

Sworn and Notarized Statement

WEC 04DCT2021 AM08:45

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 September 30, 2021.

Argelia Hernandez

(Signature of person authorized to administer oaths)

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

Notary Public or 1

(official title if not notary)

ARGELIA HERNANDEZ
NOTARY PUBLIC
STATE OF WISCONSIN

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 WEC Administrator Meagan Wolfe, Respondent, whose address is 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 enclosed pages 1-17.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 9, 2020

VIA EMAIL

jayjoelstone@gmail.com

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

RE: MUR 7854

Dear Mr. Stone:

This letter acknowledges receipt of your complaint on November 2, 2020, alleging possible violations of the Federal Election Campaign Act of 1971, as amended. The respondents will be notified of this complaint within five business days.

You will be notified as soon as the Federal Election Commission (FEC) takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be notarized and sworn to in the same manner as the original complaint. We have numbered this matter MUR 7854. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please note that you still must file the paper copy of the electronic complaint with the Commission, within 15 days of this letter, in order for the matter to be further processed as a proper complaint. Any additional correspondence sent to the Commission must be addressed to one of the following below. As indicated in the FEC's Notice found at https://www.fec.gov/resources/cms-content/documents/status_of_fec_operations_8-10-2020.pdf, the office's mailroom is open on a limited basis and, therefore, processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file via email, except amendments to your complaint, which should be filed by paper even if email correspondence is used.

Mail

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 20463

OR

Email

cela@fec.gov

Sincerely,

Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosure:
Procedures

**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING COMPLAINTS FILED WITH THE
FEDERAL ELECTION COMMISSION**

1050 First Street, NE
Washington, D.C. 20463
EMAIL cela@fec.gov FAX (202) 219-3923

Complaints filed with the Federal Election Commission shall be referred to the Enforcement Division of the Office of the General Counsel, where they are assigned a MUR (Matter Under Review) number and forwarded to Complaints Examination & Legal Administration ("CELA") for processing. Within five days of receipt of the complaint, the Commission shall notify all respondents referenced in the complaint, in writing, that the complaint has been filed, and shall include with such notification a copy of the complaint. Simultaneously, the complainant shall be notified that the complaint has been received. The respondents shall then have 15 days to demonstrate, in writing, that no action should be taken against them in response to the complaint. If additional time is needed in which to respond to the complaint, the respondents may request an extension of time. The request must be in writing and demonstrate good cause as to why an extension should be granted. Please be advised that not all requests are granted.

After the response period has elapsed, cases are prioritized and maintained in CELA. Cases warranting the use of Commission resources are assigned as staff becomes available. Cases not warranting the use of Commission resources are dismissed.

If a case is assigned to a staff person, the Office of the General Counsel shall report to the Commission, making recommendations based upon a preliminary legal and factual analysis of the complaint and any submission made by the respondent. The report may recommend that the Commission: (a) find reason to believe that the complaint sets forth a possible violation of the Federal Election Campaign Act of 1971, as amended, (hereinafter the "Act"); or (b) find no reason to believe that the complaint sets forth a possible violation of the Act and, accordingly, close the file.

If, by an affirmative vote of four Commissioners, the Commission determines that there is reason to believe that a respondent has committed or is about to commit a violation of the Act, the Office of the General Counsel shall open an investigation into the matter. During the investigation, the Commission has the power to subpoena documents, to subpoena individuals to appear for deposition, and to order written answers to interrogatories. A respondent may be contacted more than once by the Commission during this phase.

If during this period of investigation, a respondent indicates a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe that a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent. The Conciliation Agreement must be adopted by four votes of

the Commission in order to become final. After signature by the Commission and the respondent, the Conciliation Agreement is made public within 30 days of closing of the entire file.

If the investigation warrants, and no conciliation agreement has been entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. The General Counsel shall send the respondent a brief setting forth his/her position on the legal and factual issues of the case. A response brief stating respondent's position on the issues may be submitted within 15 days of receipt of the General Counsel's Brief. Both briefs are then filed with the Commission Secretary and considered by the Commission. Thereafter, if the Commission determines, by an affirmative vote of four Commissioners, that there is probable cause to believe that a violation of the Act has been committed or is about to be committed, the Commission must conciliate with the respondent for a period of at least 30 days, but not more than 90 days. If the Commission is unable to correct or prevent any violation through conciliation, the Office of the General Counsel may recommend that the Commission file a civil suit to enforce the Act against the respondent. Therefore, the Commission may, upon the affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

See 52 U.S.C. § 30109 and 11 C.F.R. Part 111.

March 2018

**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. Meagan Wolfe
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.

Administrator Meagan Wolfe's False Claims About Wisconsin Statute § 5.06(1)

Complainant filed a WEC complaint on August 28, 2020 (click [here](#) and see Stone v. Genrich, et al). Administrator Wolfe denied Complainant's August 28, 2020 complaint in part because according to Wolfe, Complainant did "not reside in any of the municipalities cited in the complaint" (click [here](#)).

Since Complainant expected a challenge to his August 28, 2020 WEC filing, he included a section on standing in his complaint (Click [here](#) and see "Jay Stone's Good Standing in this Sworn Complaint," page 4). Administrator Wolfe's September 11, 2020 denial letter to the Complainant failed to state why the Complainant's position that he had proper standing to file his complaint was incorrect (click [here](#)). Complainant's maintains it was Wolfe, not the Complainant, who misunderstood Wisconsin Statute § 5.06(1).

In Wolfe's denial of Complainant's August 28, 2020 complaint, Wolfe twice stated that she could not accept Complainant's complaint because the Complainant did not reside in the officials'

municipalities with whom his complaint was lodge against. In Wolfe's first paragraph she wrote, "Complaints filed under Section 5.06 are filed by individuals that are served by local election officials, but you do not reside in any of the municipalities cited in the complaint."

Wolfe other reference to municipalities is, "Your complaint states that you are not a resident of any of the municipalities referenced in the complaint and therefore you are not served by any of the officials you have named."

Wisconsin Statute § 5.06(1) does not include the word "municipalities" as Wolfe stated twice in her letter. Wis. Statute § 5.06(1) does not restrict a complaint to an elector's municipality as Wolfe falsely claimed.

Instead of using the word municipality, Wis. Statute § 5.06(1) uses the words, "jurisdiction" and "district." The word jurisdiction may apply to the whole state of Wisconsin, such as the governor and attorney general of Wisconsin have jurisdiction over the entire State of Wisconsin. The word district may apply to a congressional district, school district, state senate district, or state representative district. Jurisdiction and district are often significantly larger in area and population than a municipality that Wolfe stated in her September 11, 2020 letter.

The elected offices on the November 3, 2020 ballot when the Complainant filed his WEC complaint were the president of the United States and representatives for eight Wisconsin congressional districts. Complainant was an elector for both president and Wisconsin's first congressional district congressman. As an elector, Complainant's jurisdiction for the president of the United States was the entire State of Wisconsin. There are currently eight Wisconsin congressional districts, and each congressional jurisdiction is approximately one-eighth of Wisconsin's population. Since the Complainant was only an elector in Wisconsin's first congressional district, Complainant may only file a complaint against a congressional election official in the first congressional district where he is an elector.

Wis. Statute § 5.06(1) starts with the words, “Whenever any elector of a jurisdiction or district served by an election official ...” Elector means a right to vote in an election. Wisconsin legislators and Wis. Statute § 5.06(1) gave electors the right to file a WEC complaint against an election official in any election that the electors vote in. As an elector for Wisconsin’s 10 presidential electoral votes, election officials across the entire state served as election officials for the Complainant.

Because the Complainant was an elector for the office of president and the president’s jurisdiction is the entire State of Wisconsin, according to Wis. Statute § 5.06(1), Complainant had a right to file a WEC complaint against any Wisconsin election official who served the November 3, 2020 presidential election, regardless of the Complainant or election official’s principle municipality. Because Complainant was an elector for the first congressional district, he had a right file a WEC complaint against a Wisconsin first congressional district election official even if the election official was not in the Complainant’s Pleasant Prairie municipality.

Wolfe wrote to the Complainant, ““Complaints filed under Section 5.06 are filed by individuals that are served by local election officials” The word “local” and the term “local election officials” do not appear in Wis. Statute § 5.06(1). Because Wolfe added the words “local” and “local election officials,” she arbitrarily and incorrectly changed the provisions for an elector to file a complaint.

Wis. Statute § 5.06(1) has no restriction that limits complaints to local election officials only as Wolfe falsely claimed. Wis. Statute § 5.06(1)’s only restrictions are that the election officials must serve in the elector’s jurisdiction or district. This is why Complainant may file a WEC complaint against any election who serves his Wisconsin first congressional district, but he cannot file a WEC complaint against an election official who serves Wisconsin’s seven other congressional districts. According to Wis. Statute § 5.06(1), Complainant had a right to file a complaint against any election official as long as the election official served in the jurisdiction or district where the elector had a right to vote.

Complainant filed his August 28, 2020 Complaint against Green Bay Clerk Kris Teske, Kenosha Acting City Clerk who was unknown at the time, Madison Clerk Maribeth Witzel-Behl, and Racine Clerk Tara Coolidge. Complainant also filed a Complaint against Milwaukee Election Commissioners Stephanie D. Findley, Chair, Carmen C. Cabrera and Jess Ripp. The WI 5 clerks and election commissioners all served the November 3, 2020 presidential election in which their election jurisdiction was the entire State of Wisconsin. Because the WI 5 clerks and the Milwaukee election commissioners were election officials who served the presidential election jurisdiction in which the Complainant was an elector, Complainant had the lawful right to file his WEC election complaint against them.

Complainant's interpretation of Wis. § 5.06(1) makes sense, Wolfe's does not. The legislative intent of Wis. § 5.06(1) is to allow electors to file a complaint against any election official who served as an election official in which the elector has a right to vote. Legislators intended to provide electors with a complaint process against any election official who served in their elections. According to Complainant's interpretation of Wis. § 5.06(1), electors can seek accountability and corrective action if electors perceive an election official in their jurisdiction or district acting in violation of Wis. § 5.06(1).

According to Wolfe's interpretation of Wis. § 5.06(1), an elector may only file a complaint against his or her *local* municipal election officials. Because state rep, state senate, congressional and county elections exceed the boundaries of local municipalities, according to how Wolfe defines Wis. § 5.06(1), electors cannot file a complaint or seek a cure against the majority of election officials who are officiating their elections. Wolfe's interpretation of Wis. § 5.06(1) is ridiculous and unAmerican. According to Wolfe's view, electors can't hold election officials accountability outside their municipality although the election officials are determining the outcome of the elections in which the electors voted.

Administrator Wolfe's False Claims About Complainant's August 28, 2020 Complaint

Administrator Wolfe wrote the following: “Your complaint is related to the acceptance of grant funds by municipalities, but the complaint does not allege any violations of election law that the Commission has authority over to enforce or investigate” (click [here](#)).

Wolfe also said, “Your complaint also fails to state what election law or laws under the jurisdiction of the Wisconsin Elections Commission (Chapters 5-10 and 12, Wis. Stats.) that the named local officials have violated or have abused their discretion in administering.” ... “Notably, while you state that the acceptance of grant funds are contrary to law and/or an abuse of power or discretion regarding election administration and conduct of the November 3, 2020 election, there is not a citation to an election law that you alleged has been violated or will be violated by these officials” (click [here](#)).

Wolfe’s statements that the Complainant did not state a potential violation of law is a blatant lie. Complainant stated that the WI 5 Respondents allegedly violated Wis. statute § 5.06(1) three times in his complaint (click [here](#)). Furthermore, Wolfe’s above statements implies that the Complainant must submit a violation of another law besides Wis. statute § 5.06(1). As stated in the following paragraph, the WEC accepted five complaints for Compliance Review that cited Wis. statute § 5.06 like the Complainant’s as the reason for the complaints.

