

## Sworn and Notarized Statement

I, Sandra Morris who resides at 908 Belmont Ave, Racine, WI 53405 submit my Sworn Wisconsin Election Commission Complaint under the Penalty of Perjury.

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

Sandra K Morris  
Complainant Sandra Morris's Signature

STATE OF WISCONSIN )

) ss.

County of Racine,

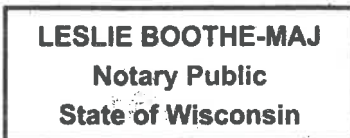
(county of notarization)

Sworn to before me this day of April 22, 20 22.

Leslie Boothe-May  
(Signature of person authorized to administer oaths)

My commission expires 5-28-2024, or is permanent.

Notary Public or \_\_\_\_\_  
(official title if not notary)



### Sworn and Notarized Statement

I, Sandy Weidner who resides at 2310 Thor Avenue, Racine, WI 53405 submit my Sworn Wisconsin Election Commission Complaint under the Penalty of Perjury.

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

*Sandy Weidner*  
Complainant Sandy Weidner's Signature

STATE OF WISCONSIN )  
) ss.  
County of Kenosha  
(county of notarization)

Sworn to before me this day of April 18, 2022.

*Leslie Boothe-May*  
(Signature of person authorized to administer oaths)

My commission expires 5-28-2024, or is permanent.

Notary Public or \_\_\_\_\_  
(official title if not notary)

**LESLIE BOOTHE-MAJ**  
Notary Public  
State of Wisconsin

**State of Wisconsin  
Before the Wisconsin Elections Commission**

**The Verified Complaint of**

1. Sandy Weidner  
2310 Thor Avenue  
Racine, WI 53405  
[sandy.weidner29@yahoo.com](mailto:sandy.weidner29@yahoo.com)

2. Sandra Morris  
908 Belmont Ave  
Racine WI 53405  
[sandra.kay.888@gmail.com](mailto:sandra.kay.888@gmail.com)

**Against Complaint Respondent**

City of Racine Clerk Tara Coolidge  
730 Washington Avenue  
Racine, Wisconsin 53403  
[clerks@cityofracine.org](mailto:clerks@cityofracine.org)  
262-636-9171

This complaint and response are made under Wisconsin Statute § 5.06.

Wis. Stat. 5.25(4)(a) states, “Each polling place shall be accessible to all individuals with disabilities. Racine’s mobile polling location is “not accessible to all individuals with disabilities” as Wis. Stat. 5.25(4)(a) requires.

In Clerk Coolidge’s response she failed to assert that Racine’s mobile polling location was accessible to all individuals with disabilities. Instead Clerk Coolidge stated that the clerk’s staff will meet with disabled voters outside of the mobile polling location as an alternative. Regardless of Clerk Coolidge and her staff’s willingness to meet disabled voters outside the mobile polling location, Clerk Coolidge and her staff must comply with Wis. Stat. 5.25(4)(a)’s requirement that “Each polling place shall be accessible to all individuals with disabilities.” Racine’s mobile polling location is ADA noncompliant because the polling place entrance, corridor, voting booths, turnaround space, and exit all fail to meet ADA standards.

Clerk Coolidge's response included an admission that Racine's mobile polling place was inaccessible to all individuals with disabilities. "For voters who are unable to enter the election vehicle, curbside voting is available" is what Clerk Coolidge wrote in her defense of using an ADA noncompliant polling place. Wis. Stat. 5.25(4)(a) does not include a provision that replaces its disabled voters accessibility requirement with curbside voting.

Wis. Stat. 5.25(4)(a) also states, "The commission shall ensure that the voting system used at each polling place will permit all individuals with disabilities to vote without the need for assistance and with the same degree of privacy that is accorded to non-disabled electors voting at the same polling place." By Clerk Coolidge's own admission, individuals with disabilities that can't enter Racine's mobile location must request assistance to use curbside voting. For Clerk Coolidge to require assistance for disabled individuals to vote curbside is contrary to Wis. Stat. 5.25(4)(a) that requires all individuals with disabilities to have the opportunity to vote without the need for assistance.

The WEC Election Administration Manual states, "In order to comply with this requirement, municipal clerks are required to submit a completed Polling Place Accessibility Survey indicating accessibility conformance. A copy of this survey is available on the agency website where it may be submitted electronically. Wis. Stat. § 5.25(4)(a)."

Complainant Sandy Weidner submitted open records requests asking for a copy of Racine's Polling Place Accessibility Survey from WEC. WEC Staff Attorney Brandon Hunzicker replied that WEC had no record of a Polling Place Accessibility Survey for Racine's mobile polling location.

Complainant Sandra Morris submitted an Open Records requests for a Polling Place Accessibility Survey for mobile polling location to the City of Racine. The Racine City Attorney responded that there is no Wisconsin statute that requires Racine to submit a polling place accessibility survey.

Complainants agree with the Racine attorney that there is no statutory requirement, but WEC has a policy that requires a submission of an accessibility survey. Complainants believe WEC's policy that requires municipal clerks to submit a polling place accessibility survey as proof of

accessibility conformance is an excellent policy since WEC's policy protects the voting rights of disabled voters whenever clerks establish a new Wisconsin polling place. Complainants assume Clerk Coolidge would want to follow both statutes and policies that advocate for the rights of disabled voters.