

State of Wisconsin
Wisconsin Elections Commission
212 Washington Avenue, Third Floor
P.O. Box 7984
Madison WI 53707-7984

In the Matter of:
City of Milwaukee
Overvote in Certain
Wards

Case No.

Jonathan Hunt
Wisconsin Voters Alliance
1511 N. Water Street, Unit 414
Milwaukee WI 53202

v.

Verified Complaint

Stephanie D. Findley
Chair
Elections Commission
City of Milwaukee
City Hall
200 E. Wells Street
Room 501
Milwaukee, WI 53202;

Expedited Proceeding Requested

Carmen Cabrera
Elections Commission
City of Milwaukee
City Hall
200 E. Wells Street
Room 501
Milwaukee, WI 53202;

Jess Ripp
Elections Commission
City of Milwaukee
City Hall
200 E. Wells Street
Room 501
Milwaukee, WI 53202;

Respondents.

This complaint is under Wisconsin Statutes § 5.06.

I, Jonathan Hunt, on behalf of myself and the Wisconsin Voters Alliance, allege the following for their complaint against the City of Milwaukee.

1. This complaint is made pursuant to Wisconsin Statutes § 5.06(1) and other laws applicable to elections and election campaigns.

2. I am a resident, elector and voter in the City of Milwaukee.

3. The Complainants seek an immediate order under § 5.06(6) to refrain and enjoin the Respondent Milwaukee election officials from overcounting ballots.

4. I have read the attached Milwaukee City Wire article (Exhibit A) which indicates that seven City of Milwaukee wards “reported more U.S. Presidential votes than they had registered voters.”

5. The reported U.S. Presidential votes from Milwaukee wards 234, 269, 272, 273, 274, 312 and 326 exceed 100% of the registered voters.

Ward	Registered	Biden	Trump	Total	Turnout	Biden %
274	640	688	602	1,290	202%	53%
273	634	672	600	1,272	201%	53%
272	1,123	772	633	1,405	125%	55%
277	1,372	1,124	481	1,605	117%	70%
269	941	512	567	1,079	115%	47%
234	532	458	114	572	108%	80%
312	930	553	389	942	101%	59%
326	5	2	3	5	100%	40%

6. Complainants respectfully request the Wisconsin Elections Commission to issue an order refraining election officials of Milwaukee from overcounting ballots city-wide if that has occurred.

7. Alternatively, Complainants understand that the data the public has is incomplete regarding same day registration and absentee ballot voter registration.

8. If that is the case, then the Wisconsin Elections Commission should require Milwaukee election officials to update their public records regarding registrations.

9. The public has a right to this information under Wisconsin's Public Records statutes, Wisconsin Statutes §§ 19.31-19.39.

10. Milwaukee's current representations to the public regarding voting and registration clearly shows a catastrophic overcounting.

11. The Wisconsin Elections Commission should require Milwaukee election officials to post their registration numbers so the public can accurately determine whether an overvote has occurred.

Request for expedited proceeding

12. The Complainants, under Wisconsin EL § 20.06(3) request an expedited proceeding due to the emergency threat to the integrity of the November 3 election.

Prayer for relief

WHEREFORE, Complainants respectfully request the Wisconsin Elections Commission to issue an order refraining election officials of Milwaukee from overcounting ballots in excess of the number of registered voters, or alternatively, to require Milwaukee under Wisconsin's Public Records statutes, Wisconsin Statutes §§ 19.31-19.39, to post its

recent registration numbers so the public can accurately determine whether an overvote has occurred in Milwaukee.

Dated: November 5, 2020



Jonathan Hunt

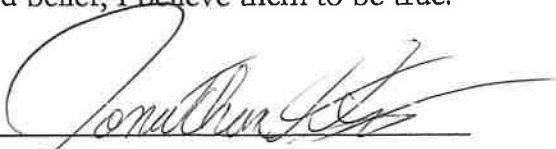
Dated: November 5, 2020

/s/ Erick G. Kaardal
Electronically signed by Erick G. Kaardal
Erick G. Kaardal, No. 1035141
Gregory M. Erickson, No. 1050298
Mohrman, Kaardal & Erickson, P.A.
Counsel for Thomas More Society
150 South Fifth Street, Suite 3100
Minneapolis, MN 55402
Telephone: (612) 341-1074
Facsimile: (612) 341-1076
Email: kaardal@mklaw.com
Email: erickson@mklaw.com
Attorneys for the Complainants