Since Complainant filed his WEC complaint, the WEC accepted five complaints under the same Wis. Statutes § 5.06 as the Complainant cited in his August 28, 2020 complaint. The first line of these five complaints is, “This complaint is made under Wisconsin Statutes § 5.06.” (to view complaints, click on [Liu et al v. Wolfe et al](#), [Werner et al. v. Wolfe et al.](#), [Thomas et al. v. Wolfe et al.](#), [Prujansky et al. v. Wolfe et al.](#), and [Carlstedt et al. v. Wolfe et al](#)).

Besides the Complainant alleging Respondents violated Wis. statute § 5.06(1) in his August 28, 2020 complaint, Complainant alleged Respondents violated the U.S. Constitution’s First and Fourteenth Amendments. Complainant wrote this in his WEC complaint: “CTCL’s \$6.3 million

grant offer and the five Wisconsin cities acceptance of CTCL's grant violates the First Amendment rights of candidates and voters as well as their equal protection rights that the 14th Amendment guarantees. The voters in Wisconsin's 185 other cities won't have the same level of protection against COVID-19 and voting resources as the five largest Wisconsin cities who received CTCL's grant money. CTCL's \$6.3 million grant to Wisconsin's five largest cities places its hand on the scale to tip the election in favor of Democrat Joe Biden" (click [here](#)).

WEC Administrator Wolfe announced WEC's Subgrant Program on June 17, 2020 (to view announcement, click [here](#)). Wolfe wrote, "The Elections Commission authorized a \$4.1 million WEC CARES subgrant program for municipalities to offset pandemic-related elections costs. The approved WEC CARES Subgrant program provides a \$200 base amount plus an additional \$1.10/per registered voter."

WEC Administrator Wolfe made sure all Wisconsin municipalities, counties, and election commissions received a fair or equal share of the WEC's \$4.1 million subgrant. Wolfe made sure the WEC's \$4.1 million grant distribution met the Fourteenth Amendment equal distribution clause.

Administrator Wolfe offered and distributed *equal* shares of a \$4.1 election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL offered and awarded a \$6.3 million grant to only five Wisconsin cities which Complainant claimed was *unequal* protection in violation of the U.S. Constitution's First and Fourteenth amendments. Furthermore, Wolfe's equal distribution of the \$4.1 million Cares subgrant demonstrates Wolfe's knowledge of her constitutional duty to distribute grant money equally to all Wisconsin municipalities and counties who administer Wisconsin elections. When it came to equal distribution of CTCL's grant money, Wolfe ceded her constitutional duty.

As with the Complainant's August 28, 2020 complaint alleging U.S. Constitution violations, the five WEC complaints of Liu et al v. Wolfe et al, Werner et al. v. Wolfe et al., Thomas et al. v. Wolfe et al., Prujansky et al. v. Wolfe et al., and Carlstedt et al. v. Wolfe et al also claimed possible violations of the U.S. Constitution. Since the Complainant and the five other WEC complaints alleged violations of Wis. statute § 5.06 and the U.S. Constitution, why did WEC Administrator Wolfe only reject the Complainant's August 28, 2020 complaint? Could it be Wolfe denied Complainant's use of Wis. statute § 5.06 because the complaint was filed before the election, and the Commission accepted the five other Wis. statute § 5.06 complaints because the complaints were filed after the election?

Administrator Wolfe wrote, "Notably, while you state that the acceptance of grant funds are contrary to law and/or an abuse of power or discretion regarding election administration and conduct of the November 3, 2020 election, there is not a citation to an election law that you alleged has been violated or will be violated by these officials." Again, Administrator Wolfe lied about Complainant not citing alleged violations of law. Complainant stated possible violations of Wis. statute § 5.06 three times and violations of the U.S. Constitution's First and Fourteenth Amendments which all Wisconsin election laws and elections must abide by.

Administrator Wolfe Failed to Identify the Complaint's Most Obvious Defect

EL 20.04(2) states, "If the complaint does not meet the standards under sub. (1), the administrator shall promptly return the complaint to the complainant, without prejudice unless otherwise provided by law, specifying both the defect in the complaint and the information appropriate to cure the defect."

Administrator Wolfe had the duty to specify the defects in the Complainant's complaint and provide specific information to cure the defects. Wolfe omitted the most obvious defect. Complainant filed his complaint against the WI 5 mayors of Green Bay Mayor Eric Genrich,

Kenosha Mayor John M. Antaramian, Madison Mayor Satya Rhodes-Conway, Milwaukee Mayor Tom Barrett, and Racine Mayor Cory Mason.

Wis. statute § 5.06(1) states, “Whenever any elector of a jurisdiction or district served by an election official”

According to Wis. statute § 5.02(4e) “‘Election official’ means an individual who is charged with any duties relating to the conduct of an election.”

Wisconsin Statute § 7.15 - Municipal Clerks (1) states, “Supervise Registration and Elections: Each municipal clerk has charge and supervision of elections and registration in the municipality.”

Wisconsin Statute 62.09 (8) provides Wisconsin mayors with their power and duties. Wisconsin statute 62.09 (8) does *not* provide Wisconsin mayors with the power or duty to supervise voter registration and elections in their cities.

Admittedly Complainant made a mistake when he used Wis. statute § 5.06(1) against the WI 5 mayors of Antaramian, Barrett, Rhodes-Conway, Genrich, and Mason in his August 28, 2020 complaint because the WI 5 mayors are not election officials according to Wis. statute § 5.02(4e).

Administrator Wolfe deliberately failed to include the WI 5 mayors are not election officials as one of the Complainant’s defects. Only recently did Complainant learn the WI 5 mayors have no charge to supervise elections. Since learning the WI 5 mayors do not supervise elections, Complainant filed two WEC complaints, Stone v. Obama et al. and Stone v. Barrett et al., against the WI 5 mayors for performing election administration duties without statutory authority. Wolfe’s failure to inform Complainant about the defect that WI 5 mayors are not election officials delayed Complainant’s complaints for nearly a year.

Administrator Wolfe Did Not Provide a Specific Cure for the Complaint

As with identifying the defects of the Complainant's complaint, EL 20.04(2) required Administrator Wolfe to provide Complainant with appropriate and specific information to cure the defects in his complaint. Wolfe used vague and general language as a way to avoid specifying a cure to Complainant. EL 20.04(2) states, "specifying both the defect in the complaint and the information appropriate to cure the defect." Specifying means identifying clearly and definitely. Wolfe failed to clearly and definitely identify the cures for the Complainant's complaint.

No thanks to Wolfe, Complainant on his own discovered a specific cure to his complaint. Wisconsin statutes 5.68 (1) and (2) state the following for the costs of elections: "The cost of acquisition of ballot boxes and voting booths, voting machines or electronic voting systems and regular maintenance thereof shall be borne by the municipalities in which the boxes, booths, machines or systems are used. (2) Except as otherwise expressly provided, all costs for ballots, supplies, notices and any other materials necessary in preparing or conducting any election shall be paid for by the county or municipality whose clerk or board of election commissioners is responsible for providing them." Because Center for Tech and Civic Life paid the WI 5 election expenses in alleged violation of Wisconsin statutes 5.68 (1) and (2), Complainant filed a WEC complaint against CTCL that is still pending.

Without Wolfe's help Complainant discovered another specific cure for his complaint. Wisconsin statute 12.09 (2) states, "No person may personally or through an agent, by abduction, duress, or any fraudulent device or contrivance, impede or prevent the free exercise of the franchise at an election." Complainant applied Wisconsin statute 12.09 (2) in his pending WEC complaint against the WI 5 mayors, CTCL, and CTCL's directors Tiana Epps Johnson and Whitney May (Stone v. Barrett et al.).

Wolfe's failure to identify specific cures to Complainant's complaint caused Complainant unnecessary delays in filing additional complaints. Complainant alleges that Wolfe's failure to identify specific cures was deliberate, not accidental.

Administrator Wolfe Deliberately Ignored Complainant's Probable Cause

After Administrator Wolfe rejected Complainant's August 28, 2020 complaint, Complainant filed a Federal Election Commission complaint alleging a similar set of facts and allegations as he did in his WEC complaint (Exhibit 1). Complainant's FEC complaint named CTCL, CTCL's directors Tiana Epps Johnson and Whitney May as Respondents. Complainant's FEC complaint did not name the WI 5 clerks or mayors as Respondents.

The FEC's initial response to complaints is similar to the WEC's: "The Office of General Counsel (OGC) reviews each complaint to determine whether it states a violation within the FEC's jurisdiction and satisfies the criteria for a proper complaint. If the complaint does not meet these requirements, OGC notifies the complainant of the deficiencies. Once a complaint is deemed sufficient, OGC assigns it a Matter Under Review (MUR) number, acknowledges receipt of the complaint and informs the complainant that the Commission will notify him or her when the entire case is resolved" (Click [here](#) and scroll down to "Early stages of the complaint process").

Since the FEC sent Complainant a MUR letter in November, 2020, the FEC is already reviewing the Complainant's FEC complaint (Exhibit 2). Whereas Complainant's WEC complaint focused on the WI 5 clerks and mayors receiving CTCL's election administration grant money, Complainant's FEC complaint concentrated on Mark Zuckerberg, Priscilla Chan (Mark Zuckerberg's wife), and CTCL who provided the grant money to the WI 5 cities.

If Complainant's FEC complaint with nearly the same facts and allegations as his WEC complaint met the FEC's requirement for review, why wasn't Complainant's WEC complaint good enough for the Administrator Wolfe to review?

The probable cause for a WEC Compliance Review that was in the Complainant's August 28, 2020 complaint or Complainant's exhibits that Administrator Wolfe rejected are as follows:

- CTCL's unequal distribution of its \$6.3 million election administration grants to only the WI 5 cities were alleged violations of the Constitution's First and Fourteen Amendments
- The WI 5 mayors admitted their election administration involvement in their Wisconsin Safe Voting Plan and press release though the WI 5 mayors have no statutory authority for election administration (Stone v. Genrich et al, Exhibit 1)
- CTCL chose the WI 5 cities over the Wisconsin counties to receive grants because more Democrats live and vote in the WI 5 cities than the counties
- CTCL Executive Director Tiana Epps Johnson completed her Obama Foundation Fellowship less than one month before she contacted Racine Mayor Cory Mason to start the WI 5 grant process.
- Democratic President Barrack and Michelle Obama provided contacts and money to CTCL and its Executive Director Johnson
- CTCL granted \$6.3 million to cities that only had Democratic mayors
- CTCL Directors Johnson and May were biased Democrats and anti-Republican as evidenced by Johnson and May's 125 social media posts that the Complainant submitted as exhibits with his complaint
- CTCL election administration grants deviated from the mission CTCL stated on its IRS tax forms
- CTCL had no employee, board or advisory member who was medical doctor or infectious disease expert at the time CTCL awarded its WI 5 election administration grants to protect against COVID 19
- CTCL used COVID 19 as a ruse to distribute partisan political grants to the WI 5 cities

- CTCL’s grant process was allegedly fraudulent and deviated from the norm
- CTCL also awarded its election administration grants to only heavily Democratic cities and counties outside the state of Wisconsin at the time Complainant filed his complaint
- The WI 5 mayors failed to perform their due diligence before they applied and accepted CTCL’s \$6.3 million grant
- The WI 5 mayors held their WI 5 mayors meetings to plan their CTCL grant application in secret (compare the WI 5’s secret grant application to Administrator Wolfe’s grant announcement that she sent to all Wisconsin election commissioners, municipal, and county clerks)
- The WI 5 mayors submitted one election administration plan for all the WI 5 cities though the first line of the Wisconsin Election Administration Manual states, “Elections in Wisconsin are conducted at a local level”

Conclusion: Wolfe Abused Her Discretion in Violation of Wis. Statute § 5.06

The stated purpose of Wis. statute § 5.06 is a “Compliance Review.” At most the result of Complainant’s complaint was Administrator Wolfe would have conducted a Compliance review of the WI 5 Respondents’ election administration. Administrator Wolfe set an unreasonable and unreachable probable cause standard for Complainant’s Compliance Review request. Wolfe expected Complainant to provide probable cause that the law requires for an arrest warrant, search warrant, or bail hearing. Having election officials and election jurisdictions transitioning from noncompliance to compliance would have been WEC’s severest penalty had Wolfe accepted Complainant’s August 28, 2020 Compliance Review request.

