information con	tained within this registration
<b>Timely Amendments</b> I am aware of the requirement to amend this re requirement to register within 10 days of meetin	egistration statement within 10 days of the requirements to register under	of any change of information co Chapter 11 of Wisconsin Statut	ntained within, as well as the es.
Records Retention I acknowledge the duty to maintain records in a which this registrant participates. If registering manner for the three-year period prescribed in :	an organized and legible manner for a candidate committee, I acknowled s.11.0201(4).	three years from the date of the ge the duty to maintain records	most recent election in in an organized and legible
Ongoing Compliance This registrant shall continue to maintain its re Statutes.	egistration and comply with all appli	icable reporting requirements u	nder Chapter 11 of Wisconsin
Tressurer/Administrator	a second s		<u></u>
G1. Printed Name	G2. Signature		G3. Date
Terry L.Johnson	Serry L. John	son	5/31/24
Candidate (if applicable)			
G4. Printed Name	G5. Signature		G6. Date

# AFFIDAVIT

This is a sworn statement in response to the August 2,2024 letter from attorney Douglas Poland for the challenge from Town Chairperson Sharon Galonski recall.

I, Gary Schaeffer, went to individual homes to obtain signatures on the recall petition. This personal visit allowed me to verify the age and residence of all electors signing the petition. All the electors on pages circulated by me live in the Town of Westfield. Errors were made on the recall petition when the 'mailing address' was used instead of the 'municipal address'. All the signatures for County Hwy A from N5521 to N6495 are in the Town of Westfield but may have Oxford as the post office mailing address.

As allowed by WI Administrative Code EL Ch 2.05 (4) and EL Ch 2.09 (1), I am correcting the address errors on the recall petition. The corrections are necessary to remove false information in the petition.

Signed in Marquette County\_\_\_\_\_ Wisconsin this \_\_\_\_\_ day of August 2024. Gary Schaeffer Sworn and subscribed to me this Mh day of August 2024 a Showth Notary Public, State of Wisconsin

My commission expires: 3-20-2028

22 **RECALL PETITION** of 1 (); Brenda Paterson, Clerk of Triwin of Westfield We, the undersigned qualified electors of the Town of Westheid (official with whom normination papers or declaration of candidacy for the office is filed) (jurisdiction or district of officeholder) S petition for the recall of Sharon L Galonski, Chairpurson of Fown of Westleid from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes. Page (name of officeholder to be recalled and office) STATEMENT OF REASON FOR RECALL (The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officebolder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.) ບົ Sharon was not truthful during her election campaign or while in office. Sharon initiated the process of termination of the Town of Westfield Fire Department without contacting the town board first. Sharon ignored all citizen comment regarding termination of the town fre dept. Sharon contacting the town board first. Exhibit acts on helval of the Town Board without authonzation. Sharon exceeded Town of Westfield budget authority in spending. Sharon overspent tax payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon donied cetrain board members access to lown prop THE MUNICIPALITY USED FOR MAILING PURPOSES, WHEN DIFFERENT THAN MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED. STREET & NUMBER OR RURAL ROUTE SIGNATURES OF ELECTORS MUNICIPALITY OF RESIDENCE. PRINTED NAME OF ELECTORS DATE OF Rural address must also include box or fire no. Indicate Town, City, or Village SIGNING Liown LI Villago 1)6885 3m LICAY Town ve LL City Town LI Villago U City Town 11 Village LICity (+Thwo LI Villayu LICHY ---¥⊁ LI Village LI City Jer fown ovenzano U Villege LICity KTOWN LI Village +×× homi EMI LICity JT TOWN Li Village €¥¥ LICity Linno LI Villag LICE  $\mathcal{H}$ Certification of Circulator GARYJJ. WESTFIELD CHAEFFER certify: I reside at N6360 COUNTY KOAD exerce OF 395 thattic of circulator (cutulator's actidence - aschule number, street, and municipality)

I further certify I an either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am aware that falsifying this certification is punishable under § 12,13(3)(n). Wis, Stats.

22/24 11ws) de (signature of circle

Page No.

ET = 170 (Rev 2014-69) The information on this form is required by Wis Stats §§ 840 and 910 This form is prescribed by the Wiscons Theorem Commission [P.O. Box 7984, Madison, WI 53707-7984 [608-266-8005] web: http://televit.org/web/ http://televit.org/web/

\* PRINTED LAST NAME IS MEYER # \*\* I WITNESSED RICKI RITT SIGN & PRINT HIS NAME HA \*\*\* I WITNESSED BOTH ELECTORS PRINT & SIGN THEIR NAMES HA

