# State of Wisconsin Elections Commission

#### **COMPLAINT FORM**

Name: Jay Stone

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#### **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 1-14.

### **Sworn and Notarized Statement**

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

I, Jay Stone, being first duly sworn, on oath, state that I personally read my complaint,

and that my allegations are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true. Complainant Jay Stone's Signature ELIZABETH A BENITEZ NOTARY PUBLIC STATE OF WISCONSIN STATE OF WISCONSIN) County of \_ (county of notarization) Sworn to before me this day of March, a 15t (Signature of person authorized to administer oaths) My commission expires \_ Notary Public or Notary Public (official title if not notary)

## 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**

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 Statute § 5.06.

Michael Spitzer-Rubinstein Performed Election Official Duties Before Administrator Wolfe Recommended Him to the Green Bay, Kenosha, Madison and Racine Clerks

According to <u>Wisconsin Statute § 5.02(4e)</u>, the definition of an election official is "an individual who is charged with any duties relating to the conduct of an election." The <u>Wisconsin Election Administration Manual</u> states that, "Election officials perform a very important public service by enhancing the high quality and integrity of our elections," and it is important for a municipal clerk to make sure individuals are "qualified and well-trained." Mr. Michael Spitzer-Rubenstein was not qualified or well-trained, and his *New York* residence would have disqualified him from becoming a *Wisconsin* election official.

Before Administrator Wolfe referred Michael Spitzer-Rubenstein to the Green Bay, Kenosha, Madison and Racine Clerks, Mr. Spitzer-Rubenstein acted as an election official for the Milwaukee Election Commission and its Executive Director Claire Woodall-Voog. Besides Mr.

Spitzer-Rubenstein not meeting Wisconsin's election official residency requirement, Mr. Spitzer-Rubenstein lacked the requisite certification, training and swearing of an oath of office.

In Mr. Spitzer-Rubenstein's email to Executive Director Woodall-Voog, he said he will submit his absentee voter instruction edits to her on the next business day. Because Mr. Spitzer-Rubenstein was not a Wisconsin election official as required, Mr. Spitzer-Rubenstein was unqualified to edit the absentee voter instructions for the Milwaukee Election Commission.

In Mr. Spitzer-Rubenstein's email to Executive Director Woodall-Voog, he wrote "I'll create a flowchart for the VBM processing that we will be able to share with both inspectors and observers." VBM is an acronym for "vote by mail." Since Mr. Spitzer-Rubenstein was not a Wisconsin election official, he was unqualified to write the Milwaukee Election Commission's vote by mail flowchart.

At the beginning of Mr. Spitzer-Rubenstein's email he asked Executive Director Woodall-Voog to send him "the procedures manual and any instructions for ballot reconstruction process." At the end of Mr. Spitzer-Rubenstein's email, he said, "I'll look at the reconstruction process and try to figure out ways to make sure it's followed." Mr. Spitzer-Rubenstein was unqualified to manage the curing of Wisconsin ballots because he was not a Wisconsin election official. Mr. Spitzer-Rubenstein may not have cured Milwaukee's absentee ballots, but according to the correspondence between Mr. Spitzer-Rubenstein and Executive Director Woodall-Voog, he was involved in the managing of the process.

<u>In Mr. Spitzer-Rubenstein's email</u> he wrote that, "We're pushing Quickbase to get their system up and running." Complainant assumes Mr. Spitzer-Rubenstein's reference to "their system" is US Digital Response (USDR), another nonprofit organization and CTCL partner. Quickbase is a database program whose intended use was to track when Milwaukee voters cast their ballots.

In Executive Director <u>Woodall-Voog's September 16, 2020 email</u>, she wrote, "While I completely understand and appreciate the assistance that is trying to be provided, I am definitely not comfortable having a non-staff member involved in the functions of our voter database, much less recording it. ... I don't think I'm comfortable having USDR get involved when it comes to our voter database."

There are no emails or evidence that shows Executive Director Woodall-Voog tried to stop Mr. Spitzer-Rubenstein or USDR from using Quickbase to interface with the Milwaukee Election Commission's database between August 28, 2020, the date Mr. Spitzer-Rubenstein first discussed Quickbase with Executive Director Woodall-Voog and September 16, 2020, the date of Executive Director Woodall-Voog's email about feeling uncomfortable with USDR. Where as Mr. Spitzer-Rubenstein was not a Wisconsin election official, Mr. Spitzer-Rubenstein should not have been given any consideration whatsoever to interface with the Milwaukee Election Commission's database.