History proves Wolfe’s failure to conduct a Compliance Review when Complainant initially requested one was cowardly and unprofessional. Since Wolfe denied Complainant’s request for a Compliance Review, the WEC has received six more and separate on-going complaints (click on Liu et al v. Wolfe et al, Werner et al. v. Wolfe et al., Thomas et al. v. Wolfe et al., Prujansky et al. v. Wolfe et al., Carlstedt et al. v. Wolfe et al, and Stone v. Barrett et al.). Wolfe is named as a

Respondent in five of the six aforementioned complaints. This complaint makes the sixth complaint that Wolfe is a Respondent. Had Wolfe started a Compliance Review in August 2020 when Complainant asked for one, the WEC would not be in the position to adjudicate these six pending WEC complaints against Wolfe.

When Complainant filed his initial August 28, 2020 complaint, Complainant had no WI 5 emails or internal documents; nevertheless, there was already enough probable cause for a Compliance Review. Given that two months earlier Wolfe offered an equal amount of grant money to every Wisconsin election jurisdiction, CTCL's unequal grant distribution to only the WI 5 cities should have met the probable cause standard by itself for a Compliance review. Furthermore, Wis. statute § 5.06(4) provides the WEC the authority and power to investigate any election administration matter. Because the private funding of public elections had never occurred before in the history of Wisconsin and the United States, the WEC should have reviewed CTCL's grants even if a complaint did *not* request one.

Complainant estimates that the WI 5 have released only 40% of their CTCL election administration grant related emails, correspondences, and documents to the public. The more the WI 5 election administration documents become available, the more it appears there was election administration misconduct. So far WI 5 emails revealed the following: The WI 5 mayors held four secret meetings that were most likely in violation of Wisconsin's open meeting law; WI 5 mayors without legal authority took over election administration duties from the municipal clerks; The WI 5 mayors signed agreements with CTCL that allowed CTCL to impose its election agenda and will upon the WI 5 cities; The WI 5 cities allowed organizations and people from outside the State of Wisconsin to influence and participate in the election administration of the WI 5 cities because the WI 5 benefactor, CTCL requested it.

The 12 reasons below explain how Administrator Wolfe abused her discretion in violation of Wis. statute § 5.06 when she rejected the complaint that the Complainant submitted on August 28, 2020. In addition, Wolfe's failure to investigate Complainant's Complaint led to Wisconsin

candidates and voters having their First and Fourteenth Amendment rights violated because of CTCL's biased election grant process and unequal distribution of Wisconsin election administration grants.

1. Administrator Wolfe added her own words of "local election officials" to Wis. statute § 5.06 and then used her fictitious statute that she created to deny Complainant's standing in his complaint.
2. Wolfe incorrectly stated the Complainant did not alleged any violation of law although the Complainant alleged violations of Wis. statute § 5.06 three times in his complaint, and he also alleged violations of candidates and voters First and Fourteenth Amendment rights.
3. The WEC has subsequently accepted five other complaints with the same citation of Wis. statute § 5.06 that the Complainant stated in his August 28, 2020 complaint.
4. The FEC is reviewing a complaint from the Complainant that is similar in facts and allegations as the complaint he filed with the WEC.
5. Administrator Wolfe distributed *equal* shares of a \$4.1 million election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL's \$6.3 million grant going to only five Wisconsin cities was *unequal* protection in violation of the U.S. Constitution's First and Fourteenth amendments.
6. Administrator Wolfe wrote Complainant submitted no probable cause for a Compliance Review while Complainant claims he submitted more than 10 probable causes.
7. Administrator Wolfe failed to include the WI 5 mayors' election administration as a defect in her September 10, 2020 letter to the Complainant.
8. Administrator Wolfe used vague and general language to recommend her cure though Wis. statute § 5.06 requires the Administrator to provide specific cures.
9. Administrator Wolfe failed to recommend the most obvious cure of Wisconsin statues 5.68 (1) and (2), Costs of Elections since the WI 5 publicized CTCL's \$6.3 million grant money paid for the WI 5's election costs.

10. Administrator Wolfe ignored the significant political bias of CTCL directors Johnson and May.
11. Administrator Wolfe disregarded Complainant's argument that CTCL employed no medical experts though CTCL claimed the purpose of its grants was to protect election workers and voters from COVID 19.
12. Administrator Wolfe's failure to use Wis. statute § 5.06(4) to initiate a WI 5 Compliance Review of her own shows Wolfe deliberately sought to avoid any scrutiny of the WI 5-CTCL election administration grants.

Prayer for Relief

1. The Commission shall prevent Administer Meagan Wolfe from participating in the adjudication of Complainant's pending WEC complaints of Stone v. Obama et al., Stone v Jarrett et al., Stone v. Barrett et al. and Stone v. Wolfe because Wolfe as a WEC Administrator investigating these complaints and Wolfe as a Respondent in this complaint are conflicts of interest.
2. The Commission shall investigate if Administrator Wolfe abused her discretion in violation of Wis. statute § 5.06 when she returned Complainant's August 28, 2020 complaint without conducting a Compliance Review.
3. The Commission shall determine if Wis. statute § 5.06 applies only to "local election officials" who serve electors as Administrator Wolfe claimed, or if Wis. statute § 5.06 applies to electors' election officials who serve in the jurisdiction or district in which the electors vote as Complainant claimed.
4. The Commission shall investigate why Administrator Wolfe failed to acknowledge Complainant's allegations of Wis. statute § 5.06 violations.
5. The Commission shall investigate why the WEC accepted five separate complaints with alleged Wis. statute § 5.06 violations though Administrator Wolfe would not recognize Complainant's citing violations of the same statute (Wis. statute § 5.06).

6. The Commission shall determine a probable cause standard and provide examples for a Compliance Review when electors alleged violations of Wis. statute § 5.06.
7. The Commission shall determine if a complaint asking for a Compliance Review under Wis. statute § 5.06 can stand on its merit, or must a complainant cite Wis. statute § 5.06 and at least one other violation of law.
8. The Commission shall determine if a complaint may cite U.S. Constitution violations as probable cause for a WEC complaint.
9. The Commission shall investigate if Complainant submitted probable cause for a Compliance Review in his August 28, 2020 WEC complaint.
10. The Commission shall investigate why Administrator Wolfe distributed *equal* shares of a \$4.1 million election grant to all Wisconsin municipalities, counties, and election commissions, yet two months later Wolfe showed no concern when Complainant alleged CTCL's \$6.3 million grant going to only five Wisconsin cities was *unequal* and in violation of the First and Fourteenth Amendments.
11. The Commission shall investigate if CTCL's unequal distribution of election administration grants provided probable cause for violations of Wis. statute § 5.06.
12. The Commission shall investigate if the defects and cures that Administrator Wolfe provided in her September 11, 2020 letter were adequate and specific enough according to statute EL 20.04(2).
13. The Commission shall investigate if Complainant adequately showed that CTCL directors Tiana Epps Johnson and Whitney Mays' political bias were grounds for Administrator Wolfe to use as probable cause.
14. The Commission shall investigate if CTCL's failure to have any employees with medical expertise though CTCL claimed the purpose of its grants was to protect election workers and voters from COVID 19 were grounds for Administrator Wolfe to use as probable cause.
15. The Commission shall investigate if Administrator Wolfe's failure to use Wis. statute § 5.06(4) to initiate a WI 5 Compliance Review of her own shows Wolfe deliberately sought to avoid her WEC oversight authority of the \$6.3 Million WI 5-CTCL election administration grants.

Exhibits

1. FEC complaint of Stone v. Center for Tech and Civic Life et al.
2. FEC Matter Under Review (MUR) letter to Complainant

Jay Stone
10501 82nd St.
Pleasant Prairie, WI 53158
773-665-4623
JayJoelStone@gmail.com

**Jay Stone's Notarized 39 Page Sworn
Complaint with 247 Exhibits**

Overview

Complainant Jay Stone is lodging FEC complaints against seven respondents:

1. Center for Tech and Civic Life (CTCL)
2. CTCL Executive Director Tiana Epps-Johnson
3. CTCL Director of Government Services Whitney May
4. Center for Election Innovation and Research (CEIR)
5. CEIR Executive Director David Becker
6. Mark Zuckerberg
7. Priscilla Chan (Mark Zuckerberg's wife)

The Center for Tech and Civic Life (CTCL) is a 501(C)(3) nonprofit. CTCL granted \$30.66 million to only Democratic strongholds in battleground and swing states. For example, CTCL provided Philadelphia with a \$10 million COVID-19 grant. Philadelphia votes 92% Democratic in the battleground state of Pennsylvania. CTCL supplied Detroit with a \$3.5 million COVID-19 grant. Detroit votes 98% Democratic in the battleground state of Michigan. CTCL provided Milwaukee with a \$2.15 million COVID-19 grant. Milwaukee votes 85% Democratic in the battleground state of Wisconsin.

CTCL used COVID-19 as a ruse or pretense for its voting grants. None of CTCL's advisory committee members, board members, or employees have a medical education or medical experience. CTCL had no legal right or medical authority to associate CTCL's COVID-19 grants with protecting election workers and voters from the pandemic.

CTCL started with \$6.3 million in grants to Democratic strongholds in Wisconsin, then \$12.2 million in grants to Pennsylvania, and \$4.4 million grants to Michigan. After CTCL completed its grants to the all important Midwest battleground states, CTCL granted \$7.4 million to Democratic strongholds in Iowa, Georgia, and South Carolina. In all,

CTCL has payed out \$30.66 million for COVID-19 voting grants. 15 of 15 of CTCL's grants went to Democratic strongholds.

CTCL's hidden motive is to increase Joe Biden's statewide vote with grants to the state's Democratic stronghold so that Joe Biden wins the state's electoral votes. For example, there are 190 cities in Wisconsin, but CTCL only granted money to the five Wisconsin's cities that produce the highest number of Democratic votes. The five cities that received CTCL's \$6.3 million grant accounted for 82% of Hillary Clinton's vote in the 2016 presidential election.

Since CTCL has only granted money to Democratic strongholds, CTCL is not advocating for an issue, rather CTCL is using its COVID-19 grants to campaign for Democratic presidential candidate Joe Biden. CTCL Executive Director Tiana Epps-Johnson and Director of Government Services Whitney May sent out numerous Anti-Trump, Anti-Republican, and Pro-Democrat social media posts. Epps-Johnson and May posted such social media comments as "Trump is a fucking sociopath," "President Trump Accused of Rape," "Go after Trump's lies," and "Don't vote for Trump."

Epps-Johnson and May are using their CTCL positions to oust Donald Trump and elect Joe Biden. CTCL disguised \$30.66 million in Joe Biden campaign contributions as COVID-19 voting grants. FEC campaign contribution laws prohibit CTCL as a 501(C)(3) from contributing \$30.66 million to Joe Biden's campaign.

