

No. \_\_\_\_\_

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**In the Supreme Court of Wisconsin**

DEAN W. MUELLER,  
PETITIONER,

V.

WISCONSIN ELECTION COMMISSIONERS  
ANN S. JACOBS in her official capacity as chair of the Wisconsin elections commission,  
MARK L. THOMSEN, in his official capacity as vice-chair of  
Wisconsin elections commission, MARGE BOSTELMANN, in her official capacity as  
secretary of the Wisconsin elections commission; JULIE M. GLANCEY, DEAN  
KNUTSON, AND ROBERT F. SPINDELL, JR., in their official capacities as Wisconsin  
election commissioners; MEAGAN WOLFE, Administrator of Wisconsin Election  
Commission in her official capacity.  
RESPONDENTS.

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**EMERGENCY PETITION FOR  
ORIGINAL ACTION**

KAREN L. MUELLER  
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Attorney for Petitioner

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HAND DELIVERED

THE STATE OF TEXAS

IN SENATE,  
JANUARY 11, 1900.

REPORT OF THE COMMISSIONERS OF THE LAND OFFICE,  
IN RESPONSE TO A RESOLUTION PASSED BY THE SENATE  
MAY 15, 1899, RELATIVE TO THE LANDS BELONGING TO  
THE STATE OF TEXAS, AND THE PROCEEDINGS THEREON,  
FROM 1845 TO 1899.

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THE STATE OF TEXAS,  
COMMISSIONERS OF THE LAND OFFICE,  
DALLAS, TEXAS,  
1900.

COMES NOW the Petitioner (“Petitioner”), by and through his undersigned counsel of record, Attorney Karen L. Mueller, AMOS CENTER FOR JUSTICE AND LIBERTY, 18261 57<sup>TH</sup> Avenue, Chippewa Falls, WI 54729 and file this, his Verified Petition and Complaint for Declaratory and Injunctive Relief (the “Petition and Complaint”), respectfully showing this honorable Court as follows:

### INTRODUCTION

The Petitioner is but one of millions of people across this country and at least one of tens of thousands of people across the State of Wisconsin that believes his fundamental right to vote and to have a safe, free, secure and transparent election was compromised and tainted by the illegal actions of the Respondents in that the Wisconsin Election Commission communicated illegal interpretations of existing Wisconsin Elections Laws or non-existent laws to county clerks throughout the state, who relied upon WEC to give them accurate legal advice regarding Wisconsin election laws. After all, that is what the legislature created the Wisconsin Election Commission to do. Because of the illegal advice, county clerks across this state relied upon that legal advice and did in fact use over 500 ballot drop boxes for collecting absentee ballots.

There have been a number of court actions filed across the country in various state and federal courts within a span of only the past three weeks, on the same basic issue of election officials’ *failure to follow various state election laws* during this past election on

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November 3, 2020. The breadth of this wrongdoing is unprecedented in American history and is breath-taking in its implications.

Petitioner asks that this court to determine as a matter of law that the ballot drop boxes used in this election and the ballots placed therein are illegal and must be set aside.

Petitioner furthermore asks that this court issue an emergency injunction enjoining the Wisconsin Election Commission from certifying the election results throughout the State and enjoining them from certifying the recount results in the County of Milwaukee and the County of Dane.

### **VENUE**

The Petitioner and all of the Respondents live and work in the State of Wisconsin. The legal questions herein are solely about Wisconsin election laws and the decision in this case will impact all citizens of Wisconsin. For this reason, venue is proper for the Wisconsin Supreme Court to hear this case.

### **PETITION FOR ORIGINAL JURISDICTION**

#### **I. REASONS WHY THIS COURT SHOULD TAKE ORIGINAL JURISDICTION OVER THIS CASE**

This Petition for original jurisdiction is regarding a question of law which is of great public importance that will affect not only citizens across the whole state of Wisconsin but will additionally affect the citizens of the whole United States of America. But this Petitioner's questions and the Wisconsin Supreme Court's answer(s) to the petition will ultimately speak to and answer the higher question of whether the citizens of Wisconsin are still sovereign and whether their duly elected representatives in the

1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It also outlines the various methods used to collect and analyze data, including surveys and interviews.

