

# Municipal LAW

& LITIGATION GROUP

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November 14, 2024

Attorney Angela O'Brien Sharpe  
Wisconsin Elections Commission  
[angela.sharpe@wisconsin.gov](mailto:angela.sharpe@wisconsin.gov)  
*submitted via email*

**Re: Complaint - Kastenson v. Hill (EL 24-11)**

Dear Attorney Sharpe:

I am an attorney for the Village of Raymond and in that capacity represent Village Clerk/Administrator Barb Hill. Along with this letter, I am providing the attached sworn response and supporting exhibits to the above referenced complaint. Should you have need for any further information or records, please feel free to contact me. Finally, when this matter is administratively closed, please provide notice of such.

Very Truly Yours,  
MUNICIPAL LAW & LITIGATION GROUP, S.C



Luke A. Martell

cc: Barb Hill, Village of Raymond Clerk/Administrator  
*enclosures*

## RESPONSE TO WISCONSIN ELECTIONS COMMISSION

Complaint Filed with Wisconsin Elections Commission  
EL 24-11: Karen Kastenson v. Barbara Hill

Attorney Sharpe:

Per your request, I submit the following response to the above-referenced complaint.

1. I am the Village Clerk for the Village of Raymond.
2. Kaitlyn Kastenson's ballot mailing was created on September 17, 2024, as part of the initial batch of absentee ballots on file for the general election and mailed to the absentee address on file. *See Exhibit A.*
3. As of the date of your letter, 10/29/24, the ballot showed in the WisVote system as "out for delivery" to the original absentee address on Thompson Court in Green Bay, Wisconsin. *See Exhibit B.*
4. The complaint asserts that "the ballot was returned to the clerk as undeliverable as my daughter had moved."
5. The ballot was never returned to my office at any time.
6. The complaint continues, asserting that my office put a sticker over the address, blacked out the bar code, wrote in the home address and then forwarded the ballot to her home address.
7. While the photo attached to the complaint seems to show that someone performed those actions, none of those actions were done by myself nor anyone within my office.
8. Had we received the ballot back as undeliverable, which we did not, we certainly would not try to guess where the ballot should go, add a sticker and attempt to forward the ballot.
9. I take my role as Village Clerk seriously and am very familiar with the process of absentee ballots, including that they should not be forwarded pursuant to Wis. Stat. § 6.86.

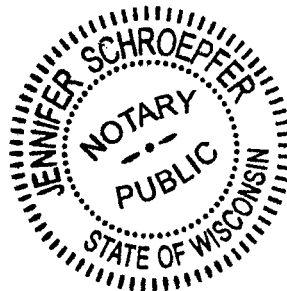
10. As Village Clerk. I have never forwarded an absentee ballot, including that of Kaitlyn Kastenson's 2024 ballot.
11. Additionally, the handwriting on the envelope is not my handwriting nor that of the Deputy Clerk, Jeni Schroepfer.
12. We are the only two who handle ballots in this office and would be more than willing to provide handwriting samples upon request.
13. Further, I have received no communication nor instruction from Kaitlyn Kastenson regarding this ballot or this election, nor any communication from the complainant regarding her daughter's ballot.
14. In summary, I fully reject the claims made against me in the WEC complaint by Karen Kastenson and deny that I took any of the illegal and/or improper actions stated in the complaint.

Dated this 11<sup>th</sup> day of November 2024.

Barbara J Hill  
Barbara Hill, Village Clerk

Subscribed and sworn to before me  
this 11<sup>th</sup> day of November 2024.

Jennifer Schroepfer  
Notary Public State of Wisconsin  
My Commission Expires: 3/27/27



**EXHIBIT A**

ABSENTEE APPLICATION  
Kastenson, Kaitlyn Jane

Application Type: Regular  
Application Source: Online

**Voter Status**  Active

**Confidential Voter Status**

**Voter Type**  Regular

**Home Address**  3446 108TH ST, FRANKSVILLE, WI 53126

**District Combo**  52168-006-4686-1

**Email Address**

**Phone Number**

**Parent Absentee Application**  Kastenson, Kaitlyn Jane

**Batch Tag**

**Care Facility Name**

**Jurisdiction**  Village of Raymond - RACINE COUNTY

**Photo ID Provided**

**Ballot Delivery Info**

**Ballot Delivery Method**  Mail

**Different Absentee Address**

**Absentee Address**  3306 Thompson Ct APT Campus Box 2807, Green Bay, WI 54311

**Election Info**

**Absentee Period**  Current Election

**Name of Election**  11/21/2024 Special Primary Election Racine County Executive

**EXHIBIT B**

ABSENTEE BALLOT  
Kastenson, Kaitlyn Jane  
Ballot Number: 1  
Application Type: Regular  
Delivery Method: Mail  
Status Reason: Not Returned

Voter and USPS Tracking Information

**Absentee Application Information**

Absentee Application: Kastenson, Kaitlyn Jane  
Ballot Type: Official  
Batch: .....  
Absentee Address: 3306 Thompson Ct APT Campus Box 2807, Green Bay, WI 54311  
Application Type: Regular  
Ballot Delivery Method: Mail  
Jurisdiction: Village of Raymond - RACINE COUNTY

**USPS Tracking**

Outgoing to Voter		Incoming to Clerk	
USPS Ballot Status	Ballot Out for Delivery (Voter)	USPS Ballot Status	No Postal Data Available
Anticipated Delivery Date	9/20/2024	Anticipated Delivery Date	.....
Last USPS Scanned City	GREEN BAY	Last USPS Scanned City	.....
Last USPS Scanned State	WI	Last USPS Scanned Date	.....
Last USPS Postal Zip code	54303	Last USPS ZipCode	.....
Last USPS Scan	9/20/2024	Last USPS Scan	.....
IMB Numeric	007162022091135471045431170240	IMB Numeric	007772022091135471055312695395

Election and Ballot Information

**Election Info**

Created On: 9/17/2024 8:50 AM  
Created By: Vote, Wis  
Owner: VILLAGE OF RAYMOND - RACINE COUNTY

**Ballot Information**

Modified On: 9/20/2024 1:13 PM  
Modified By: Vote, Wis