VERIFICATION

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

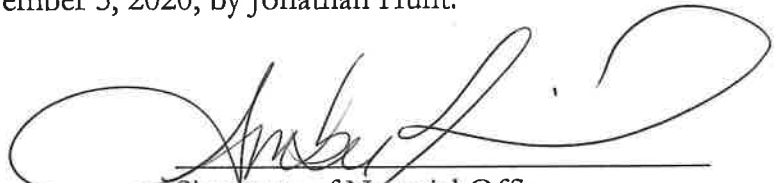
Dated: November 5, 2020


Jonathan Hunt


STATE OF WISCONSIN)
)ss.
COUNTY OF MILWAUKEE)

Signed and sworn before me this November 5, 2020, by Jonathan Hunt.

(Seal, if any)


Signature of Notarial Officer




Title (and Rank)

My Commission expires: 12-27-2021

My Commission Expires
December 27, 2021

Milwaukee City Wire

Wednesday, November 4, 2020

Politics

Business

Local Government

Real Estate

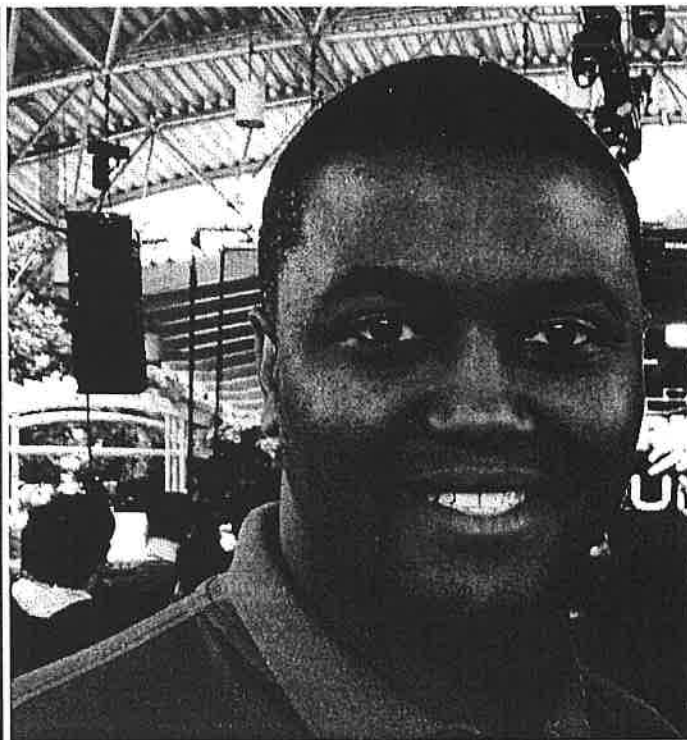
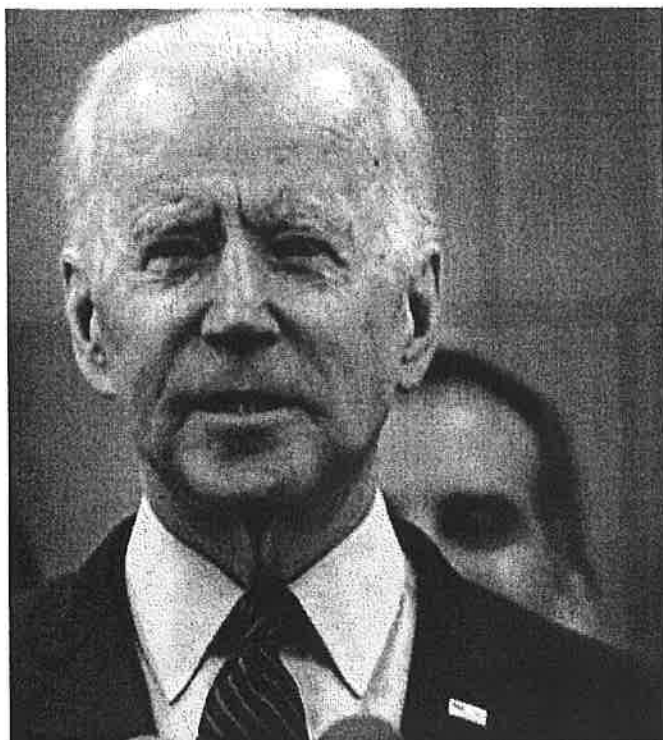
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Analysis: Seven Milwaukee wards report more 2020 presidential votes than registered voters; Biden nets 14.6K votes in city

POLITICS



By Milwaukee City Wire News Service
Nov 4, 2020

Seven City of Milwaukee voting wards reported more 2020 U.S. Presidential election votes than they had registered voters, according to an analysis of results and Secretary of State files.

