

STATE OF WISCONSIN
BEFORE THE WISCONSIN ELECTIONS COMMISSION

CHARLES HANNA,

Complainant,

v.

Case No. EL 24-39

CLAIRE WOODALL and
MILWAUKEE ELECTION COMMISSION,

Respondents.

VERIFIED RESPONSE OF PAULINA GUTIÉRREZ

STATE OF WISCONSIN)
)
COUNTY OF MILWAUKEE)

I, Paulina Gutiérrez, upon penalty of perjury, state as follows:

1. I am the Executive Director of the City of Milwaukee Election Commission, (“MEC”). I have personal knowledge and belief as to the matters set forth below.

2. The Verified Response of Claire Woodall was previously filed in the above-referenced matter, (“Woodall Response”).

3. Paragraph 2 of the Woodall Response references the Resolution appointing Democrat, Republican, and Unaffiliated Election Inspectors passed by the Milwaukee Common Council on December 20, 2023. The lists attached to that resolution do not include personally identifying information. Attached as Exhibit 1 is a spreadsheet originally provided by the Republican Party. Complainant Charles Hanna’s name appears twice on that list (once with a middle name and once without), but the same contact information was provided for both of these entries: listing his address at 2525 S. Shore Drive, #10E, Milwaukee, WI, 53207, phone number

414-483-0661, and an e-mail address of crayskier@gmail.com. I have left the names provided by the Republican Party visible, but have redacted all except Hanna's other personally identifying information.

4. Contact with election inspectors, including completion of forms required by the MEC is accomplished via the MEC's Poll Worker Portal. Contacts with election inspectors are logged via the Poll Worker Portal, and a report of these can be generated. A report of the contacts with Hanna as of the date of the submission of the Woodall Response were submitted as Exhibit C along with the Woodall Response. The report indicates the nature of the communication, whether the election inspector was contacted by e-mail or phone, the date/time of the contact, and the MEC employee who initiated the contact. E-mail communications are typically sent to a group of recipients, and can be pulled in an e-mail search, (representative e-mails have been pulled for purposes of illustration and attached). Phone communications are also typically sent to a group of recipients and an automated recording is played, phone numbers can be pulled in a contact search.

5. As noted in the Woodall Response at Paragraph 3, Hanna was contacted by MEC staff via e-mail on January 2 and 16th, 2024 and asked to complete the Election Inspector Application ("Application"). A copy of the January 2, 2024 e-mail is attached as Exhibit 2, with additional recipients redacted.

6. As noted in the Woodall Response at Paragraph 4, Hanna completed the Application on January 30, 2024.

7. As noted in the Woodall Response at Paragraph 5, Hanna was then contacted on five separate occasions via e-mail to complete an Employee Information Sheet, ("Information Sheet"). A copy of the January 30, 2024 e-mail is attached as Exhibit 3. Note that this e-mail is

actually a response from an e-mail *from* Hanna, (i.e., demonstrating that MEC was using the correct e-mail contact for Hanna and Hanna was able to access the Poll Worker Portal).

8. Attached as Exhibit 4 is a report of the MEC's contacts with Hanna since the filing of the above-referenced complaint.

9. Subsequent to the completion of briefing in the above-referenced matter, Hanna returned the Information Sheet to the MEC via his attorney to the City Attorney, who forwarded the form to Claire Woodall on June 19, 2024, (attached as Exhibit 5). The Information Sheet indicates the same contact phone and e-mail as the original Republican Party election inspector list provided to the MEC, and as was indicated by Hanna in his Application. I do note that Hanna updated his e-mail address in the Poll Worker Portal on June 27, 2024 to chinvestments1@gmail.com, and the MEC has successfully been communicating with Hanna at the updated e-mail address subsequently.

10. After Hanna provided the Information Sheet, as the Woodall Response indicated he would at Paragraph 6, he was offered training. He successfully attended in-person training on August 7, 2024 and scored 4 out of 6 on the new election inspector quiz, thus making him eligible to work as required by state law.

11. Hanna subsequently worked as an election inspector at the August 13, 2024 Fall Primary and the November 5, 2024 General Elections. (See Exhibit 4). Hanna was contacted about working at the February 18, 2025 Spring Primary, but did not respond. *Id.* Hanna has not yet responded about the April 1, 2025 Spring Election.

I declare under penalty of false swearing under the law of Wisconsin that the foregoing is true and correct.

