

In re: The Matter of:

Recall Petition of Angela Hansen-Winker

**WRIGHTSTOWN COMMUNITY SCHOOL DISTRICT BOARD
PRESIDENT ANGELA HANSEN-WINKER'S VERIFIED REPLY IN
SUPPORT OF MS. WINKER'S VERIFIED CHALLENGE TO THE
RECALL PETITION**

INTRODUCTION

On February 13, 2025, Petitioner Wrightstown School Board Member Rayn Warner filed a recall Petition with the Wrightstown School District Clerk seeking the recall of Wrightstown School Board member and president Angela Hansen-Winker. On February 21, 2025, Angela filed a Verified Challenge to the recall Petition. A Rebuttal to Angela's challenge was filed on February 25, 2025. Angela now files this Reply to the Rebuttal in support of her Challenge. For the reasons set forth in Angela's Challenge and herein, the Recall Petition falls short of the requisite 1,206 signatures necessary to conduct a recall election and should be rejected as insufficient by the Clerk.

JURISDICTION

Wis. Stat. §9.10(4)(a) allows Angela to file a Reply with the Wrightstown School District Clerk within two days of the Petitioner's Rebuttal which was filed with the Clerk on February 25, 2025.

ARGUMENT

- a. The Recall Petition is insufficient because it fails to state a legitimate claim and is impermissibly vague.**

Petitioner Rayn Warner has the personal responsibility to assure that the Recall Petition is prepared, circulated, signed and filed in compliance with statutory and other legal requirements. Wis. Admin. Code § EL 2.05(1) and § EL 2.09(1). Notwithstanding his conflict of interest as a school board member, overt political bias, disrespect for Wisconsin's election laws, state laws, Constitutional laws, and questionable, if not fraudulent, circulation practices, Mr. Warner has circulated and filed the Recall Petition which, on its face, falls far short of the necessary legal elements set forth in Wis. Stat. § 9.10(2)(b).

Petitioner's rebuttal claims that "Any elected official may be subject to recall for any reason." Rebuttal, at p. 1. This statement is false. Wis. Stat. § 9.10(2)(b) requires that a recall petition "*shall contain a statement of a reason for the recall which is related to the **official responsibilities** of the official for whom removal is sought.*" (emphasis added). Petitioner admits that the Official Statement of Intent to Circulate Recall Petition on file with the Clerk contains many more allegations about the alleged reasons for the recall related to Angela's **official responsibilities**. Rebuttal; at p. 1, Exhibit A. The Recall Petition on its face contains only four of the enumerated allegations set forth in the Official Statement—but each of them are inherently and impermissibly vague. As the Recall Petition is required to state fully the reasons for recall and as the Official Statement contains different information regarding the reasons for recall, the Recall Petition is defective on its face and no signatures can be counted.

Petitioner claims in his rebuttal that "*Electors have a right to seek information ...*" Rebuttal, at 1. As such, Petitioner apparently believes that all of the allegations supporting the recall must be discovered and researched by the signer by searching for the Official Statement in the Clerk's office prior to signing the Petition. Nowhere in statute does the law require a signer of a recall petition to seek out the official Statement in the Clerk's office prior to signing so that they

can know what they signed or may sign. In fact, Wisconsin state law directly addresses this. The Recall Petition itself must *clearly state the reason for the recall*. Wis. Stat. § 8.40(2). Vague statements like “violations of board policies” or other broad generalizations are facially defective, violative and insufficient. Here, the Recall Petition fails to state the accurate reasons for the recall as set forth by the Petitioner in the Official Statement. As such, the Recall Petition is defective on its face and the Recall Petition signatures cannot be counted.