Five of them are in the city's eleventh aldermanic ward, on the city's far Southwest Side.

Vice President Joe Biden carried the five in 2020 with 3,768 votes to President Donald Trump's 2,883— a margin of 885, or eight times what it was in 2016, when Trump earned 1,904 votes to Hillary Clinton's 2,012.

The City of Milwaukee reported record turnout of 84 percent Tuesday; 243,144 of 288,833 registered city voters cast a ballot.

Biden defeated Trump in Milwaukee 195,034 to 48,110, a margin of 145,916. He won 80 percent of the city's total vote.

Joe Biden and Milwaukee County Democratic Party Chair Chris Walton.



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City of Milwaukee

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Of the city's 327 voting wards, 90 reported turnout of greater than 90 percent; 201 reported turnout higher than 80 percent.

In 2016, city voter turnout was 75 percent.

588 to 10

Biden ran up gaudy margins in many Milwaukee voting wards.

He won 588 votes to Trump's 10 in the 107th voting ward, located in the city's Franklin Heights neighborhood. It's other two voting wards voted 411 to 14 and 968 to 33 for Biden-- a grand total of 1,967 to 57.

In the 114th voting district in Lindsay Heights, on the city's near Northwest Side, Biden defeated Trump 334-6. In the 117th, in Borchert Field, Biden won 465-9.

Trump received 15 or fewer votes in 16 Milwaukee voting wards including a total 7,389 registered voters. Biden defeated him 5,217 to 151 in them.

Trump won nine of 327 Milwaukee voting wards in his inaugural presidential run. Clinton won the other **318**.

Trump won only four Milwaukee voting wards in 2020 to Biden's 323.

Wisconsin is one of 21 states that allow same-day voter registration at the polls.

The city's Democratic Party Chair is Chris Walton.

City of Milwaukee votes big for Biden						
Joe Biden won huge margins Tuesday in the city of Milwaukee. Where did he do best?						
Voting Ward	Registered Voters	Biden Votes	Trump Votes	TOTAL	Turnout	Biden %
274	640	688	602	1,290	202%	53%
273	634	672	600	1,272	201%	53%
272	1,123	772	633	1,405	125%	55%
277	1,372	1,124	481	1,605	117%	70%
269	941	512	567	1,079	115%	47%
234	532	458	114	572	108%	80%
312	930	553	389	942	101%	59%
326	5	2	3	5	100%	40%
241	1,282	1,040	227	1,267	99%	82%
299	921	653	249	902	98%	72%
235	1,769	1,391	339	1,730	98%	80%
178	1,726	1,374	312	1,686	98%	81%
82	849	528	301	829	98%	64%
267	664	362	285	647	97%	56%
279	1,050	573	445	1,018	97%	56%
93	688	495	170	665	97%	74%
209	778	453	295	748	96%	61%