3. The document then provides a detailed description of the research methodology, including the selection of participants and the design of the study.

4. Finally, it discusses the results of the study and the implications for future research and practice.

5. The document concludes with a summary of the key findings and a list of references.

6. The following table provides a summary of the data collected during the study.

7. The data shows that there is a strong correlation between the variables studied, suggesting that the findings are significant.

8. These results have important implications for the field of research and may lead to new insights and discoveries.

9. In conclusion, this study has provided valuable information on the topic and highlights the need for further research.

10. The authors would like to thank the participants and the funding agency for their support and contribution to this project.

11. The data was collected over a period of six months, from January to June 2018.

12. The sample size was 100 participants, selected through a random sampling method.

13. The results of the study are presented in the following table, which shows the distribution of responses for each variable.

14. The table shows that the majority of participants (75%) responded positively to the first variable, while only 25% responded negatively.

15. The data also indicates that there is a significant difference between the two groups, with the first group showing a higher level of agreement.

16. This finding is consistent with previous research, which has shown that individuals in the first group tend to have more positive attitudes.

17. The results suggest that the intervention or treatment used in the study may have had a positive effect on the participants' attitudes.

18. However, it is important to note that the study was limited to a specific population and may not be generalizable to other groups.

19. Further research is needed to explore the long-term effects of the intervention and to investigate the underlying mechanisms.

20. In summary, the study has provided valuable insights into the relationship between the variables and the impact of the intervention.

21. The findings have practical implications for the development of interventions aimed at improving attitudes and behaviors.

22. The authors hope that this research will contribute to the advancement of knowledge in the field and inform future practice.

23. The document is intended for use as a reference and should not be used for legal or financial purposes without the appropriate disclaimer.

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Wisconsin State Assembly and the Wisconsin State Senate are the sole legislators of law in this state.

The questions directly posed in this petition are strictly matters of law and are limited to determining the legality of Wisconsin election law process and procedure. Furthermore, the questions in this case are about whether a “new” election procedure and process is legal under Wisconsin State law without having been promulgated by the state legislature.

Because December 1, 2020 is the date by which the Wisconsin Election Commission set to certify the election’s ballot count and December 14, 2020 is date upon which all States must cast their Electoral College Votes it is fitting and proper for this esteemed Wisconsin Supreme Court to hear and decide these questions of law as soon as possible, because time is of the essence.

## **II. THIS SUIT PRESENTS THE FOLLOWING QUESTIONS**

### **AS MATTERS OF LAW:**

A. If, as a matter of law, the over 500 election ballot “drop boxes,” spread throughout the State of Wisconsin, which were created in anticipation of the November 3, 2020 election and were designated by the Wisconsin Election Commission (hereinafter called “WEC”) and respective county clerks as “official” drop box sites for ballots throughout Wisconsin, were in fact, illegal, since neither WEC members nor county clerks had the legislative power and authority to create and to designate such drop boxes as “official” places where ballots could be cast and received and counted under current Wisconsin law.

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B. If as a matter of law, the Wisconsin Election Commission's members and county clerks newly created ballot "drop boxes" are determined to be illegal by this Wisconsin Supreme Court, then, are the ballots that were dropped into them and retrieved for counting in the November 3, 2020 election, also, illegal?

C. If as a matter of law, the ballots deposited into these drop boxes are determined to be illegal by this Wisconsin Supreme Court, then by law is the remedy to remove the illegally cast ballots from the respective candidates' total vote counts since illegally cast votes dilute legal votes which thereby disenfranchise legal voters?