Signed on this 11th day of March, 2025, at Milwaukee, Wisconsin.

 /s/ Paulina Gutiérrez
Paulina Gutiérrez

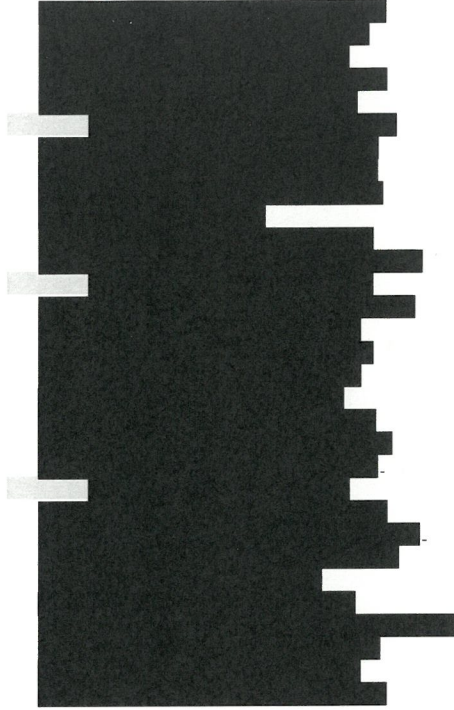
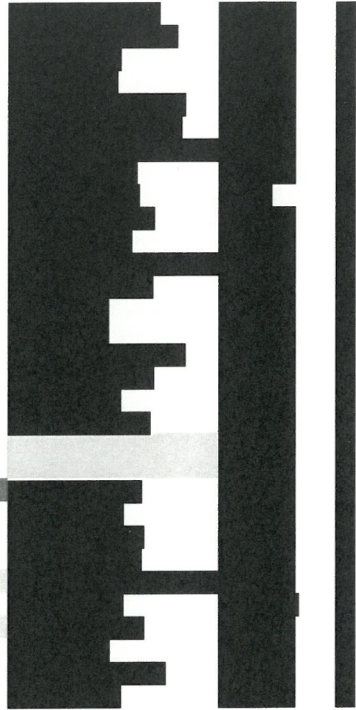
REPUBLICAN PARTY NOMINEES FOR ELECTION INSPECTOR - 2024

FIRST NAME	LAST NAME	ADDRESS	CITY	Active		PHONE #	EMAIL
				STATE	ZIP		
Judy	Bintliff						
Cherie	Wamser						
Tom (Thomas)	Wamser						
James	Prohaska						
Charles	Hanna	2525 S. Shore Drive, #10E	Milwaukee	WI		53207 414-483-0661	crayskier@gmail.com
Joanne	Serdynski						
Monica	Olencheck						
James	McFarland						
Espe	Villasenor						
Kenneth	Koltan						
Judith	Kadlec-Zielke						
Ernesto	Mireles						
Timothy	Ewert						
Janet	Hoyt						
Royce	Potter						
Deborah	Potter						
Joanne	Serdynski						
Betty	Sanders						
Natalie	Zebian						
Sean	Clark						
Tara	Clark						
Jerry (Jerome)	Siegmann						
Kylie	Flores						
Wendy	Sobczyk						
Jennifer	Gabriele						
Jennifer	Robbins						
Curt	Evers						
Susan	Freundl						
Salvatore	Librizze						
Vera	Nowak						
Wayne	Ohlheiser						
Benjamin	Swobda						
Michelle	Kenner						
Julie	Wohlrabe						
Julie	Librizzi						
Donna	Ostrowski						
Lisa	Kellermann						
Rose	Wallace						
Joseph	Hoeller						
William	Lethlean						
Nadine	Potkonjak						
Sharon	Fischer						
Charles R.	Hanna	25525 South Shore Dr	Bay View	WI		53207 414-975-0661	crayskier@gmail.com
Christine	Klug						
Cindy	Passow						
David	Clark						
Harland	Cook Jr.						
Darrell	Toth						
Barbara	DeSmet						
Dennis	Wieselmann						
Pamela	Eder						
Michael	Gonzalez						
Amir	Hesamyan						
Sherry	Ingram						
Mike	Hoeller						
Brian	Baker						
Monica T.	Radzin						
Greg	Jablonowski						
Jeffrey	Sponder						
Bart	Zwitter						
James	Biksadski						
Bill	Rozeski						
Michael	Dunn						
Lisa	Nelson						
Deborah	Pegorsch						
Dace	Glaz						
Christopher	Swainston						
Pat	Jamrozy						
Sanya	Lyles						
Peter	Mueller						
William R.	Hittman						
Aleksandra	Vilumsans						
Eugene	Mezger						

