



2023 ASSEMBLY RESOLUTION 18

November 2, 2023 - Introduced by Representatives BRANDTJEN, ALLEN, BEHNKE, BODDEN and WICHGERS. Referred to Committee on Government Accountability and Oversight.

1 **Relating to:** the impeachment of Meagan Wolfe, the Administrator of the Wisconsin
2 Elections Commission, citing allegations of maladministration in office and
3 potential violations of election laws.

4 Whereas, the following articles of impeachment are presented to the Wisconsin
5 State Assembly and Senate:

6 ***Article 1. Administrator Wolfe's Maladministration During the 2020***
7 ***Presidential Election***

8 Administrator Wolfe promoted and encouraged illegal alterations of absentee
9 ballot applications during the administration of the 2020 presidential election in
10 Wisconsin. It is important to note that absentee voting, in contrast to in-person
11 voting, is regarded as a privilege rather than a right, primarily due to legislative
12 concerns regarding potential fraudulent activities associated with absentee voting
13 that are not as prevalent in in-person voting. This perspective on absentee voting
14 has been acknowledged since former President Carter's review of the 2000

1 presidential election identified absentee voting as a significant source of potential
2 election fraud.

3 To address the perceived vulnerabilities of absentee voting, the legislature
4 established a series of safeguards, with one of the primary requirements being that
5 absentee ballots must be witnessed by a third party who provides their name,
6 signature, and address. Unfortunately, some Wisconsin Elections Commission
7 (WEC) members, with whom Administrator Wolfe concurred, criticized these
8 security measures as “vote suppressors” and employed derogatory characterizations.
9 As the chief elections official in Wisconsin, Administrator Wolfe was responsible for
10 advocating for adherence to the laws set by the legislature and advising
11 commissioners while publicly supporting adherence to the law.

12 Throughout the relevant period, Administrator Wolfe was aware, or should
13 have been aware, that absentee ballots failing to meet legal requirements, such as
14 missing witness signatures or addresses, should not be counted. Despite this
15 knowledge, Administrator Wolfe approved and endorsed specific instructions within
16 the Election Administration Manual for Wisconsin Municipal Clerks, which stated
17 that clerks “may add a missing witness address using whatever means are
18 available.” This so-called “ballot curing” procedure violated the legislative intent for
19 strict compliance with absentee ballot requirements and did not guarantee accurate
20 corrections. This maladministration of “curing,” promoted and encouraged by
21 Administrator Wolfe, created disparities in how voters were treated, allowing some
22 deficient ballots to be “cured” while others were not. The decision on which votes
23 would count was left to the municipal clerk, whereas the legislature had previously
24 determined it.

1 Wisconsin Statute § 6.87 (6d) explicitly states, “If a certificate is missing the
2 address of a witness, the ballot may not be counted.” However, the law does provide
3 a lawful method to correct missing absentee ballot information under Wis. Stat. §
4 6.87 (9). According to this law, if a municipal clerk receives an absentee ballot with
5 an improperly completed certificate or no certificate, the clerk may return the ballot
6 to the elector inside the sealed envelope if available, along with a new envelope if
7 necessary, allowing the elector to correct the defect and return the ballot within the
8 authorized period under subsection (6). Contrary to Administrator Wolfe’s directive
9 to clerks, it was the voter’s responsibility to correct absentee ballot errors, not the
10 clerks’ responsibility.

11 During the investigation into this matter, the Wisconsin Institute of Law and
12 Liberty (WILL) discovered high rates of cured ballots in Green Bay and Racine.
13 Nonprofit partners of the Center for Tech and Civic Life (CTCL), such as US Digital
14 Response (USDR), Elections Group, and National Vote at Home Institute (NVAHI),
15 played an active role in curing ballots in these locations. These partners offered
16 services to streamline and automate the ballot curing process in several cities.
17 Administrator Wolfe, as with the SVD issue outlined in Article 5, failed to fulfill her
18 duty to take reasonable steps to ensure that essential election laws concerning the
19 receipt of deficient and ineligible absentee ballots were adhered to during the 2020
20 presidential election in Wisconsin.

21 **Article 2. Administrator Wolfe’s Neglect of Duty in Safeguarding**
22 **Wisconsinites’ Personal Data**

23 Administrator Wolfe committed maladministration by unlawfully failing to
24 protect Wisconsin citizens’ confidential and personal information as mandated by
25 state statutes. These statutes require the Administrator to enter into a contract with

1 the Electronic Registration Information Center (ERIC), a private nonprofit, of which
2 Administrator Wolfe was the Chairman until recently. ERIC's stated purpose is to
3 assist states in maintaining accurate voter rolls. Yet, it has proven to be ineffective,
4 evident in the fact that Wisconsin, with approximately 4.5 million eligible voters, has
5 over 7 million names on its voter rolls—a situation that Administrator Wolfe has
6 actively contributed to. Furthermore, in the calendar year 2023, eight states have
7 terminated their relationships with ERIC, casting doubt on its ability to achieve its
8 stated objectives.

