

STATE OF WISCONSIN
ELECTIONS COMMISSION

COMPLAINT FORM

Sandra L. Juno
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Green Bay, WI 54301
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The complaint of Sandra L Juno, Republican Party of Brown County, Vice Chair (complainant) against Celestine Jeffreys, City of Green Bay Clerk (respondent), whose address is 100 N. Jefferson St., Green Bay, WI 54301.

The Complaint is under ss (6.88(3)(b))

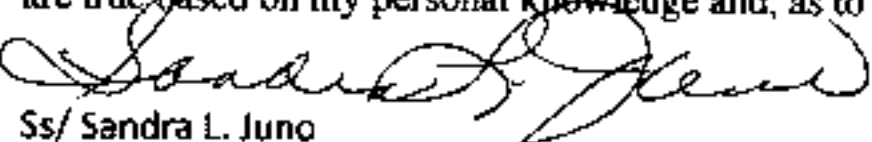
(b) When the inspectors find that a certification is insufficient, that the applicant is not a qualified elector in the ward or election district, that the ballot envelope is open or has been opened and resealed, that the ballot envelope contains more than one ballot of any one kind or, except in municipalities where absentee ballots are canvassed under s. 7.52, that the certificate of a military or overseas elector who received an absentee ballot by facsimile transmission or electronic mail is missing, or if proof is submitted to the inspectors that an elector voting an absentee ballot has since died, the inspectors shall not count the ballot. The inspectors shall endorse every ballot not counted on the back, "rejected (giving the reason)". The inspectors shall reinsert each rejected ballot into the certificate envelope in which it was delivered and enclose the certificate envelopes and ballots, and securely seal the ballots and envelopes in an envelope marked for rejected absentee ballots. The inspectors shall endorse the envelope, "rejected ballots" with a statement of the ward or election district and date of the election, signed by the chief inspector and one of the inspectors representing each of the 2 major political parties and returned to the municipal clerk in the same manner as official ballots voted at the election.

The complaint is under ss 6.15(4)(a):

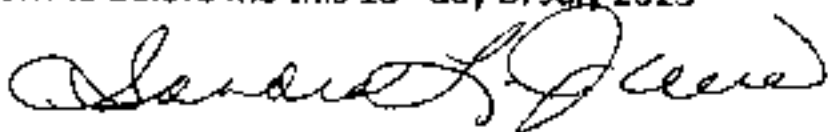
(e) If the person is not a qualified elector in the ward or municipality, or if the envelope is open or has been opened and resealed, the inspectors shall reject the vote. Rejected ballots shall be processed the same as rejected absentee ballots, under s. 6.88 (3) (b).

I was an observer at Central Count for the April 4, 2023 election. Canvassers found 2 absentee ballot certificate envelopes that were not sealed. The canvassers brought this the Deputy Jamie Fuge and Clerk Jeffreys attention. She directed them to reject the ballots. Following, I contacted WEC staff to verify if this was the correct decision. They confirmed it as correctly following the statutes. About an hour or so later, Clerk Jeffreys came back and instructed the canvassers that the two electors were on their way to central count to do a verification of their votes on the ballots. Both voters confirmed that the votes on the ballots were correct as they voted. Following, Clerk Jeffreys instructed the canvassers to accept, process, and tabulate both ballots. Again, I contacted WEC staff about Jeffreys accepting the ballot and the response I received is that state statutes don't allow accepting these ballots. Later, I went to the Clerk's Office requesting documentation on statutes they used to accept these ballots. She said she was too busy to respond. Following the election on April 10th, I sent a FOIA request to City of Green Bay legal counsel requesting documentation. On July 6, 2023, I received a response stating, "there are no records responsive to your request." I believe that ss 6.15(4)(a) was violated by the Green Bay City Clerk in accepting these two ballots. City of Green Bay Clerk Deputy, Jamie Fuge, was present at both times for Clerk Jeffreys instructions and witnessed actions.

I Sandra L. Juno, being duly sworn on oath, state that I personally read the about complaint, and that the above allegations are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.


Ss/ Sandra L. Juno
Complainant

STATE OF WISCONSIN
County of Brown
Sworn to before me this 18th day of July 2023



[Handwritten Signature]

(Signature of person authorized to administer oaths)

My Commission expires on 5/18/2025 or is permanent.

Notary Public or

(Official title if not a notary)

EL-1100