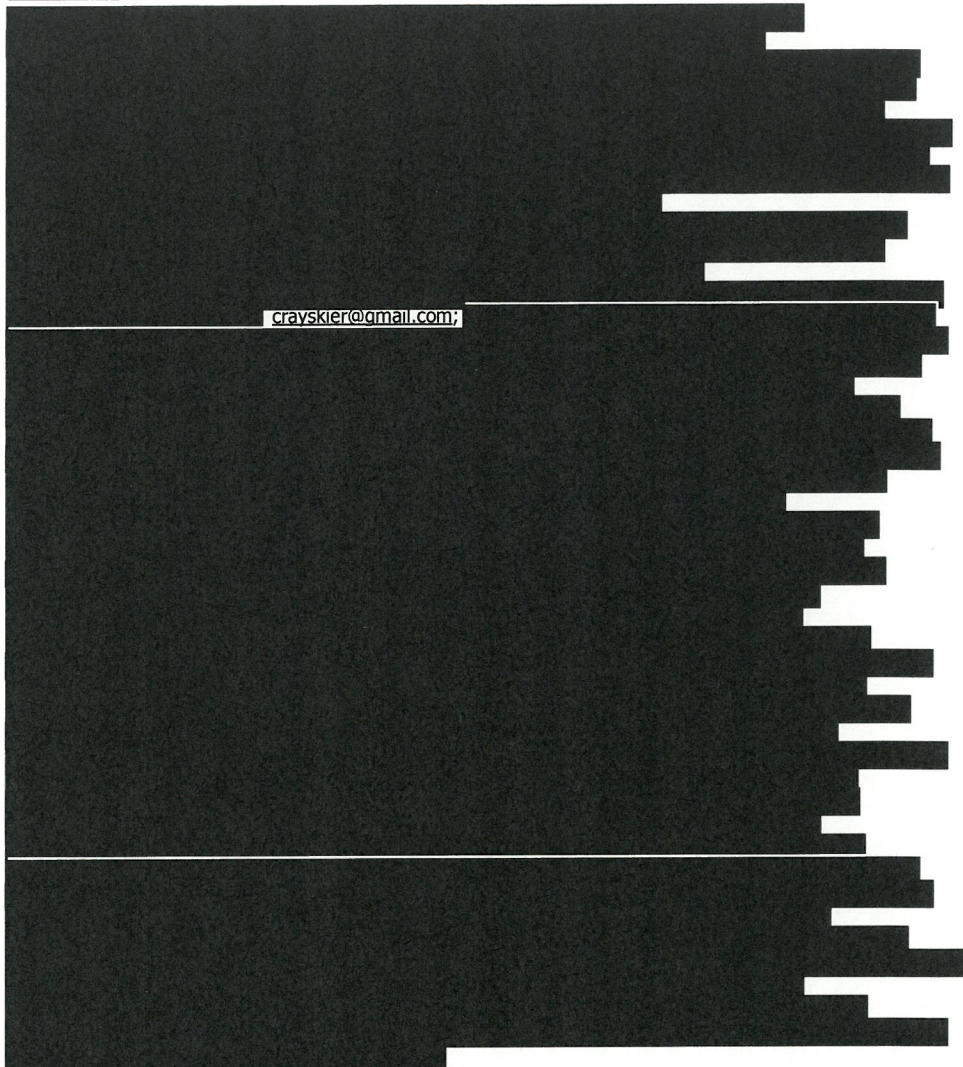
Ex. 1

Janet	Kastelic
Gregory	Krystek
Mary	Kurth
Joseph	Wojnarowski
Leroy	Buth
Daresha	Harvey
Norm	Behling
Kyle	Clow
Susan	Gutknecht
Rick	Kouchich
Carol	Hicki
William M.	Wenz
Shanyell	McCloud
Rick	Wood
Rev. Thomas	Kaul
Halezzah	Ahmad
Richard	Drenzek
Ammy	Alles
Caprice	Veal
Rosalind	Roberson
Sharon	Lowe
Bob	Brinkman
Julie	Peterson
Jeffrey	Groth
Seven	Glaser
Reinhard	Rittmeyer
Brian	Spaeth
Helena	Ehlke
Christine (Chris)	Wodke
Rich	Demski
Anne	Demski
Johnathan	Salazar
Jeffrey	Lahmann
Kirk	Bougher
Beth	Sullivan
Tracy	Sensel
Marie	Augustine
Joseph	Rice
Hafeezah	Ahmad
Cathy	Cook
Sandra	Rubeling
Craig	Depies
Alina	Piraino
Jay	Bartholomew
Carol	Roen
Terri	Bartholomew
Mos	Sher
Sue	Hogg
Karle Beth	Beske
Antonio	Martinez
David	Antonio Gill Jr
Mary Jo	Laur
Jesse	Heaton
Emilee	Wildes
Chris	Helbs
Lucas	Anderson
Lauro	Rodriguez
Bill	Gorski
Terry	Honeck
Tim	Kovacic
Pete	Schmidt
Linae	Smits
Tarlon	Harrod
Karl	Loresch
Tammy	Dent
Stephanie	Hart
Virginia	Pratt
Harry	Schaubel
Gerald	Dukat
Jerome	Kunicki
Chivas Orlando	Owens
Tim	McCormick
Sterling	Brandenburg
Tammy	Dopp
Missy	Netzel
Joan	Hartung

Philip	Post
Sandra	Kelly
Dawn	Johnson
Ryan	Antczak
Margaret	Fisher Tyler
Sherrie	Hannah
Eddie	Moore II
Jeffrey	Langer
Fran	Wallace
Richard	Champion
Julie	Loomis
Charise	Huston
Al	Timm
Rich	Metzger
Virginia	Koch
Lashawnda	Westmoreland
Julie	Karcher
Sally	Schmidt
Jason	Bonow
Julie	Samowski
Kelly	Weiss
Susanne	Krasovich
George	Azeh
Alessandro	Berto
Steve	Engstrand
Carol	Hioki
Tom	Stocco
Sharon	Azinger
Christopher	Matysik
Travis	Clark
Alciro	Deacon



From: electionworker
Bcc:



Subject: Republican Party Election Inspector Nominees
Date: Tuesday, January 2, 2024 9:04:01 AM
Attachments: image002.png

Good afternoon,

You have been nominated by the Republican party to serve as an Election Inspector for the 2024-2025 term. To confirm your nomination please complete this online application at:

<https://milwaukeepwp.pollchief.com/worker-portal/application>

Please complete these steps by January 15th. After your application is submitted, you will receive an email to complete an employee information sheet. If you wish to receive payment, you will need to upload a picture of your social security card along with your employee information sheet.