Wisconsin Election Administration Manual requires election officials who are "qualified and well-trained" for the purpose of "high quality and integrity in our elections." Mr. Spitzer-Rubenstein was neither qualified nor well-trained to perform the election official duties that he did for the Milwaukee Election Commission. Administrator Wolfe's referral of Mr. Spitzer-Rubenstein after he performed election official duties for the Milwaukee Election Commission was reckless and gross negligence at best. Administrator Wolfe's referral of Mr. Spitzer-Rubenstein to the Green Bay city clerk allowed Mr. Spitzer-Rubenstein to continue to perform Wisconsin election official duties, which has caused many voters to doubt the Wisconsin November 3, 2020 election results.

#### Administrator Wolfe's Referral of Michael Spitzer-Rubenstein to Four Zuckerberg 5 Cities

WEC Administrator Meagan Wolfe sent out an email to the Green Bay, Kenosha, Madison, and Racine clerks 12 minutes after Executive Director Woodall-Voog emailed her an "introduction"

to Michael Spitzer-Rubenstein, Hillary Hall, and Vote at Home. <u>In Administrator Wolfe's August 28, 2020 email</u> she wrote the below recommendation for Mr. Spitzer-Rubenstein and Vote at Home.

"Green Bay, Madison, Racine and Kenosha-

Passing along a recommendation and resource from Milwaukee. Just wanted you to be aware in case you thought this might be a group you are interested in working with or learning about. Claire in Milwaukee okayed me sending this along, and it sounds like you should reach out to Michael at <a href="michael@voteathome.org">michael@voteathome.org</a> if you are interested in learning more."

The subject line in Executive Director Woodall-Voog's email to Administrator Wolfe was "Introduction to Vote at Home." In the body of Executive Director Woodall-Voog email to Administrator Wolfe, she wrote: "I just wanted to reach out and connect you with Micheal Spitzer-Rubenstein and Hillary Hall from the Vote at Home Institute in case you think other clerks or the WEC staff would find working with them useful."

Administrator Wolfe wrote, "Passing along a recommendation" from Milwaukee, but Executive Director Woodall-Voog did not say she recommended Michael Spitzer-Rubenstein or Vote at Home as Administrator Wolfe wrote. Rather, Executive Director Woodall-Voog said she was providing an "Introduction to Vote at Home." There is difference between a "recommendation" and an "introduction." A *recommendation* of a person or organization is based upon known qualifications and accomplishments. An *introduction* is the presentation of a person or organization without implying the person or organization is qualified or accomplished.

Administrator Wolfe wrote "Claire in Milwaukee okayed me sending this along." Administrator Wolfe implied she was okay with Michael Spitzer-Rubenstein becoming involved in their cities election administration. When Administrator Wolfe referred Mr. Spitzer-Rubenstein, she failed to specify what Mr. Spitzer-Rubenstein and Vote at Home could or could not do.

In her email Administrator Wolfe wrote, "it sounds like you should reach out to Michael at michael@voteathome.org if you are interested in learning more." After Executive Director Woodall-Voog's scant 35 word "introduction," Wisconsin's highest election official, Administrator Wolfe gave her gold seal of approval for Michael Spitzer-Rubenstein to perform election official duties although Mr. Spitzer-Rubenstein lacked the required training, certification, and oath of office.

The Zuckerberg 5 cities did not request volunteers from Administrator Wolfe. Administrator Wolfe's referral of Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha and Racine was completely *unsolicited*.

Administrator Wolfe wanted the clerks of Green Bay, Madison, Kenosha and Racine to use Mr. Spitzer-Rubenstein as a resource though Mr. Spitzer-Rubenstein's election administration services were *completely unnecessary*. The clerks of Green Bay, Madison, Kenosha and Racine could have easily provided the same level of election administration and service without Mr. Spitzer-Rubenstein meddling in the November 3, 2020 presidential election.