D. If as a matter of law, the illegally cast ballots can no longer be identified as coming from particularized ballot "drop boxes" and segregated for removal from the total count, then for the purpose of restoring fairness, security, transparency and integrity to the November 3, 2020 election and in order to provide an equitable remedy for the restoration of free elections in the State of Wisconsin, the Wisconsin Supreme Court should nullify and set aside the results of the November 3, 2020 United States Presidential election and should notify the Wisconsin State Assembly and Wisconsin State Senate that they must follow the constitutionally prescribed process of choosing (by a simple majority vote) ten (10) Electors who will cast their Electoral votes for the President of the United States on December 14, 2020 as provided under the U.S. Constitution:

**Each State shall appoint, in such Manner as the Legislature thereof may direct, a Number of Electors, equal to the whole Number of Senators and Representatives to which the State may be entitled in the Congress: but no Senator or Representative, or Person holding an Office of Trust or Profit under the United States, shall be appointed an elector.**

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**United States Constitution, Article II, section 2**

**III. A STATEMENT OF THE PARTIES AND THE FACTS**

**A. THE PARTIES**

1. Petitioner is a legally registered voter in the State of Wisconsin. Petitioner is a Citizen of the State of Wisconsin and resides in Chippewa County.

2. Six Respondents are Wisconsin State Actors that are members of the Wisconsin Election Commission. These Respondents are all agents of the State of Wisconsin because they are voting members of the Wisconsin Election Commission. They are being sued in their official capacity. The seventh Respondent, Meagan Wolfe, is Administrator of WEC, is the chief election official in Wisconsin and is therefore also a state actor.

**B. THE FACTS**

1. The Petitioner avers that his fundamental right to a safe, free, secure and transparent presidential election has been burdened and impaired by the actions and inactions of the Respondents in that his vote has been diluted by the counting of thousands of illegal votes placed in illegal ballot drop boxes across the State of Wisconsin.

2. The United States Constitution, Article I, §4, cl. 1 states that “the Times, Places, and Manner of holding Elections for Senators and Representatives shall be prescribed in each State by the Legislature thereof; but the Congress may at any time by Law make or alter such Regulations, except as to the Place of Choosing Senators.”

MEMORANDUM FOR THE DIRECTOR

DATE: 10/15/54

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3. Accordingly, the Wisconsin legislature retains all legislative and oversight responsibilities over Wisconsin's elections laws because of its constitutional duties to the citizens of Wisconsin, including the Petitioner to whom they *serve* and because of allegiance to the U.S. Constitution.

4. The Petitioner and the all citizens of the State of Wisconsin deserve free, fair, secure and transparent elections. Providing for these positive values to remain in our elections is the only way to ensure the continued freedom of Wisconsin citizens. Fair, secure and transparent elections are essential to the "maintenance of a free government." Achieving these values for elections are both a dictate and a right found in Article I, §22 of the Wisconsin State Constitution. The prescribed recipe for maintaining a free government according to §22, in part, includes adherence to such principles as "justice," "virtue" and "frequent recurrence to fundamental principles."

5. On the other hand, negative traits such as unfairness, bias, insecurity, chaos, secretiveness and deception in elections destroys trust and truth by any insertion or presence of these negative traits into the election process. Throughout human history it has often been true that unfair and fraudulent elections have ensnared and enslaved people by essentially destroying their ability to make the correct and wise choice. It becomes extremely difficult to do so when TRUTH is hidden and people can no longer discern what to believe. At that point in time reality is bathed in chaos and darkness . . . then freedom and liberty can be destroyed.

6. The Wisconsin State Assembly and Senate members took an oath of office to uphold the Wisconsin State Constitution and are charged with promulgating and

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enacting election laws that lead to and promote freedom, not bondage or slavery. Any law that the legislators promulgate that increases secrecy, division, chaos, unfairness, etc., would therefore, by definition violate the letter and spirit of the language found in Article I, §22 which is part of the Wisconsin State Constitution which the legislators swore to uphold. The same would also be true for any rule-making body that the legislature authorized to oversee election laws, (although Petitioner does not admit here that the Legislature gave any rule-making or legislative authority to the Wisconsin Election Commission.)

7. The Wisconsin State Legislature, in order to achieve such goals of fairness, security and transparency in Wisconsin elections created the Wisconsin Election Commission (“WEC”) to administer Wisconsin’s existing election laws in 2015 by providing “guidance” to election officials throughout the state. The legislative intent was to have a bipartisan commission with three democrats and three republicans serving on its board in order to preserve fairness and transparency in elections for all people within the State of Wisconsin. That goal was not reached.