Notably, Petitioner, in his Rebuttal, effectively *admits* that the recall petition failed to provide a clear and sufficient justification for recalling Angela, as required by Wis. Stat. § 9.10(2)(b). Instead of disputing that the stated reasons were impermissibly vague, Petitioner argues only that electors could have sought additional information from the Clerk. This is wholly inappropriate and directly contradicts the statutory requirement that sufficient reasons must be evident from the face of the Recall Petition itself. Under Wisconsin Administrative Code EL § 2.11(3) and case law precedent in *United Cooperative v. Frontier FS Cooperative*, 2007 WI App 197, 304 Wis. 2d 750, 738 N.W.2d 578, failure to address a legal deficiency constitutes waiver and concession. Because Petitioner failed to rebut the argument that the recall petition itself lacked the required specificity, he has admitted this fatal defect, requiring rejection of the recall petition.

b. The Recall Petition circulators may not edit or change any signature data on the Petition.

Petitioner claims that circulators have the right to edit the municipality within the signature data due to recent municipal annexations and other reasons. Rebuttal, p. 3. This statement is false. Circulators have NO right to edit any information provided by the signer. Wis. Stat. § 8.40(2). When circulators enter a second municipality on the Petition, the Clerk cannot determine from the Recall Petition “on its face” the signer’s correct address and municipality. Nor can the Clerk determine who edited the signature data. As such, all signatures so modified by the circulators are

ambiguous “on its face” and cannot be counted by the Clerk when performing his “careful examination” of the Petition. Wis. Stat. § 9.10(4)(a). The Clerk is not required, and, by law is not allowed, to research or verify addresses or municipalities. The Clerk is required to look at the Recall Petition and decide from information provided by the signers *on its face* whether the Recall Petition is sufficient for certification. Wis. Stat. § 9.10(4)(a).

Rather, the *signer* of a recall petition is required by statute to sign the Recall Petition and fill in the required information. Wis. Stat. § 8.40(1). Petitioner admits that “changes” to the Recall Petition were done by persons other than the signer and were “the result of clerical errors or simple administrative oversight.” There is no statute or case law in Wisconsin that allows *any* person, other than the elector himself, to change or edit any signature on the Petition. As such, *none* of these signatures with “changed” data can be counted. Rebuttal, at p. 3.

Petitioner also claims that he was advised by Wisconsin Elections Commission staff person, Mr. Riley Willman, who allegedly told him that “the address, municipality, and circulator information on Recall Petition sheets can be corrected by the circulator.” Rebuttal, pp. #3. Most importantly, ***Petitioner offers no communication, email, statement, letter, affidavit or other evidence to show that Mr. Willman so advised them.*** In fact, Mr. Willman is not a WEC commissioner and has no authority to advise any Wisconsinite to violate Wis. Stat. § 8.40(2) or Wis. Stat. §9.10(4). *See Pellegrini v. Wisconsin Elections Commission*, 22CV1656 (discussing that WEC staff cannot issue substantive guidance or rules affecting election administration without commission oversight). There exists no official WEC guidance, No WEC administrative Rule, no Wisconsin Statute, no Wisconsin case law and no reference in WEC’s official publication: *Recall of Local Elected Officials (2020 ed.)* (See: Rebuttal, Exhibit Q), to support this claim or otherwise allow any recall petition circulators to edit any signature data on a recall petition. In fact, Wis. Stat.

§ 8.40(2) makes it clear that recall petition circulators cannot edit signature data in any way, and that doing so is a violation of Wisconsin's election fraud statute Wis. Stat. § 12.13. As such, this statement by the Petitioner is untrue.

Further, Petitioner claims that “the process of collecting and verifying signatures is rigorously and closely monitored to ensure accuracy and transparency.” Rebuttal, pp. #3. This statement is false. Nobody rigorously and closely monitors circulators. Nowhere in law is there any requirement by anyone other than the circulator him or herself to follow the law regarding the circulation of recall petitions - including the requirement that “*the circulator is aware that falsifying the certification is punishable under Wis. Stat. § 12.13(3)(a).*” Wis. Stat. § 8.40(2).

c. Petitioners are government officials and have a conflict of interest and vested interest in the outcome of the recall.