22 **RECALL PETITION** of (C): Brenda Peterson, Clerk of Hown of Westflokt We, the undersigned qualified electors of the Town of Weathout (juristiction or district of officeholder) (official with whom nomination papers or declaintion of candidacy for the office is filed) 9 from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes. petition for the receil of Sharon I. Galonski, Chakpurson of Town of Westfield Page (name of officeholder to be recalled and office). STATEMENT OF REASON FOR RECALL (The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the official responsibilitie legislative, judicial, or county officials.) Sharon was not truthful during her election campaign or while in office. Sharon initiated the process of termination of the Town of Westfield Fire Department without contacting the fown board first. Sharon ignored all citizen comment regarding termination of the town fire dept. Sharon consistantly acts on behalf of the Town Board without authorization. Sharon exceeded Town of Westfield budget authority in spending. Sharon everspent tax payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property and the payers funds in attorney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county attorney exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county atterney exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county atterney fees for out of county atterney exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county atterney. The number of exceeding budgeted amount. Sharon denied celtain board members access to town property atterney fees for out of county atterney fees for out of county at Town GLORIA J. MENAMARA NG495 CTY ROA U Village DESTFIELD LICity Town RANCIS E. MCRAMAN NG495 CTU ROA U Vileoo WESTFIELD L City Niown Li Villega West FICLD Ci City Town FULL MER NG125 CTH-ROA - 24 LI City Que Town - 8 - 24 \* N6353 Ctv Rd Li Village LICity Flown 353 Ctu Rd NI U Village 6.8.24 LI Cây Town 6-8-24 UMMINGS LI Village A LICity Village 8 KD. LI City Wown 9. ما XX 1981 COUNTY RD E U Village LI City CTOWN ×× COUNTY RAF 6.9 E HONEY W7981 U Vileos YVEII WESTFIEL L) City **Certification of Circulator** 21 FIFTO CHACTFER N6360 COUNTYRd ARY certify: I reside at XFORD W iname of circulaters teneralator's residence - include number street and numericality) I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recal petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her

name 1 know their respective residences given 1 support this recall petition. Tam aware that falsifying this certification is punishable under § 12.13(3)(a). Wis Stuts. 6/17/24 6/7/24

NL-170 (Rev 2019-49) The information on this form is required by Wis Stats 55 8 40 and 9-10. This form is prescribed by the Wisconsin Llections Commission (P.O. Hon 7984, Madison, W7 53707-7984) 608-266-8005 [web http://electicus.th.gev [email elections/(wingot

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I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recal period and personally obtained each of the signatures on this paper 1 know that the signers are electors of the jurisdiction or district represented by the officeholder named in this patitice. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given 1 support this recall petition. I annaware that falsifying this certification is patient under \$12(3)(a), Wis. Stats.

cer P 101 6/21/24 ruca (signature of circulator)

EL-170 (Rev 2019-40) The information on this form is required by Wis State 56. B40 and 9.10. This form is preprinted by the Wiscousin Dections Conversion [P.O. Her 7904, Madison, WI 53707-7904 [608-266-8005 [web" http://the.inou.com/action.com/acti

\* I witnessed Tem Schuarz Signature AD

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		RECALL PETITION	201 - III III III III III III III III III	
Bronda Peterson, Clerk of Town of Wostlield	wpapers or declaration of candidacy for the office is filed)	We, the undersigned qualified ele	CEOFS OF The Town or Westman	rict of officeholder)
tion for the recall of Sharon I. Galowski, Chi		from affice sursuant to Article XIII Sect	ion 12 of the Wisconsin Constitution and §.9.10 o	
tion for the recail of anether chemist, con	(name of officeInider to be recalled and office)	Touronice pursuant to Antole Ant, See	An 12 of the wisconsin constitution and graves	
		STATEMENT OF REASON FOR RECALL		a contracted
	for city, village, town, and school district officials. Th	e reason must be related to the official responsibilities of the officehold	n. No statement of reason is required to initiate the recall of	of stale, congressional,
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name 1 know then respective residences given 1 support this recall petition. I am Guare that falsifying this certification is physicable under [12,13(3)(a), Wis Stats.