9	780	633	115	748	96%	85%
187	752	573	147	720	96%	80%
302	821	476	309	785	96%	61%
183	2,529	1,918	482	2,400	95%	80%
81	648	384	230	614	95%	63%
186	2,634	1,795	696	2,491	95%	72%
88	835	605	183	788	94%	77%
177	2,269	1,787	352	2,139	94%	84%
264	1,233	676	485	1,161	94%	58%
206	682	479	163	642	94%	75%
268	1,522	798	634	1,432	94%	56%
89	1,056	746	245	991	94%	75%
83	1,050	662	323	985	94%	67%
317	944	533	352	885	94%	60%
294	651	418	191	609	94%	69%
15	805	535	218	753	94%	71%
243	1,141	852	215	1,067	94%	80%
135	1,326	1,076	164	1,240	94%	87%
307	843	486	302	788	93%	62%
211	803	461	285	746	93%	62%
296	1,032	670	288	958	93%	70%
303	1,241	722	429	1,151	93%	63%
189	818	621	137	758	93%	82%
260	430	290	108	398	93%	73%
87	631	434	150	584	93%	74%
262	1,138	665	388	1,053	93%	63%
310	383	250	104	354	92%	71%
265	669	351	267	618	92%	57%
80	1,571	1,072	379	1,451	92%	74%
205	833	572	197	769	92%	74%
84	747	465	224	689	92%	67%
181	1,768	1,288	334	1,622	92%	79%
208	888	512	302	814	92%	63%
74	720	597	62	659	92%	91%
92	1,439	1,057	260	1,317	92%	80%
266	765	340	360	700	92%	49%
313	1,874	950	762	1,712	91%	55%
242	985	740	159	899	91%	82%
132	1,769	1,255	359	1,614	91%	78%
308	813	506	235	741	91%	68%
278	801	370	359	729	91%	51%
263	630	374	199	573	91%	65%
316	817	373	370	743	91%	50%
203	1,099	807	192	999	91%	81%
300	1,311	967	224	1,191	91%	81%
86	994	629	274	903	91%	70%
282	414	265	111	376	91%	70%
246	1,363	1,030	206	1,236	91%	83%
304	1,004	531	379	910	91%	58%
298	777	542	162	704	91%	77%
131	1,249	864	267	1,131	91%	76%
244	940	699	152	851	91%	82%
301	1,249	769	361	1,130	90%	68%

261	565	337	174	511	90%	66%
102	1,238	1,062	57	1,119	90%	95%
204	957	678	186	864	90%	78%
97	1,018	711	208	919	90%	77%
314	739	347	320	667	90%	52%
33	2,225	1,324	684	2,008	90%	66%
90	1,053	733	217	950	90%	77%
245	766	556	135	691	90%	80%
8	1,616	1,150	306	1,456	90%	79%
6	1,953	1,408	350	1,758	90%	80%
292	696	428	198	626	90%	68%
214	484	335	100	435	90%	77%
72	1,017	840	74	914	90%	92%
168	1,635	1,204	265	1,469	90%	82%
98	725	619	32	651	90%	95%
77	684	518	96	614	90%	84%
53	424	348	32	380	90%	92%
311	720	368	277	645	90%	57%
280	1,792	1,124	481	1,605	90%	70%
288	1,183	673	386	1,059	90%	64%
188	622	429	127	556	89%	77%
79	1,222	929	162	1,091	89%	85%
1	1,305	974	190	1,164	89%	84%
125	1,287	1,012	131	1,143	89%	89%
126	1,000	815	73	888	89%	92%
202	866	636	133	769	89%	83%
85	1,042	623	302	925	89%	67%
20	1,006	800	93	893	89%	90%
75	765	565	114	679	89%	83%
167	895	659	135	794	89%	83%
295	826	541	191	732	89%	74%
56	727	617	27	644	89%	96%
34	1,260	853	263	1,116	89%	76%
289	718	449	186	635	88%	71%
293	873	495	277	772	88%	64%
309	1,242	645	453	1,098	88%	59%
36	885	687	95	782	88%	88%
71	755	618	48	666	88%	93%
281	838	474	265	739	88%	64%
180	1,328	955	216	1,171	88%	82%
297	946	637	197	834	88%	76%
95	616	498	44	542	88%	92%
207	814	446	270	716	88%	62%
305	1,036	567	344	911	88%	62%
182	1,808	1,328	259	1,587	88%	84%
26	785	607	80	687	88%	88%
283	831	473	252	725	87%	65%
10	1,335	880	284	1,164	87%	76%
248	1,418	1,006	229	1,235	87%	81%
14	1,150	930	71	1,001	87%	93%
35	982	613	241	854	87%	72%
58	721	602	25	627	87%	96%
42	1,010	811	67	878	87%	92%