9 Notably, Kevin Kennedy, the then-chief legal counsel for the Government
10 Accountability Board, signed a contract with WEC shortly after the statutes
11 authorizing WEC's creation were enacted. The Government Accountability Board
12 was dissolved by statute due to its perceived dishonest and partisan activities.
13 Despite this, Administrator Wolfe has never signed a contract with ERIC. It is
14 crucial to underline that the duty to sign such a contract is explicitly laid out in the
15 statute to protect the confidential information of all Wisconsin citizens.
16 Administrator Wolfe was well aware of this duty through her four-year term as
17 Administrator of the WEC or her concurrent role as Chairman of ERIC. Her failure
18 to uphold this vital statutory duty has left ERIC, an organization with partisan
19 implications if not in name, with unrestricted access to sell, distribute, or share
20 confidential data. Administrator Wolfe's neglect of this straightforward and
21 essential duty is indefensible.

22 **Article 3. Administrator Wolfe's Maladministration in Ensuring**
23 **Safeguards Against Fraudulent Voting**

24 Administrator Wolfe unlawfully failed to establish the minimum required
25 safeguards to prevent fraudulent voting in Wisconsin. Under Wisconsin law,

1 residents temporarily residing overseas can cast ballots in Wisconsin's elections. It
2 is also incumbent upon Administrator Wolfe to establish, implement, and maintain
3 a comprehensive database containing the names of these individuals. This database
4 serves as a crucial tool for municipal clerks to cross-reference voter requests with the
5 overseas voter list, thereby ensuring the legitimacy of such requests. This safeguard
6 is especially significant because, unlike military overseas absentee voters,
7 non-military overseas voters are not required to provide a photo ID when requesting
8 an absentee ballot.

9 Regrettably, Administrator Wolfe's maladministration unfulfilled her
10 responsibility to create, implement, and maintain this reference database for our
11 clerks. Consequently, this method of ballot gathering is left vulnerable to fraudulent
12 activity, akin to the vulnerabilities seen in the military overseas voting system. In
13 other words, just as demonstrated by the case of Kim Zapata, who fabricated three
14 fictitious names and addresses of non-existent military absentee ballot requesters
15 and had all three ballots sent to Representative Brandtjen's home, anyone, from
16 anywhere, at any time, can similarly obtain an unlimited number of non-military
17 absentee ballots. Much like the ballots sent to Representative Brandtjen's home,
18 there is no mechanism to verify the authenticity of non-military overseas absentee
19 ballots obtained through this process. This lack of verification results directly from
20 Administrator Wolfe's complete and inexcusable failure to fulfill her duties.

21 **Article 4. Administrator Wolfe's Unlawful Advocacy for Ballot Drop**
22 **Boxes**

23 Administrator Wolfe unlawfully promoted maladministration with the use of
24 ballot drop boxes. In her role as Wisconsin's chief elections official, Administrator
25 Wolfe was responsible for guiding clerks regarding the procedures outlined in the

1 state's elections law. However, there have been instances where Administrator Wolfe
2 acted as if she, and not the legislature, had the authority to establish rules for
3 Wisconsin's elections. One such instance was her purported authorization of ballot
4 drop boxes.

5 Ballot drop boxes were unfamiliar in Wisconsin before the 2020 presidential
6 election cycle. Their use was mandated for the state's five largest cities through
7 contracts signed with the "Center for Tech and Civic Life" (CTCL), a private
8 corporation funded by Mark Zuckerberg to conduct partisan Get Out the Vote
9 (GOTV) campaigns in Wisconsin and other swing states.

10 Under the guise of her official role, Administrator Wolfe fully supported and
11 promoted the use of these unauthorized drop boxes by issuing a series of memoranda
12 (prepared by WEC staff under her supervision) to municipal clerks. This
13 endorsement and promotion of ballot drop boxes ran counter to Wisconsin law, as
14 highlighted in the *Teigen* case, which concluded that WEC's staff erred by
15 authorizing a voting method not sanctioned by law. The memos created a ballot drop
16 box system entirely absent from Wisconsin's election code, as the legislature's
17 procedures for absentee voting do not allow for voting via ballot drop boxes.