Petitioner claims he and other circulators are not “government officials” but rather private persons circulating the Petition. Rebuttal pp. #6. In fact, the Petitioner and one of the circulators are elected school board members and will have to cast a vote to call the recall election - should one be necessary. Notwithstanding the misuse of school board property, misuse of school events, misuse of school district branding and intellectual property (all in violation of school board policy), the participation in restricted Facebook forums in violation of Angela's civil rights and Wisconsin Open Meetings and Open records law, and the illegal editing of signatures, these school board members—(one of whom is the recall Petitioner), organizers, circulators, and promoters—should not be allowed to vote on any scheduling or procedural matter relating to the Recall or the Recall Petition should a vote by the Board be required. Fraud in the inducement of the recall election cannot be a basis for participating in a recall election vote. For the same reasons, Petitioner's Exhibits Y and Z also confirm that Van Vreede and Lemke also had direct access and

control to the creator of the recall website www.r4wcsd.com wherein Kimberly Denkins is listed on both as point of contact and Admin at the time of Board Members Van Vreede and Lemke.

Next, Van Vreede and Lemke were Admins and had ongoing access to the Private Facebook Page regarding official school board matters about Angela relating to the recall. Petitioners attempt to argue that Wrightstown School Board members Tiffany Van Vreede and Melinda Lemke were not "admins" of the private Facebook page by providing screenshots showing that Lemke manually changed her own status—and that of Van Vreede—from Admin to Member on December 4, 2024. This argument misses the point entirely.

First, the screenshots confirm that both Lemke and Van Vreede were, in fact, Admins prior to December 4, 2024. Their ability to change their own status proves they had administrative control over the page. Additionally, their connection to current admin Kimberly Denkins, who was an admin alongside them, means they continue to have direct access to the page's leadership and influence over its content. As public officials, they had the ability to control participation, discussions, and access for Wrightstown electors, including Angela.

Second, Petitioners fail to address an important issue: the private Facebook page was used by Wrightstown board members—including Van Vreede, Lemke, and Rayn Warner—to discuss official School Board matters. This may constitute a quorum, meaning their actions on this page violated Wisconsin's Open Meetings Law. Notably, Petitioners do not even attempt to rebut this point, effectively conceding it.

Thus, their argument regarding admin status is nothing more than a misdirection to avoid addressing the larger issue: public officials used a private forum to conduct government business, excluding public participation and violating the law.

- d. Petitioner is incorrect that public officials cannot violate the First Amendment based on their purported "private actions" on a social media page.**

Angela argued that the First Amendment prohibits government officials from restricting access to public forums based on their identity or viewpoint discrimination. Courts have recognized that when public officials use social media to discuss official business—such as announcing policies or engaging with constituents about board matters—those platforms function as public forums subject to constitutional protections. The U.S. Supreme Court in *Lindke v. Freed* and the Northern District of Illinois in *Czosnyka v. Gardiner* reaffirmed that officials cannot exclude individuals from these forums based on disagreement or criticism. *Lindke*, 601 U.S. 187 (2024); *Czosnyka*, 21-cv-3240, (N.D. Ill. Sep. 25, 2023).

In *Lindke*, the Supreme Court held that a public official's social media account is subject to the First Amendment when used to exercise government authority. Similarly, *Czosnyka* ruled that blocking critics from an official government Facebook page constituted unconstitutional viewpoint discrimination. Both cases establish that when officials open digital spaces for public discussion, they must allow equal access regardless of viewpoint.

In her Challenge, Angela argued that these legal standards for public officials violate the First Amendment because, not only did the Facebook page kick people out, but it restricted Angela and many citizens' access, and *requested that citizens state their beliefs* regarding recall issues prior to entry. This is clear and unequivocal viewpoint discrimination and violations of the First Amendment. Specifically, where *board members* Rayn Warner, Tiffany Van Vreede, and Melinda Lemke all publicly posted about official school board issues—all of which were part of their “recall petition” effort against Angela.