Please see below our frequently asked questions section. If you have any additional questions, please contact us by replying to this email or by calling us at 414-286-3491.

Ex. 2

City of Milwaukee Election Commission
414-286-3491

FAQ

Why do I have to submit a copy of my social security card?

It is a policy of the Office of the Comptroller in order for you to receive payment for attending training and working on Election Day.

Do I need to submit a copy of my social security card if I am volunteering my time?

No, you do not need to submit a copy of your social security card if you do not want to receive payment.

Am I required to attend a training?

Yes, attending training is a requirement for all new Election Inspectors.

How much will I be paid for attending training and working on Election Day?

You will be paid \$30 for attending a 2 hour training and \$220 for working a full shift on Election Day.

When will I know where I am working?

After attending training in January, the Election Commission will assign you to a polling place.

Regards,

City of Milwaukee Election Commission
200 E. Wells St., Room 501, Milwaukee, WI 53202
(414) 286-3957



From: Charles Hanna
To: electionworker@milwaukee.gov
Subject: Re: Poll Worker Application - Next Steps
Date: Tuesday, January 30, 2024 11:11:08 AM

I accept the position.
On Tue, Jan 30, 2024 at 11:06 AM <electionworker@milwaukee.gov> wrote:

Dear Charles Hanna,

Thank you for applying to serve as an Election Inspector. To move forward with your application please complete the following steps in order.

Complete an Employee Information Sheet

You need to complete an Employee Information Sheet. If you want to receive payment for your service you will also need to attach a copy/picture of your social security card. This is a requirement in order to receive payment. You can complete the Employee Information Sheet securely via DocuSign [here](#) or you in-person at our office in City Hall, [200 E Wells Street, Room 501](#), Monday-Friday from 8:00am – 4:30pm.

Create a Poll Worker Portal Account

After we review and approve your Employee Information Sheet, you will receive an email to create a Poll Worker Portal Account. Once you login to your worker portal you will be able to sign up to attend a training class.