8. In March of 2018 the Wisconsin Election Commission members appointed Meagan Wolfe as the Interim Administrator of the agency and Wisconsin’s Chief Election Official. In 2019 she was confirmed by the State Senate as the Administrator of the WEC.

9. Despite the non-legislative nature of the WEC and therefore having no power to enact laws, on August 19, 2020 the Wisconsin Election Commission sent out a notice addressed to “All Wisconsin Election Officials” in Wisconsin inviting them to

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install either permanent or temporary absentee ballot “drop-boxes” for the upcoming November 3, 2020 election. The Subject line states: “Absentee Ballot Drop Box Information.” See Exhibit #1.

10. Some of the suggestions WEC provided to municipal and/or county election officials by sending Exhibit #1 throughout the state included: 1) “Designate drop boxes or mail slots set up for taxes and public utilities as secure ballot drop locations;” 2) “Partnering with public libraries to use book and media drop slots for ballot collection;” 3) “Partnering with businesses or locations that have already implemented social distancing practices, such as grocery stores and banks.” See Exhibit #1, p.2, β1.

11. By sending out the August 19, 2020 document and encouraging county election officials to adopt the ballot drop boxes, the WEC created a new process and procedure for casting a ballot in Wisconsin. By doing so, the WEC gave the newly created voting process of using ballot drop-boxes, the imprimatur of legality. But these ballot drop-boxes are part of a procedure and process that was never created through legislation by the Wisconsin legislature. By leaving election officials in all Wisconsin Counties the impression that the use of ballot drop boxes was legal, members of the WEC violated Wisconsin elections laws and encouraged county clerks to do so, also.

12. But, beyond Wisconsin there is a nationwide systemic component to this story. An underlying “model” document titled “Ballot Drop Box” was initially received and used by the Wisconsin Election Commission to create the August 19, 2020 WEC document now labeled Exhibit #1. See Exhibit #2. According to a statement on this model document, it originated and was created by the “Cybersecurity and Infrastructure

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Security Agency Elections Infrastructure Government Coordinating Council and Sector Coordinating Council's Joint COVID Working Group" of the federal government (hereinafter known as "CISA"). The model "guideline" document that originated from CISA encouraged local election officials across the country to adopt and set up ballot drop boxes.

13. The Cybersecurity and Infrastructure Security Agency is a United States of America Federal government agency that is part of the U.S. Department of Homeland Security "hereinafter referred to as "DHS"). CISA was created by Congress in 2018 and was signed into existence by President Donald J. Trump.

14. CISA, the originator and distributor of Exhibit #2, worked with or through several multi-interstate, quasi-governmental organizations to promote to their members the adoption and use of Ballot Drop Boxes for the November 3, 2020 election. On the websites of these organizations, they also repeated and promoted CISA's campaign of stopping "*misinformation or disinformation*" regarding election information both before and after the November 3, 2020 election. These organizations included the National Conference of State Legislators (NCSL), the National Association of Secretaries of State (NASS) and the National Association of State Election Directors (NASSED). See Exhibit #'s 3,4,5,6,7,8,9. Under the apparent guise of protecting our country from a foreign threat of election interference, unknown government actors within CISA in working with these other organizations, did in fact interfere in the election laws of Wisconsin. It is possible that voters in other states were also victims of this alleged treacherous operation to interfere with the presidential election.

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15. The National Association of Secretary of State's (NASS) took CISA's propaganda campaign a step further and created, with the help of CISA, their own campaign called the #TRUSTEDINFO2020 in which on one document NASS members characterized it as "an education effort to promote election officials as the trusted sources of election information." See Exhibits #9 & #10. They noted in their documents, "By driving voters directly to election officials' websites and social media pages "we will ensure voters are getting accurate election information and cut down on the *misinformation and disinformation* that can surround elections." See Exhibits #9 & #10.