18 Ballot drop boxes present opportunities for election fraud by reducing the
19 likelihood of detection, and their maladministration use, as endorsed and promoted
20 by Administrator Wolfe, likely had a significant and unfair impact on the outcome
21 of the November 2020 presidential election in Wisconsin. The cities of Green Bay,
22 Kenosha, Madison, Milwaukee, and Racine received \$216,000 from CTCL
23 specifically to purchase and utilize 44 ballot drop boxes in Wisconsin's five largest
24 metropolitan areas. The exact number of ballots deposited in these unlawful drop
25 boxes during the 2020 election remains unknown.

1 **Article 5. Administrator Wolfe's Role in Enabling Unlawful Absentee**
2 **Voting in Long-Term Care Facilities Without Special Voting Deputies**

3 Administrator Wolfe was involved in facilitating illegal absentee voting in
4 long-term care facilities without the presence of Special Voting Deputies (SVDs), as
5 required by Wisconsin law. According to Wisconsin law, when absentee voting is
6 conducted in long-term care facilities such as nursing homes, each municipal clerk
7 or their designated representatives must be accompanied by two SVDs, one from
8 each of the two major political parties. These SVDs receive specialized training and
9 take an oath to ensure that absentee voting is conducted strictly with the law. One
10 of their essential functions is to challenge the competency of potential voters in
11 nursing homes and other long-term care facilities, as outlined in Wis. Stat. § 6.875
12 (4).

13 Administrator Wolfe caused maladministration by assisting five out of the six
14 WEC commissioners in consistently voting to unlawfully direct Wisconsin's clerks to
15 disregard the statutorily mandated SVD procedure. This disregard for the law
16 occurred in 2020 during the administration of three separate elections, including the
17 presidential election. Several authorities, including the Racine County Sheriff's
18 Department, the Racine County District Attorney, Wisconsin's Legislative Audit
19 Bureau (LAB), and the Wisconsin Assembly's Special Counsel to Investigate the
20 2020 presidential election, all reached the conclusion that WEC violated Wisconsin
21 election law each time it permitted absentee voting in long-term care facilities
22 without requiring the presence of at least two special voting deputies. It is
23 indisputable that the actions of those five commissioners and Administrator Wolfe
24 were illegal.

1 Throughout the relevant period, Administrator Wolfe publicly and privately
2 supported this illegal scheme and encouraged Wisconsin's clerks to participate in it.

3 **Article 6. Administrator Wolfe's Neglect in Safeguarding the Votes of**
4 **Overseas Military Voters**

5 Administrator Wolfe is charged with maladministration for failing to protect
6 overseas military voters' votes, as Wisconsin Statutes require. These statutes assign
7 to WEC and its Administrator, Meagan Wolfe, the responsibility to establish,
8 implement, and maintain a process through which the identities of Wisconsin
9 residents serving in the military and stationed overseas can be made available to
10 municipal clerks.

11 Upon receiving an application for a ballot from a purported serviceman or
12 woman, the municipal clerk is then statutorily obligated to refer to the identification
13 list created, implemented, and maintained by WEC to verify the individual's military
14 service status. This verification process is especially crucial because military service
15 personnel are exempt from the statutory requirement to present photo identification
16 before voting.

17 The significance of the system that WEC is mandated to create, implement, and
18 maintain cannot be overstated; it serves as the protective barrier between access to
19 military ballots and those who may attempt to fraudulently obtain them by falsely
20 claiming eligibility. The need for such a verification system was unequivocally
21 demonstrated in October 2022 when Kim Zapata, then employed as the Deputy
22 Director of the Milwaukee Election Commission, intentionally fabricated three
23 fictitious names with non-existent home addresses and submitted them online to
24 generate three fraudulent ballots, which were subsequently mailed to the residence
25 of Representative Janel Brandtjen, who was serving as the Chairman of the

1 Assembly Committee on Campaigns and Elections at the time. These fraudulent
2 ballots were indeed delivered to Representative Brandtjen's home, prompting her to
3 turn them over to law enforcement. Kim Zapata later admitted her actions,
4 explaining that she did so to illustrate to Representative Brandtjen and others the
5 "true" vulnerability to fraud in Wisconsin elections.

6 Crucially, due to Administrator Wolfe's negligence, if anyone had cast the three
7 fraudulent ballots created by Kim Zapata, there would have been no means to detect
8 the fraudulent activity or the resulting disenfranchisement of three legitimate
9 military absentee ballots.

10 When a lawsuit sought declaratory and injunctive relief to compel
11 Administrator Wolfe to address this dereliction, she engaged the services of a private
12 law firm, the Mark Elias Law Group, in an attempt to avoid remedying the situation.

