## STATE OF WISCONSIN

 BEFORE THE ELECTIONS COMMISSIONGlen Hogan, Joanne Lensing, and David A. VanderLeest

## Complainants,

 $v$.Celestine Jeffreys, in her capacity as Clerk for the City of Green Bay

## Respondent.

## COMPLAINANTS' REPLY

Complainants submit the following reply in response to Respondent Celestine Jeffreys's Response (dated April 29, 2024), and in support of their Complaint:

In her response, Clerk Jeffreys concedes that she does not comply with the requirements of Wisconsin Statutes Section 6.56 concerning undeliverable EDR postcards. See Response at 3. Clerk Jeffreys also states that she "does not oppose Complainants' first request for relief," Response at 3, which is the following: "That Clerk Jeffreys be directed to conform her conduct to the law as described in Wis. Stat. § 6.56(3) and the EDR Guidance," Complaint at 10, Prayer for Relief, para. A.

Accordingly, Complainants request that WEC issue an order (1) finding that Clerk Jeffreys has violated Wis. Stat. § 6.56(3) and the EDR Guidance, and (2) ordering Clerk Jeffreys to conform her conduct to the law as described in Wis. Stat. § 6.56(3) and the EDR Guidance.

Complainants shall waive any entitlement they may have to recover costs and fees incurred in bringing this matter.

Dated this 15th day of May, 2024.

## CRAMER MULTHAUF LLP

Attorneys for Complainants,

## BY: Electronically signed by Matthew M. Fernholz <br> MATTHEW M. FERNHOLZ <br> (State Bar No. 1065765)

CRAMER MULTHAUF LLP
1601 East Racine Avenue • Suite 200
P.O. Box 558

Waukesha, WI 53187-0558
(262) 542-4278
mmf@,cmlawgroup.com
PUBLIC INTEREST LEGAL FOUNDATION, INC.
Attorneys for Complainants,
BY: Electronically signed by Noel H. Johnson
NOEL H. JOHNSON
(State Bar No. 1068004)
Public Interest Legal Foundation, Inc.
107 S. West Street, Suite 700
Alexandria, VA 22314
Tel. (703) 745-5870
njohnson@,PublicInterestLegal.org

The Complainant, David VanderLeest, being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

Subscribed and sworn to before me
this $1^{\text {th }}$ day of $\qquad$ , 2024.


My commission expires $\quad 2-18-2028$

The Complainant, Jen $\mathcal{I}$, Houran being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

Complainant

Subscribed and sworn to before me this $3^{t^{+h}}$ day of May, 2024.


Notary Public, State of Wisconsin
My commission expires 4-7-2026

The Complainant, $\qquad$ Joanne Lensing , being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

Subscribed and sworn to before me this $\qquad$ $13^{\text {th }}$ day of $\qquad$ may, 2024.


County
 $\qquad$ of Brown