If you have any questions, please contact us by replying to this email or by calling us at 414-286-3491.

Sincerely,

City of Milwaukee Election Commission

electionworker@milwaukee.gov

[414-286-3491](tel:414-286-3491)

[200 E Wells St, Room 501](#)

[Milwaukee, WI 53202](#)

Ex. 3

milwaukee.gov/election

Follow us on social media



Subject	Type	Sent/Printed Date & Time	Sent by	Received by
<u>2025 Elections Open for Sign Up</u>	Notified by Email	2/27/2025 9:17	Wrnk, Erin	Charles Raymond Hanna
<u>PM and on call Inspectors Needed</u>	Notified by Voice	2/15/2025 10:11	Harris, Maricha	Charles Raymond Hanna
<u>Chiefs Needed</u>	Notified by Email	2/4/2025 15:18	BROWN, CAPRICE	Charles Raymond Hanna
<u>2025 Elections Open for Sign Up</u>	Notified by Email	1/17/2025 9:51	BROWN, CAPRICE	Charles Raymond Hanna
<u>Post-Election Survey</u>	Notified by Email	1/17/2024 15:09	BROWN, CAPRICE	Charles Raymond Hanna
<u>Election Tuesday November 5 - Assignment and Other Reminder</u>	Notified by Email	10/29/2024 12:35	Zuniga, Jonatan	Charles Raymond Hanna
<u>Correction: Training Attendance Not Required</u>	Notified by Email	10/29/2024 9:22	Anders, Debra	Charles Raymond Hanna
<u>General Election - Sign Up for Training</u>	Notified by Email	10/28/2024 12:27	Anders, Debra	Charles Raymond Hanna
<u>November 5 Election Work Assignment</u>	Notified by Email	10/4/2024 8:40	Zuniga, Jonatan	Charles Raymond Hanna
<u>Optional Poll Worker Safety and Security Training</u>	Notified by Email	9/19/2024 16:00	Zuniga, Jonatan	Charles Raymond Hanna
<u>General Election - Sign Up for Optional Training</u>	Notified by Email	9/11/2024 14:36	Bennett, Jennifer	Charles Raymond Hanna
<u>Post-Election Survey & Paycheck Info</u>	Notified by Email	8/19/2024 13:28	Zuniga, Jonatan	Charles Raymond Hanna
<u>Election - Polling Location Assignment</u>	Notified by Email	8/12/2024 15:01	Maldonado, Sonia	Charles Raymond Hanna
<u>Election - Volunteer Status Change</u>	Notified by Email	8/8/2024 14:04	BROWN, CAPRICE	Charles Raymond Hanna
<u>Election - Volunteer Status Change</u>	Notified by Email	8/7/2024 15:53	Bennett, Jennifer	Charles Raymond Hanna
<u>New Election Inspector Training Reminder</u>	Notified by Email	8/6/2024 10:34	Bennett, Jennifer	Charles Raymond Hanna
<u>Election Training Assignment</u>	Notified by Email	7/29/2024 8:30	Helsper, Kathryn	Charles Raymond Hanna
<u>New Election Inspector Training Reminder</u>	Notified by Email	7/26/2024 12:39	Bennett, Jennifer	Charles Raymond Hanna
<u>Training Signup Confirmation</u>	Notified by Email	7/11/2024 8:04	Hanna, Charles	Charles Raymond Hanna
<u>Fall Primary - Sign Up for Training</u>	Notified by Email	7/10/2024 10:16	Bennett, Jennifer	Charles Raymond Hanna
<u>Poll Worker Application Approved - Create Your Worker Portal</u>	Notified by Email	7/8/2024 11:42	BROWN, CAPRICE	Charles Raymond Hanna
<u>Poll Worker Application - Next Steps</u>	Notified by Email	6/27/2024 11:22		Charles Raymond Hanna

Ex. 4

Election	Position	Location	DateTime
08/13/2024 Fall Primary	Election Inspector	Holt Playground Fieldhouse	8/13/2024
11/05/2024 - General Election	Election Inspector	Holt Playground Fieldhouse	11/5/2024

Block, Kathryn

From: Block, Kathryn
Sent: Wednesday, June 19, 2024 11:23 AM
To: kag@lcojlaw.com
Cc: Gutierrez, Paulina
Subject: FW: Charles Hanna
Attachments: 5037855.pdf

SO sorry for not getting back to you sooner.