Administrator Wolfe referred Michael Spitzer-Rubenstein to the Green Bay, Kenosha, Madison, and Racine election clerks for the purpose of having Mr Spitzer-Rubenstein perform election administration duties which only Wisconsin election officials are authorized to do. As Wisconsin's highest election official, Administrator Wolfe should have known that she was referring Mr. Spitzer-Rubenstein for some type of an election official position that required training and certification as well as taking an oath of office.

To ensure Wisconsin elections are safe, secure, fair, and free, Wisconsin legislators required the Green Bay, Kenosha, Madison, and Racine to hire and retain election officials who are well-trained and qualified, which Mr. Spitzer-Rubenstein was not. Administrator Wolfe abused her discretion because she referred Mr. Spitzer-Rubenstein for the duties of an election official

though Mr. Spitzer-Rubenstein could not meet the requirements to become a Wisconsin election official.

#### Administer Wolfe's Inaccuracies in Response to Special Counsel's 2nd Interim Report

Administrator Wolfe lied and provided incomplete information in her <u>Special Counsel's inaccuracies of the 2nd Interim Report</u>. Administrator Wolfe wrote, "Further, Michael Spitzer-Rubinstein had reached out to WEC as a representative of the Vote at Home Institute, not CTCL." Michael Spitzer-Rubinstein did not reach out to WEC as Administrator Wolfe falsely claimed. Executive Director Woodall-Voog was the one who introduced Michael Spitzer-Rubinstein and Vote at Home via her <u>August 28, 2020 email</u> to Administrator Wolfe.

Administrator Wolfe said she emailed large municipalities. This is a lie of omission. The truth is Administrator Wolfe only emailed the clerks of Green Bay, Madison, Kenosha and Racine. Administrator Wolfe deliberately left out receiving a Michael Spitzer-Rubenstein and Vote at Home introduction from Milwaukee Election Commission Executive Director Woodall-Voog because Milwaukee is one of the Zuckerberg 5 cities. Also, Administrator Wolfe intentionally failed to disclose she only forwarded Michael Spitzer-Rubenstein and Vote at Home as a resource to Green Bay, Madison, Kenosha and Racine because these are the four remaining cities who are part of the Zuckerberg 5 cities. What Administrator Wolfe wrote in describing the Wisconsin Special Counsel's "inaccuracies" was her feeble attempt to cover up her Zuckerberg 5 favoritism.

Administrator Wolfe said she only sent the Michael Spitzer-Rubinstein and Vote at Home referrals to "large municipalities because they were the ones who were experiencing the most precipitous by-mail absentee voting increases in 2020...." Administrator Wolfe offered no proof of her claim that an unmanageable number of voters in large cities were voting absentee. In fact, absentee voting for the November 3, 2020 presidential election hadn't even begun when Administrator Wolfe sent out her August 28, 2020 Michael Spitzer-Rubenstein and Vote at Home referral. Furthermore, Administrator Wolfe and WEC distributed Cares Act sub-grants that

provided additional funds to cover the increased costs of COVID related absentee voting in 2020; in addition, Administrator Wolfe supplied government resources for additional funding if election clerks needed more money.

In Administrator Wolfe's Special Counsel's inaccuracies of the 2nd Interim Report, she referred How Wisconsin Is Ready for the November 3, 2020 Election report that was in the process of being prepared when she recommended Michael Spitzer-Rubenstein and Vote at Home to four of the Zuckerberg 5 cities. In the report Administrator Wolfe referenced, none of the cities cited a concern for "precipitous" or increase of absentee ballots as Administrator Wolfe stated. Instead the Zuckerberg 5 cities submitted positive reports for their election preparedness. Furthermore, the Zuckerberg 5 cities received a combined \$8.8 million in grants. The Zuckerberg 5 grants allowed the cities to hire as many additional election workers as they wanted. Because of the sizable Zuckerberg 5 grant, the Zuckerberg 5 cities were not in need of Michael Spitzer-Rubenstein as a human resource, nor were the Zuckerberg 5 cities in need of the Vote at Home corporation as an organizational resource as Administrator Wolfe falsely implied to her readers.