TO: Brade Balance Cited and		<b>RECALL PETITION</b>		
TO: Brenda Peterson, Clark of Town of Westfield (official with whom nominal	tion papers or declaration of candidacy for the office is filed)	We, the undersigned qualified e		
etition for the recall of Sharos L. Galonski, G		from office purposet to Article VIII Se	(jurisdiction or distriction of the state of	
	(name of officeholder to be recalled and office)	Irom onice pursuant to Article Alti, See	ction 12 of the Wisconsin Constitution and §.9.10 of	the Wisconsin Statutes.
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a behalf of the Town Board without authorization,	Sharon exceeded Town of Westfield budget authority in sp	MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE STREET & NUMBER OR RURAL ROUTE	ly attorney exceeding budgeted amount. Sharon denied cetrain boa	rd members access to town property
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SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
Tyler Nehm	Tyler Nelson	N5907 2nd Ave	U village Westfield.	7-5-24
som all	Logah Mills	NS779 2nd Ave	U Village WRStfre/6	7-5-24
alle Janles n	Alken Jankerr.	W 8407 Ember Auc	Uviliago GRY Westfield	7-5-24
mpin	MATT NITKA	WBZOSEMBERAVE	U Vilage UESTFIELD	7-5-24
Jusk // dage	Austin Nelson	W8171 Ember Ave	U Vilage Westfield	7-5-24
Dennie pleloon	DENNIS NELSON	W8171 Ember Ave	Uvilage Westfield	7-5-24
Evelone tocan	Eveling Toscani	N5971 2nd Ave	Uvage Ucay Westfield	7.5.24
tank	Borian Gaylord	NGZII Code Cove line	UVago Dxford U25)fn/d	7-5-24
Ser K-	Shania Bowers	NSSZI Cty Rd A	UNAGE Westfield	7-6-24
Juli	Lane Grupe	N5521 Ctx KL A	uvillege westfield	7-6-24
Charles Char	pentier, certify: I	reside at N5971 2nd Ave Ox	ford, Wisconsin (Westfie	b Town)
ther certify I am either a qualified elector of V	Visconsin, or a U.S. citizen, age 18 or older who, if I w	ere a resident of this state, would not be disqualified from voting under	(circulator's residence - include number, size), and numerically er Wis Stat § 6.03. I personally circulated this recall petition au	id personally obtained each of
Brittines on this paper. I know that the signer E. Eknow their respective residences given. F	is are electors of the jurisdiction or district represented	by the offset of the mancel in this period. I know that each person si this certification is punishable under § 12.13(3)(a), Wis Stats.	gned the paper with fall knowledge of its content on the date in	dicated opposite his or her
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(Rev 2014(N) The information on this form is require	ed by Wis Stats §§ 8.40 and 9.10. This form is prescribed by the	Witconsin Elections Commission   P.O. Box 7984, Madison, WI 53707-7984   608-	266-8005 [web http://decificas.wagov] email electrons@wigov	
I witnessed	this signature, an	id I confirm that th	re printed name is All	en Janke S
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the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content or the date indicated opposite his or her name. I know that respective residences given. I support this recall petition. I am aware that falsifying this certification's punishable under § 12.13(3)(a), Wis. Stats. 13

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E1-120 (Rev 2030. (P)) The information on this form is required by Wis Stars \$5.8.40 and 9.10. This form is prescribed by the Wisconsin Elections Commission [P.O. Box 7984, Macfison, WI 51707-7984] [608-266-8005 [seeb: http://tex.iiou.org/actions/02.00]

		RECALL PETITION			
(): Bronda Peterson, Clerk of Township of Westfield (official with whom nomination papers or declaration of candidacy for the office is filed)		ed)			
	next) w	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statute			
ition for the recall of Sharon L. Galooski,	Chairperson of Township of Wesilieku (name of officeholder to be recalled and office).	from other pursuant to Article Arti, seen	ION 12 OF the wisconsiti Constitution and $g_{12}$ to $g_{12}$		
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lin Alit	Tim Marotz	NI6405 County J	U Vilage Westfield	6-22-2	
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Netowats	For Same - (-1) rut	N6265 (+1)	Uviliage Westfield	6-22-20	
Mr Burnet	Michael J Scyma /	NG339 County rough M	Winger Westfreld	10-22-29	
David South	Dain Schultz	NG248 canty Ad M	Wrown Writigge Westfield	6-22-2	
Tampy & spitte	- Toulow Scholts	1249 Sty od th	UVillage U city Nestacld	6-22-21	
Great Sularon	Innerk Sullivan	NO284 Cty M	UVIAGO West-Cield	7-8-2	
Roll Soul My	BOBERT Sullivan	N 62 86 alt M	Willinge Westffield	1-8:24	
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her certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of flux state, wow the signatures on this paper, I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I support this recall petition. I am aware that falsifying the pertitication is punishable under § 12.13(3)(a), Wis. Stats.

Page No. 14

\* I witness two different people signing this petition T.S.M.

