

State of Wisconsin
Elections Commission

COMPLAINT FORM

1. Sandy Weidner
2310 Thor Avenue
Racine, WI 53405
sandy.weidner29@yahoo.com

2. Sandra Morris
908 Belmont Ave
Racine WI 53405
sandra.kay.888@gmail.com

State of Wisconsin
Before the Elections Commission

The Complaint of Sandy Weidner and Sandra Morris, the Complainants, against Respondent, City of Racine Clerk Tara Coolidge, 730 Washington Avenue, Racine, Wisconsin 53403, whose email address and phone number are clerks@cityofracine.org and 262-636-9171

This complaint is made under Wisconsin Statutes § 5.06.

We, Sandy Weidner and Sandra Morris, allege that:

Please see pages 1-5.

Sworn and Notarized Statement

I, Sandy Weidner who resides at 2310 Thor Avenue, Racine, WI 53405 submit my Sworn Wisconsin Election Commission Complaint under the Penalty of Perjury.

I, Sandy Weidner, 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.

Sandy Weidner

Complainant Sandy Weidner's Signature

STATE OF WISCONSIN)

) ss.

County of Racine,

(county of notarization)

Sworn to before me this day of 8th, 2022.

Leslie Boothe-Maj

(Signature of person authorized to administer oaths)

LESLIE BOOTHE-MAJ
Notary Public
State of Wisconsin

My commission expires 5-28-2024, or is permanent.

Notary Public or N/A
(official title if not notary)

Sworn and Notarized Statement

I, Sandra Morris who resides at 908 Belmont Ave, Racine, WI 53405 submit my Sworn Wisconsin Election Commission Complaint under the Penalty of Perjury.

I, Sandra Morris, 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.

Sandra Morris

Complainant Sandra Morris's Signature

STATE OF WISCONSIN)

) ss.

County of Racine,

(county of notarization)

Sworn to before me this day of 8th, 2022.

Leslie Boothe-Maj

(Signature of person authorized to administer oaths)

LESLIE BOOTHE-MAJ
Notary Public
State of Wisconsin

My commission expires 5-28-2024, or is permanent.

Notary Public or N/A

(official title if not notary)

State of Wisconsin Before the Wisconsin Elections Commission

The Verified Complaint of

1. Sandy Weidner
2310 Thor Avenue
Racine, WI 53405
sandy.weidner29@yahoo.com

2. Sandra Morris
908 Belmont Ave
Racine WI 53405
sandra.kay.888@gmail.com

Against Complaint Respondent

City of Racine Clerk Tara Coolidge
730 Washington Avenue
Racine, Wisconsin 53403
clerks@cityofracine.org
262-636-9171

This complaint is made under Wisconsin Statute § 5.06.

Racine's Clerk is Getting Out the Vote in Violation of HAVA

The City of Racine used a portion of its \$1.7 million CTCL grant to create the Racine City Clerk's voteracine.org website. Racine Clerk Tara Coolidge name and contact information appear on all of voteracine.org's webpages.

Racine's voteracine.org's "About" webpage states, "The City of Racine's main objectives with this initiative are: Encourage and increase absentee voting by mail." Racine's goal to "Encourage and increase absentee voting by mail" are identical to [Recommendation I in the Zuckerberg 5's Wisconsin Safe Voting Plan](#).

Racine Clerk Coolidge's goal of encourage and increase absentee voting by mail is a campaign to GOTV (Get Out the Vote). HAVA deems GOTV campaigns impermissible. It's one thing for Clerk Coolidge to educate Racine voters on voting absentee, but to encourage and increase absentee voting asks voters to choose Clerk Coolidge's preferred method of voting for her stated goal of increasing absentee voter turnout. Notably, increasing absentee voting is a strategy used by Democrats to win elections, especially in reliable Democratic cities like Racine.

HAVA guidance states, that for costs to be allowable, the costs "must be necessary, reasonable and allocable to the grant." Clerk Coolidge's stated purpose to encourage and increase absentee voting by mail is unnecessary, unreasonable, and not allocable to HAVA grants.

In a June 17, 2020 WEC CARES Subgrant Program Announcement, WEC Administrator Megan Wolfe outlined the authorized uses of WEC's subgrants. Administrator Wolfe deliberately omitted GOTV grants were a permissible use for Wisconsin elections because HAVA bans the use of its funds for GOTV. If HAVA permitted GOTV campaigns, Administrator Wolfe would have included a GOTV program as an authorized use.