13 ***Article 7. Administrator Wolfe's Involvement in the Employment of***
14 ***Partisan, Out-of-State Residents for Election Administration in 2020***

15 Administrator Wolfe facilitated, promoted, and encouraged the employment of
16 partisan, out-of-state residents to administer Wisconsin's elections in 2020. In this
17 maladministration, Mark Zuckerberg's stated objective in 2020 was to aid in the
18 defeat of President Donald Trump. Zuckerberg enlisted the services of David Plouffe,
19 one of former President Obama's principal political advisors and the author of "The
20 Citizen's Guide to Beating Donald Trump," to oversee a plan aimed at staffing the
21 offices of the largest cities in swing states with partisan employees and agents to
22 administer the elections in those cities. An essential aspect of this plan, called
23 "block-by-block political warfare," was directed at cities like Detroit, Milwaukee,
24 and Philadelphia.

1 David Becker, a highly partisan individual employed by George Soros and the
2 administrator of the partisan Electronic Registration Information Center (ERIC),
3 played a central role in executing this scheme. It is noteworthy that while
4 Administrator Wolfe was the Chairman of ERIC, David Becker was in charge. In this
5 context, Zuckerberg, Plouffe, and Becker arranged for the Center for Tech and Civic
6 Life (CTCL) to distribute payments totaling \$8.8 million to the five largest cities in
7 Wisconsin, namely Milwaukee, Madison, Racine, Kenosha, and Green Bay (referred
8 to as the “Zuckerberg Five” or the “Cities”). The contracts governing the transfer of
9 these funds required the Cities to perform various services for Zuckerberg, with a
10 primary obligation being the installation of illegal ballot drop boxes in unmonitored
11 locations. Additionally, the Cities were required to “cooperate” with Zuckerberg’s
12 directives and follow the instructions of CTCL’s designated personnel in
13 administering the elections.

14 One of the individuals involved in this scheme was Michael
15 Spitzer-Rubenstein, a Brooklyn, New York resident and known partisan. In an
16 email to the clerks of the Zuckerberg Five Cities, Administrator Wolfe provided her
17 authorization to utilize Michael Spitzer-Rubenstein as part of their election
18 administration efforts. Although Claire Woodall-Vogg, the Milwaukee Election
19 Commission’s leader, recommended Michael Spitzer-Rubenstein to Administrator
20 Wolfe without indicating that she had vetted him, Administrator Wolfe promptly
21 forwarded this recommendation to the clerks of the Zuckerberg Five Cities,
22 suggesting they reach out to him if they were interested in learning more.

23 As a direct result of Administrator Wolfe’s recommendation, Michael
24 Spitzer-Rubenstein, a designated “partner” of Zuckerberg and CTCL, assumed
25 control over various aspects of the Green Bay election, including overriding the

1 Clerk's recommendations, signing contracts, controlling access to a key location, and
2 determining the acceptance of ballots after the 8 p.m. deadline. Mr.
3 Spitzer-Rubenstein lacked the requisite training, certification, and oath of office
4 necessary to work in Wisconsin elections.

5 Wisconsin Statute § 5.02 (4e) defines an election official as an individual
6 charged with duties related to election conduct. The Wisconsin Election
7 Administration Manual emphasizes the importance of qualified and well-trained
8 election officials. Michael Spitzer-Rubenstein did not meet these qualifications and
9 was disqualified due to his New York residence. After Administrator Wolfe's
10 recommendation, any roles assigned to Mr. Spitzer-Rubenstein by the clerks would
11 have involved his participation in election activities, constituting a violation of Wis.
12 Stat. § 5.02 (4e).

13 Spitzer-Rubenstein also played a significant role in the Racine 2020 election,
14 setting up systems, collecting ballots, and creating absentee ballot logs. He authored
15 the Election Day Manual in Milwaukee, had exclusive access to critical information,
16 and recruited out-of-state personnel. This scheme included "ballot navigators" who
17 could visit citizens' homes, represent themselves as being "from the City" (although
18 funded by Zuckerberg/CTCL), offer assistance in completing absentee ballots, and
19 potentially illegally return the ballots to the clerk's office.

20 Administrator Wolfe's cooperation in this scheme was vital for covering the
21 Zuckerberg Five Cities clerks. By participating in and facilitating this scheme,
22 Administrator Wolfe betrayed the trust of Wisconsin citizens who had entrusted her
23 with the position of Administrator of WEC.

24 **Article 8. Administrator Wolfe's Maladministration of Third-Party**
25 **Submission of Absentee Ballot Applications**

1 Administrator Wolfe's actions regarding submitting absentee ballot
2 applications by individuals other than the voter, contravening Wisconsin election
3 laws, were unlawful. Administrator Wolfe is responsible for the guidance provided
4 in the Election Administration Manual for Wisconsin Municipal Clerks.

5 According to the manual, "If an absentee ballot request is delivered by someone
6 other than the registered elector (spouse, campaign volunteer, etc.), it is treated as
7 a by-mail request." This directive lacked a legal basis, and Administrator Wolfe's
8 actions in this regard were unlawful, as outlined in the *Teigen* case.