In

7-8-2024

(); blonda Pelerson, Clark of Town of Westbekt		<b>RECALL PETITION</b>		
	um papers or declaration of candidacy for the office is filed)	We, the undersigned qualified elec	Cors of the Town of Westfield (jurisdiction or distri	in of allieshalder)
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	(name of officeholder to be recalled and office)	from office pursuant to Article XIII, Section	on 12 of the Wisconsin Constitution and §.9.10 of	the wisconsin Statutes.
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SIGNATURES OF ELECTORS	PRINTED NAME OF ELECTORS	STREET & NUMBER OR RURAL ROUTE Rural address must also include box or fire no.	MUNICIPALITY OF RESIDENCE Indicate Town, City, or Village	DATE OF SIGNING
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name 1 know their respective residences given 1	support this recall petition I am aware pat falsifying t	y the officeholder named in this petition. Manow that each person signed his certification is punishable under $12.13(3)(a)$ , Wis. Stats.	d the paper with full knowledge of its content on the dole in	licated opposite has or her
0710313034 (date)	May Dam	of eisculator)		Page No 15
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Deccel Honoold a	L USACH CLUBAH	Confirm line 5 15		
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	10): Brenda Peterson, Clerk of Jown of Westiked		<b>RECALL PETITION</b>		
		in popers or declamation of candidacy for the office is filed)			atrict of officeholder)
	petition for the recall of Sharon L. Galousin, C		from office pursuant to Article XIII. Section	on 12 of the Wisconsia Constitution and §.9.10 c	
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*	2 Une ma	Lucas Nelson	W7366 FAUNANT	uvilage Westfield	7-8-24
	Colfeen Vulson	Colleen Nelson	w7366 Fawn Are	ucly west field	7-8-24
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	"Sod Panne	Logan Baumann	N53755thRo	U Village Westfield	7/8/2024
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n	07/08/2024	support this recall petition. I am aware that falsifying t	his certification is punishable under § 12.13(3)(a), Wis. Stats.	с	Page No. 16
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		<b>RECALL PETITION</b>			
(); Brenda Peterson, Clerk of Lown of Westheld		. Wc, the undersigned qualified	electors of the Town of Weathats	A 107 1 84 X	
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mon for the recent of sharone Gaosse, ch	(name of officeholder to be recalled and office).	from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.			
		STATEMENT OF REASON FOR RECALL			
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	while in office. Sharon inflated the process of termination o	the Town of Westfield Fire Department without contacting the town box	ard first. Sharon ignored all citizen comment regarding termination	of the town fire dept. Sharon consist	
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Misson & Long	Durun Slowey	N5331 County RaA	Using WEStfield	6/12/24	
tt - Stenny	AIAN Slower	N5331 Count RDA	Willingo west-field	6/12/24	
Katty Schnell	Kitty Schnell	N5313 5th Rd	Wingo Westfield	6/12/24	
vi Baunan	Lori Baumann	N5313 5th Rd	Uvillage Westfield	6/12/24	
22 al	Distin Schwell	W7040 EMber DR	Li Village Westfield	6/12/24	
gelie Benner	Jackie Benner	w6996 Ember Dr.	Divilege Westfield	4/12/24	
2 Thing	Devon Jurgenberg	46996 Ember Dr.	B Town U Village Westfield U City Westfield	6/12/24	
Frank Trains	Frank Traina	NS67 contylet	Unitage WSTACED	06/12/202	
hadif Baumon	Lacey Baumann	N5460 54 Rd	Uviliago Westfield	07/08/2024	
Lacey Bauma		reside at N5460 5th Rd WestF	ield HI 53964 LB		
(name of circulator) her certify 1 am either a qualified elector of W	Viscousin, or a U.S. citizen, age 18 or older who, if I w	ere a resident of this state, would not be disqualified from voting un	(circulator's residence - include number, street, and managably) der Wis, Stat. 6 6.03. I personally circulated this recall petitie	in and personally obtained each of	

the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this polition. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name 1 know their respective residences given. I support this recall petition 1 an aware that falsifying this certification is punishable under § 12, 13(3)(a), Wis, Stats.

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07/08/2024 (duc) EI -170 (Rev 2019449) The information on this form is required by Wis Stats. §§ 8 40 and 9.10. This form is prescribed by the Waconsin Elections (Commissions ) P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 | web: http://elections.twi.gov/ensil elections@wigov 0710812024

; Benda Paterson, Clock of Town of Wastlield (official with whom nominatio	as papers or declaration of caudidacy for the office is filed)	, We, the undersigned qualified elec		istrict of officeholder)
tion for the recall of Sharon L Galonski, Ch	auporson of Foun of Westlield	from office oursuant to Article XIII. Section	n 12 of the Wisconsin Constitution and §.9.10	
	(nume of office)uilder to be recalled and office)			
shawer, pudicial, or county officials.)	for city, village, town, and school district officials. The	STATEMENT OF REASON FOR RECALL e reason must be related to the official responsibilities of the officeholder (the Town of Westfield Fire Department without contacting the town board firs		
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James M.	Johnson certify: 1 rd		ield. WI *	
er certify I and either a qualified elector of Wi	scousin or a U.S. citizen are 18 or older who if I we	a resident of this state, would get be discussified from voting under W	(currenters in the interview of the structure structure and municipality)	and personally obtained each of
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1-8-24 (date)	James M	Johnson		Page No. 18
Rev 2011-09) "The information on this form is required	by Wis State \$5. 8.40 and 9.10 This form is prescribed by the W	n cricenten) Facençan Flections: Commission (P.O. Hox 7984, Madison, W1 53707-7984 (608-266-8	005 (web http://kkathons.ns.gov   crossi coccisentifyini pre	
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		<b>RECALL PETITION</b>		
Brenda Pelarson, Clerk of Town of Westlight			ctors of the Town of Weathed	
	on papers or declaration of candidacy for the office is filed)		(jurisdiction or distr	
ition for the recall of Sharon L. Galonski, Cl		from office pursuant to Article XIII, Section	on 12 of the Wisconsin Constitution and §.9.10 of	the Wisconsin Statutes.
	(name of officeholder to be recalled and office)	TATEMENT OF BRACON FOR DECIAL		
reason for recall must be stated on petitions		STATEMENT OF REASON FOR RECALL reason must be related to the official responsibilities of the officeholder	No statement of some is serviced to initiate the small of	Conte compressional.
Intive indicial or county officials )				
was not truthful during her election campaign or	while in office. Sharon inflated the process of termination of	the Town of Westfield Fire Department without contacting the town board fir	st. Sharon ignored all citizen comment regarding termination of th	he town fire dept. Sheron consis
ehalf of the Town Board without authorization.	Sharon exceeded Town of Westfield budget authority in spi	anding. Sharon overspent tax payers funds in attorney fees for out of county a	atiomev exceeding budgeted amount. Sharon denied celrain boa	rd members access to lown pr
provident at description of the street, in the	THE R. P. LEWIS CO., LANSING, MICH.		- All and the second standard	
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BICHARd 1-	MU. RRAY VELDE	Certification of Circulator eside at N 1498 CA RUM TOOL	NOF WESTFIELD P. D.	1

