

**State of Wisconsin  
Before the Elections Commission**

The Complaint of

Abraham A. Voelker,  
Complainant,

Against

DeeAnn Cook in her official capacity as Barron County Clerk,  
Respondent.

---

**RESPONSE ON BEHALF OF LOCAL FILING OFFICER, DEEANN COOK, BARRON COUNTY CLERK  
TO THE COMPLAINT FILED JANUARY 13, 2022 BY ABRAHAM A. VOELKER**

---

In response to the Complaint filed by Abraham A Voelker, John Muench, Corporation Counsel for Barron County states on behalf of DeeAnn Cook, Barron County Clerk and local filing officer for Barron County the following:

1. That I am the duly appointed Corporation Counsel for Barron County.
2. That the Local Filing Officer for Barron County, DeeAnn Cook is currently unavailable for purposes of executing a verified response to the Complaint filed on January 13, 2022.
3. That due to the timelines involved in the election process, Barron County does not wish to delay the Wisconsin Elections Commission from reviewing this Complaint and rendering a decision.
4. That I have consulted with County Clerk DeeAnn Cook about the content of this response, and she has requested that I submit this verified response on her behalf.
5. That there are no material facts in dispute, and the facts as stated in the original challenge submitted by Abraham A. Voelker, and the facts stated in the Decision issued on January 11, 2022 by DeeAnn Cook are true and correct and are attached as Exhibits 1 and 2 to the Complaint filed before the Wisconsin Elections Commission.
6. That the issue before the Wisconsin Elections Commission is the proper interpretation of the governing statute and Wisconsin Administrative Code as it applies to the facts.
7. That the Respondent, DeeAnn Cook believes that the Complainant has misinterpreted the relevant Wisconsin Administrative Code Sections.
8. That the Respondent, DeeAnn Cook asserts that the interpretation of the statutes and Administrative Code sections as cited in the Decision dated January 11, 2022 are correct and re-asserts those findings, analysis and conclusions here as if fully set forth herein.

9. In conclusion, I submit this response on behalf of Respondent DeeAnn Cook supporting the initial finding that pursuant to Wisconsin Administrative Code Section EL 2.05 (5) that the information submitted by Jerry McRoberts was in substantial compliance with the law and therefore the challenge was invalid.

WHEREFORE: John Muench as Corporation Counsel for Barron County submits this response on behalf of the Respondent DeeAnn Cook as follows:

(1) That the Wisconsin Elections Commission uphold the Decision of the Local Filing Officer dated January 11, 2022.

Jan. 14, 2022  
Date

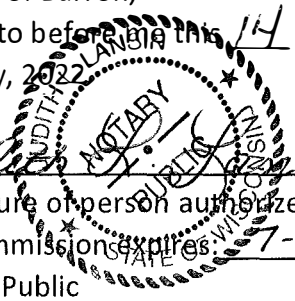
  
John Muench Corporation Counsel  
on behalf of DeeAnn Cook, County  
Clerk, Barron County

I John Muench, Barron County Corporation Counsel, being first duly sworn, on oath, state that I personally read the above complaint, and that the above statements are true and correct based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

  
John Muench, Corporation Counsel on  
behalf of Respondent DeeAnn Cook, County  
Clerk for Barron County

STATE OF WISCONSIN

County of Barron,  
Sworn to before me this 14 day of  
January, 2022

  
Judith A. Lang  
(Signature of person authorized to administer oaths)  
My commission expires 7-17-24 (is permanent)  
Notary Public