

**Rebuttal of Renee Brickner's response
to Kenneth Wolfe's allegations in Wolfe v. Brickner (EL 25-09)**

Except as noted below, I stand by the allegations stated in my original complaint.

Below are the individual allegations that respondent Renee Brickner (hereby referred to as Clerk Brickner) denies and my response to them.

1. **Clerk Brickner states that as clerk it is her responsibility to program the DS-200 on election day as was stated in her training from the former village clerk.** It is well known that the previous clerk lacked knowledge in election procedures and that Clerk Brickner should have referred any questions to the Wisconsin Elections Commission. It would be impossible for a clerk with multiple polling locations to be able to program multiple machines on election day. When I was an election inspector in the city of Kenosha the machines came to the polling place on election day and the chief was provided with a set of keys for that machine prior to election day so that all the chief had to do was turn the machine on and open the polls.

As I did not even have keys to the building to assess the election day materials to begin the process of setting up the polling place, this was another failing on Clerk Brickner's behalf.

2. **Clerk Brickner denied that she left the location a second time to go get the programming code for the DS-200 but that she sent another election inspector to go get keys for the DS-200.** This is a difference without distinction. She told me on election day that she left the keys for the DS-200 on her desk when she was looking for the key to the building. If she is insistent that it is her responsibility to program the machines on election day, then it is her responsibility to make sure that the polling place and equipment is ready at the time the polls are supposed to be open.

3. **Clerk Brickner denies that the ineligible voter list was not provided until almost 11:00AM.** While we did have two bins at our polling location neither of them had the ineligible voter list or absentee voter list in them. This can be verified not only by myself but I also had Election Inspectors David Patterson (R) and Kevin Zeoli (D) go through both bins and they did not find the lists either.

4. **In Clerk Brickner's conclusion she indicates that she has asked the Republican Party of Kenosha County (RPKC) to nominate more inspectors.** The RPKC has submitted supplementary nomination lists, it is unfortunate for Clerk Brickner that the party did not submit the names of the people that she requested. It is not her responsibility to notify the party of those she wants to have nominated and that if there are not enough people nominated by either party she has the authority to use unaffiliated election inspectors but she must use people from the nominated lists first. Reference Wis. Stat. § 7.30.

5. While Clerk Brickner admits to numerous mistakes and while I have spoken to village officials about the need for her to be replaced I have done so in my capacity as a village resident and not as the Chief Election Inspector. While I have said in the past that things that she is doing could open her up to legal ramifications I have not filed any legal proceedings until I have filed this complaint. Clerk Brickner has stated that my words and actions are interfering with her yet she still hired me to be Chief Election Inspector for the February 18, 2025 election.

State of Wisconsin

County of Kenosha

BEFORE ME, the undersigned Notary, Sonia Moreno, on this 25th day of February, 2025, personally appeared Mary Magdalen Moser, known to me to be a credible person and of lawful age, who being by me first duly sworn an oath, states:

1. I, Mary Magdalen Moser, reside at 2106 73rd Street, Kenosha, WI 53143.
2. I have been an oath-sworn poll worker for the City of Kenosha for more than 20 years, a Chief Election Inspector in charge of a polling location for the City of Kenosha since 2008, and a member of the Kenosha County Board of Canvassers (KCBC) since 2024.
3. I participated as a poll worker in the 2016 Kenosha County Presidential Election recount and numerous recounts for Kenosha County elections as both a trainee for the KCBC and as a member.
4. Because of the contentiousness of the past two Presidential Elections, the KCBC had been anticipating and preparing for a county-wide recount of the November 5, 2024 Presidential Election since early 2024.
5. I have been an acquaintance of Kenneth Wolfe for about four or five years.
6. Because Mr. Wolfe knows my history as a poll worker, he asked me on Wednesday, November 6, 2025 to help him reconcile the poll books for his polling location in Bristol on Thursday, November 7, 2024.
7. I met Village of Bristol Clerk Renee Brickner for the first time on Thursday, November 7, 2024 around 2PM when I arrived at the Village of Bristol Hall to assist in the reconciliation. I do not know her personally, nor had I any knowledge of her prior to that day.
8. I have read both Mr. Wolfe's complaint and Ms. Brickner's response to his complaint.
9. I am the unnamed "poll worker from the City of Kenosha" referenced in both Mr. Wolfe's complaint and Ms. Brickner's response to his complaint.
10. I support Mr. Wolfe's allegations of everything that took place during the reconciliation process on Thursday, November 7, 2024.
11. I witnessed first hand the disarray of the election materials and the unsecured DS-200. Also, DS-200s have a backup battery and do not need to be plugged into an electrical outlet to be activated. A municipal clerk should know this.
12. Ms. Brickner had already removed all the loose, 3-hole punched pages from the 3-ring binders that make up the poll books before we arrived for the reconciliation. She only provided us with the loose pages of the non-signature book. I had to ask her to provide us with the 3-ring binders so we could keep the pages in order, and the signature poll book because we could not conduct the reconciliation without both books. I do not believe that Ms. Brickner understands the reconciliation process and she exhibited no interest in learning it.
13. I do not recall seeing any supplemental poll list pages in either poll book when we conducted the reconciliation and because the poll books are all loose pages inserted into a 3-ring binder, there is no way to know when any pages were inserted or withheld.
14. I witnessed the conversation about the Ineligible Voter List and Absentee Voter List not being included inside either of the two bins on Election Day among Mr. Wolfe, his two Election Day poll workers (Mr. Patterson and Mr. Zeoli), and Ms. Brickner. I can confirm that all three men calmly stated that each of them had gone through the bins multiple times and neither list had been included. I witnessed Ms. Brickner repeat multiple times "Well I put them in there."

