STATE OF WISCONSIN BEFORE THE WISCONSIN ELECTIONS COMMISSION

SANDY WEIDNER and, SANDRA MORRIS, Complainants,

against

Complaint 22-25

CITY OF RACINE CITY CLERK TARA COOLIDGE, Respondent.

VERIFIED RESPONSE OF RESPONDENT TARA COOLIDGE

NOW COMES Respondent, City of Racine City Clerk Tara Coolidge, by Racine City Attorney Scott R. Letteney and responds to the above-entitled Complaint as follows:

This Response is supplemented by the Affidavit of Tara Coolidge appended hereto.

The City of Racine has a website titled City of Racine Voter Guide, published on line at voteracine.org. The website is available to any person without distinction as to any personal characteristic.

The Complaint makes conclusory statements without any evidence or support in the law. The Complaint does not demonstrate that anything about voteracine.org prevents or restrains, or presents any obstacle to, any person—including Complainants—who is lawfully eligible to vote from exercising that right to vote.

It is easy to interpret the Complaint that Complainants argue that where "Black and other minority" voters exercise the right to vote, it somehow diminishes the vote of "white" people. (Compl., p. 3) Complainants reference a newspaper article about a case from federal court in Florida in support of that allegation. Aside from the twisted logic in the Complaint, there seems no actual relationship between the case in newspaper article and voteracine.org.

Complainants also suggest that an outreach to high school, technical school, and college students to serve as election workers somehow discriminates on the basis of age. Complainants do not cite to any law prohibiting any sort of hiring practice based in any way upon age, so it is impossible to determine what group, if any, Complainants think have faced discrimination. It certainly is not up to the Commission or Respondent to guess as to what Complainants mean. Further, Complainants provide no information even suggesting that the Respondent discriminated in any way against any person in any *actual* hiring practice.

For all the reasons stated, *supra*, the Commission should decline to investigate the allegations in the Complaint as to the City of Racine's use of its voteracine.org website or its outreach to high school, technical school, and college students to participate in the democratic process by serving as election workers. Respondent prays the Commission dismiss the Complaint with prejudice.

Dated this 6th day of April, 2022.

Respectfully submitted,

sl Scott R. Letteney Scott R. Letteney City Attorney State Bar No. 1000559 Attorney for Respondent Tara Coolidge 730 Washington Avenue Room 201 Racine, Wisconsin 53403 Telephone: (262) 636-9115 Facsimile: (262) 636-9570 scott.letteney@cityofracine.org

VERIFICATION

I, Scott R. Letteney, being first duly sworn upon oath, state that I personally read the above verified Response, and that the above Response is true and correct based upon my personal knowledge.

Dated April 6, 2022

Scott R. Letteney City Attorney, City of Racine State Bar No. 1000559

STATE OF WISCONSIN))ss. COUNTY OF RACINE)

Subscribed and sworn to before me this 6 day of April, 2022, by

Brech V Signature

Notary Public, State of Wisconsin

My commission expires: November 15, 2023

STATE OF WISCONSIN BEFORE THE WISCONSIN ELECTIONS COMMISSION

SANDY WEIDNER and, SANDRA MORRIS, Complainants,

against

Complaint 22-25

CITY OF RACINE CITY CLERK TARA COOLIDGE, Respondent.

)) ss

)

AFFIDAVIT OF TARA COOLIDGE

State of Wisconsin

City of Racine

Tara Coolidge, being first duly sworn on oath, deposes as states as follows:

- At all times relevant to this matter she was an adult resident of the State of Wisconsin and the City Clerk for the City of Racine, Wisconsin.
- A website titled City of Racine Voter Guide is published on line at voteracine.org. It provides information about when, how, and where to vote in elections. It is available for any person who visits the website.

Dated this 6th day of April, 2022.

Tara Coolidge

