

**State of Wisconsin**  
***Elections Commission***

COMPLAINT FORM

1. Sandy Weidner  
2310 Thor Avenue  
Racine, WI 53405  
[sandy.weidner29@yahoo.com](mailto:sandy.weidner29@yahoo.com)

2. Sandra Morris  
908 Belmont Ave  
Racine WI 53405  
[sandra.kay.888@gmail.com](mailto: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](mailto: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 1-4.

## 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-May

(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](mailto:sandy.weidner29@yahoo.com)

2. Sandra Morris  
908 Belmont Ave  
Racine WI 53405  
[sandra.kay.888@gmail.com](mailto:sandra.kay.888@gmail.com)

**Against Complaint Respondent**

City of Racine Clerk Tara Coolidge  
730 Washington Avenue  
Racine, Wisconsin 53403  
[clerks@cityofracine.org](mailto:clerks@cityofracine.org)  
262-636-9171

This complaint is made under Wisconsin Statute § 5.06.

**The City of Racine's \$250,000 Purchase and Use of a Mobile Voting Precinct**

The City of Racine's Common Council authorized Racine Mayor Cory Mason and Racine Clerk Tara Coolidge on August 5, 2020 to spend \$250,000 of CTCL grant money on a "mobile voting precinct." (See "Journal Times," June 27, 2021, "First of its kind in Wisconsin | Racine now has its mobile election vehicle, thanks to CTCL grant"). Racine has been using its mobile voting precinct to register new voters and as a polling place (Fox6 News, June 29, 2021, Racine Mobile Elections Vehicle rolled out after 2020 vote).

**Racine's Mobile Voting Precinct is Not ADA Compliant as Required by HAVA and WEC**

On WEC's "[Introduction to Voting Accessibility webpage](#)," WEC states, "The Wisconsin Elections Commission is committed to ensuring that all polling places in Wisconsin are accessible to all voters. The Help America Vote Act (HAVA) requires that every polling place in the State of Wisconsin meet Americans with Disabilities Act (ADA) accessibility standards."

WEC's "[Accessible Voting: Polling Place Set-Up Guide](#)" requires the following for ADA and HAVA Compliance:

- The Americans with Disabilities Act (ADA) requires each polling location to have at least one van-accessible parking space available of at least 8 feet wide with an 8 foot wide marked accessible aisle or loading area.
- Each polling location is required to have at least one ADA accessible entrance
- Each polling location is required to have an accessible route that connects the accessible entrance with the voting area
- Each polling location is required to have an internal corridor with a minimum width of 36"
- Each polling location is required to have within the voter area a minimum of 5' by 5' turning space.
- Each polling place is required to have an accessible voting machine, booth or table present where a voter with a disability can cast a ballot.

Racine's mobile voting precinct does not meet any of the above ADA requirements for an accessible polling location.

- Racine's mobile voting precinct has stairs instead of a wheel chair lift at its entrance.
- Racine voters with ambulatory problems who do not require a wheel chair cannot climb Racine's mobile voting precinct's stairs to enter the polling place
- Racine's mobile voting precinct entrance is not ADA compliant. The width and handles of Racine's mobile voting precinct entrance door are not ADA compliant

- The width of Racine’s mobile voting precinct internal corridor is too small and not ADA compliant
- The turning space within the Racine’s mobile voting precinct voting area is too small and not ADA compliant.
- Racine’s mobile voting precinct’s voting booth and table are too small and not ADA complaint
- Racine requires its mobile voting precinct voters to exit the rear of the vehicle. Racine’s mobile voting precinct exit door and stairs are not ADA compliant.

### **Prayer for Relief: Cease and Desist Racine’s Use of It’s ADA-Non-Compliant Mobile Voting Precinct**

CTCL granted Racine \$1.7 million dollars to allegedly protect Racine voters and election officials from COVID. Because Racine ordered its mobile voting precinct in August 2020, it was impossible for Racine’s mobile voting precinct to be used before in the November 3, 2020 presidential election. Racine Clerk Coolidge spent approximately \$25,000 of CTCL’s \$1.7 million grant money on personal protective equipment compared to the \$250,000 she spent on the Racine mobile voting precinct.

The Racine mobile voting precinct had nothing to do with protecting voters and election officials from COVID during the Wisconsin 2020 presidential election; the Racine mobile voting precinct’s purpose is to get out the reliable Democrat Racine voters to vote over the next 20 or more years.

Wisconsin Statute § 5.25(4)(a) states, “Each polling place shall be accessible to all individuals with disabilities. The commission shall ensure that the voting system used at each polling place will permit all individuals with disabilities to vote without the need for assistance and with the same degree of privacy that is accorded to nondisabled electors voting at the same polling place.” The Racine mobile voting precinct denies disabled voters the same access and ability to vote as non-disabled voters as Wisconsin Statute § 5.25(4)(a) requires.

Racine City Clerk Tara Coolidge abused her discretion in violation of Wisconsin Statute § 5.06 by ordering and using Racine's mobile voting precinct. The Racine mobile voting precinct does not comply with the American Disability Act from the entrance of the vehicle to the exit of the converted mobile home and every place in-between. Because the Racine mobile voting precinct violates the key principles and practices of the American Disability Act and Wisconsin Statute § 5.25(4)(a), Complainants ask WEC to order Racine City Clerk Tara Coolidge to immediately cease and desist Racine's use of its mobile voting precinct to register new voters or act as a Racine mobile polling place.