Both the State of Wisconsin and the State of Florida named the proper use of HAVA grants; however, Florida also explained the unauthorized uses of HAVA grants. The State of Florida HAVA guidance specifically stated GOTV programs are not allowable HAVA expenses. According to Florida, GOTV programs "promote voting rather than provide voter education." Clerk Coolidge stated goal to encourage and increase voting by mail promotes voting instead of providing education.

GOTV campaigns are the responsibility of candidates and political parties, not clerks. Indeed a Wisconsin election clerk's duty includes educating voters, but a clerk such as Tara Coolidge should not engage in GOTV programs because GOTV campaigns are deemed partisan activity.

Racine’s Goal to “Expand Voter Education and Outreach to Disenfranchised Populations” is Unconstitutional

Racine’s voteracine.org's “About” webpage also states, “The City of Racine’s main objectives with this initiative are: Expand Voter Education and Outreach to Disenfranchised Populations.” Racine’s goal to “Expand Voter Education and Outreach to Disenfranchised Populations” comes from Recommendation II in the Zuckerberg 5’s Wisconsin Safe Voting Plan.

Disenfranchised means denied the right to vote. Clerk Coolidge should name the disenfranchised Racine populations she refers to on her clerk’s website and explain how the populations she mentioned on her website are currently being disenfranchised. Since Ms. Coolidge is Racine’s clerk of elections, if any Racine resident is responsible for disenfranchised voters presently, it would be Clerk Coolidge.

The Biden Administration sought to provide loan relief to Black and other minority farmers who historically faced discrimination. U.S. District Judge Marcia Morales Howard said that the race-based plan violated the white plaintiffs’ constitutional and equal-protection rights. As with the unconstitutional race-based agricultural grant program, Racine’s election administration that relies on race to determine the degree of voter education and outreach violates members of other races equal protection rights guaranteed by the 14th Amendment.

Clerk Coolidge’s Selectively Hiring of Poll Workers Discriminates

Racine’s voteracine.org's “About” webpage includes, “The City of Racine’s main objectives with this initiative are: “Hire and train poll workers, particularly high school, college and technical school students.” Clerk Coolidge seeking a majority of high school, college and technical students to fill poll worker positions is age discrimination and violates the City of Racine’s own hiring and employment policies.

Click [here](#) to view the City of Racine job postings. Each Racine job post lists categories such as job description, essential duties, supplemental information, knowledge, skill and abilities, etc. Compare Racine's Human Resource's job posts with Clerk Coolidge's poll worker recruitment in which the applicants' primary qualification is being a "high school, college and technical school student."

The City of Racine's Affirmative Action Policy is as follows: "It is the policy of the City of Racine not to discriminate against any employee or any applicant for employment because of age, race, religion, color, handicap, sex, physical condition, developmental disability, sexual orientation or national origin." Because Clerk Coolidge's sought to primarily hire high school and college students, Clerk Coolidge is discriminating on the basis of age.

Clerk Coolidge seeking young employees to hire as poll workers is from the Elect Democrats Playbook. An overwhelming percentage of young voters vote for Democrats. Clerk Coolidge is purposely seeking younger employees for poll workers because she can persuade her fledgling poll workers to recruit their fellow students to vote for Democrats.

Prayer for Relief

Complainants expect Clerk Coolidge and the Racine attorney to claim that CTCL's private funding of Wisconsin public elections has already been litigated and settled. The premise that the three issues submitted by these Complainants has already been litigated is untrue. Complainants did not question CTCL's right to provide election administration grants. Rather, Complainants are asking WEC for a Compliance Review of Clerk Coolidge's GOTV absentee voting campaign, additional assistance to disenfranchised voters though Clerk Coolidge offers no proof that disenfranchised voters currently exist in Racine, and age discrimination in the hiring of Racine's poll workers.

Complainants ask WEC to Review Clerk Coolidge's discretion and decide the following in favor of Complainants:

1. Clerk Coolidge must remove "Encourage and increase absentee voting by mail" from the Racine's clerk's website and end all of Racine's impermissible GOTV campaigns.
2. Clerk Coolidge must remove "Expand Voter Education and Outreach to Disenfranchised Populations" from the Racine's clerk's website and end all of Racine's prejudicial and unconstitutional efforts that focus on increasing the number of minority votes.
3. Clerk Coolidge must remove "Hire and train poll workers, particularly high school, college and technical school students" from the Racine's clerk's website and end all of Racine's discriminatory poll worker hiring practices.