

STATE OF WISCONSIN
BEFORE THE WISCONSIN ELECTIONS COMMISSION

SANDY WEIDNER and,
SANDRA MORRIS,
Complainants,

Complaint 22-24

against

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.

On August 5, 2020, the City of Racine Common Council lawfully approved the purchase of a vehicle to be used for voting purposes. Municipal governments are permitted to designate alternate absentee voting sites pursuant to Wisconsin Statutes section 6.855. There is nothing in Wisconsin Statutes section 6.855 prohibiting the use of a vehicle at an alternate absentee voting site. The mobile election vehicle has been used at sites designated as alternate absentee ballot sites by the Racine Common Council. All agendas of all meetings of legislative bodies of the City of Racine may be found on line at <https://cityofracine.legistar.com/Calendar.aspx>.

As with any polling place, any elector seeking to vote at a site where Racine's mobile election vehicle is employed, voters with disabilities are offered an equally effective opportunity to cast their votes without having to enter the mobile election vehicle. Van-accessible parking spaces are always available. For voters who are unable to enter the mobile election vehicle,

curbside voting is available. The mobile election vehicle is equipped with an awning permitting shelter from inclement weather.

The curbside voting system used by the City of Racine includes signage informing voters of the possibility of voting curbside, the location of the curbside voting, and how a voter is able to notify the official that she is waiting curbside. A method exists for the voter with a disability to announce their arrival at the mobile election vehicle, specifically there is a temporary doorbell or buzzer system in place. City of Racine election officials promptly response to acknowledge their awareness of the voter. City of Racine election officials deliver the same information that is provided to voters inside the mobile election vehicle polling place. Finally, there is a portable voting system that is accessible and allows the voter to cast their ballot privately and independently.

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 mobile election vehicle. Respondent prays the Commission dismiss the Complaint with prejudice.

Dated this 6th day of April, 2022.

Respectfully submitted,

s/ 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

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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 6th day of April, 2022, by



Signature
Notary Public, State of Wisconsin

My commission expires: November 15, 2023

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AFFIDAVIT OF TARA COOLIDGE

State of Wisconsin)
) ss
City of Racine)

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


1. 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.
2. The City of Racine owns a vehicle that is used as a mobile election vehicle as an alternate absentee ballot site.
3. When used for voting-related purposes, the mobile election vehicle, is situated with accessibility concerns in mind and ensuring that any barriers to voting are eliminated or minimized.
4. When used, I assure that each location has at least one van-accessible parking space available. Any eligible elector who chooses to vote mobile election vehicle is accommodated. Any eligible elector who is unable to enter the mobile election vehicle may notify a member of my staff working at the location verbally, or by the use of a push button outside the vehicle that rings a bell to alert members of my staff. A member of my

staff will meet the eligible elector outside the vehicle, where the elector may complete their absentee ballot and return it to a member of the city clerk staff. In short, my staff follows all procedures set forth in Wisconsin Statutes section 6.82.

Dated this 6th day of April, 2022.


Tara Coolidge

Subscribed and sworn to before
me by Tara Coolidge this
6th day of Apr, 2022.


Notary Public, State of Wisconsin
My Commission expires 01/16/2022