CEIR received a \$50 million donation from Mark Zuckerberg and Priscilla Chan. CEIR's Executive Director David Becker posted 41 Anti-Trump tweets. Mr. Becker said such things as "President Trump sows chaos," "President Trump's false claims," and "The things President Trump says are flatly wrong" Thanks to Zuckerberg-Chan's \$50 million donation, Mr. Becker has the means to achieve his goal of defeating President Trump.

CEIR created a Sample-Project-Budget that focuses on getting voters to cast ballots via automated calls, postcards, radio, and TV buys. Instead of purchasing cleaning supplies and PPE's to protect election workers and voters from COVID-19, CEIR is concentrating \$50 million on increasing voter turnout in Democratic states. The Help American Vote Act disallows media buys to increase voter participation. CEIR will disburse \$50 million to help Democratic candidate Joe Biden win the November 3, 2020 election. As a 501(C)(3) nonprofit organization, federal campaign contribution laws prohibit CEIR from donating \$50 million to Joe Biden's campaign.

Mark Zuckerberg and Priscilla Chan deliberately granted \$250 million to CTCL and another \$50 million to CEIR because CTCL and CEIR are doing Zuckerberg-Chan's political bidding—increase Democratic votes for Joe Biden through CTCL and CEIR's ruse of COVID-19 grants. CTCL and CEIR offered the perfect cover for Zuckerberg-Chan to help Democratic Joe Biden become president. CTCL and CEIR have no transparency, no oversight, and no accountability.

CTCL and CEIR are known for their left political leanings. When Zuckerberg-Chan donated to CTCL and CEIR, Zuckerberg-Chan knew their \$300 million donation would help Democrat Joe Biden win his 2020 presidential election. FEC's individual campaign contribution limit is \$2,800 per person. Zuckerberg-Chan disguised their \$300 million Joe Biden campaign contribution as a \$300 million donation to CTCL and CEIR. Zuckerberg-Chan used their CTCL and CEIR donation as a means to avoid their combined \$5,600 contribution limit. Zuckerberg-Chan's \$300 million contribution to Joe Biden's campaign is 5,400 times more than FEC's \$2,800 individual contribution limit.

Complainant Jay Stone filed a Wisconsin Election complaint on August 28, 2020. The Wisconsin Election Commission notified Mr. Stone on September 11, 2020 that he was ineligible to file a complaint because he did not live in one of the five Wisconsin cities that received a CTCL grant. No commission, board, or court has adjudicated the merits of Mr. Stone's complaint.

In 2005 Federal Court Judge Wayne A. Andersen awarded Complainant Stone \$75,000 because the City of Chicago violated his civil rights when he ran for a Chicago City Council seat in 2003. Since then Complainant Stone has been vigilant about seeking fair and honest elections regardless of a candidate's political party. Complainant Stone researched and wrote his complaint by himself. He is not coordinating or working with any political candidate or political party.

FEC Complaint against Center for Tech and Civic Life, Tiana Epps-Johnson, and Whitney May starts on the next page.

FEC Complaint against Center for Tech and Civic Life, Tiana Epps-Johnson, and Whitney May

The Center for Tech and Civic Life (CTCL) started giving \$23 million in Safe Voting and COVID-19 grants to only Democratic strongholds in the battleground states of Michigan, Pennsylvania and Wisconsin. CTCL's provided Safe Voting and COVID-19 grants to 1 county and 10 cities that vote between 58% and 98% Democratic (see tables below). CTCL deliberately initiated its Democratically targeted grants and limited its funding to only local Democratic election authorities in Democratic strongholds. CTCL's intent of granting \$23 million to only Democratic strongholds is to increase the chances of Democrat Joe Biden winning the statewide and electoral votes in the battleground states of Michigan, Pennsylvania and Wisconsin.

Center for Tech and Civic Life's Grants to Democratic Strongholds in Three Battleground States

State of Wisconsin

City	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 WI Win	Trump's 2016 WI Win in Votes
Milwaukee	\$2,154,500	85%	14%	0.77%	22,748
Madison	\$1,271,788	70%	23%	0.77%	22,748
Green Bay	\$1,093,400	58%	42%	0.77%	22,748
Racine	\$942,100	72%	28%	0.77%	22,748
Kenosha	\$862,779	69%	31%	0.77%	22,748

City	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 WI Win	Trump's 2016 WI Win in Votes
Total CTCL WI Grant	\$6.32 Million				

The five Wisconsin cities above accounted for 82% of Hillary Clinton's vote in 2016. CTCL's \$6.32 million grant to increase voter participation in only five of Wisconsin's 190 cities will produce a lopsided vote for Joe Biden in Wisconsin's five largest Democrat strongholds. If CTCL's \$6.3 million Wisconsin voter participation grant increases the Biden vote in just the five Democratic strongholds by 2%, then Democrat Joe Biden will win Wisconsin. CTCL's \$6.3 million Wisconsin grant deliberately increases Joe Biden's chances of winning Wisconsin's popular vote and 10 electoral votes.

State of Pennsylvania

City/County	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 Pa Win	Trump's 2016 PA Win in Votes
Delaware County	\$2,200,000	65%	35%	0.72%	44,292
Philadelphia	\$10,000,000	92.1%	7.9%	0.72%	44,292
Total CTCL PA Grant	\$12.2 Million				

CTCL granted Philadelphia more money than anywhere else because President Trump can't win his reelection if he doesn't win Pennsylvania's electoral votes. If CTCL's \$10 million voter participation grant increases just the Philadelphia Democratic voter turnout by 7.5%, then CTCL has flipped Pennsylvania for Democrat Joe Biden.

Hillary Clinton had her second largest winning percentage in Delaware County behind the City of Philadelphia. CTCL's Pennsylvania grants to Democratic strongholds in Philadelphia and Delaware County will play a significant role in determining whether Biden or Trump wins Pennsylvania.

State of Michigan

City	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 MI Win	Trump's 2016 MI Win in votes
Detroit	\$3,512,000	98%	2%	0.23%	10,704
Lansing	\$440,000	81%	19%	0.23%	10,704
East Lansing	\$8,500			0.23%	10,704
Flint	\$475,625	74.5%	25.4%	0.23%	10,704
Total CTCL MI Grant	\$4,436,125				

If CTCL's \$3.5 million Detroit grant increases Democrat Joe Biden's vote by 4.5% in just Detroit, CTCL's grant will have flipped Michigan from Red to Blue. CTCL's \$4.43 million in Michigan grants to Democratic strongholds in Detroit, Flint, Lansing and East Lansing increase Democrat Joe Biden's chance of winning Michigan's statewide and 16 electoral votes.

If CTCL was honest about its motive of granting money to keep voters safe during the COVID-19 pandemic, then CTCL would have first distributed its grant money to the cities and states that had most COVID-19 cases and deaths. Based on the 5 counties and 10 cities that already received CTCL grants, CTCL did not use the statistics for the highest rates of confirmed COVID 19 cases and the highest rate of confirmed deaths to determine its grant recipients. Instead CTCL used election data to determine where CTCL's grants will help Democratic candidate Joe Biden the most.

CTCL's failure to cite COVID-19 statistics as the primary determining factor of its grants proves CTCL's motivation was pure partisan politics. For example, New York City has the highest rate of confirmed COVID-19 deaths and the second highest rate of confirmed cases. Why didn't New York City receive the first CTCL grant? New York City and State are solidly for Democratic presidential candidate Joe Biden. CTCL won't

was to use any of its COVID-19 grant money on New York since Joe Biden will win New York's electoral votes without its grant. CTCL only awards its COVID-19 grants to cities and counties that increase Joe Biden's chances of winning swing state electoral votes and the presidency.

Because CTCL's voter participation grants are partisan contributions to Democratic presidential candidate Joe Biden, CTCL's \$23 million in grants are prohibited. CTCL applied and received a nonprofit status from the IRS. Both the IRS and Federal Election Campaign Act disallow CTCL's partisan \$23 million campaign contribution to Democrat Joe Biden.

CTCL's Donations to Other Democratic Strongholds

The order of CTCL safe voting and COVID-19 grants reveal CTCL's strategy for helping Democrat Joe Biden win the all-important midwestern states. CTCL first granted \$6.3 million to five Wisconsin Democratic strongholds. Next CTCL granted \$12.2 million to two, large Democratic strongholds in Pennsylvania. CTCL finished its midwestern grants with \$4.44 million in grants to four Democratic strongholds in Michigan. Once CTCL finished improperly influencing Wisconsin, Pennsylvania, and Michigan, it moved on to South Carolina, Georgia, and Iowa with the same strategy—grant money to increase voter participation and turnout in only Democratic strongholds.

State of South Carolina

County	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 SC Win	Trump's 2016 SC Win in Votes
Richland	\$730,000	64%	31.1%	14.1%	300,016
Charleston	\$695,000	50.6%	42.8%	14.1%	300,016
Total CTCL SC Grant	\$1,425,000				

Republican Senator Lindsey Graham represents South Carolina and is on the November 3, 2020 ballot. CTCL's grants to South Carolina Democratic strongholds improperly increases Democratic votes in Richland and Charleston counties and makes President Trump and Senator Graham's reelection more difficult.

State of Georgia

County	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 Georgia Win	Trump's 2016 GA Win in Votes
Fulton	\$6,000,000	69.2%	27.1%	4.09%	211,141
Total GA Grant	\$6,000,000				

Fulton County is one of the most reliable Democratic Counties in the country. Since 1876 Fulton County has voted Democratic in every presidential election, except in 1928 and 1972. Of the State of Georgia's 159 counties, Hillary Clinton received more votes in Fulton County than any other Georgia county. In 2016 Clinton beat Donald Trump by 180,000 votes in Fulton County.

State of Iowa

County	CTCL Grant	Dem. Vote	Rep. Vote	Trump's 2016 Iowa Win	Trump's 2016 IA Win in Votes
Black Hawk	\$267,500	Caucus	Caucus	9.41%	147,314
Total IA Grant	\$267,500				

In 2016 Hillary Clinton won only six of Iowa's 99 counties. In Black Hawk County Clinton beat Trump 50.05% to 42.66%. Black Hawk County election commissioner

Grant Veeder said he was “surprised” at the amount of CTCL’s grant. He added, “I didn’t expect that large of an award.”

Total CTCL Grants

State	CTCL Grant Amount
Wisconsin	\$6.32 Million
Pennsylvania	\$12.20 Million
Michigan	\$4.44 Million
South Carolina	\$1.43 Million
Georgia	\$6.00 Million
Iowa	0.27 Million
Total CTCL Swing State Grants	\$30.66 Million

CTCL granted \$30.66 million to 5 counties and 10 cities. The common denominator of all 15 CTCL grants is that CTCL awarded grants to only cities and counties who vote heavily Democratic. Because CTCL is 15 for 15 when it comes to financially supporting Democratic strongholds. CTCL's grant amounts and grant locations are not random or based upon an unbiased funding formula.

CTCL's Partisan Grant Process

How CTCL awarded its monetary grants to Democratic strongholds is proof that CTCL grants were campaign donations to Democratic candidate Joe Biden. CTCL did not follow the proper protocols before it awarded grants. The standard practice to award grants is to start with a grant announcement that has the grant open date, grant close date, amount of the grant, eligibility for the grant, and description of the grant.

Without an open call for applications, CTCL did not receive grant applications from which CTCL could pick the election commissions who submitted the most deserving or best applications. Instead CTCL preselected or targeted its grants to heavily Democratic voting commissions in three battleground and three swing states.