Petitioner's argument that their actions, removals, and restrictions of accessing the page did not constitute “government restrictions” is incorrect and inconsistent with established precedent. These cases above underscore that public officials who use social media for

governmental purposes, such as discussing confidential and official board matters to obtain signatures against Board President Angela, cannot censor dissenting voices. Just as traditional public forums require viewpoint neutrality, government-run social media pages must remain open to all constituents. Because Petitioner's Rebuttal admits and provides evidence that Board Members Lemke and Van Vreede were not only Admins but were connected to with direct access and control over the Admin, Ms. Denkins, they too facilitated and participated in the constitutional violations that perpetuated their "recall" signatures in violation of both *Angela* and many electors' First Amendment rights. Blocking users or deleting critical comments is a violation of free speech rights, reinforcing that digital public forums must be governed by constitutional principles. No part of the Facebook page discussed anything other than official board matters and allegations about Angela including district legal counsel and internal investigations or board policy matters. The Recall Petition should be rejected outright for its clear and unequivocal violation of many citizens, including Angela's, First Amendment rights.

e. Standard of Review by Clerk.

Petitioner incorrectly argues that the Clerk can research land records or property listings to verify a signer's address and municipality. Rebuttal, at p. 3. In fact, the Clerk has no power or duty to look beyond the face of the Recall Petition to determine the validity of any signature data. The duty to certify the Recall Petition rests solely with the Clerk. "The Clerk... shall determine by **careful examination of the face of the [Recall] Petition** whether the Petition is **sufficient...**" for certification. Wis. Stat. § 9.10(4)(a) (emphasis added). This means that the Clerk must review each signature and data on the Recall Petition and reasonably believe only from the writing on the Recall Petition itself the accuracy of the signature, printed name, address, municipality and date of each signature. Wis. Stat. §9.10(4)(a).

The Clerk is limited to the data written on the Recall Petition by the signer to make a determination “on its face” as to whether the signature complies with legal requirements. Wis. Stat. § 8.40(2). The Clerk cannot go beyond the “face” of the Recall Petition to correct or verify any signature data using outside sources. Wis. Stat. § 9.10(4)(a). As such, the Clerk cannot determine from the face of the Recall Petition where any signer lives if the Recall Petition gives two separate municipalities for a signer. Those signatures cannot be counted because they are insufficient on the face of the Petition. Given the number of edited signatures in the Recall Petition exceeds 250 signatures, this deficiency fails to deliver the requisite 1,206 valid signature minimum threshold to sustain a recall election of Angela. The Petitioner himself confirms the Clerk’s limited role in admitting that the Clerk could not remove an elector who was misled—apparently acknowledging the Clerk cannot make any changes to a recall petition nor clarify unclear information. *See* Rebuttal, at pp. 10-11, Exs. De & E.

f. The Clerk should reject the Rebuttal because there is no signature or verification on the Rebuttal required under Wisconsin Administrative Code and Statutory rules.

Wisconsin Administrative Code EL § 2.07(2)(a) mandates that challenges to nomination papers be made through a verified complaint with a signed and notarized affirmation of truth. This ensures accountability and allows election officials to rely on sworn allegations. The rebuttal at issue fails to meet these verification requirements, lacking both a sworn signature and notarization. Without verification, its factual claims cannot be properly assessed, creating an inequitable standard between challengers and respondents.

Wisconsin administrative agencies and courts consistently enforce proper signature requirements in legal and election-related filings, rejecting unverified or improperly signed submissions. The same standard applies here. Because the rebuttal lacks the required verification

and signature, it should not be given legal weight or considered in response to Angela’s challenges to the Recall Petition.

g. The Rebuttal failed to sufficiently address concerns that warrant the rejection of insufficient signatures.