9 Wisconsin Statute § 6.86 describes six distinct "methods for obtaining an
10 absentee ballot," and § 6.86 (1) (a) 2. specifies the law for submitting an absentee
11 ballot application directly to the municipal clerk, stating, "In person at the office of
12 the municipal clerk or at an alternate site under s. 6.855, if applicable." Notably, Wis.
13 Stat. § 6.86 (1) (a) 2. allows the elector to personally submit their absentee ballot
14 application at the clerk's office.

15 Administrator Wolfe's directive to clerks, permitting a "spouse," "campaign
16 volunteer," or other agents to submit absentee ballot applications on behalf of
17 electors, contradicted the plain language of Wis. Stat. § 6.86 (1) (a) 2. Furthermore,
18 her treatment of absentee ballot applications submitted by agents as "by-mail"
19 requests also conflicted with the statute's language.

20 How Wolfe mishandled the return of absentee ballot applications paralleled her
21 maladministration of absentee ballot returns. In the *Teigen* case, the Wisconsin
22 Supreme Court addressed the delivery of absentee ballots and emphasized that
23 Wisconsin law did not allow agents or anyone other than the elector to submit an
24 elector's absentee ballot directly to a clerk's office. Similarly, Wisconsin law did not

1 permit a family member or agent to submit an elector's absentee ballot application
2 directly to a clerk's office, as Administrator Wolfe allowed.

3 The court noted that the guidance provided by Administrator Wolfe in the
4 March 2020 memo was contrary to Wis. Stat. § 6.87 (4) (b) 1., similar to the situation
5 with absentee ballot applications. Wis. Stat. § 6.86 (1) (a) 2. required a
6 person-to-person exchange between the elector submitting an absentee ballot
7 application and the clerk or the clerk's authorized representative. The court
8 reaffirmed that absentee ballots could only be returned through two authorized
9 methods: mailing by the voter to the municipal clerk or personal delivery by the voter
10 to the municipal clerk. Therefore, Administrator Wolfe's memos advising otherwise
11 conflicted with the law and were rightly void.

12 ***Article 9. Administrator Wolfe's Inadequate Absentee Ballot Request***
13 ***Web Page and Violation of Wisconsin Election Law***

14 Administrator Wolfe's absentee ballot request web page potentially facilitated
15 ballot maladministration and contradicts Wisconsin election law requirements.

16 On July 26, 2022, Harry Wait, the President of HOT Government, made
17 absentee ballot requests on behalf of Wisconsin House Speaker Robin Vos, Racine
18 Mayor Cory Mason, and several other registered Wisconsin voters. Mr. Wait
19 intended to demonstrate the ease with which one person could request absentee
20 ballots using the names of other voters without any intention of actually casting
21 these ballots. Mr. Wait openly confessed to this practice in emails to various
22 authorities, drawing state and national attention to the flaws in the WisVote
23 system's absentee ballot mailing process.

24 Wisconsin Statute § 6.86 outlines six "methods for obtaining an absentee
25 ballot," all of which require "proof of identification," with a few exceptions. Following

1 Mr. Wait's public disclosure of absentee ballot requests on behalf of others, the WEC
2 sent confirmation postcards to voters who had requested absentee ballots to new
3 addresses. This action by WEC tacitly acknowledges the flaws in the WisVote
4 absentee ballot request process.

5 Had Administrator Wolfe mandated that WisVote request proof of
6 identification, as required by law, Mr. Wait would not have been able to obtain
7 absentee ballots in other people's names, and WEC would not have needed to send
8 out confirmation cards. The underlying issue lies in mailing absentee ballots
9 without prior proof of identification, which underscores the importance of such
10 verification in preventing voter fraud.

11 WEC currently provides an online form on its web page, allowing voters to
12 submit their names, addresses, and birth dates to request an absentee ballot.
13 However, Wis. Stat. § 6.86 specifies six methods to obtain an absentee ballot, none
14 of which state that WisVote's absentee ballot form is a lawful method for application.
15 Wis. Stat. § 6.86 also requires voters to direct their absentee ballot requests to their
16 municipal clerk, not WEC.

17 The Wisconsin Supreme Court has previously ruled that Administrator Wolfe
18 lacked the authority to establish a law allowing citizens to use ballot drop boxes to
19 return their absentee ballots. Wis. Stat. § 6.86 allows an absent elector to make a
20 written application to their municipal clerk for an official ballot but does not grant
21 WEC the authority to serve as an intermediary in the absentee ballot application
22 process. Administrator Wolfe apparently established WEC's absentee voting
23 application method, potentially enabling absentee voters to circumvent Wisconsin's
24 proof of identification requirement.