16. The second and third pages of Exhibit #9 include a list of organizations NASS characterized as "National level #TrustedInfo2020 supporting partners." See Exhibit #9, p2&3. <https://www.nass.org/initiatives/trustedinfo-2020>

17. Dominion Voting Systems is listed as an organization that provided promotional materials and other in-kind donations to NASS in support of their supposed #TrustedInfo2020 campaign. *Id.* at p.3.

18. Another linked organization for NASS's #TrustedInfo2020 is the Center for Technology and Civic Life. <https://www.techandciviclifef.org>

19. From a series of cross-linked documents, it is evident that CISA worked extremely hard to "sell" state election officials on the need for obtaining the ballot drop boxes as a way to fight for the safety of voters during COVID-19. CISA, <https://www.cisa.gov> NCSL, [www.ncsl.org](http://www.ncsl.org) and NASS [www.nass.org](http://www.nass.org) are all entities linked through their respective websites. In several cross agency documents/web pages, CISA ran a continuous propaganda campaign through these entities by telling the American

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people to just “trust election officials” and “*stop the spread of misinformation and disinformation*” regarding the upcoming election and in the days following the election.

20. In February of 2020 CISA had developed “#PROTECT2020 STRATEGIC PLAN which the governmental agency characterized as a “National call to action” to “enhance the integrity and resilience of the nation’s election infrastructure.” See Exhibits #11 & #12. On October 20, 2020 CISA launched the #Protect2020 Rumor vs. Reality pages. See Exhibit #13. On October 23, 2020 CISA announced a graphic novel titled the Real Fake that “communicates the dangers and risks associated with *dis- and misinformation campaigns*. The plot shows how threat actors capitalize on political and social issues (especially around election cycles) to plant doubt in the minds of targeted audiences and steer their opinion.”

21. By the end of October 2020 the Wisconsin Election Commission was still encouraging the public to use the ballot “drop boxes” that they “spoke or wrote” into existence through the August 19, 2020 Ballot drop box document. They cited several reasons why voters might choose to vote using a drop box such as including “lack of trust in the postal process, fear that their ballot could be tampered with, or concern that their information will be exposed.” Exhibit #14. By so stating they planted the seeds of fear in the public regarding these very issues and “steered” them away from using the United State Postal Service and towards the ballot drop boxes in the same way that CISA had just explained (through its previously discussed publications above) would be a very effective method to plant doubts into the minds of people regarding one method of voting, i.e. USPS, and move them towards another through their media driven “use of ballot drop boxes” campaign that was also broadcast through many media outlets.

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22. On November 17, 2020 the first and only director of CISA since its creation in 2018, Chris Krebs, was fired by President Trump. He had been sending repeated messages throughout CISA's/DHS's vast network of quasi-state non-governmental entities such as NASS and NCSL down to state controlled election officials, that during the 2020 elections there "is no evidence that any voting system deleted or lost votes, changed votes or was in any way compromised." See Exhibit #15, p.1. President Trump refuted that claim by stating "The recent statement by Chris Krebs on the security of the 2020 Election was highly inaccurate, in that there were massive improprieties and fraud." After his firing, Chris Krebs Tweeted: "honored to serve. We did it right. Defend Today, Secure Tomorrow. #Protect2020."

23. The original CISA drop box document simply titled "Ballot Drop Box" and labeled Exhibit #2, contains more information and guidance regarding the security measures necessary when using ballot drop boxes was eventually included in the August 19, 2020 document created and sent out by the Wisconsin Election Commission. See Exhibit #1. For example the last paragraph on page 3 of Exhibit #2 was entirely omitted from Exhibit #1 which was the WEC version of the Ballot Drop Box document sent to all Wisconsin county clerks by WEC. This omitted paragraph would have encouraged a Wisconsin County or Municipal Clerk to "review existing laws" and to determine for them whether existing changes to laws would be required before deciding to use ballot drop boxes in the upcoming election on November 3, 2020. The excluded language from the WEC document but present in the CISA document is as follows:

If you are considering the use of ballot drop boxes, you should review your existing laws and requirements and determine whether emergency changes may be necessary. A full list of state practices can be

The Commission on the Status of Women, established in 1946, was the first of its kind. It was created by the United Nations to address the needs and concerns of women worldwide. The Commission's mandate was to study and report on the status of women in various countries and to recommend ways to improve their lives. Over the years, the Commission has held numerous sessions and has produced a wealth of reports and resolutions. One of its most significant achievements was the adoption of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in 1979. This landmark treaty is considered the international bill of rights for women and has been ratified by over 110 countries. The Commission continues to work towards achieving gender equality and the empowerment of women in all spheres of life.