- **The Clerk should reject all signatures prior to January 4, 2025.**

In his Rebuttal, Petitioner admits that the Wrightstown School District logo was used on both the recall website and the recall Facebook page, which induced signatures by implication of official school board endorsement of the recall using official School Board trademarks. *See* Rebuttal, at pp. 4-5.

- **The Circulators’ targeting and manipulative abuse of electors that could not know what they were signing warrants rejection of the Recall Petition.**

Petitioner dismisses Angela’s evidence that Circulator Vande Hey sought signatures in bars late at night, claiming “location does not matter.” However, Angela’s concern is not the location itself but the circulators’ deliberate strategy of stalking electors—specifically on December 21 and 28—when they would be distracted with drinking and Packers games, ensuring they would not fully comprehend what they were signing.

As Angela noted, many electors may not even remember signing, and a single Facebook post offering an opportunity to “unsign” does not cure the fundamental issue of improper solicitation. In *Matter of Recall of Redner*, the court held that substantial compliance with recall procedures requires petitions to be circulated in a manner that prevents fraud and *ensures signers understand the petition’s contents*. 153 Wis.2d 383, 1989. If intoxication impaired a signer’s understanding, that raises serious concerns about the validity of their signature, and Petitioner has refused to address Angela’s challenge to this point nor the multiple statements she produced from electors.

Petitioner has provided no affidavits or verifiable statements from any signers at these bars late at night or during a Packer game from the contested dates, relying only on unverified claims and a narrow response that “location does not matter” (which Angela did not argue). For the same reasons, Petitioner’s argument that he and Van Vreede’s Recall Petition pages are valid because their signatories had the same chance to strike also fails.

h. Petitioner’s Failure to Respond Constitutes Waiver and the Clerk should find that the Petitioner(s) have conceded Angela’s arguments in her Challenge that were not responded to.

Petitioner submitted a rebuttal to Angela Hansen-Winker’s Challenge to the Recall Petition but failed to address multiple arguments raised in the Challenge. Under Wisconsin law, failure to rebut an argument constitutes waiver, and unchallenged allegations are deemed conceded. *United Cooperative v. Frontier FS Cooperative*, 2007 WI App 197, 304 Wis. 2d 750, 738 N.W.2d 578. Because Petitioner chose not to dispute key arguments, he has forfeited the right to contest them, and the Clerk must accept Angela’s arguments in rejecting the Petition.

This principle is supported by Wisconsin Administrative Code EL § 2.11(3), which requires that a response to a challenge to a Recall Petition be filed within the time specified by law or, if no time is specified, within five days of the challenge’s filing. The rule further states that after the deadline passes, the filing officer must decide the challenge with or without a hearing, indicating that failure to timely address specific allegations may result in those allegations being deemed admitted. Similarly, Wisconsin courts recognize that failing to respond to arguments can be taken as a concession. In *United Cooperative v. Frontier FS Cooperative*, the Wisconsin Court of Appeals held that an appellant’s failure to respond to arguments in a reply brief may be deemed a concession of those arguments. See *United Cooperative v. Frontier FS Cooperative*, 2007 WI App 197, 304 Wis. 2d 750, 738 N.W.2d 578.

The following arguments raised in Angela's Challenge remain unrebutted, *meaning*

Petitioner has conceded them:

- Petitioner failed to respond, at all, to Angela's challenge of the December 28 circulation by Rayn Warner and Jason (or Kyle) Gerend at a bar during a loud Packer game where they knew (and stalked) electors who would be drinking and distracted with the game unable to understand what they were signing. By wholly ignoring this argument entirely, Petitioner concedes Angela's challenge and waives his rebuttal and response that all signatures obtained on this date by Warner and Gerend are invalid because circulators here abused the process, stalked distracted citizens, and failed to provide any rebuttal or response, thereby conceding that these signatures were improperly obtained and must be invalidated.
- Angela argued that Petitioner and circulators that are current School Board members with Angela and knowledge of falsity of their claims, used their positions to make false and misleading statements about official school board information to induce electors to sign the Petition. Petitioner merely stated that he and Van Vreede had a right to circulate the petition. That misses the point. Angela does not dispute that Warner and Van Vreede had the right to circulate petitions—rather, she argues they misused their official positions to mislead signers with vague language and false claims. Petitioner has failed to address this argument, effectively conceding it. Petitioner did not dispute this claim and made no argument about their fraudulent inducement, effectively admitting to deceptive practices by school board members, using their official positions, that compromise the validity of the recall effort.
- Angela argued that Wisconsin law requires the stated reason to relate to the official's responsibilities. The rebuttal did not refute this legal standard or explain how the vague allegations met the statutory requirement of Wis. Stat. § 9.10(2)(b).
- Angela's argument that electors were misled and that some were intentionally denied removal was not refuted. The rebuttal gives procedural reasons for why some were not removed but does not address whether circulators actively misled electors about their ability to remove signatures, namely the fraudulent inducement of signatures on knowingly false information from current public officials.
- Angela's argument that Wis. Stat. § 8.40(1) requires signers to complete their own information. The rebuttal does not provide any response to the claim that circulators intentionally changed municipal information, nor does it address the 258 specific cases listed in Angela's complaint.
- Angela's claim that the use of district logos misled signers before its removal. The rebuttal does not address whether signatures obtained before January 4 should be invalidated because they were collected under false pretenses.
- Angela cited multiple policies (po2430, po9700, po3210, po0144.5, and p. 29 of the staff handbook) and asserted that multiple instances of circulation on school grounds occurred

as well as numerous violations of policies. The rebuttal only discusses one incident regarding circulator Jonathan Curtis on January 8, but does not respond to Angela's claim that circulators repeatedly used school facilities to collect signatures and repeatedly violated multiple policies, including fraud from current public officials on the school board.

- Angela's argument that government officials (Board Members Warner and Van Vreede) were involved in restricting access to recall discussions. The rebuttal does not refute that these officials used a private Facebook group to discuss board matters and knew that electors, including Angela, were being restricted from viewing or commenting on that public forum solely because of their identity and viewpoints. In fact, their only argument is that they are "private citizens" and their restrictions were not "official government restrictions" on speech. This is not accurate nor does it address Angela's argument that they discussed official school board matters to induce recall signatures and violated the Constitutional rights of Wrightstown electors—certainly those who would have wanted to see Angela's responses and others to their discussions about official school board policies and matters.
- Angela specifically alleged that some circulators offered bribes (such as food gifts) or told electors they would have to pay \$10 if they did not sign. The rebuttal does not explain why these allegations are false or provide any evidence disproving them despite the inclusion of a text message verifying the incident. Certainly a simple affidavit from the circulator and electors on that challenged page would have attempted to rebut this. But rather, Petitioner merely claims it is untrue in an unsworn and unverified Rebuttal.
- Angela specifically argued that Board Members Warner and Van Vreede knew certain claims about her were false before circulating petitions—going back as far as emails they received in September 2024 from the district's legal counsel and multiple communications about the investigation and district counsel resources. The rebuttal does not explain why their false statements, in their official capacities about official board matters, should not invalidate the signatures they collected. In fact, they make no argument or rebuttal to these points beyond simply stating that there is "no law against public officials gathering signatures." There are, however, many laws against intentional defamation, breach of public trust, and intentional fraud relating to an election or public office. None of these arguments by Angela were addressed or rebutted and are, thus, effectively conceded.
- Angela argued that Warner and Van Vreede submitted the recall signatures early to prevent more people from removing their names. The rebuttal does not refute this claim or explain why the signatures were submitted before the deadline.
- The rebuttal does not deny or address the potential financial burden on the district from legal liabilities, election costs, or potential retaliation claims from electors who fear reprisal and the Petitioner's breach of public trust. Despite the vague statement that Warner, Lemke, and Van Vreede were acting as "private citizens" that is not the law. Public officials are always public officials. There is not a magical light switch when it comes to using their official position and knowledge of their official position to defraud the electors in their community.