287	543	331	141	472	87%	70%
184	1,690	1,106	363	1,469	87%	75%
259	579	380	123	503	87%	76%
17	694	477	125	602	87%	79%
5	879	660	102	762	87%	87%
247	719	480	142	622	87%	77%
18	1,000	739	125	864	86%	86%
31	764	590	70	660	86%	89%
285	205	127	50	177	86%	72%
142	718	598	21	619	86%	97%
91	1,472	1,141	128	1,269	86%	90%
96	1,126	857	118	970	86%	88%
4	1,683	1,257	188	1,445	86%	87%
213	1,006	569	294	863	86%	66%
284	813	500	197	697	86%	72%
40	735	580	49	629	86%	92%
99	1,208	938	95	1,033	86%	91%
175	663	522	44	566	85%	92%
221	1,146	759	219	978	85%	78%
78	1,203	881	145	1,026	85%	86%
76	761	592	57	649	85%	91%
166	365	277	34	311	85%	89%
290	634	399	141	540	85%	74%
217	787	506	164	670	85%	76%
65	1,144	934	38	972	85%	96%
44	1,043	804	81	885	85%	91%
129	1,147	809	162	971	85%	83%
11	1,195	841	170	1,011	85%	83%
16	1,614	1,211	154	1,365	85%	89%
164	932	696	92	788	85%	88%
153	783	624	38	662	85%	94%
212	976	514	310	824	84%	62%
94	519	415	23	438	84%	95%
73	1,140	870	92	962	84%	90%
215	448	299	79	378	84%	79%
325	444	299	74	373	84%	80%
161	224	181	7	188	84%	96%
57	965	788	21	809	84%	97%
165	907	623	137	760	84%	82%
70	1,359	1,059	78	1,137	84%	93%
219	601	391	111	502	84%	78%
185	2,340	1,531	422	1,953	83%	78%
55	1,221	847	172	1,019	83%	83%
39	808	568	105	673	83%	84%
291	621	357	160	517	83%	69%
46	577	446	34	480	83%	93%
64	1,432	1,134	54	1,188	83%	95%
286	498	277	136	413	83%	67%
137	774	558	83	641	83%	87%
27	747	508	109	617	83%	82%
21	967	740	58	798	83%	93%
3	1,051	718	146	864	82%	83%
124	721	539	52	591	82%	91%

218	885	569	155	724	82%	79%
306	845	476	215	691	82%	69%
173	721	567	22	589	82%	96%
138	2,330	1,773	129	1,902	82%	93%
101	1,118	883	28	911	81%	97%
69	966	747	40	787	81%	95%
67	634	497	19	516	81%	96%
223	804	498	156	654	81%	76%
139	1,569	1,177	99	1,276	81%	92%
323	322	203	58	261	81%	78%
200	469	333	47	380	81%	88%
174	1,009	778	39	817	81%	95%
41	770	572	51	623	81%	92%
29	412	293	39	332	81%	88%
179	1,902	1,337	195	1,532	81%	87%
13	631	386	122	508	81%	76%
159	553	400	45	445	80%	90%
134	1,089	759	117	876	80%	87%
141	697	531	28	559	80%	95%
114	606	470	16	486	80%	97%
258	891	544	169	713	80%	76%
50	654	472	49	521	80%	91%
133	1,018	710	100	810	80%	88%
176	885	668	36	704	80%	95%
47	1,045	783	48	831	80%	94%
22	873	612	81	693	79%	88%
45	1,077	771	81	852	79%	90%
7	703	398	158	556	79%	72%
127	1,550	1,016	209	1,225	79%	83%
59	1,467	1,115	44	1,159	79%	96%
48	529	382	35	417	79%	92%
28	295	205	27	232	79%	88%
155	589	433	30	463	79%	94%
151	517	391	15	406	79%	96%
19	828	551	99	650	79%	85%
121	822	612	33	645	78%	95%
51	634	472	25	497	78%	95%
227	889	589	107	696	78%	85%
158	575	429	21	450	78%	95%
100	776	573	34	607	78%	94%
123	1,133	810	76	886	78%	91%
115	1,034	789	19	808	78%	98%
103	1,589	1,147	94	1,241	78%	92%
108	771	576	26	602	78%	96%
49	719	521	39	560	78%	93%
210	861	355	315	670	78%	53%
240	721	464	97	561	78%	83%
220	669	424	95	519	78%	82%
322	156	98	23	121	78%	81%
150	755	553	32	585	77%	95%
68	1,229	846	106	952	77%	89%
25	889	605	83	688	77%	88%
252	582	342	108	450	77%	76%