I turther certify 1 am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally circulated this recent petition and personally obtained each of To find events of this paper. I know that the signers are electron of a 0.3 circle of the jurisdiction of a 0.3 circle of the second of the state, would not be displanted from volving under with state 0.00.1 personally circle allowed the personal circle of the second of the state of the personally circle allowed the personal circle allowed t

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Douglas M. Poland

222 West Washington Avenue, Suite 900 P.O. Box 1784 Madison, WI 53701-1784 DPoland@staffordlaw.com 608.259.2663

August 10, 2024

#### **BY HAND DELIVERY**

Ms. Brenda Petersen, Clerk Town of Westfield W7703 Ember Ave P.O. Box 157 Westfield, Wisconsin 53964

Re: Verified Reply of Town Chairperson Sharon L. Galonski to Petitioner's Response

Dear Clerk Petersen:

We have received the response to Chairperson Galonski's verified challenge that Petitioner Terry Johnson filed on August 8, 2024, with supporting attachments submitted to the Clerk on the morning of August 9, 2024. Because Chairperson Galonski did not receive the attachments to Ms. Johnson's reply until August 9, 2024, at your express direction, we file this reply no later than August 11, 2024.

As a threshold matter, Ms. Johnson's reply must be rejected because it is not verified as required by Wisconsin law. Pursuant to the rules promulgated by the Wisconsin Elections Commission, the standards for determining challenges to election petitions, including recall petitions, are generally the same standards applied to determining the sufficiency of nomination papers. Wis. Admin. Code § EL 2.11(1). Just as the complaint challenging the sufficiency of nomination papers and the response thereto must be verified (Wis. Admin. Code § 2.07(2)), so too must the complaint challenging a recall petition and the response thereto be verified. Wis. Admin. Code § EL 2.11(1)-(2).

Verification requires that the party filing the response swear upon oath before a notary public or other person authorized to administer oaths that said party personally read the response and the allegations contained therein are true and correct, based on personal knowledge. Wis. Admin. Code § EL 20.03(1), (5). A statement to that effect must be included at the bottom of the response. Here, Terry Johnson signed the response but failed

#### Madison Office

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1200 North Mayfair Road Suite 430 Milwaukee, Wisconsin 53226-3282 414.982.2850 888.655.4752 Fax 414.982.2889 www.staffordlaw.com

Exhibit H, Page 1 of 7

to do so under oath as required by law. It follows thaft the response is deficient and must be rejected.

In addition to that threshold fatal deficiency, substantively, the response lacks merit, and entirely fails to undermine the legal grounds that Chairperson Galonski identified in her August 2nd challenge.

*First*, Chairperson Galonski did not receive a copy of the recall petition until 9:26 PM on July 25, 2024. If the recall petition was filed on July 15, 2024, then Chairperson Galonski should have received a copy of the recall petition within 24 hours, as required by the Wisconsin Election Commission's rules. Wis. Admin. Code El 2.07(2)(a). But this did not happen until July 25—9 days after the purported July 15 filing date. Accordingly, it would be a violation of Chairperson Galonski's due process rights to require that she file on July 26, 2024, just one day after receiving a copy of petition. The ten-day filing period of section 9.10(4)(a) contemplates that the official sought to be recalled has proper notice of the recall, including receipt of a copy of the petition. Town Clerk Petersen properly accepted Chairperson Galonski's challenge, and the verified challenge was timely submitted on August 2, 2024, eight days after receiving a copy of the recall petition.