Administrator Wolfe Abused Her Discretion When She Recommended Michael Spitzer-Rubenstein to the Green Bay, Madison, Kenosha, and Racine Clerks

Had Administrator Wolfe hired Mr. Spitzer-Rubenstein as a WEC employee, Mr. Spitzer-Rubenstein would have had to complete a job application, submit a resume, attend multiple job interviews, and undergo a background check. Because Mr. Spitzer-Rubenstein was not a vetted WEC employee and he was without the requisite Wisconsin training, certification and qualifications, Administrator Wolfe's referral of Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha and Racine was an abuse of her election official discretion.

When Administrator Wolfe referred Michael Spitzer-Rubenstein and Vote at Home to four Zuckerberg 5 cities, what kind of election assistance did Administrator Wolfe expect Michael

Spitzer-Rubenstein to provide Green Bay, Kenosha, Madison and Racine election clerks and voters?

When Administrator Wolfe recommended Mr. Spitzer-Rubenstein she knew nothing about Mr. Spitzer-Rubenstein's education, work history, election administration experience, or his motivation for traveling from his Brooklyn, New York home to Wisconsin in the midst of a pandemic. Administrator Wolfe had no knowledge of how well Mr. Spitzer-Rubenstein performed his Milwaukee Election Commission responsibilities that led Executive Director Woodall-Voog to introduce him to her.

The following question is one that only Administrator Wolfe can and should answer. Had Administrator Wolfe known that Mr. Spitzer-Rubenstein quickly became involved with writing Milwaukee absentee voting instructions, Milwaukee's system for processing vote by mail ballots, the management of curing Milwaukee absentee votes, and tracking of Milwaukee voters, would she have recommended Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha and Racine?

If Mr. Spitzer-Rubenstein was a valuable asset to the Milwaukee Election Commission, Executive Director Woodall-Voog would have retained Mr. Spitzer-Rubenstein. Instead within minutes of Mr. Spitzer-Rubenstein asking for a referral, Executive Director Woodall-Voog sent an introduction email to WEC Administrator Wolfe. Complainant surmises that Executive Director Woodall-Voog gladly and quickly fulfilled Mr. Spitzer-Rubenstein's request for a referral because she wanted Mr. Spitzer-Rubenstein to work elsewhere and stop his highly inappropriate election administration intrusion as Green Bay's Clerk Teske attempted to do. Had Administrator Wolfe bothered to inquire what Mr. Spitzer-Rubenstein did in Milwaukee before Executive Director Woodall-Voog's introduction to WEC, Administrator Wolfe would have refrained from referring Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha and Racine prior to the 2020 election.

All election employees who work election day in polling places and count the votes after the polls close have a specific job title, duties to perform, qualifications, and training. Job titles for Wisconsin poll workers include chief election inspector, election inspector, election registration officials, special voting deputies, greeters, and tabulators. These jobs require training to become certified election officials who take an oath of office.

Paid or unpaid employees like Mr. Spitzer-Rubenstein who are involved in the conducting of an election before election day are equally as important as the employees who work on election day. Given that more voters are choosing to vote absentee before election day, Administrator Wolfe should have performed her due diligence and vetted Mr. Spitzer-Rubenstein before she referred him to the clerks of Green Bay, Madison, Kenosha and Racine to perform election official duties 10 weeks before the November 3, 2020 presidential election.

Administrator Wolfe's referral of Mr. Spitzer-Rubenstein to the clerks of Green Bay, Madison, Kenosha and Racine came with two assumptions: 1. Mr. Spitzer-Rubenstein was qualified to work a Wisconsin election because Administrator Wolfe who is the highest Wisconsin election official recommended him. 2. Administrator Wolfe authorized Mr. Spitzer-Rubenstein's election administration duty without the required training, certification, or oath of office since Administrator Wolfe who is in charge of Wisconsin's elections gave Mr. Spitzer-Rubenstein an exemption.

After Administrator Wolfe referred Mr. Spitzer-Rubenstein, he went from acting as unqualified Milwaukee Election Commission election official to acting as an unqualified Green Bay election official. Mr. Spitzer-Rubenstein's lack of qualifications to perform the election duties that he was undertaking led to the resignation of Green Bay's Clerk Kris Teske who did not want to violate election laws. Below are some of Mr. Spitzer-Rubenstein's emails after Administrator Wolfe recommended Mr. Spitzer-Rubenstein. These emails are proof that Mr. Spitzer-Rubenstein performed election officials duties though he lacked the required training, certification, and oath of office.