The Commission on the Status of Women has played a crucial role in the advancement of women's rights. It has provided a platform for women from different cultures and backgrounds to share their experiences and concerns. Through its reports and resolutions, the Commission has raised awareness of the challenges women face and has urged governments to take action. The Commission's work has been instrumental in the development of international law and policy related to women's rights. Its efforts have led to the adoption of numerous treaties, conventions, and resolutions that have shaped the global agenda for women's equality. The Commission's ongoing work is essential for ensuring that women's voices are heard and that their rights are protected and promoted.

The Commission on the Status of Women remains committed to its mission of promoting gender equality and the empowerment of women. It continues to monitor the implementation of CEDAW and other international instruments. The Commission also provides technical assistance and advice to governments and other stakeholders. Its work is guided by the principles of equality, non-discrimination, and the full participation of women in all spheres of life. The Commission's efforts are essential for achieving the Sustainable Development Goals, particularly Goal 5, which focuses on gender equality and women's empowerment.

found at the National Conference of State Legislators (NCSL) website listed in the Additional Resources section.

Exhibit #2, p.3, β7.

24. Another significant omission WEC kept out of the final version of the August 19, 2020 document, Exhibit #1, was the following section found in CISA's original Ballot Drop Box document, Exhibit #2:

### **Election Night and Closing Boxes**

You need to give special consideration to returning temporary ballot drop boxes and locking permanent drop boxes on election night. Organizing teams from other county or city departments is one way to accomplish this. Essentially you need bipartisan teams to be at every ballot drop-off location precisely when polls close. Their responsibilities include:

Identifying the voter or car in line at the time polls close and ensuring they have the opportunity to deposit their ballots.

Retrieving the temporary indoor boxes and returning them to the counting facility.

Locking the drop slot on the 24-hour boxes and transferring ballots to a ballot transfer bag or box and returning them to the counting facility.

Completing "chain of custody" forms.

Exhibit #2, p.6,β1

25. The importance of the above cited omission on Wisconsin election security and transparency cannot be overstated. The possibility that there were some one-sided partisan teams retrieving un-mailed and un-postmarked ballots from illegally placed ballot drop boxes, combined with the fact that there was an alleged gross "relaxation" of Wisconsin voter ID laws under the "indefinitely confined" exemption to the Voter ID statute that allegedly "allowed people to vote absentee without having to show proof of



identification and residency, would be a recipe for voter fraud, if anyone was so inclined to do so. See Exhibit #16.

26. Add to that possible scenario an event that actually took place on July 7, 2020 when the self-identified non-profit the Center for Tech and Civic Life (earlier identified and connected in this Petition to the National Association of Secretary's of State NASS's #TrustedInfo2020, in paragraph 18 above) announced on its website that the mayors of Wisconsin's five largest cities had secured \$6.3 million in private grant funds from this organization to support election administration in the midst of the COVID-19 pandemic and a "perfect storm" of election interference could emerge. See Exhibit #17. The website story titled "CTCL Partners with 5 Wisconsin Cities to Implement Safe Voting Plan" on page 2 states that \$2,572,839 was used, in part, to "Utilize secure drop-boxes to facilitate return of absentee ballots." The City of Racine received \$ 942,100; City of Kenosha \$862,779; City of Green Bay \$1,093,400; City of Madison \$1,271,788 and City of Milwaukee received \$2,154,500, all from the private, non-profit organization, Center for Tech and Civil Life, whose name showed up on NASS's/CISA's #TrustedInfo2020 document in Exhibits #9 & #10 discussed above.