The City of Lansing Clerk Chris Swope admitted that CTCL first approached Lansing to see if the City of Lansing wanted CTCL's grant money (Exhibit 179). In an internal City of Green Bay Grant Tracking Form, the City of Green Bay acknowledged that Green Bay received \$1,103,400 from CTCL "through the City of Racine's efforts (Exhibit 166)." Because there is no evidence or trail that CTCL had an open call for its election grants, CTCL targeted its grants to 5 counties and 10 cities because these municipalities are Democratic strongholds. CTCL approached these Democratic strongholds first to start CTCL's process of distributing the organization's grants to municipalities that have the highest concentration of Democratic voters.

If CTCL followed the proper protocols for its safe voting and COVID-19 grants, then CTCL will be able to provide the following information.

1. CTCL can provide information of how it publicized its grants and solicited applicants for the \$30.66 million in grants that eventually went to only Democratic strongholds.
2. CTCL can provide the names of other cities and counties who also applied for grants at the same time as the Democratic strongholds that received CTCL grants.
3. CTCL can provide the applications of all the cities and counties who also applied for CTCL's grants that eventually went to only Democratic strongholds.

For CTCL to avoid its grants from being labeled partisan grants, CTCL must prove its grants protected voters in the cities and counties who received grants because they had the highest COVID-19 risk. If CTCL's grants were truly nonpartisan, then CTCL will

provide the names and application of grant applicants who didn't receive a portion of the \$30.66 million that eventually went to only to Democratic strongholds.

CTCL Executive Director Epps-Johnson Social Media Posts

CTCL Executive Director Epps-Johnson tweeted or retweeted 61 political tweets. Epps-Johnson mentioned Republicans in 36 of her tweets and retweets. All 36 of Epps-Johnson's Republican tweets and retweets were derogatory and negative (Exhibits 12 through 47). Epps-Johnson mentioned Democrats in 25 of her tweets and retweets. All 25 of Epps-Johnson's Democratic tweets and retweets were flattering and positive (Exhibits 48 through 72). Epps-Johnson should not have been making derogatory statements about President Trump at the same CTCL was granting money that may determine the outcome of President Trump's election.

CTCL Executive Director Epps-Johnson tweets and retweets clearly show her political bias in favor of Democrats and opposition against Republicans. On issues of abortion, Black Lives Matter, Defund the Police, immigration, kneeling during the National Anthem, policing, gun control and voting rights, CTCL Executive Director Epps-Johnson is clearly pro-Democrat and Anti-Republican. Epps-Johnson's outspoken and strong pro-Democrat public support makes her unqualified to provide nonpartisan grants.

In Epps-Johnson's first entry of her Twitter bio, she said she was CTCL's founder and executive director (Exhibit 48). By naming herself CTCL's founder and executive director first and foremost, Epps-Johnson made sure her Twitter followers knew she was in charge of CTCL when she tweeted or retweeted. Many of Epps-Johnson's tweets and retweets involved political issues that had nothing to do with voting or the election process. Epps-Johnson posted negative social media comments about President Trump at the same CTCL distributed grant money to Democratic strongholds. Epps-Johnson social media posts reveal CTCL's hidden agenda of partisan grants that were meant to stop Donald Trump from being reelected president.

Exhibit	Description	Date
	CTCL Director Epps-Johnson's Derogatory and Negative Tweets about President Trump, the Trump Administration, and Republican Party	
12	President Trump's Election Disinformation	6/22/2020
13	President Trump Defying 1997 Court Agreement	9/6/2018
14	Criticism of President Trump Immigration Policy	7/9/2018
15	Criticism of President Trump's election fraud commission	1/3/2018
16	Criticism of President Trump's Tweets	11/28/2017
17	President Trump can't cancel or postpone the election	5/8/2020
18	President Trump Accused of Rape	6/21/2019
19	Criticism of President Trump's Haitian Immigration Policy	11/22/2017
20	Criticism of President Trump's Immigration Policy	8/3/2018
21	Complaint that the White House is attacking Dem. Senate Candidate	6/4/2018
22	President Obama's Attorney General Sally Yates says President Trump is embracing Putin	11/11/2017
23	Dem. Senator Durbin criticizes President Trump	7/31/2018
24	Dem. Congressman Adam Schiff's criticizes the Trump Administration	6/21/2018
25	Dem. Sen. Richard Blumenthal criticizes President Trump's Immigration Policies	7/6/2018
26	President Trump Doesn't Have the Authority to change election date	7/30/2020
27	Neg. Post about the diversity of President Trump's staff	8/13/2018
28	Vice President Pence wants to kill gay people	10/18/2017
29	Criticism of Republican Party	12/7/2017
30	Criticism of the Republican Party #2	12/3/2017

Exhibit	Description	Date
31	Criticism of Trump Campaign Manager	6/19/2018
32	Criticism of Republican Senate Candidate	12/10/17
33	Dem. Sen. Durbin calls GOP Tax Scam	12/1/2017
34	Gloating over Gen. Flynn's Guilty Plea	12/1/2017
35	Neg. Comments about Michael Cohen and Paul Manafort	8/21/2018
36	Republican Senator Flake Harassed during Kavanaugh confirmation hearing	9/28/2018
37	Nicki Haley Criticism and Defund the Police	12/6/2019
38	Criticism of Kavanaugh SCOTUS Appointment	10/6/2018
39	Dem. Rep. Speier criticism of Immigration	7/13/2019
40	Trump Administration handled Immigration Poorly	2/3/2020
41	Derogatory Comments about Justices Thomas and Kavanaugh	9/27/2018
42	Accusations Against Federal Law Enforcement	7/17/2020
43	Dem. Rep Elijah Cummings Immigration Criticism	7/6/2018
44	Negative comments about St. Louis Couple who pointed guns at BLM trespassers	7/11/2020
45	Wrong for NFL team's kneeling for national anthem to discipline players	7/19/2018
46	Democratic Congressman Bass' Immigration Comments	7/24/2018
47	Democratic Congresswoman Madeleine Dean Immigration Comments	7/1/2019
	CTCL Director Epps-Johnson's Flattering and Positive Tweets about Democrats and the Democratic Party	
48	Tiana Epps-Johnson bio with her as CTCL's founder and Executive Director	
49	Black Women Save Democratic Party	11/7/2017
50	Every Democrat's Black Agenda Ranked	2/28/2020

Exhibit	Description	Date
51	Democratic Primaries are about Delegate Math	2/11/2020
52	Ranking of Localities that best represent CTCL	8/26/2019
53	Goal is to reach all election offices in the country	6/24/2020
54	Dem. Senator Kamala Harris Health Care Comments	12/3/2017
55	Dem. Rep Alexandria Ocasio-Cortez Message on Voting	6/28/2018
56	Dem. Rep Alexandria Ocasio-Cortez Speech	7/23/2020
57	Dem. Rep John Lewis get out the vote tweet	7/3/2018
58	Dem. Rep John Lewis get out the vote tweet 2	6/30/2018
59	Democratic Presidential Debate Discussion	10/15/2019
60	Dem. Senator Durbin and Dem Governor Pritzker Messages	3/19/2020
61	Dem. Rep. Elijah Cummings Praised	10/27/2019
62	Dem. Sec. of State Hillary Clinton retweet	11/8/2017
63	First Lady Michelle Obama Praised	4/18/2019
64	Democrat Presidential Candidate Elizabeth Warren Praised	3/5/2020
65	Obama Foundation Praise of Tiana Epps-Johnson	4/2/2020
66	Obama Foundation Statement	9/24/2019
67	Support for Dem. Governor Candidate Stacy Abrams	7/26/2019
68	Support for Democratic Congressional Candidate	8/7/2018
69	Support for Florida Democratic Governor Candidate	8/30/2018
70	Support for Dem. Senate Candidate Doug Jones	11/9/2017
71	Dem. Senator Doug Jones Elected	12/12/2017
72	Kamala Harris VP Picked Praised	8/11/2020

Director of Government Services May's Anti-Republican and Pro-Democratic Social Media Posts

CTCL Director of Government Services Whitney May tweeted or retweeted 61 political tweets. May mentioned Republicans in 50 of her tweets and retweets. All 50 of May's Republican tweets and retweets were derogatory and negative (Exhibits 77 through 126). May mentioned Democrats in 11 of her tweets and retweets. All 11 of May's Democratic tweets and retweets were flattering and positive (Exhibits 127 through 137).

CTCL Director of Government Services Whitney May posted political Facebook posts 22 times. Eleven of May's posts were about the Trump Family, President Trump, and Republicans. All eleven of May's Republican related posts were derogatory, demeaning and negative (Exhibits 138 through 148). May posted eleven Facebook posts about Democrats and Democratic issues. All eleven of May's Democratic related posts were flattering and positive (Exhibits 149 through 159).

Exhibit	Description	Date
	CTCL Director of Government Services May's Negative Tweets about President Trump, the Trump Family and Administration	
77	Trump is a Fucking Sociopath 1	2/16/2017
78	Trump is a Fucking Sociopath 2	2/16/2017
79	Trump's "Bogus Election Panel"	9/12/2017
80	Trump's Appearance Mocked	2/13/2017
81	Trump is "gas lighting America"	12/10/2016
82	Go After Trump's Lies	2/16/17
83	Derogatory Image of President Trump	2/7/2017
84	Accuses Trump of Plagiarism	1/20/2017
85	Criticism of Trump's Fund Raising	1/12/2017
86	Complaint about Trump pardoning Sheriff Joe Arpaio	9/5/2017
87	Mocking President Trump with Photo	5/30/2018

Exhibit	Description	Date
88	Whitney May says. "Trump ego is the most fragile"	1/11/2017
89	Trump Family called out of touch Hollywood Elitest	1/5/2017
90	President Trump accused of targeting Nordstrom's	2/8/2017
91	Whitney May mocks President Trump	1/11/2017
92	Whitney May Attacks Trump U	1/18/2017
93	Democrat Attorney General Eric Holder's Criticisms of Trump's DOJ's Criminal Justice Policies	5/12/2017
94	Cheap Shot at Ivanka Trump	2/13/2017
95	Cheap Shot at Jared Kushner	9/27/2017
96	Harsh Criticism of President Trump	1/14/2017
97	Nancy Pelosi criticizes President Trump	1/17/2019
98	Protests over President Trump's Travel Ban	1/28/2017
99	Excuses/lies from Trump administration and other Republicans	1/21/2017
100	Maxine Waters calls Trump a "bum" and a "disgrace"	9/23/2017
101	Congressional Black Caucus Complaints about Trump	2/16/2017
102	Criticism of Trump's Muslim Travel Ban	2/24/2017
103	Congressional Black Caucus Complaints about President Trump's Vote Fraud Panel	6/30/2017
104	Dem. Rep. Maxine Waters desire to impeach President Trump	2/3/2017
105	Doubts about President Trump's Kobach Commission Report	1/29/2017
106	Whitney May calls VP Pence "Sad"	1/20/2017
107	White House Advisor Kellyanne Conway Attacked	2/9/2017
108	Senate Republicans Mistreated President Obama's SCOTUS Nominee Merrick Garland	1/31/2017
109	GOP Criticized for people with disabilities treatment	11/2/2018
110	White House Interview with Sean Spicer denigrated	2/9/2017