October 7, 2020: From Michael Spitzer-Rubenstein to Kris Teske

"Hi Kris, Can we help with curing absentee ballots that are missing a signature or witness signature/address?"

October 9, 2020: From Michael Spitzer-Rubenstein to Kris Teske

"Kris . . . I'll also be in Wisconsin starting next week; can I stop by your office next Friday? I'm happy to lend a hand. For instance, I'm helping Milwaukee assign inspectors to Central Count stations as well as polling places; happy to do the same for you."

November 1, 2020: From Michael Spitzer-Rubenstein to Amaad Rivera & Jamie Fuge (2 days before the election day)

"Hi Jamie, are the ballots going to be in trays/boxes within the bin? I'm at KI now, trying to figure out whether we'll need to move the bins around throughout the day or if we can just stick them along the wall and use trays or something similar to move the ballots between stations."

November 2, 2020: From Michael Spitzer-Rubenstein to Celestine Jeffreys and copied Diana Ellenbecker, Eric Genrich, Ilana Walder-Biesanz, Jamie Fuge and Kim Wayte (1 day before election day)

"Hi Kim & Jamie, would you be able to pull the numbers on the absentee ballots returned and outstanding per ward? If you want to just export the Excel files for the absentee ballot report, we can work with that."

November 3, 2020: Green Bay Central Count Location Contract (election day)

"DO NOT UNLOCK GRAND BALLROOM UNTIL MICHAEL SPITZER-RUBENSTEIN

REQUESTS AND IS WITH SECURITY WHEN UNLOCKING THE GRAND BALLROOM

DOORS."

Instead of helping Michael Spitzer-Rubenstein violate election laws, <u>Kris Teske chose instead to resign her position as Green Bay's clerk</u>. Clerk Teske went into further detail about unqualified outsiders impinging upon Green Bay's election <u>in her submission to WEC</u>. The controversy and chaos surrounding Michael Spitzer-Rubenstein, Clerk Teske, and the Green Bay election are the direct result of Administrator Wolfe's abuse of her discretion in recommending Michael Spitzer-Rubenstein, whose certification, qualifications, and election administration experience Administrator Wolfe knew nothing about when she referred him to the City of Green Bay.

## Administrator Wolfe Abused Her Discretion When She Recommended Vote at Home to the Green Bay, Madison, Kenosha, and Racine Clerks

Only 12 minutes elapsed between the time Administrator Wolfe received Executive Director Woodall-Voog's email to introduce Vote at Home to her and the time Administrator Wolfe sent out her email recommending Vote at Home to the Green Bay, Madison, Kenosha, and Racine clerks. It was impossible for Administrator Wolfe to thoroughly scrutinize Vote at Home in the 12 minutes that she had before emailing her recommendation. Furthermore, Administrator Wolfe said she was recommending Vote at Home because Executive Director Woodall-Voog okayed it. As with her recommendation of Michael Spitzer-Rubenstein, Administrator Wolfe abused her election official discretion by recommending Vote at Home on blind faith to the Green Bay, Madison, Kenosha, and Racine clerks.

The following is <u>Vote at Home's mission</u>: "The National Vote at Home Institute aims to increase voters' access to, use of, and confidence in voting at home." The problem is Vote at Home's goal of increasing absentee voting is a get out the vote campaign (GOTV). Vote at Home's mission is to increase the number of people voting by increasing the number of voters who cast absentee ballots before an election. Getting as many voters to cast absentee ballots is a well known political strategy more commonly employed by Democrats.

HAVA disallows GOTV campaigns, such as Vote at Home's. In 2020 WEC accepted a HAVA grant of \$7,818,581 on behalf of the State of Wisconsin. Because WEC accepted HAVA funds, WEC is supposed to refrain Wisconsin election clerks from promoting GOTV campaigns, including Vote at Home's get out the absentee vote that WEC Administrator Wolfe sanctioned with her Michael Spitzer-Rubenstein and Vote at Home recommendations.