37	833	580	64	644	77%	90%
156	888	636	50	686	77%	93%
157	635	444	46	490	77%	91%
66	724	536	22	558	77%	96%
276	1,321	573	445	1,018	77%	56%
112	774	577	18	595	77%	97%
61	867	644	22	666	77%	97%
216	401	243	65	308	77%	79%
160	710	531	14	545	77%	97%
253	270	149	58	207	77%	72%
255	328	199	52	251	77%	79%
118	736	539	24	563	76%	96%
107	782	588	10	598	76%	98%
222	772	460	128	588	76%	78%
62	702	511	23	534	76%	96%
12	1,054	667	134	801	76%	83%
250	449	281	60	341	76%	82%
320	54	37	4	41	76%	90%
104	1,322	968	33	1,001	76%	97%
239	578	349	88	437	76%	80%
199	651	459	33	492	76%	93%
236	585	367	75	442	76%	83%
163	809	576	35	611	76%	94%
38	707	492	41	533	75%	92%
233	272	173	32	205	75%	84%
119	753	550	17	567	75%	97%
143	619	448	18	466	75%	96%
193	735	491	62	553	75%	89%
170	488	317	50	367	75%	86%
63	701	507	20	527	75%	96%
148	727	524	22	546	75%	96%
105	566	411	14	425	75%	97%
196	946	631	79	710	75%	89%
113	672	482	22	504	75%	96%
60	1,014	736	23	759	75%	97%
32	1,670	1,225	24	1,249	75%	98%
162	463	320	26	346	75%	92%
154	688	486	26	512	74%	95%
197	418	266	45	311	74%	86%
324	148	84	26	110	74%	76%
54	568	411	11	422	74%	97%
257	827	489	124	613	74%	80%
152	475	332	19	351	74%	95%
23	401	262	34	296	74%	89%
172	584	399	30	429	73%	93%
52	938	643	45	688	73%	93%
238	656	368	113	481	73%	77%
122	906	630	33	663	73%	95%
169	603	406	35	441	73%	92%
237	795	490	91	581	73%	84%
117	649	465	9	474	73%	98%
30	891	561	88	649	73%	86%
149	915	632	34	666	73%	95%

116	557	395	10	405	73%	98%
2	484	323	28	351	73%	92%
225	624	350	101	451	72%	78%
109	878	614	18	632	72%	97%
232	310	180	43	223	72%	81%
228	498	291	67	358	72%	81%
194	672	425	55	480	71%	89%
321	283	173	29	202	71%	86%
128	1,807	1,056	227	1,283	71%	82%
147	1,023	700	23	723	71%	97%
226	358	210	42	252	70%	83%
192	1,150	657	152	809	70%	81%
230	822	467	110	577	70%	81%
111	680	461	15	476	70%	97%
201	480	292	44	336	70%	87%
270	866	313	290	603	70%	52%
24	496	312	33	345	70%	90%
195	604	382	38	420	70%	91%
251	334	179	53	232	69%	77%
254	274	143	47	190	69%	75%
229	482	272	62	334	69%	81%
224	663	350	107	457	69%	77%
140	536	343	25	368	69%	93%
144	498	334	6	340	68%	98%
146	272	179	6	185	68%	97%
136	1,273	738	121	859	67%	86%
231	396	204	62	266	67%	77%
120	698	447	20	467	67%	96%
110	501	324	11	335	67%	97%
145	308	200	5	205	67%	98%
315	1,368	466	436	902	66%	52%
249	551	282	79	361	66%	78%
171	222	107	36	143	64%	75%
106	498	307	11	318	64%	97%
256	415	214	51	265	64%	81%
198	979	543	69	612	63%	89%
43	407	235	17	252	62%	93%
190	1,500	685	218	903	60%	76%
191	1,039	399	141	540	52%	74%
275	1,549	370	359	729	47%	51%
271	1,498	296	297	593	40%	50%
130	1,498	267	78	345	23%	77%
TOTALS	288,833	195,034	48,110	243,144	84%	80%

*Source: Milwaukee County Clerk; Wisconsin Secretary of State

TRENDING

OPINION: Americans deserve safety. Joe Biden isn't prepared to deliver it.

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Wisconsin Right to Life Victory Fund receives \$200 on September 23

POLITICS

Wisconsin Right to Life Victory Fund receives \$50 on September 2

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Wisconsin Right to Life Victory Fund receives \$200 on October 6

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Wisconsin Right to Life Victory Fund receives \$500 on October 14

POLITICS

Wisconsin Progress PAC receives \$46 on October 19

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