27. With all of these allegation and facts considered together, there is now a cloud of suspicion over the whole election process in Wisconsin. For the sake of election integrity, WEC's omission of the need to communicate to local election officials and clerks around Wisconsin the extreme necessity and importance of having bipartisan teams ready and properly trained on retrieving ballots from drop boxes, precisely at 8:00 p.m. on election night, would significantly affect the security, transparency and integrity

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of the whole Wisconsin election, even if the ballot drop boxes had been legalized by the legislature.

28. The WEC document Exhibit #1 did have a separate guideline that stated that each drop box must have a separate “chain of custody” log that was to be completed and signed each time the drop box was emptied and its contents returned to the pre-designated election official who was assigned responsibility for the security and integrity of all ballot drop boxes and their contents. The clerk of each county should have retrieved and secured these logs with the final pickup of ballots on election night. There should also be proof of training for the persons assigned to pick up these ballots and the importance of filling out the “chain of custody” logs. The importance of these security measures is to ensure that if ballots placed in these ballot drop boxes were challenged, that there would be a “chain of custody” log that could be reviewed in order to discover who emptied the contents of that receptacle, how many ballots were in the drop box and when it was last emptied.

29. Even if this Court was to find that the ballot drop boxes are legal, it is still true the “chain of custody” logs must be available for review. If the “chain of custody” logs were not secured for any given ballot drop box that was placed into service to receive ballots leading up the November 3, 2020 election and then were not properly tracked and accounted for, then the contents of those drop boxes would need to be rejected as illegal ballots because they will have “tainted” the election process and compromised fairness, security and transparency of the whole vote. Without a “chain of custody” log, the evidence that proves that the ballots were received and transported from a specific ballot drop box by 8 p.m. on election night becomes impossible to prove.

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30. According to the Wisconsin Election Commission's website "look-up" there was over 500 ballot drop boxes sites around the State after August 19, 2020. See Exhibit #14. There were 15 drop boxes in Milwaukee alone, 13 of which were at libraries. A law to make the use of these designated drop sites a legal means of voting in Wisconsin was never enacted. Rather, according to the **Absent voting procedure** found in Wis. Stat. 6.87(6):

The ballot shall be returned so it is delivered to the polling place no later than 8 p.m. on Election Day. Except in municipalities where absentee ballots are canvassed under s 7.52, if the municipal clerk receives an absentee ballot on Election Day, the clerk shall secure the ballot and cause the ballot to be delivered to the polling place servicing the elector's residence before 8 p.m. Any ballot not mailed or delivered as provided in this subsection may not be counted.

31. WEC was charged with administering all *existing* Wisconsin election laws, without bias. It was not given rule-making powers. For WEC to make a new law, the will and intent of the legislature would have to have been contradicted.

32. On May 29, 2020 WEC admitted that they lacked legislative power to change laws when they answered various questions in a document called "WEC Prepares for Fall Elections by Approving Block Grants to Municipalities and Mailing to Voters." See Exhibit #18. When asked if they would be mailing absentee ballots to everyone, WEC responded: "No, changes such as these would require the legislature to pass and amend existing law, and the Wisconsin Elections Commission does not have the authority to make these changes. Id. p.2.β1.

33. Under Wisconsin law's legislative position of voting the following emphasizes a very conservative approach:

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Wis. Stat. 6.84(1) Construction: Under LEGISLATIVE POLICY The legislature finds that voting is a constitutional right, the vigorous exercise of which should be strongly encouraged. In contrast voting by absentee ballot is a privilege exercised wholly outside the traditional safeguards of the polling place. The legislature finds that the privilege of voting by absentee ballot must be carefully regulated to prevent the potential for fraud or abuse; to prevent overzealous solicitation of absent electors who may prefer not to participate in an election; to prevent undue influence on an absent elector to vote for or against a candidate or to cast a particular vote in a referendum; or other similar abuses.

Under INTERPRETATION: "Notwithstanding s.5.01(1), with respect to matters relating to the absentee ballot process, ss. 6.86, 6.87(3) to (7) and 9.01(1)(b)2. and 4. shall be construed as mandatory. Ballots cast in contravention of the procedures specified in those provisions may not be counted. Ballots counted in contravention of the procedures specified in those provisions may not be included in the certified result of any election." Id. at (2).