Exhibit	Description	Date
111	Criticism of Montana GOP Party Chairman	2/22/2017
112	Dem. Rep Luis Gutierrez Complains about ICE meeting	2/16/2017
113	Dem. Sen. Dick Durbin says Republicans Can't Listen	2/7/2017
114	Dem. Senator Kamala Harris calls for investigation of Trump-Russian Collusion	2/14/2017
115	Whitney May says "GOP campaign office firebombed because it was weak"	1/11/2017
116	Dem. Congressman John Dingell's disbelief Trump was elected	1/26/2017
117	WH Press Sec. Sean Spicer is lying	1/31/2017
118	Dem. Senator Tim Kaine says he is appalled by President Trump's Administration's Cruelty	1/28/2017
119	Swipe at Republican Senate Candidate Roy Moore	11/13/2017
120	Republican Rep Dana Rohrabacher is a "fool"	6/3/2017
121	Republican Media Pundit Ann Coulter is a racist	6/3/2017
122	Dem. Sen. Elizabeth Warren Impugns Jeff Sessions	2/8/2017
123	Mocking Republican Rep. Jason Chaffetz	3/7/2017
124	Dem. Rep. Maxine Waters says FBI has no credibility regarding Trump Investigation	1/13/2017
125	President Trump White House Press Secretary Lies about Crowd Turnout	1/21/2017
126	Chicago Reacts to President Trump's EPA Announcement	5/9/2017
	CTCL Director of Government Services May's Positive Tweets about Democrats and the Democratic Party	
127	Obama Foundation announces Tiana Johnson Epps as Original Fellow	4/16/2018
128	Whitney May's Praise for President Obama	1/11/2017
129	Whitney May's Praise for Michelle Obama	1/6/2017

Exhibit	Description	Date
130	Praise for President Obama's ACA	1/14/2017
131	President Obama sets record with 1,715 commutations	1/19/2017
132	Praise for Hillary Clinton	1/13/2017
133	President Obama Retweet	8/29/2018
134	Support for Chicago Dem. candidate for mayor	10/16/2018
135	Whitney May's Fax Receipt to Mitch McConnell	2/8/2017
136	Democratic Candidate for IL Governor Highlighted	4/5/2017
137	Run for City and County Clerks	2/21/2019

Exhibit	Description	Date
	CTCL Director of Government Services May's Derogatory and Negative Facebook posts about President Trump, the Trump Family and Republicans	
138	May says, "Don't Vote for Trump"	9/16/2016
139	May again says, "Don't vote for Trump"	9/21/2016
140	May says, "Hillary is superior to Trump. I'm voting for her."	7/25/2016
141	Trump family embodies a very old sexist hypocrisy	7/21/2016
142	May's Criticizes How Trump is seeking a fair election	10/4/2016
143	May's easy decision to support Democrats over Republicans	8/4/2016
144	Donald Trump Calls for extreme vetting of immigrants	8/19/2016
145	Trump Criticizes Flint, Michigan Pastor	9/15/2016
146	May is against Republican Senate Candidate Roy Moore	9/28/2016
147	May celebrates Ohio Trump Chair's Resignation	9/23/2016
148	Melania Trump plagiarized Michelle Obama	7/19/2016
	CTCL Director of Government Services May's Flattering and Positive Facebook Posts about Hillary Clinton and support for the Democratic Party Platform	

Exhibit	Description	Date
149	May's support of Hillary Clinton	9/29/2016
150	May Encourages people to vote for Hillary Clinton	9/29/2016
151	May's Push for Clinton	9/8/2016
152	May support for Clinton-Kaine Ticket	9/17/2016
153	Hillary Clinton has presidential look	10/20/2016
154	Another May Endorsement for Clinton	9/26/2016
155	"endorsement of Clinton and rejection of Trump"	10/5/2016
156	May says, "I'm Voting for Elizabeth Warren"	3/1/2020
157	Michelle Obama was right as Clinton accepts the Democratic nomination for president	7/26/2016
158	May wants to ban assault rifles	6/12/2016
159	May supports gun control	6/22/2016

CTCL's Executive Director Epps-Johnson's Democratic History and Ties

CTCL Director Epps-Johnson strong Democratic ties extend from her youth to the present. Epps-Johnson interned at the Young Democrats of America (Exhibit 3). CTCL Executive Director Epps-Johnson was an original Obama Foundation fellow from April, 2013 until April, 2020. Epps-Johnson was also a director at a Democratic grass roots organization named New Organizing Institute (NOI) for three years before she started CTCL. The NOI executive director and Epps-Johnson's NOI boss was Barack Obama's digital director for the Obama 2008 and 2012 campaigns.

Epps-Johnson wrote CTCL's Action Plan while she was an Obama Foundation fellow because the Obama Foundation required her to do so (Exhibit 4). CTCL's \$30.66 million grant to 5 counties and 10 cities in the battleground and swing states are directly related to Epps-Johnson's training and work that she did at the Obama Foundation. Because of President Barack and First Lady Michelle Obama's very public support for

Democrat Joe Biden, election officials in the battleground states should have rejected the \$30.66 million in voting grants from someone who had just finished training at the Obama Foundation a few months earlier.

A picture captured the close relationship between CTCL Director Epps-Johnson and President Obama (Exhibit 5). Ms. Epps-Johnson and President Obama's photo appeared on the front page of the May 17, 2018 of the Chicago Tribune.

Ms. Epps-Johnson and her other 19 Obama Foundation fellows had a round table with President Obama first and then had a second round table with the former First Lady Michelle Obama. President Obama said, "These folks don't need inspiration, they need money. They need contacts, they need space to develop their ideas (Exhibit 6)." Shortly after Obama may his statement about needing space, CTCL moved its offices into the same building at 233 N. Michigan, Chicago, IL 60601 that Barack Obama used when he launched his run for president in 2008. Several other nonprofits and/or businesses use the same mailing address and suite number as CTCL.

President Obama made good on his promise to provide Epps-Johnson with contacts and money. In 2018 CTCL listed its total revenue on its Form 990 as \$1.4 million (Exhibit 7). Based on CTCL's grants and operating budget, CTCL's 2020 revenue increased 215 fold or more in the same year Epps-Johnson completed her Obama Foundation fellowship. President Barack and First Lady Michelle provided contacts and funding for CTCL's \$30.66 million in grants to the five counties and 10 cities in six swing states. Since the Obama's are constantly working to defeat President Trump, the Obamas help in funding CTCL's COVID-19 grants creates doubts about CTCL's nonpartisanship.

On April 17, 2015 CTCL Director Epps-Johnson was invited to the first White House Tech Meetup (Exhibit 8). President Obama sponsored the Tech event. In the same year President Obama was accused of exploiting the use of technology in his 2012 presidential campaign. President Obama successfully used tech and voter data

research to win his 2008 and 2012 presidential elections; consequently, Obama knows the value of tech, voter data, and political-technical savvy leaders like CTCL Director Epps-Johnson.

In 2015 the Government Accountability Institute lodged a Federal Election Commission complaint against the Obama Campaign. The lawsuit stated, "Moreover, the Obama Campaign assembled the most talented team of data and technology specialists ever employed by a presidential campaign. This team of specialists produced and used extensive information gathering software and multiple data basis and cross-referencing systems to ensure the Obama Campaign knew as much about every potential voter or donor as possible including substantial information about the potential voter's network of friends, relatives and co-workers" (Exhibit 9).

The Obama Campaign cross-referenced data from its website with information collected from Facebook and Google to determine precisely the identity of each Obama website visitor, the visitor's political biases, and issues important to the individual voter. CTCL lists both Facebook and Google as corporate sponsors (Exhibit 10). CTCL is free to sell the data it collects about candidates, voters and elections to Facebook, Google and other the tech companies who in turn provide the information to political campaigns for the purpose of tailoring a message to each specific voter.

For the last five years President Obama groomed CTCL Executive Director Epps-Johnson to work for him, and the Democratic Party. President Obama recruited, trained, connected and funded CTCL's Executive Director Epps-Johnson. Epps-Johnson is not a nonpartisan executive director of a nonprofit organization. CTCL Director Epps-Johnson is a Democratic partisan and loyal to her greatest benefactor President Obama and Obama's choice for president—Joe Biden.

CTCL's Changed How the Organization Awards Grants

CTCL announced on September 1, 2020 that it received \$250 million from Facebook founder Mark Zuckerberg and his wife Priscilla Chan. CTCL intends to redistribute the Zuckerberg-Chan \$250 million donation to election commissions throughout the U.S. However, the manner in which CTCL is distributing the \$250 million grant money is quite different than how it previously awarded its initial grants to battleground states. Though CTCL's grant process is slightly better, CTCL voting grants still lack transparency and are ripe for CTCL continuing to award its voting grants to only Democratic strongholds.

Previously when CTCL announced the organization's Rural Grants, it said, "Stay tuned to learn more about the grants, recipients, and how the funds have been utilized by local election officials (Exhibit 2). Several days after Complainant posted his Wisconsin Election Commission complaint online and criticized CTCL for unprofessional and biased grants, CTCL changed how the organization distributed its COVID-19 voting grants. On September 1, 2020 CTCL published and called for potential grant recipients to fill out CTCL grant applications (Exhibits 171 and 172). CTCL did not publicize and attract grant recipients before the organization awarded \$30.66 million in COVID-19 to five counties and ten cities in battleground and swing states. The change in CTCL's grant procedures is CTCL's admission that CTCL did not follow proper grant protocols before awarding its \$30.66 million in grant money to municipalities in battleground and swing states.

On CTCL's FAQ grant page, CTCL partially explained how it will determine the amount of funding for a city or county. "Your election office will be eligible to apply for a grant amount based on a formula that considers the citizen voting age population and other demographic data of your jurisdiction. (Exhibit 173)." Please note CTCL deliberately failed to release its complete funding formula because CTCL wants to continue to grant funds to Democratic strongholds in states where the outcome of the presidential election is still in question. CTCL's funding formula also failed to include the rate of COVID 19 confirmed cases and deaths.

CTCL has No Employee, Board Member, or Adviser with Medical Expertise

CTCL's 2020 grants are either called "Safe Voting Grants" or "COVID-19 Response Grants." Based on CTCL grant monikers of "Safe Voting" or "COVID-19 Response," CTCL is using the pretense of protecting voters' from COVID-19 as a means to grant money to cities and counties that vote heavily Democratic in battleground states. In a [CTCL webinar training video](#) on "Implementing public health guidelines for voting locations," CTCL's Training Associate Dylan Lynch said, "We don't want to provide any incorrect advice or guidelines. We are not really in public health. We are really relying on experts to help us" (Mr. Lynch made his comments 4 min and 10 sec into the [video](#)). The COVID-19 expert advice CTCL is disseminating is only from a limited number of public health articles, brochures and studies.

CTCL is granting nearly \$300 million to U.S. election commissions for the medical purpose of protecting voters from COVID-19. Yet, CTCL is an organization that doesn't have one medical expert on its staff, board, or advisory committee. Not one CTCL employee, board member, or advisory committee member has an infectious disease degree, medical degree, or public health degree. The staff of CTCL consists of 21 employees. Not one CTCL employee has any kind of a medical degree (Exhibit 176). There are five members on CTCL's Board of Directors. Not one CTCL board member works in the field of medicine (Exhibit 177). CTCL has 10 members on its Advisory Committee. Not one CTCL Advisory Committee member is employed in the field of public health (Exhibit 178). Because none of CTCL's 21 employees, 5 board members and 10 Advisory Committee members has a medical degree or is an expert in infectious diseases, CTCL had no legal right or medical authority to associate CTCL's Safe Voting and COVID-19 grants with the current pandemic.

The basis of CTCL's \$30.66 million grant to 5 counties and 10 cities in battleground states is public health; however, CTCL has no prior public health experience and no public health expert on its staff in which the CTCL could have properly concluded its \$30.66 million grants were a public health necessity for the 5 counties and 10 cities

that received its battleground and swing state grants. Without CTCL's association of its grants with COVID-19, CTCL has no justifiable reason for its highly selective grants. CTCL employees have neither the medical credentials nor the medical expertise to decide what is best for the public health of voters in Iowa, Georgia, Michigan, Pennsylvania, South Carolina and Wisconsin.