1 When Mr. Wait submitted absentee ballot requests using others' names, none
2 of these requests were legitimate because WEC lacked the legal authority to
3 establish the WisVote absentee ballot request form. Consequently, WEC now seeks
4 charges against Mr. Wait for conduct made possible only due to Administrator Wolfe's
5 maladministration.

6 **Article 10. Administrator Wolfe's Maladministration of Addressing**
7 **Accessibility Issues at Racine's Mobile Polling Place**

8 Administrator Wolfe failed to address accessibility concerns at Racine's mobile
9 polling place, which was funded by Zuckerberg/CTCL and used in two elections.

10 On March 24, 2022, members of HOT Government, Sandy Weidner, and Sandra
11 Morris, lodged a complaint with the WEC regarding the Racine mobile polling
12 location—a converted recreational vehicle (RV) purchased by the city with funding
13 from Zuckerberg/CTCL. The complaint highlighted that the RV did not provide full
14 accessibility to every disabled person, a requirement mandated by Wis. Stat. § 5.25
15 (4) (a), which states that “Each polling place shall be accessible to all individuals with
16 disabilities.”

17 In response to the complaint, Racine Clerk Tara Coolidge contended that a bell
18 had been placed outside the mobile polling location's door, which could be used by
19 voters physically unable to enter the RV. Racine suggested that the bell constituted
20 a “reasonable accommodation” for those unable to access the vehicle. However, the
21 law governing handicap accessibility at polling places is categorical and cannot be
22 met merely by placing a bell outside the entrance. The law explicitly states, “Each
23 polling place shall be accessible to all individuals with disabilities.”

24 Additionally, WEC requires a Polling Place Accessibility Survey to be
25 conducted for each new polling place, a requirement that had not been fulfilled for

1 Racine’s RV. Upon discovering Racine’s failure to submit such a survey,
2 Administrator Wolfe committed maladministration by not instructing Racine to
3 cease using the mobile polling location until WEC could ascertain whether the
4 mobile unit complied with the accessibility requirements, as mandated by law.

5 Despite being aware of the RV’s lack of handicap accessibility and the complaint
6 filed on March 24, 2022, Administrator Wolfe did not take any action. Administrator
7 Wolfe’s failure to address this issue allowed Racine to employ its converted
8 RV/mobile polling place in two elections for partisan purposes. The RV became a tool
9 for partisan politics, favoring certain voters over others and making it easier for the
10 preferred voters to cast their ballots.

11 **Article 11. Administrator Wolfe’s Maladministration of CTCL Grants**
12 ***from the September 2020 Election Preparedness Report***

13 On September 1, 2020, Administrator Wolfe released a 125–page report titled
14 “How Wisconsin is Prepared for the November 3, 2020 Election.” She compiled this
15 report in response to inquiries from legislators and WEC commissioners. While
16 preparing this report, Wolfe requested election preparation plans specifically from
17 the cities of Green Bay, Madison, and Milwaukee.

18 It is important to note that these three cities, Green Bay, Madison, and
19 Milwaukee, held particular significance because they were among the five Wisconsin
20 cities that received approximately 86 percent of the substantial funding provided by
21 Mark Zuckerberg and the Center for Tech and Civic Life (CTCL) to support the
22 administration of Wisconsin’s elections. The publicly stated purpose of this funding
23 was to safeguard Wisconsin voters from the spread of COVID-19. However, the
24 actual allocation of funds, such as Green Bay’s use of less than 1 percent for personal
25 protective equipment (PPE), raised questions about the true intent behind these

1 expenditures. Furthermore, the lack of transparency in the financial reporting of the
2 other “Zuckerberg Five” cities has contributed to suspicions that these funds were
3 used to promote voter turnout among specific demographic groups favored by
4 partisan actors like Mark Zuckerberg, David Plouffe, David Becker, the mayors of
5 the “Zuckerberg Five” cities, and the Biden campaign.

6 The central issue with Administrator Wolfe’s maladministration of the “How
7 Wisconsin is Prepared for the November 3, 2020 Election” report does not revolve
8 around its contents but rather its omissions. Rather than disclosing the CTCL
9 grants to the legislature, Administrator Wolfe conspicuously removed any references
10 to Zuckerberg, CTCL, CTCL grants, CTCL partners, and their employees from her
11 report on election preparedness.

12 During a subsequent Assembly committee hearing, Administrator Wolfe
13 claimed that she became aware of the CTCL funding only when a city (though
14 unnamed in her statements, it is clearly Green Bay based on her email exchanges)
15 submitted an addendum to a report on August 30, 2020. However, this claim does
16 not align with the facts, as she had received emails from CTCL and its partners at
17 least six weeks before publishing her report on September 1, 2020.