**Second,** as Chairperson Galonski's August 2nd challenge established, by submitting a materially false certification, Ms. Johnson failed to properly register her recall committee. Despite Ms. Johnson's protests that the recall petition should be processed in the spirit of the law, a challenge to the sufficiency of the recall committee's registration directly disputes the validity of the recall petition. As clearly stated in the verified challenge, Wisconsin law requires that a recall committee be properly registered with the Wisconsin Ethics Commission *before* a recall petition may be circulated for signatures. Wis. Stat. § 9.10(2)(d).

Indeed, the response confirms that the registration statement contained a material misrepresentation. Ms. Johnson states, "when I checked the box to oppose the recall, it was done in error." Resp. at 1. Thus, despite the statutory prohibition in section 9.10(2)(d), the recall committee was not properly registered when Ms. Johnson circulated the recall petition for signatures.

Although Ms. Johnson submitted an amended registration statement with her response to Chairperson Galonski's challenge, an amendment that is submitted *after* all signatures were collected does not remedy the fact that the signatures were collected in violation of section 9.10(2)(d), as explained above. Thus, the entire petition is rendered invalid. Wisconsin Ethics Commission rules do allow for the amendment of registration statements. But section 6.02(2) provides that the filing officer who accepts the insufficient registration statement "shall then promptly notify the registrant indicating the nature of the

... insufficiency" and give the registrant "15 days from the date of such notice to rectify the problem." Wis. Admin. Code ETH § 6.02(2). The amendment to the registration statement needed to be submitted to Clerk Petersen *before* Ms. Johnson circulated the petition for signatures, not *after* all signatures were collected and *after* the recall petition was challenged. Consequently, Ms. Johnson's submission on August 8, 2024, of an amended registration statement—in her response to Chairperson Galonski's challenge does not remedy the statutory violation and allow the recall to proceed based on signatures that were already collected under a defective registration statement.

*Third*, Ms. Johnson's efforts to rectify the legal defects in the certifications of circulator, as well as the defects of the individual signatures, are unavailing. The challenged certifications of circulator and individual signatures remain invalid.

### A. Certifications of circulator.

Ms. Johnson attached corrected certifications of circulator and an affidavit from circulator Gary Schaeffer. As a threshold matter, the corrections attached to Ms. Johnson's response clearly demonstrate that the certifications of circulator were defective, as established in Chairperson Galonski's challenge. As explained below, it is too late to make corrections to the certifications of circulator. Thus, all 68 signatures on the pages that required correction must be stricken for the reasons initially explained in Chairperson Galonski's challenge.

Administrative Rule EL section 2.05(4) allows for the correction of information on the recall petition, supported by an affidavit of either the circulator or the individual elector who signed the petition. However, the correction and supporting affidavit must be submitted "*not later than three calendar days after*" *the filing date* of the recall petition. Wis. Admin. Code EL § 2.05(4) (emphasis added). Section 2.05(4) does indeed allow for corrections to errors within a short window after filing. But the provision is not intended to give a recall petitioner a second chance to properly complete the certifications of circulator *well after* a challenge to the recall identifies the legal defects in the certifications.

Here, that deadline for corrections supported by affidavits was July 18, 2024—three days after filing. Corrections to legal deficiencies in the certifications of circulator, even if they are supported by affidavit, cannot be made in the response to a verified challenge of the recall petition, more than two weeks after the recall petition was filed. Moreover, circulator Schaeffer's affidavit only attempts to swear to the validity of the individual signatures, but it does not address the fatal deficiencies in his certifications. And the other corrections to the certifications by circulators Marotz, Dagel, and Murray are not supported by affidavit, as required by section 2.05(4). Consequently, the corrections and supporting affidavit of circulator Schaeffer, as well as the corrections made by circulators Marotz,

Dagel, and Murray (Items 1-4, 5, and 7 in the response) do not render the signatures on those pages valid. All 68 signatures on those pages must be stricken for the reasons provided in Chairperson Galonski's challenge letter.

As for Item 6 in the response, the addition of James Johnson's address in his own handwriting to his certification of circulator also comes too late to rectify the legal defect. To comply with section 2.05(4), this correction needed to be made within three days of filing—that is, by July, 18, 2024—and supported by affidavit. Because the correction was made more than two weeks after the recall petition was filed, and it was made in response to Chairperson Galonski's challenge, it simply cannot rectify the legal defect that circulator Johnson did not himself sign the certification. Further, the correction was not supported by an affidavit. It remains a fact that another person completed the filed certification of circulator for James Johnson, in violation the law. *See* Wis. Stat. § 8.40(2); Wis. Admin. Code EL § 2.05(9) (providing that "a person may not sign for his or her spouse"). The seven signatures on circulator Johnson's page 18 must be stricken.

The untimely and unsupported corrections therefore do not remedy the improper, false, incomplete, or otherwise deficient certifications of circulators identified in the Chairperson Galonski's challenge. These pages contain 75 signatures of electors. Those signatures may not be counted.