CTCL Executive Director Tiana Epps-Johnson is the mastermind behind CTCL's COVID-19 scam of redistributing \$300 million from liberal donors as COVID-19 Response grants. Epps-Johnson stands to personally profit from CTCL's grants. CTCL's 2018 Form 990 lists Epps-Johnson yearly salary at \$102,000 (Exhibit 7). Nonprofit executive directors are compensated between 1% to 2.5% of its budget. Given that CTCL's budget increased to \$300 million in 2020, Epps-Johnson's yearly salary will most likely jump from \$102,000 to between \$300,000 and \$750,000. CTCL's other paid employees will also reap financial rewards from CTCL's 2020 election interference. CTCL employees stand to profit handsomely for helping Democrat Joe Biden win key swing states.

Iowa, Georgia, Michigan, Pennsylvania, South Carolina and Wisconsin, voters are victims of CTCL's fraud in two ways: 1. CTCL's \$30.66 million COVID-19 grants to cities and counties in these six states weren't based on the organization's medical experience or medical expertise. CTCL provided its \$30.66 million in grants to Iowa, Georgia, Michigan, Pennsylvania, South Carolina and Wisconsin because CTCL sought to increase Democrat Joe Biden's chances of winning these states. CTCL's \$30.66 million in grants for voter safety was merely a ruse for increasing Democrat Joe Biden's chances of winning the six states' electoral votes. 2. CTCL is not nonpartisan as five Wisconsin mayors claimed three times in their July 6, 2020 Press Release (Exhibit 1). CTCL Executive Director Epps-Johnson and Director May committed fraud because they claim CTCL's motives and actions are nonpartisan.

Because CTCL's \$30.66 million is for voting grants, CTCL Executive Director Epps-Johnson and Director of Government Services May are *quasi-election officials*. It would

be inappropriate for local, state, or federal election commissioners to make partisan social media comments like CTCL's Epps-Johnson and May did (Exhibits 12 through Exhibit 159). If local, state or federal election commissioners put 150 anti-Republican or pro-Democrat posts on social media like Epps-Johnson and May, they would be removed or forced to resign from their election commission positions.

CTCL Violating Help America Vote Act

The Help America Vote Act (HAVA), granted \$425 million for safe voting during the COVID-19 pandemic. Allowable HAVA costs include cleaning supplies, protective masks for staff and poll workers, resources to meet an unanticipated increased demand for mail ballots due to self-isolation and quarantine in response to COVID-19, and temporary staff to process the increased absentee ballot demand.

A substantial portion of CTCL grants are going to pay for increased voter participation and voter registration which HAVA doesn't allow. CTCL required its grant recipients to use its money in Democratic strongholds to register new Democratic voters and to remind registered Democratic voters to cast their ballots. For example, \$1.06 million of CTCL's \$6.3 million grant that went to Wisconsin's five Democratic strongholds was used for voter outreach and voter registration programs (Exhibit 1). CTCL only sought to register new Wisconsin voters or remind voters of the November 3, 2020 election in the five Democratic strongholds that accounted for 82% of Hillary Clinton's Wisconsin vote in 2016.

The City of Green Bay received a CTCL grant of \$1,093,400. The City of Green Bay posted this on Twitter. "COVO is one of the volunteer organizations working with the City of Green Bay on increasing voter participation. The Wisconsin Safe Voting Plan, funded by the Center for Tech and Civic Life, guides these partnerships" (Exhibit 245). The Twitter post also stated that registering to vote, requesting an absentee ballot or obtaining a Voter ID was available thru October 11, 2020. Registering to vote or obtaining a Voter ID have nothing to do with keeping voters safe during the COVID-19

pandemic. CTCL's grant money to register voters and obtain voter IDs are not HAVA compliant. Furthermore, the City of Green Bay's post does not say one word about protecting voters from COVID-19.

In the heavily Democratic cities of Lansing and East Lansing, Michigan, the city clerks used CTCL's grants to mail absentee ballots to voters who did not request them. "Lansing's mailing list targeted more than 60,000 people who hadn't yet asked for applications. The capital city first began mailing the applications to all registered voters prior to August 2020 primary. Lansing and East Lansing received \$15,600 and \$8,500 respectively from the Center for Tech and Civic Life, a center-left nonprofit focused on increasing voter participation, for the mailings" (Exhibit 246)." Lansing and East Lansing Michigan's use of CTCL's grants for mailing applications is not HAVA compliant.

Richland County, South Carolina received a \$730,000 COVID-19 grant from CTCL (Exhibit 247). Please note that in the Richland County expense list in Exhibit 247, not one dollar of CTCL's \$730,000 grant went to purchase cleaning supplies or PPE's to protect voters and election workers. However, CTCL's grant did pay \$100,000 for advertising to promote absentee voting. CTCL's grant for advertising is not HAVA compliant.

FEC Complaint Against Center for Innovation and Research and David Becker starts on the next page.

FEC Complaint Against Center for Innovation and Research and David Becker

On September 1, 2020 Center for Election Innovation and Research (CEIR) announced that Facebook founder Mark Zuckerberg and his wife Priscilla Chan donated \$50 million to CEIR and another \$250 million to CTCL (Exhibit 239). The \$300 million Zuckerberg-Chan donation was to "Promote Safe and Reliable Voting During the COVID-19 Pandemic (Exhibit 239). CEIR and CTCL's Press Release for the Zuckerberg-Chan \$300 million grant does not quote any medical expert or medical information to explain how the Zuckerberg-Chan grant keeps voters safe from COVID-19 during the pandemic (Exhibit 239). As with CTCL, CEIR is using COVID-19 as ruse to spend Zuckerberg-Chan's \$50 million on Democratic strongholds.

CEIR has No Medical Credentials or Medical Expertise to Claim Its Grants will Keep Voters Safe from COVID-19

CEIR is granting \$50 million to Secretaries of State for the medical purpose of keeping voters safe from COVID-19 (Exhibit 242). Yet, CEIR is an organization that doesn't have one medical expert on its staff or board. Not one CEIR employee or board member has an infectious disease degree, medical degree, or public health degree. The staff of CEIR consists of 6 employees. Not one of CEIR's six employee has any kind of a medical degree or medical experience (Exhibit 240). There are six members on CEIR's Board of Directors. Not one of CEIR's six board member works in the field of medicine (Exhibit 241). Because none of CEIR's 6 employees, and 5 board members have a medical degree or public health experience, CEIR had no legal right or medical authority to claim CEIR's \$50 million in COVID-19 voting grants will keep voters safe during the pandemic.

CEIR has No Prior Grant Distribution Experience

CEIR has no prior history or experience in distributing voting grants. With a staff of only six employees during an extremely busy election season, CEIR doesn't have enough

employees to adequately review grant applications, distribute grants, and oversee the compliance of its \$50 million grants.

CEIR has no experience managing millions of dollars. CEIR was formed in 2016. CEIR's total expenses in 2017 was \$53,700, and CEIR's total expenses in 2018 was \$321,939. Zuckerberg-Chan's donation of \$50 million is 155 times the amount of cash from CEIR's 2018 budget. CEIR must redistribute \$50 million of Zuckerberg-Chan's money for the presidential election that was two months away when Zuckerberg-Chan made their CEIR donation.

CEIR's Executive Director David Becker's Anti-Trump Social Media Posts

Mr. Becker posted on his Twitter bio that he was CEIR's executive director (Exhibit 180). Mr. Becker posted 41 tweets and retweets about President Donald Trump on his Twitter account. Mr. Becker said such things as "President Trump sows chaos," "President Trump's false claims," and "The things President Trump says are flatly wrong" All 41 of Mr. Becker's comments about President Trump were negative or critical (Exhibits 180 through 237). Mr. Becker's social media comments about President Trump show Mr. Becker is a Democratic partisan.

Mr. Becker tweeted or retweeted about Attorney General Bill Barr four times. Mr. Becker said, "AG Barr's baffling and false claims," "A chilling ignorant statement from our nation's chief law enforcement officer," "AG Barr debunked" and "AG Barr's absentee ballot fraud concerns are impossible." All four of Mr. Becker's tweets about Attorney General Barr were extremely negative or critical. Mr. Becker's social media comments about Attorney General Barr put his Democratic partisanship on full display.

Exhibit	Becker's Anti-Trump Social Media Posts
180	David Becker's CEIR's Executive Director Twitter Bio
181	Will Democrats get the message to their voters?
182	President Trump sows chaos
183	Criticism of Trump for not warning of vote fraud in 2016
184	Becker on MSNBC two days in a row
185	President Trump's False Claims
186	Michelle Obama's positive comments
187	Negative Insinuation stemming from Trump tweet
188	Fact checking Trump's claims on mail in vote fraud
189	COVID Policy Failures
190	Image promoting the Democratic National Convention
191	Criticism of Trump using mail in voting
192	Criticism of Trump supporting the use of ballot drop boxes
193	Trump faux distinction between mail and absentee
194	Criticism of White House Chief of Staff Mark Meadows
195	Criticism of Trump not understanding absentee and vote by mail are the same
196	There is no evidence of supporting Trump's mail ballot warnings
197	Becker on CNN
198	Becker claims Trump is supporting the voting process in GA, PA, VA, OH, MI, WI and most other states
199	Trump hates mail in voting
200	Trump's stunning admission
201	Trump's claims about mail in voting are completely wrong
202	Becker applies what Trump said to 5 other states
203	Becker on CNN
204	The things President Trump says are flatly wrong
205	Criticism of President Trump's opinion of election result

Exhibit	Becker's Anti-Trump Social Media Posts
206	President Trump defies the law and Constitution
207	AG Barr's baffling and false claims
208	A chilling ignorant statement from our nation's chief law enforcement officer
209	President Trump is again spreading misinformation
210	President is fine with mail in votes when he wins
211	The impact of the President's false claims
212	Donald J. Trump for President Inc.
213	President Trump should complain to Utah Republican Lt. Gov.
214	POTUS and his allies spreading a false distinction
215	AG Barr debunked
216	Trump spreads new lies about foreign-backed vote fraud
217	Trump wrong about mail in voting
218	Trump should stop complaining about mail in voting because he won 15 states that voted 10% by mail in 2016.
219	Newt Gingrich spread unsubstantiated voter fraud conspiracy
220	AG Barr's absentee ballot fraud concerns are impossible
221	President's fear mongering
222	President's comment is disturbing and predictable
223	Becker on MSNBC
224	President should leave the vote by mail debate
225	President ramps up his mail in voting attacks
226	President Trump's voters are far more likely to believe his false statements
227	Trump rants about fraud
228	Twitter gives Trump a new enemy in the mail voting fight
229	Didn't expect the Kentucky Republican Party to pursue absentee voting
230	Twitter fact checked Trump's mail in ballot tweets
231	Cannot let misinformation come from the White House

Exhibit	Becker's Anti-Trump Social Media Posts
232	Trump is 100% wrong
233	President threatens Nevada Republican Sec. of State
234	Trump's unprecedented federal election interference
235	President Trump in the vast minority of his own party
236	Becker on MSNBC
237	Trump's tweet is absolutely ridiculous
238	Becker on MSNBC Morning Joe

CEIR Sample-Project-Budget is about getting voters to cast ballots via automated calls, postcards, radio, and TV buys (Exhibit 243). The Help America Vote Act (HAVA), granted \$425 million for safe voting during the COVID-19 pandemic. Allowable HAVA costs include cleaning supplies, protective masks for staff and poll workers, resources to meet an unanticipated increased demand for mail ballots due to self-isolation and quarantine in response to COVID-19, and temporary staff to process the increased absentee ballot demand.