34. In conclusion, under Wisconsin statutes the Wisconsin Election Commission WEC cannot make law. Therefore, the ballot drop boxes that it encouraged the elections official to set up in 72 counties throughout the State of Wisconsin are illegal. Therefore, the ballots placed within the drop boxes are illegal ballots and cannot be counted under Wisconsin law.

35. Under Wis. Stat. 6.93, and 7.52(5)(a) Petitioner hereby challenges every ballot that was placed in an illegal ballot drop box across the State of Wisconsin and asks this Court to set all of those ballots aside.

**Challenging the absent elector.** The vote of any absent elector may be challenged for cause and the inspectors of election shall have all the power and authority given them to hear and determine the legality of the ballot the same as if the ballot had been voted in person. In municipalities where absentee ballots are canvassed under s. 7.52, the vote of an absentee elector may be challenged as provided in s. 7.52 (5).

**Wis. Stat. 6.93, and**

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The vote of any absent elector may be challenged by any elector for cause and the board of absentee ballot canvassers shall have all the power and authority given the inspectors to hear and determine the legality of the ballot the same as if the ballot had been voted in person.

**Wis. Stat. 7.52(5)(a).**

36. If the drop box ballots were not segregated so that they could be identified to a legal certainty and removed, then the Petitioner asks the Wisconsin Supreme Court to nullify the results of this whole election in Wisconsin and notify the legislature that it must choose 10 Electors under the directives of the U.S. Constitution found in Article II §1, (2).

#### **A STATEMENT OF THE RELIEF SOUGHT**

1. Petitioner seeks a temporary injunction to enjoin the Wisconsin Election Commission from certifying the results of the November 3, 2020 election on December 1, 2020 until the merits of this case can be heard.

2. Petitioner seeks a declaratory judgment that the Wisconsin Election Commission lacked the authority to place ballot drop boxes anywhere in the state of Wisconsin and to tell or insinuate to county election officials, that they could legally place ballot drop boxes throughout their jurisdictions in order to collect ballots.

3. Petitioner seeks a declaratory judgment that the over 500 ballot drop boxes placed around the state of Wisconsin were illegal for the purpose of receiving and holding election ballots

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4. Petitioner seeks a declaratory judgment that as a matter of law, every ballot that was cast by placing it into one of the illegal drop boxes, is also illegal and cannot be counted.

5. Petitioner seeks a permanent injunction to stop the Wisconsin Election Commission from certifying the results of the November 3, 2020 election if this Court finds that the drop boxes and the ballots placed within them are illegal.

6. Petitioner seeks a declaratory judgment that in the interests of justice and in order to restore fair, secure and transparent elections to the State of Wisconsin, this Supreme Court of Wisconsin nullify the November 3, 2020 presidential election results in the State of Wisconsin and notify the Wisconsin State Legislature that as a body, it must either arrange for another election before the Dec. 14, 2020 or appoint 10 Electors under the U.S. Constitution.

7. Petitioner asks that this Wisconsin Supreme Court grant any other relief that it deems appropriate.



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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities.

2. It then outlines the various methods and tools used to collect and analyze data, including surveys, interviews, and focus groups.

3. The document also addresses the challenges of data collection and analysis, such as ensuring the reliability and validity of the data.

4. Finally, it provides a summary of the key findings and conclusions of the study, along with recommendations for future research.

5. The document is organized into several sections, each focusing on a different aspect of the research process.

6. The first section provides an overview of the research project and its objectives.

7. The second section describes the research design and the methods used to collect data.

8. The third section discusses the data analysis process and the results of the study.

9. The fourth section provides a detailed discussion of the findings and their implications.

10. The fifth section offers conclusions and recommendations for future research and practice.

11. The document is written in a clear and concise style, making it accessible to a wide range of readers.

12. It is a valuable resource for anyone interested in the field of research and data analysis.

13. The document is well-organized and easy to read, with clear headings and subheadings.

14. It provides a comprehensive overview of the research process and the various methods used to collect and analyze data.

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