

Sworn and Notarized Statement

I, Jay Stone, who resides at 10501 82nd St. Pleasant Prairie, WI 53158 submit my Sworn Wisconsin Election Commission Complaint under the Penalty of Perjury.

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

Jay Stone

Complainant Jay Stone's Signature

STATE OF WISCONSIN)

) ss.

County of Kenosha,

(county of notarization)

Sworn to before me this day of 16th Oct, 20 21.

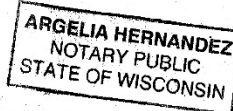
[Signature]

(Signature of person authorized to administer oaths)

My commission expires 8/19/2022, or is permanent.

Notary Public or Barker

(official title if not notary)



State of Wisconsin
Elections Commission

COMPLAINT FORM

Name: Jay Stone

Address: 10501 82nd. St. Pleasant Prairie, WI 53158

Telephone: 773-665-4623

E-mail: jayjoelstone@gmail.com

State of Wisconsin
Before the Elections Commission

The Complaint of Jay Stone, Complainant against Respondent 1, WEC Staff Attorney Nathan Judnic; Respondent 2, Unknown WEC Staff Attorney; and Respondent 3, Wisconsin Election Commission whose addresses are Wisconsin Elections Commission, 212 East Washington Avenue, Third Floor, P.O. Box 7984, Madison, Wisconsin 53707-7984.

This complaint is made under Wisconsin Statutes § 5.06.

I, Jay Stone, allege that:

Please see pages 1-5.

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

The Verified Complaint of

1. Jay Stone
10501 82nd St.
Pleasant Prairie, WI 53158

Against Complaint Respondent

1. Nathan Judnic
Wisconsin Elections Commission
212 East Washington Avenue, Third Floor
P.O. Box 7984
Madison, Wisconsin 53707-7984
2. Respondent 2 (Unknown WEC Staff Attorney)
Wisconsin Elections Commission
212 East Washington Avenue, Third Floor
P.O. Box 7984
Madison, Wisconsin 53707-7984
3. Wisconsin Election Commission
C/O Wisconsin Elections Commission
212 East Washington Avenue, Third Floor
P.O. Box 7984
Madison, Wisconsin 53707-7984

This complaint is made under Wisconsin Statutes § 5.06.

WEC Staff Attorneys Investigating a WEC Complaint Against their Manager Meagan Wolfe is a Clear and Obvious Conflict of Interest

In an October 21, 2021 email to Complainant, WEC staff attorney Nathan Judnic said that he and another WEC staff attorney are working on the Complainant's Stone v. Wolfe complaint (Exhibit 1). This unknown WEC staff attorney who was also assigned to the Stone v. Wolfe complaint is Respondent 2. Since Administrator Wolfe manages the entire WEC staff, both Mr. Judnic and

Respondent 2 are subordinates to Administrator Wolfe. Mr. Judnic and Respondent 2 review of their boss Administrator Wolfe's WEC decisions is a clear and obvious conflict of interest.

Which is in the best interest for Mr. Judnic and Respondent 2's careers? Is it in the best interest of Mr. Judnic and Respondent 2's careers to find in favor of Complainant whom they never met, or is it in the best interest for Mr. Judnic and Respondent 2's careers to find in favor of their boss, Administrator Wolfe? Indeed the best interest of Mr. Judnic and Respondent 2's careers is to side with their manager, Administrator Wolfe. Mr. Judnic and Respondent 2 are co-workers that share a history with Administrator Wolfe, and they will continue their manager-subordinate relationship after there is a resolution of the complaint against Administrator Wolfe. Because Mr. Judnic and Respondent 2 may jeopardize their careers if they support the Complainant, Mr. Judnic and Respondent 2 cannot remain fair and impartial in a WEC complaint that questions their boss's Administrator Wolfe's motives and decisions.

To maintain fairness and impartiality, Complainant's complaint against WEC administrator Megan Wolfe should *not* be investigated by WEC staff attorney Judnic, Respondent 2, or any other WEC employee. Complainant made serious allegations of malfeasance and misconduct against Administrator Wolfe ([click here](#)). Since Administrator Wolfe supervises every WEC employee, a fair and impartial person who is *not* a WEC employee should investigate the complaint against Administrator Wolfe.