None of costs in CEIR's sample grant budget included costs for cleaning supplies, protective masks, or resources to meet the increased demand of mail-in ballots. Rather CEIR is concentrating its \$50 million on increasing voter turnout in Democratic states. CEIR's grants does nothing to protect voters and election workers from COVID-19. Since CEIR first publicized its grants with, "Promote Safe and Reliable Voting During the COVID-19 Pandemic," one would expect CEIR to first distribute grant money for cleaning supplies and PPEs. Because CEIR wants election commissions to use its grant money to increase voter participation in select Democratic leaning states, CEIR's \$50 million in grants is a campaign contribution to presidential candidate Joe Biden.

CEIR has yet to announce the recipients of CEIR's grants. We already know from CTCL's grants is that who receives the COVID-19 grants may determine the outcome several important battleground states. Mr. Becker should not have made derogatory

comments about Attorney General Barr and President Trump at the same time he was determining grants that may influence the outcome President Trump's election. Given that CEIR has no prior grant experience, no medical expertise, and CEIR Executive Director Becker wants President Trump out of office, CEIR is in the process of spending \$50 million in partisan grants to advertise for Democrat Joe Biden.

FEC Complaint Against Mark Zuckerberg and Priscilla Chan

Mark Zuckerberg and Priscilla Chan announced that they were donating \$300 million to "Promote Safe and Reliable Voting During the COVID-19 Pandemic" (Exhibit 239). The Zuckerberg-Chan donation apportioned \$250 million to CTCL and \$50 million to CEIR. Zuckerberg-Chan's \$300 million COVID-19 safe voting donation is a \$300 million Joe Biden campaign contribution since CTCL and CEIR are redistributing the money to directly aid presidential candidate Joe Biden. FEC limits campaign contributions to \$2,800 per person. Zuckerberg-Chan's \$300 million partisan donation to CTCL and CEIR for candidate Joe Biden's benefit is 5,400 times more than FEC's contribution limit.

In 16 years Facebook founder Mark Zuckerberg created his \$572 billion social media empire that currently employs 52,000 workers. Zuckerberg built an infrastructure that has attracted 3 billion Facebook users who send more than 1 billion messages a day. In 2018 CEO Mark Zuckerberg, COO Sheryl Sandberg and CFO David Wehner received compensation of \$105.4 million. Financial experts estimate Zuckerberg's net worth between \$80 billion and \$100 billion. Based on all standards, Mark Zuckerberg is a social media genius and a brilliant, accomplished businessman.

As brilliant as Mr. Zuckerberg has been expanding his Facebook business, he has been equally bad with his \$300 million COVID-19 grants. Zuckerberg-Chan donated \$50 million to CEIR who will redistribute Zuckerberg-Chan's donation to secretary of states who apply for grants. At the time CEIR received Zuckerberg-Chan's donation, CEIR had no prior grant distribution experience. Mr. Zuckerberg would not hire top Facebook executives and pay them handsomely if they had no experience. Zuckerberg-Chan purposely donated \$50 million to CEIR because of CEIR's known left political leanings. When Zuckerberg-Chan donated to CEIR, Zuckerberg-Chan knew their \$50 million CEIR grant would help Democrat Joe Biden win the 2020 presidential race.

CTCL had two months of grant distribution experience when Zuckerberg-Chan donated \$250 million to CTCL. Mr. Zuckerberg would not hire a Facebook executive who had only two months experience to manage a division that has substantial influence on the lives of 330 million people. Zuckerberg-Chan deliberately donated \$250 million to CTCL because of CTCL's known left political leanings. When Zuckerberg-Chan donated to CTCL, Zuckerberg-Chan knew their \$250 million grant would help Democrat Joe Biden win his 2020 presidential election.

Zuckerberg-Chan should have had other concerns besides CTCL and CEIR's lack of grant distribution experience. A lack of time to properly redistribute \$300 million should have been a bigger concern for Zuckerberg-Chan. CTCL and CEIR announced that they were receiving Zuckerberg-Chan's \$300 million grant on September 1, 2020. The deadline to apply for CEIR grants was September 18, 2020 (Exhibit 242). Since CEIR had never awarded a grant before, CEIR had to develop grant criteria, grant applications, grant award process, and hire employees to oversee CEIR grants in 18 days. By the time CEIR grants reached election workers and voters, voting had already started.

CTCL opened its grant application process on September 8, 2020 (Exhibit 172). CTCL had one week from September 1, 2020 to September 8, 2020 to develop its grant criteria, grant application, grant award process and hire employees to oversee CTCL's \$250 million grant distribution. Facebook CEO Mark Zuckerberg would never allow Facebook to hastily proceed to market with unproven employees and unproven service in two months time. Because of Zuckerberg-Chan's last minute donation, CTCL's \$250 million COVID-19 grants won't reach election workers and voters until after voting has begun.

If Zuckerberg-Chan minimally vetted CTCL and CEIR before their \$300 million donation, Zuckerberg-Chan would have discovered that there were serious questions and complaints about CTCL's previous grants. Zuckerberg-Chan would have also learned about CTCL and CEIR's having no advisory committee members, board

CTCL only sought to grant money to Democratic strongholds in states whose presidential outcome was in doubt. So far CTCL's \$30.66 million in grants have been arbitrary and in partisan favor for Democrats. Suppose CTCL did not make another COVID-19 voting grant. CTCL's grants to 15 Democratic strongholds were so strategically placed to help candidate Joe Biden, the effects of CTCL's 15 grants on the presidential race are most likely irreversible.

Mark Zuckerberg was previously criticized for Facebook allowing Russian political ads during the 2016 election. More recently Facebook has been accused of having employees and policies that favor Democrats. "A Facebook employee told Project Veritas that 75% of the posts he sees selected by Facebook's algorithm for review are in support of President Trump and other conservative pages (Exhibit 244). One Facebook content moderator said, "If someone is wearing a MAGA Hat, I am going to delete them" (Exhibit 244).

Zuckerberg-Chan deliberately granted \$300 million to CTCL and CEIR because CTCL and CEIR are doing Zuckerberg-Chan's political bidding—increase Democratic votes for Joe Biden through CTCL and CEIR's ruse of COVID-19 voting grants. CTCL and CEIR offered the perfect cover for Zuckerberg-Chan to help Democratic Joe Biden become president. CTCL has no transparency, no oversight, and no accountability.

If Zuckerberg-Chan wanted to truly donate money to keep American voters and election workers safe during the COVID-19 pandemic, then Zuckerberg-Chan would have followed the Help American Vote Act model. The federal government gave each secretary of state a proportionate grant. After receiving the federal grant, each secretary of state gave a proportionate sub-grant to election commissions within its state. Unlike Zuckerberg-Chan's \$300 million donation for COVID-19 grants, every election commission received a fair share from the HAVA grant. Zuckerberg-Chan intentionally chose CTCL and CEIR to distribute their \$300 million donation because Zuckerberg-Chan knew CTCL and CEIR will continue to distribute their \$300 million disproportionately to Democratic strongholds.

its COVID 19 Rural Response grant (Exhibit 2). Thus, it was \$12.2 million of Zuckerberg-Chan's money that CTCL poured into heavily Democratic Philadelphia and Delaware County, Pennsylvania to increase the Pennsylvania Democratic voter turnout. \$12.2 million from Zuckerberg-Chan's \$250 million donation significantly increased the odds of Joe Biden winning Pennsylvania's 20 electoral votes.

Six days before the Zuckerberg-Chan \$250 million donation, CTCL granted Detroit, Michigan \$3.5 million. CTCL granted Lansing, Michigan \$440,000 three days after the Zuckerberg-Chan \$250 million donation. \$4 million of Zuckerberg-Chan's \$250 million donation went to increase Democratic voter turnout in the Democratic strongholds of Detroit and Lansing, Michigan. \$4 million of Zuckerberg-Chan's \$250 million donation significantly enhances Joe Biden's chances of winning the state of Michigan's 16 electoral votes.

CTCL's second largest grant of \$6 million went to Fulton County, Georgia one week after Zuckerberg-Chan's \$250 million donation to CTCL. More Democratic votes will come from Fulton County than any other Georgia county. Currently Real Clear Politics average of polls has President Trump at plus 1.5% and within the polls margin of error. It was \$6 million of Zuckerberg-Chan's money that CTCL poured into heavily Democratic Fulton County, Georgia to reap more Fulton County Democratic votes for Joe Biden. \$6 million of Zuckerberg-Chan's \$250 million donation improves Joe Biden's chances of winning Georgia's 16 electoral votes.

Before CTCL announced Zuckerberg-Chan's \$250 million donation, CTCL was 8 for 8 in granting money to Democratic strongholds in the battleground states of Michigan, Pennsylvania, and Wisconsin. When Zuckerberg-Chan donated to CTCL, it was Zuckerberg-Chan's intent to have CTCL use their \$250 million to continue CTCL's trend of granting money to only Democratic strongholds to help Joe Biden win key political states. *After* CTCL received Zuckerberg-Chan's \$250 million donation, CTCL granted 7 out of 7 grants to Democratic strongholds in swing states.

City or County	CTCL Grant	Date of CTCL Grant
FEC Complainant Jay Stone	Files a Wisconsin Election Complaint	August 28, 2020
Mark Zuckerberg and	Priscilla Chan Donate \$250 million to CTCL	September 1, 2020
Lansing Michigan	\$440,000	September 4, 2020
Fulton County, GA	\$6 million	September 8, 2020
A Second Wisconsin resident	Files a Wisconsin Election Complaint	September 10, 2020
Charleston County, SC	\$695,000	September 10, 2020
Richland County, SC	\$730,000	September 11, 2020
East Lansing, MI	\$8,500	September 11, 2020
Black Hawk County, IA	\$267,000	September 16, 2020
Flint, MI	\$475,625	September 17, 2020

CTCL's four largest grants are \$10 million to Detroit, Michigan; \$6 million to Fulton County, Georgia; \$3.5 million to Detroit, Michigan; and \$2.2 million to Delaware County, Pennsylvania. CTCL's four largest grants occurred shortly before or after Zuckerberg-Chan donated \$250 million to CTCL.

CTCL's largest grant of \$10 million went to Philadelphia, Pennsylvania five days before Zuckerberg-Chan publicly announced their \$250 million donation to CTCL. CTCL's fourth largest grant of \$2.2 million went to Delaware County, Pennsylvania 10 days before Zuckerberg-Chan's \$250 million donation. CTCL knew the Zuckerberg-Chan's \$250 million donation was coming as early as August 7, 2020 when CTCL announced

members, or employees with medical experience to insure voters and election workers are protected from COVID-19. CTCL and CEIR's lack of medical expertise and medical experience should have concerned Zuckerberg-Chan since they were claiming their \$300 million donation would protect election workers and voters from COVID 19.

CTCL lists Zuckerberg's Facebook company as a CTCL supporter and partner. CEIR Executive Director David Becker said he developed a partnership with Facebook when he was at Pew Charitable Trusts (Exhibit 240).

Before Facebook hires an executive, the company does a thorough background check. One would have expected that a businessman of Zuckerberg's stature would have performed background checks on CTCL and CEiR and their executives before handing them \$300 million to inject into a close and bitter presidential election. Because Zuckerberg-Chan already knew about CTCL and CEIR's left leaning political activism, they omitted background checks and donated \$300 million to CTCL and CEIR with the intention of helping Democrat Joe Biden win his election.

Timeline of CTCL's Grants to Democratic Strongholds in Battleground and Swing States

City or County	CTCL Grant	Date of CTCL Grant
Milwaukee, WI	\$2,154,500	July 6, 2020
Madison, WI	\$1,271,788	July 6, 2020
Green Bay, WI	\$1,093,400	July 6, 2020
Racine, WI	\$942,100	July 6, 2020
Kenosha, WI	\$862,779	July 6, 2020
Delaware County, PA	\$2.2 million	August 21, 2020
Detroit, MI	\$3.5 million	August 25, 2020
Philadelphia, PA	\$10 million	August 26, 2020