- Angela argued that the allegations in the Official Recall Statement are inconsistent with the required “reason” language printed on the Petition. Petitioner did not address this argument, meaning he concedes that the recall petition does not meet statutory requirements.
- Angela argued that circulator Nicole Gerend, using the pseudonym “Nicole Better,” contacted Angela’s legal counsel in an attempt to gather information about the evidence against the recall effort. Petitioner did not dispute this, conceding that their circulators engaged in deceptive conduct.
- Angela argued that Petitioner and circulators falsely claimed Angela initiated an investigation of the former superintendent without board knowledge or out of personal spite. Petitioner did not respond, thereby admitting that this claim was a fabrication used to mislead the public.
- Angela argued that Petitioner and circulators falsely accused Angela of using public funds to pay for her personal legal counsel. Petitioner failed to dispute this, thereby conceding that the claim was false and defamatory.
- Angela argued that she was properly performing her duties as school board president by investigating fraud and public corruption. Petitioner provided no rebuttal, conceding that their attacks on Angela’s official actions were unfounded.

Because Petitioner failed to rebut these arguments, he has waived his right to contest them here or in any appeal. As a result, under Wisconsin Administrative Code EL § 2.11(3) and case law, the Clerk must accept Angela’s arguments herein as undisputed and reject the Recall Petition entirely based on the foregoing.

i. Petitioner’s claim that accusations of false statements are “opinions” lacks any relevance to Angela’s argument.

Petitioner’s claim that Angela’s accusations of dishonesty are merely opinions (p. 6) disregards the clear factual evidence demonstrating intentional misconduct. The District’s legal counsel confirmed in writing that the statements made by school board member circulators were false *to the Board* months before the Recall Petition began. Furthermore, statements from Angela, along with the evidence presented to the Board, establish that these falsehoods were not only deliberate but were wielded maliciously by public officials leveraging their positions of authority. This was not a case of subjective interpretation or opinion—it was a calculated effort to mislead

the public and induce signatures under false pretenses. Given this, signatures obtained through such deceptive tactics cannot be considered voluntary and must be rejected.

Next, more electors have come forward since the filing of Petitioner's rebuttal who are upset that they were misled into signing the Recall Petition from school board officials or their spouses. Christopher Charles Lemke, the spouse of Wrightstown School Board member Melinda Lemke, knowingly misled electors while circulating the Recall Petition. Like Petitioner Rayn Warner and Circulator Tiffany Van Vreede, Ms. Lemke had direct knowledge that Angela never used District legal counsel for personal matters—because all three of these people are current Wrightstown School Board officials who serve with Angela and received the same communications from the District's counsel that confirmed they engaged in no personal favors and represented the district only. Despite this, Ms. Lemke's husband falsely told electors that Angela misused taxpayer funds for legal fees. Lemke personally circulated over a dozen Recall Petition pages, securing at least 100 signatures based on this false claim.

After the Petitioner's rebuttal was filed, Angela has since received a sworn affidavit from an elector detailing this misconduct (attached to this Reply). This affidavit confirms that electors were misled by circulators—including Wrightstown School Board members and their associates—who fabricated claims to induce signatures. The vague language of the Recall Petition allowed circulators to spread false information without accountability, creating a recall effort tainted by deception.

This is not just a breach of public trust; it is a clear violation of the law. This is not an opinion but supported by numerous statements from electors within the Wrightstown Community. The Clerk must reject the Recall Petition in its entirety due to its misleading circulation and the fraudulent inducement of electors. The elector who signed the affidavit fears retaliation from

Wrightstown officials Warner, Van Vreede, and Lemke for opposing the recall. Thus, the affiant has requested redaction of their name. This intimidation chills free speech and coerces silence, a clear First Amendment violation. This intimidation unlawfully compels and coerces speech. *See e.g. Pet. Rebuttal, Exs. O & P* (same added back mysteriously after requesting removal). Electors were not only misled into signing but now fear consequences for speaking out. If this recall proceeds, the District may be at risk for legal and financial repercussions. The Clerk must reject this petition.