Perhaps Ms. Brickner did not say the phrase "you're lying" or "you're a liar," but the meaning is the same when three people have the same recollection and one person keeps insisting the opposite is true. Both positions cannot be true.

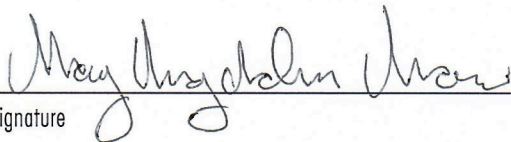
15. Perhaps there is not a Wisconsin State Statute mandating that a municipal clerk alphabetize 998 returned absentee ballots over the month and a half during which they are returned to the municipal clerk's office instead of making volunteer poll workers do it on Election Day in addition to helping 883 in-person voters cast their ballots, but there probably isn't one requiring we all put aside our differences and work to successfully administer a free and fair election either.

16. Everyone makes mistakes, but we all have to accept responsibility for our own mistakes and work to correct them. I am disappointed with the blame-shifting I read in Ms. Brickner's response: Almost everything is someone else's fault. Whether it was the former clerk who failed to train her properly, our County Clerk who failed to provide her with materials for the polling locations, or the poll workers who just couldn't get the job done until the wee hours of Wednesday morning, Ms. Brickner appears to believe she bears no responsibility for any of these failures. I disagree with Ms. Brickner's responses. It is Ms. Brickner's responsibility as municipal clerk to understand how to administer elections in the Village of Bristol.

17. My concern is in the sheer volume of errors by Ms. Brickner alleged in Mr. Wolfe's complaint that occurred in one municipality during one election and in her response to these allegations. These failings are not an isolated problem wholly contained within the Village of Bristol, but represent a danger to all of Kenosha County elections.


In the event of a recount, the Kenosha County Board of Canvassers—alone—must explain and defend to the attorneys for the candidates all of the actions taken by the people who administer the elections here.

Based on what I witnessed on Thursday, November 7, 2024 and in her written response dated February 6, 2025 to Mr. Wolfe's complaint, I believe any reasonable person would have difficulty explaining or defending Ms. Brickner's actions and statements as Village of Bristol Clerk with regard to her administration of an election in the State of Wisconsin.


Signature

Mary Magdalen Moser
2106 73rd Street
Kenosha, WI 53143

Subscribed and sworn to before me, this 25th day of February, 2025.
Notary Seal


Signature of Notary

SONIA MORENO
Printed name of Notary

NOTARY PUBLIC

My commission expires: 5/10, 2025.

Official Election Complaint Form



STEP 1

Complaint Type

Please select the statutory process that governs your complaint:

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

[5.05 \(Election Law Violation\)](#)

[5.06 \(Violations by Election Officials or Appeals of Decisions of Election Officials\)](#)

[5.061 \(Help America Vote Act Violation\)](#)

STEP 2

Complainant Contact Information

Please provide the following information about yourself.

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

STEP 3

Respondent

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

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



.....

Applicable Statutes

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

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



.....

Allegations

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

STEP 6

Sign

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

STEP 6a

Unsworn Statement

I declare under penalty of false swearing under the law of Wisconsin that the foregoing is true and correct. Signed on the _____ day of _____, _____ at _____ (city or other location and state or country).

Printed Name

Signature

STEP 6b

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

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

Complainant's Signature

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

STATE OF WISCONSIN

County of, _____ (county of notarization)

Sworn to before me this day of, _____.

Stamp Here

(Signature of person authorized to administer oaths)

My commission expires on _____, or is permanent.

Notary Public or _____ (official title if not notary)



.....
Filing the Complaint

Please send this completed form to the Wisconsin Elections Commission

Email:

elections@wi.gov

Please put your name and
"Complaint" in the email
subject field

Mail:

Wisconsin Elections
Commission
P.O. Box 7984
Madison, WI 53707-7984

Fax:

608-267-0500

Additional Complainants

First Name

Last Name

Residential Address

Mailing Address (if different)

Telephone (optional)

Email

First Name

Last Name

Residential Address

Mailing Address (if different)

Telephone (optional)

Email

First Name

Last Name

Residential Address

Mailing Address (if different)

Telephone (optional)

Email

Additional Respondents

Respondent Name

Respondent Title (5.06 complaints)

Mailing Address

Telephone (if available)

Email (if available)

Respondent Name

Respondent Title (5.06 complaints)

Mailing Address

Telephone (if available)

Email (if available)

Respondent Name

Respondent Title (5.06 complaints)

Mailing Address

Telephone (if available)

Email (if available)

Respondent Name

Respondent Title (5.06 complaints)

Mailing Address

Telephone (if available)

Email (if available)

STEP 6

Sign

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

STEP 6a

Unsworn Statement

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

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

at

(city or other location and state or country).

Printed Name

Signature

STEP 6b

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

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

Complainant's Signature

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

STATE OF WISCONSIN

County of, (county of notarization)

Sworn to before me this day of, .

(Signature of person authorized to administer oaths)

Stamp Here

My commission expires on , or is permanent.

Notary Public or (official title if not notary)