Complainant named WEC as a Respondent because having WEC employees investigate a complaint against WEC Administrator Wolfe is a WEC intra-organization conflict of interest. There are numerous Wisconsin precedents for having an outside government agency investigate another agency's employee to avoid a conflict of interest. Whenever a Wisconsin police officer shoots someone either the Wisconsin Department of Justice or a separate, unrelated police department to the shooting will investigate. If the officer's own department cleared the officer it would be a conflict of interest because clearing the officer also clears the department. Similarly if WEC employees absolve Administrator Wolfe of malfeasance or misconduct at the same time the

WEC employees are also absolving their WEC employer of misconduct. Hence, it is absolutely necessary that an outside organization or person investigate complainant's allegations against Administrator Wolfe.

WEC Attorney Judnic's Animosity and Malice Towards Complainant

For the last two months WEC attorney Judnic displayed animosity and malice towards complainant. According to WEC's sworn complaint webpage, "Within five days, the Commission acknowledges receipt of the complaint" (click [here](#)). The Commission's acknowledgement of receipt of a complaint is as simple as sending an email to a complainant with a single sentence. To email complainant the acknowledgement of receipt of a complaint takes only a minute or two.

On August 25, 2021 the USPS delivered Complainant's Stone v. Obama et al. complaint to the WEC. Complainant received acknowledgement of receipt of his Stone v. Obama et al. complaint from Mr. Judnic on October 21, 2021. It took Mr. Judnic 40 business days to acknowledge the Complainant's Stone v. Obama et al. complaint, not five business days as stated on WEC's complaint webpage.

On September 5, 2021 the USPS delivered Complainant's Stone v. Jarrett et al. complaint to the WEC. Complainant received acknowledgement of receipt of his Stone v. Jarrett et al. complaint from Mr. Judnic on October 21, 2021. It took Mr. Judnic 32 business days to acknowledge the Complainant's Stone v. Jarrett et al. complaint, not five business days as stated on WEC's complaint webpage.

On September 20, 2021 the USPS delivered Complainant's Stone v. Barrett et al. complaint to the WEC. Complainant received acknowledgement of receipt of his Stone v. Barrett et al. complaint from Mr. Judnic on October 21, 2021. It took Mr. Judnic 22 business days to

acknowledge the Complainant's Stone v. Barrett et al. complaint, not five business days as stated on WEC's complaint webpage.

In Mr. Judnic's October 21, 2021 email to Complainant, Mr. Judnic apologized to Complainant for not acknowledging receipt of his complaints sooner. Mr. Judnic *minimized* his behavior towards Complainant with his sentence of, "I apologize if there have been some minor delays in communications to you on these complaints and posting to the website" (Exhibit 1). Even in his apology, Mr. Judnic lied to Complainant. Notification delays of 35 business days, 27 business days, and 17 business days are not "minor delays" as Mr. Judnic claimed.

When Complainant called Mr. Judnic to inquire about the receipt of his complaints, Mr. Judnic ignored Complainant's two voicemail messages. When Complainant sent Mr. Judnic an email to inquire about receipt of his complaints, Mr. Judnic ignored him again.

Mr. Judnic is a WEC attorney who knows Wisconsin law and WEC policies. Mr. Judnic knew better than to wait 35 business days, 27 business days, and 17 business days to acknowledge receipt of Complainant's complaints. Because Mr. Judnic delayed Complainant's notification not once, not twice, but three times, Mr. Judnic's lengthy delays were both deliberate and intentional.

Mr. Judnic also failed to post Complainant's Stone v. Wolfe complaint on WEC's Filed Sworn Complaints and Decisions webpage (click [here](#)). Complainant alleged that Mr. Judnic's failure to post his Stone v. Wolfe complaint on WEC's website was Mr. Judnic's attempt to coverup and protect his boss, Administrator Wolfe. The next day after Complainant sent an email to the WEC commissioners informing them of Mr. Judnic's deliberate misconduct, Mr. Judnic posted his Stone v. Wolfe complaint on WEC's website and provided acknowledgement of his three WEC complaints.

Mr. Judnic posting Complainant's Stone v. Wolfe complaint on WEC's website is not the end of the story. Complainant sent Mr. Judnic an email with his Stone v. Wolfe complaint as a PDF

attachment. In his email Complainant requested Mr. Judnic post the PDF of Stone v. Wolfe so the links in complaint work. Of course, Mr. Judnic continued his maliciousness toward the Complainant by posting the Stone v. Wolfe complaint version in which the links don't work.