CONCLUSION

For the forgoing reasons, the Clerk must reject the Recall Petition entirely because it is woefully insufficient, and Petitioner's rebuttal conceded the majority of the arguments raised in Angela's Challenge.

Dated: February 27, 2025.

Respectfully submitted,

Electronically signed by: Jennifer T. DeMaster

Jennifer T. DeMaster

Wis. Bar No. 1124201

DEMASTER LAW LLC

361 Falls Rd, Ste 610

Grafton, Wisconsin 53024

Phone (414) 235-7488

Fax: (262) 536-0515

jennifer@demasterlaw.com

Daniel J. Eastman

Wis. Bar No. 1011433

EASTMAN LAW, LLC

PO Box 158

Mequon, Wisconsin 53092

Phone: (414) 881-9383

dan@attorneyeastman.com

AFFIDAVIT

State of Wisconsin

County of Brown

I, [redacted], being duly sworn to hereby swear and affirm the [redacted]

[redacted] and I reside at [redacted], I witnessed or learned of [redacted]

3. I am a resident of the Town of Wrightstown and am over the age of 18. I have personal knowledge of the facts stated herein and if called as a witness, could and would testify thereto.

Statement of Facts: On 2/23/25 I spoke with a member of my family who signed the recall petition against Angela Hansen Winkler. During our talk, I inquired about the statements made to her by the petitioner. During our conversation I asked them about their experience when approached as well as I sought their insights into this experience with the petitioner. Please note the petitioner is Chris Lemke.

Details of Petitioner's Statement: The petitioner informed my family member the reason for pursuing the recall was due to Angela Hansen Winkler alleged use of district funds to pay for her legal representation. It was further claimed that when Angela was questioned about these funds, she responded aggressively and asserted she did not need to justify or explain herself. The petitioner also said Angela's behavior during schoolboard meetings has been concerning & belligerent when voting on decisions, especially when the vote was 4 to 3 and no discussion was ever held.

Clarification of Facts: I have found these allegations to be false against Angela Hansen Winkler. She did not use district monies to pay for her lawyer. She has not behaved inappropriately - please =>

4. The above information is based on and to the best of my personal knowledge.

Please see this is confirmed by James Macy-1 [redacted]

Affiant's name [redacted]

Signed and sworn to before me on 26 (date) February 2025 by (affiant's name) [redacted]

Cindy Zebroski Notary Public, State of Wisconsin

My commission 8/22/26

This notarial act involved the use of communication technology.



view meetings online. She maintains order as her job requires. Accusing her of aggressive behavior is untrue and attacks her character. Such claims are unfounded and misrepresented.

Impact on Angela Hansen Winker's reputation:

These false allegations have contributed to the defamation of Angela Hansen Winker's character within the Wrightstown Community. The dissemination of these untrue statements has caused harm to her reputation and has led to unwarranted negative perceptions among community members. Furthermore, the above claims are untrue and are contributing to the ongoing defamation of Angela's character within the Wrightstown community. Several people are now speaking about these claims in the community and these rumors prompted me to reach out to family who signed the petition to confirm these stories.

Conclusion:

I affirm that this information provided in this affidavit is true & correct to the best of my knowledge and belief.

VERIFICATION

I, Angela Hansen-Winker, being first duly sworn under oath, states that I personally read the foregoing Verified Reply in Support of my Challenge to the Recall Petition, and that the information contained therein is true and correct based on my personal knowledge. Where not based upon personal knowledge, I believe the information to be true based upon information and belief.



Angela Hansen-Winker

Subscribed and sworn to me on this 27th day of February 2025.



Notary Public: Daniel J. Eastman, Esq.

My commission is permanent.