Yes, in the future I have no issue with you submitting forms of this type directly to MEC but I am also forwarding same to Paulina. I do not believe the form coming from you (vs. the usual manner) makes any substantive difference to either of us, but I'll allow Paulina to tell me if I'm wrong.

Kathy

From: Kurt A. Goehre <kag@lcojlaw.com>
Sent: Wednesday, June 19, 2024 11:09 AM
To: Block, Kathryn <kblock@milwaukee.gov>
Subject: RE: Charles Hanna

Asst. City Attorney Block,

I wanted to follow up on the e-mail below, as I know you were out of the office when I sent it last week. As a result of your prior submissions in EL 24-39—in particular the Employee Information Sheet that was attached to Ms. Woodall's affidavit—I had my client complete that Employee Information Sheet form. A copy of the completed form is attached.

Can you confirm whether you are willing to accept the form on behalf of your clients or, if not, whether you have any issue with either myself or my client returning the form to the Milwaukee Election Commission (presumably via e-mail to: electionworker@milwaukee.gov)?

Please do not hesitate to contact me if you have any questions or would like to discuss further. Thanks.

Kindest regards,

KURT A. GOEHRE
Partner/Attorney
Law Firm of Conway, Olejniczak & Jerry, S.C.
231 S. Adams Street | P.O. Box 23200
Green Bay, WI 54305
P: 920-437-0476 F: 920-437-2868
E: KAG@lcojlaw.com | lcojlaw.com

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From: Kurt A. Goehre
Sent: Thursday, June 13, 2024 2:39 PM
To: kblock@milwaukee.gov
Subject: Charles Hanna

Asst. City Atty. Block,

As you know, I represent Charles Hanna in relation to EL 24-39. As a result of Respondent's recent submissions in that case—in particular the Employee Information Sheet that was attached to Ms. Woodall's affidavit—I had my client complete that Employee Information Sheet form. A copy of the completed form is attached.

Since my client never received the form previously and did not receive an e-mail with a link to submit the form, I was unsure exactly how to submit the form and wanted to avoid any perception of ex-parte communications. As a result, can you confirm whether you are willing to accept the form on behalf of your clients or, if not, whether you have any issue with either myself or my client returning the form to the Milwaukee Election Commission (presumably via e-mail to: electionworker@milwaukee.gov)?

Please do not hesitate to contact me if you have any questions or would like to discuss further. Thanks.

Kindest regards,

KURT A. GOEHRE
Partner/Attorney
Law Firm of Conway, Olejniczak & Jerry, S.C.
231 S. Adams Street | P.O. Box 23200
Green Bay, WI 54305
P: 920-437-0476 F: 920-437-2868
E: KAG@lcojlaw.com | lcojlaw.com

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CITY OF MILWAUKEE
Election Commission
 200 East Wells Street - Room 501
 Milwaukee, WI 53202
 (414) 286-3491

EMPLOYEE INFORMATION SHEET

Note: All Information asked for on this sheet is REQUIRED

****THIS FORM DOES NOT UPDATE VOTER REGISTRATION CHANGES****

Legal Name (Exactly as it appears on your Social Security card):

HANNA Charles R
 Last Name First Name M.I.

2525 S Shore Dr #10E
 HOME Street Address Apt # City State Zip

Milwaukee WI 53207
 MAILING Street Address (If Different) City State Zip

Phone Type:	Phone Number:	Choose Main Number:	E-Mail Type:	E-Mail Address:	Choose Main:
HOME	(414) 483-0661	<input type="radio"/>	PERSONAL	crayshen@gmail.com	<input type="radio"/>
MOBILE	(414) 975-0661	<input checked="" type="radio"/>	OTHER		<input type="radio"/>

I wish to VOLUNTEER. (Do not provide Social Security number below)

I wish to Receive Payment. (A copy of your Social Security Card is Required for payment)
 Social Security Number _____

Date of Birth 03/07/1944 Sex: Male or Female

Marital Status: Divorced Married Separated Single Widowed

Ethnic Group(s): African American/Black Asian Caucasian/White Hispanic/Latino
 Native American Native Hawaiian/Pacific Islander
 (Circle all that apply and underline the primary/main one.)

Signature Charles R Hanna Date 06/06/2024

<input type="checkbox"/> Updated in Database	Office Staff Initials:	Date:
<input type="checkbox"/> Updated in HRMS/ #:	Office Staff Initials:	Date:

Ex.D