Prayer for Relief

1. The Commission shall appoint a person or organization from outside WEC to investigate and decide the Stone v. Wolfe complaint since all WEC employees being subordinate to WEC Administrator Meagan Wolfe creates a conflict of interest if WEC internally resolves the Stone v. Wolfe complaint.
2. The Commission other than Meagan Wolfe shall determine Mr. Judnic's appropriate discipline for intentionally making Complainant wait 40 business days for the WEC to acknowledge his Stone v. Obama et al. complaint.
3. The Commission other than Meagan Wolfe shall determine Mr. Judnic's appropriate discipline for deliberately making Complainant wait 35 business days for the WEC to acknowledge his Stone v. Jarrett et al. complaint.
4. The Commission other than Meagan Wolfe shall determine Mr. Judnic's appropriate discipline for purposely making Complainant wait 22 business days for the WEC to acknowledge his Stone v. Barrett et al. complaint..
5. The Commission other than Meagan Wolfe shall determine Mr. Judnic's appropriate discipline for deliberately delaying posting Complainant's Stone v. Wolfe complaint on WEC's "Filed Sworn Complaints and Decisions" webpage.
6. The Commission other than Meagan Wolfe shall consider Mr. Judnic's malicious intent of his actions listed in 2 through 5 above as well as treating the four allegations of misconduct against Mr. Judnic independently.

Exhibits

1. WEC Staff Attorney Nathan Judnic's October 21, 2021 email to Complainant

Judnic, Nathan - ELECTIONS
to me

Mr. Stone,
I am in receipt of your email yesterday regarding the 4 complaints you have filed with the WEC and your request that I recuse myself from involvement in those complaints.

First, EL 21-37 (Stone v. Obama, et al), EL 21-38 (Stone v. Jarrett, et al) and EL 21-40 (Stone v. Barrett, et al) are currently in progress. Section 5.05 complaints are confidential, therefore there are really no updates provided while those complaints are in progress and until the Commission meets in closed session to discuss them. They have all be sent out for responses as provided by the statute. I am not the attorney working on these 3 complaints, but when I saw you were looking for confirmation that they had been received, I provided that to you with the attached email earlier this week.

Second, EL 21-39 (Stone v. Wolfe) required the full 10 business days of review to decide how it was going to be handled, as your complaint is about a decision that was issued 14 months ago, and internally we were trying to determine if the complaint was timely, in proper form and stated probable cause. Wis. Admin. Code EL 20.04(1). While there are still questions that the Commission will ultimately have to navigate on that front, your complaint is moving forward through the 5.06 complaint process which first requires a response from the Respondent, and then a reply will be asked for from you if you choose to file one. This information was provided to you via email as well and is attached. The complaint has been posted to the Commission's website, with the exhibits. I also notified you of that with the first attached email and provided you the website link of where it was posted. I was assigned to work on this complaint and intend to work on it with one of the other attorneys in our office as that's how work in a small agency is assigned.

Third, I apologize if there have been some minor delays in communications to you on these complaints and posting to the website. We try hard to treat all the complaints we receive as uniformly as we can. To imply there is some sort of personal bias or hostility against you or your complaints just isn't true. I know that likely won't change your opinion on this matter, but I am capable of doing the work that has been assigned to me and impartially working on EL 21-39. All your complaints are currently in progress in various stages. The next communication you would likely receive from the Commission would be a response to the complaint filed against Ms. Wolfe (EL-21-39). That is a Section 5.06 complaint, so therefore that information will also be posted to the website. Communication on your Section 5.05 complaints (EL 21-37, EL 21-38, EL 21-40) will be less frequent, and there may not be any additional communications until after the Commission has considered those complaints in closed session at a future meeting.

Finally, I will share your email and this response with the full Commission, so they are aware of this response.

Regards,

Nathan W. Judnic
Staff Attorney
Wisconsin Elections Commission
212 East Washington Ave, Third Floor
P.O. Box 7984
Madison, WI 53707-7984
608.228.7697 (cell)
608.267.0500 (fax)
nathan.judnic@wi.gov

From: jay stone <jay@elstone@gmail.com>
Sent: Wednesday, October 20, 2021 11:40 AM
To: Judnic, Nathan - ELECTIONS <Nathan.Judnic@wisconsin.gov>
Subject: Please Recuse Yourself from My Four Pending WEC Complaints

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

70
18
Compose
Inbox
Starred
Snoozed
Sent
Drafts
More
Meet
New meeting
Join a meeting
Hangouts
Jay
No recent chats
Start a new one