18 Furthermore, it is highly improbable that Administrator Wolfe remained
19 unaware of CTCL’s grants until late August, as news of the \$6.3 million in CTCL
20 grants awarded to the “Zuckerberg Five” cities was widely covered by radio,
21 television, and print news sources in early July. For Wolfe to assert that she first
22 learned of CTCL’s grants after compiling her “How Wisconsin is Prepared for the
23 November 3, 2020 Election” report strains credibility. Additionally, she could have
24 easily added an addendum regarding CTCL grants to her report after its initial
25 submission, following the example set by the City of Green Bay.

1 **Article 12. Administrator Wolfe’s Maladministration of Reporting**
2 **CTCL and the “Zuckerberg Five” Clerks for Unauthorized Creation of**
3 **Absentee Voter Instructions**

4 Wisconsin Statute § 6.869 clearly stipulates that the WEC is responsible for
5 prescribing uniform instructions to be provided by municipalities to absentee
6 electors. This statute underscores the importance of standardized absentee voting
7 instructions across the state. However, a substantial number of
8 emails—approximately 80—reveal communications between CTCL, the Center for
9 Civic Design (CCD), the clerks of the “Zuckerberg Five” cities, and Milwaukee
10 Election Commission Executive Director Woodall-Vogg regarding the development
11 and printing of absentee ballot instructions in both English and Spanish.

12 The actions taken by municipal election officials to create their own absentee
13 ballot instructions stand in violation of Wis. Stat. § 6.869, as the statute exclusively
14 grants the authority to WEC to establish uniform absentee voting instructions.

15 In one email from CTCL’s Whitney May, the “Zuckerberg Five” city clerks were
16 solicited for their feedback on ballot instructions and envelopes. On August 18, 2020,
17 Administrator Wolfe updated Uniform Instructions for Absentee Voters. In this
18 communication, Wolfe made it explicitly clear that these instructions would be
19 utilized for all absentee voters, commencing with the absentee ballots that clerks
20 would send out for the November 3rd General Election, following WEC’s directive,
21 which is evident maladministration.

22 On the very same day that Wolfe disseminated her uniform instructions for
23 absentee voters, CTCL’s Whitney May corresponded with the clerks of the
24 “Zuckerberg Five” cities. May’s email indicated CTCL’s intention to halt an
25 operation due to WEC’s desire for statewide conformity in format and their plans to

1 embark on new envelope design work in the following year. This communication
2 raises questions regarding how May was privy to WEC's intentions and the fact that
3 they were supplying uniform absentee ballot instructions. Notably, May's email did
4 not mention that the creation of their own absentee ballot instructions by CTCL,
5 CCD, and the clerks of the "Zuckerberg Five" cities potentially violated Wis. Stat. §
6 6.869.

7 In an additional incident, Madison Clerk Maribeth Witzel-Behl sent an email
8 on September 17, 2020, to Whitney May and the other clerks of the "Zuckerberg
9 Five," including an attachment containing Spanish-language absentee ballot
10 instructions. It's imperative to note that Wis. Stat. § 6.869 does not differentiate
11 between English and Spanish absentee ballot instructions; it unequivocally states
12 that the commission shall prescribe uniform instructions for municipalities to
13 provide to absentee electors. Wolfe's memo from August 18, 2020, left no room for
14 ambiguity—it mandated the use of uniform absentee ballot instructions for absentee
15 voters, which should be applied regardless of language.

16 The discrepancy between Wolfe's memo and Witzel-Behl's actions, sending
17 Spanish absentee ballot instructions, necessitates an investigation into whether any
18 of the "Zuckerberg Five" cities distributed their versions of absentee ballot
19 instructions in Spanish, potentially contravening Wis. Stat. § 6.869.

20 This situation exemplifies how CTCL and its partners influenced Wisconsin
21 election officials leading up to the 2020 election. Even though the "Zuckerberg Five"
22 clerks ultimately did not send out their versions of absentee ballot instructions, the
23 act of creating them likely violated state law. What is certain is that Administrator
24 Wolfe did not hold CTCL, CCD, the "Zuckerberg Five" clerks, or Milwaukee Election

1 Commission's Claire Woodall-Vogg accountable for producing their own absentee
2 ballot instructions in apparent violation of Wis. Stat. § 6.869.

3 **Article 13. *Administrator Wolfe's Maladministration in Establishing a***
4 ***Systematic Program for the Removal of Incompetent Individuals from the***
5 ***Voter Roll***

6 Wisconsin law dictates that individuals whose voting rights have been legally
7 terminated by a court due to incompetence are ineligible to vote. However, this legal
8 provision is not self-executing. To ensure the proper functioning of this process, it
9 is incumbent upon the Administrator of the WEC to institute a system that enables
10 municipal clerks to promptly identify cases of adjudication for incompetence,
11 allowing for the removal of the affected individuals from the voter roll. Establishing
12 and maintaining such a system is a legal obligation that falls within the purview of
13 the Administrator's role.

