

KENNETH BROWN,

Plaintiff,

v.

WISCONSIN ELECTIONS
COMMISSION,

and

TARA McMENAMIN,

Defendants.

Case No. 22-CV-1324
Case Code: 30703

**BRIEF IN SUPPORT OF PROPOSED INTERVENOR-DEFENDANT
DEMOCRATIC NATIONAL COMMITTEE'S MOTION TO INTERVENE**

I. Introduction and Summary of the Argument

Plaintiff Kenneth Brown challenges the Racine City Clerk's use of alternate absentee ballot sites for the August 2022 primary election and November 2022 general election. Plaintiff alleges that Defendant McMenamini violated Wis. Stat. § 6.855, which authorizes the use of alternate absentee ballot sites, in numerous ways and asks the Court to condemn her actions and adopt a severely narrow and restrictive reading of Wis. Stat. § 6.855. Plaintiff's cramped interpretation of Wis. Stat. § 6.855, which the Wisconsin Elections Commission (WEC) rejected in adjudicating Plaintiff's administrative complaint under Wis. Stat. § 5.06, would limit the availability and accessibility of absentee voting statewide and curtail the right to vote.

Plaintiff also challenges a February 27, 2020 WEC document that, among other things, delineates the internal process for dealing with voter complaints under Wis. Stat. § 5.06. According

to Plaintiff, this Order is improper because it allegedly allows WEC's Administrator, who serves as "the chief elections official of this state," Wis. Stat. § 5.05(3g), "(a) to rule on complaints, with or without advance input or knowledge by the Commissioners; and (b) to determine whether and under what circumstances the state officials *to whom the Legislature actually provided this authority* can have any say about those decisions" (Comp., ¶88 (emphasis in original)). Plaintiff contends this so-called "Delegation Order" (*id.* ¶81) violates Wisconsin law because WEC did not have the power to delegate its statutory duty to WEC's Administrator, or, in the alternative, was required to promulgate the Order as an administrative rule.

The stakes are extremely high in this litigation and, should Plaintiff succeed on either claim, that would have a statewide impact. For this reason, the Democratic National Committee (DNC) seeks to intervene as a defendant in this litigation and to advocate against Plaintiff's cramped reading of Wis. Stat. § 6.855 and combat Plaintiff's efforts to constrict the scope and application of alternate absentee ballot sites. Additionally, Plaintiff seeks a significant alteration of the rules under which WEC currently operates to administer statewide election and election-related challenges, and DNC has an interest in those challenges being resolved efficiently, effectively, and transparently. DNC therefore has an interest in Plaintiff's demand that WEC's internal processes change.

As detailed below, DNC meets the standards for both intervention as of right and permissive intervention under subsections (1) and (2) of Wis. Stat. § 803.09. In compliance with Wis. Stat. § 803.09(3), DNC has submitted a responsive pleading setting forth the defenses for which it seeks intervention; that proposed Answer is attached as Exhibit A to DNC's Motion to Intervene.

Wisconsin law affords circuit courts authority to grant intervention as of right and permissive intervention to parties with cognizable interests in pending litigation. Wis. Stat. § 803.09(1)–(2). DNC is a “national committee” as defined in 52 U.S.C. § 30101(14), with the mission of electing Democratic candidates to federal, state, and local offices, including in Wisconsin. *See* Affidavit of Ramsey Reid in Support of Motion to Intervene (“Reid Aff.”) ¶2. DNC works to accomplish its mission by making expenditures for and contributions to Democratic candidates and assisting state parties throughout the country in voter education and turnout efforts, among other things. *Id.* ¶4. DNC represents a diverse group of Democrats, including elected officials, candidates, constituents, and voters. *Id.* ¶2.

Plaintiff seeks declaratory and injunctive relief that would have a statewide impact and would likely cause election-related chaos and uncertainty, as well as the potential denial or abridgement of qualified absentee voters’ right to vote. Plaintiff first asks the Court for a declaratory judgment that Defendant McMenemy violated Wis. Stat. § 6.855 in five ways and seeks a permanent injunction prohibiting her, or any successor, “from engaging in the unlawful conduct.” (Comp. at p. 21) Plaintiff’s cramped reading of Wis. Stat. § 6.855 would narrow the opportunity and availability of absentee voting statewide. Plaintiff’s lawsuit is the latest salvo in a relentless series of attacks in recent years that aim to make it harder for Wisconsin voters to exercise their constitutionally guaranteed right to vote in the state’s elections.

As part of his second claim, Plaintiff asks the Court for a declaratory judgment that WEC’s delegation to the Administrator or Chair to resolve Wis. Stat. § 5.06 complaints is unlawful and seeks a permanent injunction prohibiting WEC from delegating any such authority to those parties. Plaintiff also seemingly asserts that Wis. Admin. Code § EL 20.04 is unlawful and improper and asks the Court to issue such a ruling. Plaintiff’s requested relief would result in a significant

alteration of the current rules under which WEC operates. DNC, as one of two national parties that consistently has candidates running in Wisconsin elections, has an interest in how elections are run statewide and the processes that WEC employs in administering those elections and resolving election-related challenges.

In these circumstances, DNC readily satisfies the standard for intervention as of right under Wis. Stat. § 803.09(1). DNC's Motion is clearly timely; DNC has an interest directly related to the subject matter of the action; disposition of the action may, as a practical matter, affect DNC's interests; and neither of the Defendants nor any other government official can adequately represent DNC's partisan interests. In the alternative, this Court should exercise its broad discretion and grant DNC permissive intervention under Wis. Stat. § 803.09(2).

