

Kris A. Teske
Former City Clerk of Green Bay

Wisconsin Election Commission
% Mr. Jon P. Axelrod and Ms. Deborah C. Meiners

June 15, 2021

Sent via e-mail

**Re: Response to Complaint Filed with Wisconsin Elections Commission
EL21--24: Richard Carlstedt et al. V. Meagan Wolfe et al.**

This response is pursuant to your request regarding the above mentioned complaint. Please be advised that I am responding without the benefit of legal counsel as my many requests for separate (independent) counsel due to a conflict of interest were denied by the City of Green Bay. Further, the City Attorney **today** informed me that she is withdrawing as my legal counsel due to a conflict of interest after months of insisting that no conflict of interest existed. Unfortunately, I do not have adequate resources to personally pay for counsel. Please be advised that I am in no way waiving the City's obligation to defend me against this complaint or any other complaint or action arising from my role as City Clerk or as an employee of the City of Green Bay. The decision to withdraw as counsel and not provide resources for independent counsel was solely the decision of the City of Green Bay. So, if there is something missing in this response or it was not properly filed, please let me know so I can fix any issues.

Let me start with acknowledging the serious nature of the allegations made in the complaint. I have earned the designation of a Wisconsin Certified Municipal Clerk

(WCMC) and have been a municipal clerk since 2012. Prior to 2012 I spent several years in the Green Bay Clerk's office participating and assisting in the supervision of countless elections. Achieving WCMC designation requires significant training and experience in performing the duties of a municipal clerk with significant emphasis on the administration of elections and election laws. As you know, election laws can be very technical having been developed over many years to ensure the integrity of the election process. Maintaining integrity of an election is something I take very seriously and do so by carefully following election laws. The fact that this complaint has been filed, calling into question the integrity of the November 2020 election, is of great concern to me.

Regarding the complaint itself, during the planning process for the November 2020 election I wrote several emails outlining my concerns with meetings that excluded the Clerk's office and decisions that were made without consulting the Clerk's office. I stand by what is included in those emails. However, please allow me to summarize the overall situation to provide context.

The complaint accurately states that municipal clerks are responsible for the supervision of registration and elections. This is important as clerks are trained in election laws that can be very technical and all decisions must be evaluated with election laws in mind. As my emails indicate, there were a number of parties involved in the planning of the November 2020 election including the Mayor, his staff, the City Council and an Ad Hoc Committee on election suggestions. I believe the Mayor's office referred to this as "all

hands on deck". I was very much in favor of additional assistance as long as it was under the supervision of the Clerk's office. I was very much looking forward to receiving and applying input and suggestions from others, especially related to the learnings from the April 2020 election. However, the application of such input must comply with the law and, understandably, there were times when suggestions did not have the full benefit of understanding the law. Nonetheless, all suggestions were welcomed.

As my emails indicate, as planning proceeded, others in the Mayor's office began to hold meetings and make decisions relating to the election outside of the Clerk's office. Many of these decisions were made by persons who were not authorized to do so and some were made by people not qualified to make them as, again, election laws need to be followed to ensure the integrity of the election. This caused planning for the election to become VERY dysfunctional and caused great confusion in the Clerk's office as many of the meetings and decisions were driven by the Mayor's chief of staff and other senior officials without the knowledge or consent of the Clerk's office. A further complicating factor arose when outside (private) organizations were engaged to participate in the planning and administration of the election. Unfortunately, the dysfunction created by persons outside of the Clerk's office only increased as the election drew closer creating morale issues and, at times, a chaotic/toxic work environment driven by personnel outside of the Clerk's office. Again, this is all documented in various emails during my time as City Clerk and are readily available through the open records laws.

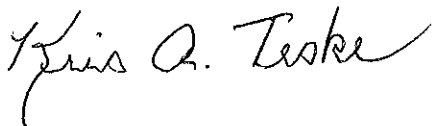
I cannot respond to the complaint regarding matters that occurred after I took the leave of absence as I was not involved from the date of the leave forward.

One last item I would like to address in the complaint relates to a comment regarding the leave of absence. The complaint states in paragraph 81, " Teske....saw the only way out as taking FMLA [Family Medical Leave Act] leave". It is important to note that I took FMLA leave to tend to an important family medical matter.

In summary, I believe the Clerk's office was in a solid position to oversee the November 2020 as we debriefed from the April 2020 election and began planning the November 2020 elections. However, as the planning process progressed the office's ability to fulfill the obligations for the election were greatly hindered and diminished by outside interference. Unfortunately, we are now left with the need to respond to serious complaints given the decisions and actions of others outside the Clerk's office.

Again, please let me know if you need anything else to ensure I am properly responding to your request.

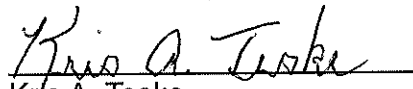
Respectfully submitted,

A handwritten signature in cursive script that reads "Kris A. Teske". The signature is written in black ink and is positioned above the printed name.

Kris A. Teske

Former City Clerk of Green Bay

I, Kris A. Teske, being duly sworn, on oath, state that the responses attached are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

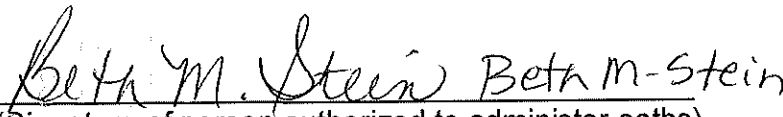

Kris A. Teske
Former City Of Green Bay Clerk

STATE OF WISCONSIN

County of Brown,

Sworn to before me this 15th day of

June, 2021.


(Signature of person authorized to administer oaths)

My commission expires 05-08-2024, or is permanent.

Notary Public or _____
(official title if not notary)