#### **B.** Individual Signatures

Although the burden of proof for any challenge rests with the individual bringing the challenge, Chairperson Galonski's *verified* challenge was sufficient to overcome any presumption of validity. *See* Wis. Stat. §§ 9.10(2)(g), (h). Section 9.10(2)(h) provides that a "challenge to the validity of signatures on the petition shall be presented by affidavit *or other supporting evidence*" (emphasis added). An affidavit is a written statement, confirmed by oath before a notary, affirming that certain facts are true; the oath lends an affidavit its evidentiary value in a legal proceeding. Similarly, a verification is a written statement, taken under oath and before a notary that swears to the truth of the allegations in the verified document. Accordingly, Chairperson Galonski's verified challenge has the same evidentiary value as an affidavit, thereby satisfying section 9.10(2)(h)'s requirement of evidence to support a challenge. The verified challenge alleges legal defects in certain individual signatures with specificity—defects that are clear from the recall papers themselves. This is sufficient to overcome the presumption of validity and prompt the Town of Westfield Clerk to scrutinize the challenged signatures to determine whether they must be stricken.

Ms. Johnson's response acknowledges that another person completed the individual signatures of the electors in items 2, 3, 5, and 6. A person may not sign for any other person. Wis. Admin. Code EL § 2.05; Wis. Stat. § 8.40(1).

In attachments to the response, Ms. Johnson attempts to rectify the defects of the individual signatures for items 7, 20, 9, 19, 1, 13, and 18 by having the circulator either correct the information and/or make a statement attesting to the information provided. These corrections do not rectify the legal defects. First, the corrections were made too late. As explained above, Administrative Rule EL section 2.05(4) requires that any corrections to individual signatures be made *within three days of filing*—in this case, by July 18, 2024—not more than two weeks after filing, and in response to a challenge of the recall petition. Second, section 2.05(4) requires that these corrections *each* be supported by an affidavit of the person who signed the petition. The informal, signed statements of the circulators that Ms. Johnson added to the petition pages in support of her response are no substitute for a sworn and notarized affidavit of the individuals who signed the petition, as the law requires. Those signatures therefore remain invalid and must be stricken.

As for item 15, only qualified electors may sign a petition for recall. Wis. Stat. § 9.10(1)(a). Section 6.03(1)(a) provides that "any person who is incapable of understanding the objective of the elective process" is not a qualified elector. With all due respect, Chairperson Galonski alleges, under oath, that Ruth Mui does not have the cognitive ability to understand the objective of a recall petition and elective process of a recall.

Lastly, Ms. Johnson makes no rebuttal to the challenge of the signatures in item 21. They remain invalid and must be stricken.

Chairperson Galonski's challenge has overcome any presumption of validity of 25 individual signatures by establishing that they are legally defective. Ms. Johnson's rebuttal is unavailing. The 25 signatures remain invalid and must be stricken.

In conclusion, Ms. Johnson's response is fatally deficient because it is unverified. Moreover, it fails to undermine the firm legal grounds for the challenges raised to the recall petition of Chairperson Galonski. The recall petition was deficient from its inception because Terry L. Johnson formed a committee to *oppose* the recall of Sharon L. Galonski. Additionally, the challenged certifications of circulator and individual signatures remain defective, bringing the number of valid signed electors to just 51 eligible voters, well below the 25% threshold of 110 signatures. For the forgoing reasons, we respectfully request that you reject the petition and refuse to schedule a recall election.

Respectfully submitted,

STAFFORD ROSENBAUM LLP

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Douglas M. Poland Stephen Goettsche

cc: Sharon L. Galonski, Town Chairperson (by email) Eric Larson (by email) Terry L. Johnson (by U.S. Mail) 

## -1011-1103

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#### August 13, 2024

#### CERTIFICATE OF SUFFICIENCY OF RECALL PETITION

I am the Town Clerk for the Town of Westfield. In that capacity, I am required to make a determination of whether the recall petition made against Town Chair Sharon Galonski is sufficient or insufficient, pursuant to Wis. Stats. Section 9.10(4)(a). I hereby determine that the recall petition is sufficient.

This certification of sufficiency is attached to the petition. I am hereby transmitting this sufficient recall petition to the Town Board to set a recall election, pursuant to Wis. Stats. Section 9.10(4)(a).

#### TOWN OF WESTFIELD

Brenda Petersen

**Brenda Petersen** 

Enclosure cc: Eric Larson, Town Attorney

#### FINDINGS IN SUPPORT OF CERTIFICATE OF SUFFICIENCY

I received a recall petition on July 15, 2024. I have closely considered the matter, and reserved judgment as to the sufficiency of the recall petition until this time. Between the date of receipt of the petition and today, I received information from the Town Chair and her legal counsel, as well as additional information from the Petitioner. Based upon all information received in this regard, I reach the following conclusions.