14 In the maladministration of the Administrator's fulfillment of this duty, there
15 exists a substantial risk that the legislative intent to exclude from the voter roll those
16 individuals who have been declared incompetent to vote will remain unfulfilled.
17 Administrator Wolfe's failure to initiate and sustain such a system represents a
18 significant deficiency in her execution of one of the fundamental responsibilities
19 inherent in her position.

20 **Article 14. *Administrator Wolfe's Unlawful Failure to Remove Names***
21 ***from the Wisconsin Voter Roll***

22 In Wisconsin, the law distinguishes between two categories of voters: "eligible"
23 and "ineligible." "Eligible" voters are those who meet the qualifications to register
24 and have their names placed on the voter roll, while "ineligible" voters are not
25 permitted to be listed on this roll. These designations are consistent with the

1 statutes' language and align with the legislative intent and the reasonable
2 expectations of Wisconsin's citizens.

3 Regrettably, Administrator Wolfe has initiated maladministration with a
4 systematic replacement of "eligible" and "ineligible" with "active" and "inactive."
5 These non-statutory designations, although seemingly harmless, have resulted in
6 consequences that have compromised both the integrity and the public trust in our
7 voter roll. Under Administrator Wolfe's leadership, names are never removed from
8 the voter roll, even in cases of individuals who have passed away. Rather than
9 designating these deceased individuals as "ineligible" voters, as the statute would
10 dictate, Administrator Wolfe categorizes them as "inactive" voters, allowing their
11 names to persist on the voter roll.

12 One of Administrator Wolfe's past justifications for this practice was a reference
13 to HAVA (Help America Vote Act), which requires states to maintain historical
14 records of all those who have voted. However, her explanation lacks completeness,
15 as there is no requirement to retain the names of deceased "historical" voters on the
16 voter roll.

17 At best, this practice of retaining deceased individuals on the voter roll
18 needlessly complicates the list, making it more challenging for auditors and others
19 interested in assessing its accuracy. At worst, it provides a reservoir of names that
20 can be "activated" two weeks before an election and "deactivated" two weeks after,
21 by anyone with access to the WisVote system. This process operates in a manner that
22 conceals the identities of both the "activator" and the "deactivator." Consequently,
23 it fosters suspicions of potential fraud or, at the very least, creates a fertile ground
24 for such suspicions.

1 In sum, Administrator Wolfe’s oversight of this problematic system is
2 unacceptable to the people of Wisconsin and raises serious concerns about the
3 integrity of our voter roll.

4 **Article 15. Administrator Wolfe’s Promotion of an Unlawful Voter**
5 **Registration Form**

6 On September 5, 2023, the Circuit Court for Waukesha County, presided over
7 by the Honorable Michael P. Maxwell, issued a summary judgment in favor of a
8 concerned citizen who contested the use of the WEC’s voter registration form. The
9 court’s decision was based on two primary grounds: firstly, that the form did not
10 conform to state law requirements, and secondly, that WEC had never engaged in the
11 statutory rule-making process of the additional information requested on the form,
12 which was not mandated by Wisconsin law. Throughout this relevant period, it
13 remains undisputed that Administrator Wolfe actively promoted this
14 maladministration and encouraged clerks to accept it. Administrator Wolfe was
15 likely aware and should have certainly been aware, that the disputed form solicited
16 more information from citizens than what was authorized by Wisconsin law.

17 As emphasized by the Circuit Court, “WEC was granted authority by the State
18 Legislature to administer Wisconsin’s election laws and was subsequently tasked
19 with using that authority to prescribe the voter registration forms permissible for
20 use in our state. WEC, however, has failed in this fundamental duty by permitting
21 the use of the National Form in Wisconsin, despite never officially prescribing its
22 use.”

23 Administrator Wolfe, in her capacity as Wisconsin’s “chief elections official,”
24 has exhibited reluctance or incapacity to fulfill this fundamental responsibility,
25 much like several others detailed herein. Her mismanagement of WEC has

1 transformed the agency into one requiring substantial reform or, possibly,
2 dissolution, as was the case with its predecessor, GAB. The crucial initial step
3 toward achieving either goal is the impeachment of Administrator Wolfe.

4 ***Resolved by the assembly, That*** per Article VII, section 1, of the Wisconsin
5 Constitution and Wis. Stat. § 17.06 (1), the Assembly hereby initiates proceedings
6 for the impeachment of Meagan Wolfe, the Administrator of the Wisconsin Elections
7 Commission, based on allegations of maladministration in office.

8

(END)