Recommendation 1 in the Zuckerberg 5's Wisconsin Safe Voting Plan is "Encourage and Increase Absentee Voting (By Mail and Early, In-Person)." Similarly, Vote at Home's mission is to encourage and increase absentee voting. CTCL told the Zuckerberg 5 cities what to include in the Zuckerberg 5 Safe Voting Plan. Because CTCL told the Zuckerberg 5 cities to focus on increasing absentee voting, it is no surprise that CTCL partnered with Vote at Home in Wisconsin to help the Zuckerberg 5 cities achieve their goal of increasing absentee voting.

"While its claims that vote-by-mail policies are non-partisan, Vote at Home is a partner of a number of progressive and left-of-center organizations, including Democracy Fund, Common Cause, Nonprofit VOTE, and Rock the Vote. It is also a partner of Unite America."

CTCL partnered with Vote at Home to increase absentee voting four months before CTCL began negotiating its first Zuckerberg 5 election grant. "On January 6, 2020, National Vote at Home Institute collaborated with the Center for Civic Design and the Center for Tech and Civic Life (CTCL) on three webinars about voting by mail." Not surprisingly, the Zuckerberg 5 cities also employed the services of Center for Civic Design.

The Zuckerberg 5 cities did not ask Administrator Wolfe to provide an organization to assist them. Administrator Wolfe's Vote at Home referral to the clerks of Green Bay, Madison, Kenosha and Racine was completely *unsolicited*.

Administrator Wolfe wanted the clerks of Green Bay, Madison, Kenosha and Racine to use Vote at Home as a resource though Vote at Home assistance was *completely unnecessary* to conduct

the 2020 election. The clerks of Green Bay, Madison, Kenosha and Racine could have easily provided the same level of election administration and service to the voters without Vote at Home directly meddling in the November 3, 2020 presidential election.

#### **Conclusion and Prayer for Relief**

The Oxford English Dictionary defines *discretion* as "the freedom to decide what should be done." Administrator Wolfe had the freedom to decide whether or not to refer Vote at Home and Mr. Spitzer-Rubenstein to the Green Bay, Kenosha, Madison and Racine clerks. Administrator Wolfe abused her discretion in violation of <u>Wisconsin Statute § 5.06</u> because she referred and sanctioned Michael Spitzer-Rubenstein to undertake election official duties when he did not have the requisite certification, training and qualifications.

Administrator Wolfe abused her discretion in violation of <u>Wisconsin Statute § 5.06</u> by referring Michael Spitzer-Rubenstein to the Green Bay, Kenosha, Madison and Racine clerks without interviewing him or knowing if he is qualified. Administrator Wolfe's recommendation of Michael Spitzer-Rubenstein is especially troubling because her recommendations as Administrator carries more weight than any other Wisconsin election official. Administrator Wolfe's abuse of her discretion eventually led to Green Bay's esteemed Clerk Kris Teske's resignation as Clerk Teske chose resigning over violating election laws.

Administrator Wolfe abused her discretion in violation of <u>Wisconsin Statute § 5.06</u> by referring Vote at Home to the Green Bay, Kenosha, Madison and Racine clerks without properly vetting the organization. As with the Michael Spitzer-Rubenstein referral, Administrator Wolfe recommendation of Vote at Home came without limits of what Vote at Home could or couldn't do.

Complainants Ask for the Following Relief:

- 1. Admonishment and discipline for WEC Administrator Meagan Wolfe's abuse of her election official discretion for referring Michael Spitzer-Rubenstein for election official duties to the Green Bay, Kenosha, Madison, and Racine clerks without knowing his election official certification status, intent, or qualifications.
- 2. Admonishment and discipline for WEC Administrator Meagan Wolfe's abuse of her election official discretion for referring Vote at Home to the Green Bay, Kenosha, Madison, and Racine clerks without thoroughly vetting the organization's mission or methods.
- 3. Complainant's previous complaint against WEC Administrator Meagan Wolfe was adjudicated by Administrator Wolfe's subordinate—WEC Staff Attorney Nathan Judnic. Complainant unsuccessfully protested Mr. Judnic reviewing his complaint against Mr. Judnic's boss, Administrator Wolfe. Complainant requests that a non-WEC arbiter review his complaint and Mr. David Bolter's complaint against Milwaukee Election Commission Executive Director Woodall-Voog because Mr. Bolter's complaint is material to Complainant Stone's.