

**STATE OF WISCONSIN
BEFORE THE ELECTIONS COMMISSION**

CHARLES HANNA,

Complainant,

v.

Case No. EL 24-39

CLAIRE WOODALL and
MILWAUKEE ELECTION COMMISSION,

Respondents.

**BRIFE AND REQUEST TO DISMISS OF RESPONDENT
CITY OF MILWAUKEE ELECTION COMMISSION**

INTRODUCTION

Respondents Claire Woodall (“Woodall”) and City of Milwaukee Election Commission (“MEC”), acting by and through Assistant City Attorney Kathryn Z. Block, hereby submits the following Brief and Verified Response of Respondent Woodall and asks the Wisconsin Elections Commission (“WEC”) to dismiss in its entirety the April 5, 2024 verified complaint (“Complaint”) of Complainant Charles Hanna, (“Hanna”).¹

FACTUAL BACKGROUND

Hanna correctly notes he was nominated by the Republican Party² to serve as an election inspector pursuant to Wis. Stat. § 7.30(4)(b)1. (Woodall Aff. ¶ 2) The Milwaukee Election Commission appointed nominated Hanna (and others nominated by the Republican Party,

¹ WEC determined the Complaint was insufficient as to the Republican Party of Wisconsin.

² Note that Hanna’s name appears twice on the list (attached to Complaint) because it was submitted by the Party twice (once as Charles Hanna and once as Charles R. Hanna – with the same contact information).

Democrat Party, and Unaffiliated election inspectors) on December 20, 2023 pursuant to Wis. Stat. 7.30(4)(b)1. (Woodall Aff. ¶ 2)

Hanna claims Respondents never provided him with notice of his appointment, never contacted to serve as an election inspector, never asked to sign or file an official oath, and never asked to attend training.³

In the Verified Response of Respondent Woodall, filed along with this Brief, she indicates that staff reached out to Hanna twice (on January 2, 2024, and January 16, 2024 via e-mail) requesting Hanna complete the City’s Election Inspector Application, (“Application”). (Woodall Aff. ¶ 3) The Application requests basic biographical information including information which would go to the qualifications of the applicant. Hanna completed the Application on January 30, 2024. (Woodall Aff. ¶¶ 3-4) MEC staff then reached out to Hanna to complete the City’s online worker portal, to complete an Employee Information Sheet (“Information Sheet”) (in fact, sending five separate communications to Hanna to do so). (Woodall Aff. ¶ 5) The “Information Sheet” requests basic information required for payroll purposes (or to make an indication that the election inspector wishes to perform their services on a volunteer basis). (Woodall Aff. ¶ 5) Hanna never followed up in response to these communications. (Woodall Aff. ¶ 6)

ARGUMENT

Hanna makes vague assertions regarding Respondents’ failures to communicate with Hanna (and another non-party) and unsupported allegations regarding favoritism shown with regard to the appointment of other election inspectors, but the fact remains, all of the new election inspectors appointed on December 20, 2023, were treated the same as Hanna. Both notice of the

³ Hanna alleges that “Respondents [also] failed to contact and schedule numerous other qualified, nominated, and appointed Republican Party election inspectors to serve as election inspectors in the City of Milwaukee at any polling location for the April 2, 2024 election,” but the City notes that only Hanna is named in the Complaint.

meeting appointing election inspectors was published publicly and online on Legistar along with “the attached list of election inspectors and special voting deputies...appointed to a two-year term from 2024-2025 so long as they comply with required paperwork and meet the qualifications to serve....” Each new election inspector (whether appointed by either party or unaffiliated) on December 20, 2023 was asked to complete two separate forms – the Application and the Information Sheet. These forms requested information to enable Respondents to make sure they met the qualifications listed in Wis. Stat. § 7.30(2) (i.e., a qualified elector with residence in the city/county/state, as applicable, able to read and write English, not a holder of public office other than notary public) and further allow the City to pay these individuals, once employed. This is consistent with WEC guidance which provides: “Municipalities may require appointed individuals to comply with standard personnel policies and requirements, such as the submission of contact information and documents necessary to process compensation.”⁴

Hanna has not provided any explanation for why he apparently received (and responded to) initial communications regarding the Application, but not the Information Sheet, or for why he was able to complete the Application, but not the Information Sheet. Nor has Hanna stated that he was somehow unable to complete the Application, but not the Information Sheet, or that he reached out to Respondents, but that Respondents were unwilling to assist him. In fact, as far as Respondents are concerned, Hanna is in no way precluded from completing the Information Sheet and moving on to the training portion of the process and serving as an election inspector for the remainder of the 2024-25 term, if he successfully completes the training.

⁴ WEC Memo – Appointment of Election Inspectors from Lists Submitted by Political Parties, October 3, 2023. <https://elections.wi.gov/sites/default/files/documents/Partisan%20Appointment%20of%20Inspectors%20memo%2010%203%202023.pdf>

CONCLUSION

For the foregoing reasons, the WEC should dismiss Hanna’s Complaint in its entirety.

Dated and signed at Milwaukee, Wisconsin this 28th day of May, 2024.

EVAN C. GOYKE
City Attorney

Electronically signed by Kathryn Z. Block

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