- 1. I previously ruled that the registration statement for the recall committee was sufficient to proceed, and I stand by that determination. The checkbox "oppose" or "support" is arguably ambiguous, and regardless the intent of the registration for recall was clear, so I do not invalidate the process on that basis.
- 2. The circulator pages prepared by Gary Schaeffer are sufficient. Gary Schaeffer corrected the errors regarding his address by preparing an affidavit with the correct information, as allowed by Wisconsin Statutes Section 9.10(4)(a), 9.10(2)(e) and (r).
- 3. Virginia Dagel's circulation pages are not counted because she listed the Town of Oxford as her residence, when she resides in the Town of Westfield. She did not correct her mistake by affidavit pursuant to Wis. Admin. Code Section EL 2.05(4). As such, pages 7 and 8 of the recall petition, which include 18 signatures, are invalid.
- 4. The circulation pages of Tim Marotz and Richard F. Murray are sufficient. As initially filed, they did not provide their complete address. The Wisconsin Elections Commission outlined certain insufficiencies which may be corrected in its "Recall of Local Elected Officials" manual:

"Correctable insufficiencies as prescribed by Wis. Stat. 9.10(2)(e) and (r) include, but are not limited to:

• The failure of the circulator to sign the certification or to include all required information.

• The person signing the petition omitted the date or wrote the incorrect date.

# • The failure of the circulator to write his or her complete address on the certification."

These were corrected by providing an updated circulation page with the correct address.

5. I received allegations that certain handwriting was the same as another individual's handwriting when filling out information on the petition. Absent additional information that this was completed by another individual, I am not a handwriting expert and am unable to determine whether this was completed by another individual<sup>1</sup>. Wisconsin Administrative Code Section EL 2.05(4) states that information on a recall petition is entitled to a presumption of validity.

<sup>&</sup>lt;sup>1</sup> Please note that this conclusion applies to all claims that information was completed by individuals other than the signatory, including the individual signatures on page 1, line 6, page 1, lines 8-9, page 2, lines 9-10, page 3, lines 3-4, page 14, line 2, and the circulator signature for page 18.

- I have received allegations that certain signatories reside in another municipality. For these claims, the signatures will be counted. These individuals state on the Petition they are residents of the Town of Westfield, and this is presumed valid pursuant to Wis. Admin. Code Section EL 2.05(4).<sup>2</sup>
- 7. For page 1, line 3, this signature is counted. Gary Schaeffer provided an affidavit stating he received signatures only from electors, and clarified the name of this elector is "Dale Meyer."
- 8. For page 3, line 10, the signature of Jacob Wilson is counted. The signatory initially wrote Oxford as their residence. This was an error that was corrected by the circulator, Gary Schaeffer. Mr. Schaeffer noted, by affidavit, that he only received signatures from Town of Westfield residents.
- Certain signatures are alleged to be illegible, but I have not rejected those signatures. Wisconsin Statutes Section 8.40(1) only states a printed name must be legible in a space provided next to his or her signature. This does *not* state that the signature itself must be legible.

In addition, the Government Accountability Board (now the WEC) in its "Determination of Sufficiency of Recall Petitions" manual specifically states the following regarding the legibility of a signature on page 2, Section 1(a):

"A signature does NOT need to be legible."

As such, the signatures on page 7, line 4, and page 16, line 2 were sufficient and counted.

- 10. For page 12, line 3, this printed name is "Allen Janke Sr." and the signature is sufficient and is counted. I was able to discern this individual's name from the printed name on the petition.
- 11. For page 13, line 2, the signature is sufficient. I do not have sufficient information to prove that the signatory does not have the competency to understand and sign a recall petition.
- 12. For page 15, line 5, the signature is insufficient because the printed name is illegible. While the Petitioner provided an updated page stating this was Darrel Hanhold, this was not an insufficiency that could be corrected by "other proof" pursuant to Wis. Stats. Sections 9.10(2)(e) or 9.10(2)(r). This signature would have needed to be corrected pursuant to Wis. Admin. Code Section EL 2.05(4) by affidavit, which was not done.
- 13. For page 19, lines 9 and 10, the signatures are sufficient and are counted. I received certain information stating the signatures were invalid because a change was made to the municipality of residence by someone other than the signatories and it was not initialed. I received no information to show that this correction was not done by the two

<sup>&</sup>lt;sup>2</sup> This finding applies to the individual signatures on page 2, line 5, page 4, line 6, page 11, lines 4 and 6, page 11, lines 7-8, page 12, line 2, page 12, lines 9-10, page 14, line 2, and page 14, line 9.

signatories. Simply because the change was not initialed is not sufficient to overturn the signatures.

14. For page 20, lines 1 and 2, only one signature is counted. The name "David Schaefer" appears twice. There is no distinction between the individuals, and electors can only sign a recall petition once. As such, I did not count one of the "David Schaefer" signatures.

I find that the recall petition contains **131 valid signatures**. Based upon the formula provided in Wis. Stats. Section 9.10(1)(b), only 110 valid signatures were required.

TOWN OF WESTFIELD

Brenda Petersen

Brenda Petersen