II. This Litigation

Plaintiff is a registered elector who resides in Racine, Wisconsin and alleges that the City's use of alternate absentee ballot sites for the August 2022 primary election and November 2022 general election violated Wisconsin law. Plaintiff filed a complaint with WEC, pursuant to Wis. Stat. § 5.06, against Defendant McMenamín and her actions surrounding the use of alternate absentee ballot sites for the August 2022 primary election. WEC denied that complaint on November 4, 2022. About a month later, Plaintiff filed this lawsuit against WEC and Defendant McMenamín. Now, on appeal from WEC's denial of his § 5.06 complaint, Plaintiff raises two new sets of allegations. The first set of new allegations surrounds Defendant McMenamín's actions leading up to the November 2022 general election and the use of alternate absentee ballot sites. The other set of new allegations surrounds a February 2020 WEC Order that delineates WEC's internal processes for adjudicating voter complaints filed under Wis. Stat. § 5.06.

Defendant McMenamín filed a motion to dismiss the complaint or, in the alternative, to strike portions of the complaint on January 19, 2023. (Dkt. 12) WEC filed its Answer to the

Complaint on January 20, 2023. (Dkt. 15) The parties are currently briefing the motion to dismiss, which the Court is to set to hear on February 27, 2023.

III. Legal Standards

There is “no precise formula for determining whether a potential intervenor meets the requirements of [Wis. Stat.] § 803.09(1)”; “[t]he analysis is holistic, flexible, and highly fact-specific.” *Wolff v. Town of Jamestown*, 229 Wis. 2d 738, 742, 601 N.W.2d 301 (Ct. App. 1999). “A court must look at the facts and circumstances of each case against the background of the policies underlying the intervention rule.” *Helgeland v. Wis. Muns.*, 2008 WI 9, ¶40, 307 Wis. 2d 1, 745 N.W.2d 1 (internal quotation marks omitted). To intervene as of right, a proposed intervenor must satisfy the four criteria specified in Wis. Stat. § 803.09(1):

- (A) its motion to intervene must be timely;
- (B) it must claim an interest sufficiently related to the subject of the action;
- (C) it must show that the disposition of the action may, as a practical matter, impair or impede its ability to protect that interest; and
- (D) it must demonstrate that the existing parties do not adequately represent its interest.

Id. ¶38. “Wisconsin Stat. § 803.09(1) is based on Rule 24(a)(2) of the Federal Rules of Civil Procedure, and interpretation and application of the federal rule provide guidance in interpreting and applying § 803.09(1).” *Id.* ¶37. Intervention must be granted if these elements are satisfied. *Armada Broad., Inc. v. Stirn*, 183 Wis. 2d 463, 471, 516 N.W.2d 357 (1994) (“If [movant] meets each of the requirements [in Wis. Stat. § 803.09], we must allow him to intervene.”).

The standard for permissive intervention, which DNC seeks in the alternative, is even less stringent: “Upon timely motion anyone may be permitted to intervene in an action when a movant's claim or defense and the main action have a question of law or fact in common.” Wis. Stat. § 803.09(2).

IV. Argument

A. DNC is entitled to intervention as of right.

1. DNC's motion is timely.

The timeliness requirement for intervention as of right is measured by the applicant's diligence and the impact the motion will have on the existing litigants. Two factors guide a court in deciding whether an application for intervention is timely: (1) whether, in light of all the circumstances, the proposed intervenor acted promptly; and (2) whether the intervention will prejudice the original parties. *State ex. rel. Bilder v. Delavan Twp.*, 112 Wis. 2d 539, 550, 334 N.W.2d 252 (1983) (application for intervention timely as court had not approved a stipulation to settle case). The "promptness" element focuses on when the proposed intervenor discovered its interest was at risk and how far the litigation has proceeded at the time of the motion to intervene. *Roth v. La Farge Sch. Dist. Bd. of Canvassers*, 2001 WI App 221, ¶¶16–17, 247 Wis. 2d 708, 634 N.W. 2d 882.

DNC readily satisfies the timeliness requirement. Plaintiff filed his Complaint on December 1, 2022, just over two months ago. Roughly three weeks ago, WEC filed its Answer to the Complaint and Defendant McMenamien filed a motion to dismiss. The parties are currently briefing the motion to dismiss and the Court is set to hear that motion on February 27, 2023. DNC proposes that its motion to intervene, and any opposition to it, also be heard at that February 27, 2023 hearing. DNC's intervention would not prejudice any party, as Plaintiff's claims have not progressed in any material way since the filing of the Complaint. Additionally, DNC will work within whatever schedule this Court establishes for the resolution of Plaintiff's claims. This is clearly sufficient to meet the timeliness requirement. *See Bilder*, 112 Wis. 2d at 550 ("The critical factor is whether in view of all the circumstances the proposed intervenor acted promptly.").

2. DNC has interests sufficiently related to the subject of the action.

Consistent with the “broader, pragmatic approach” taken by Wisconsin courts with regard to intervention, the “interests” factor for intervention serves “primarily [as] a practical guide to disposing of lawsuits by involving as many apparently concerned persons as is compatible with efficiency and due process.” *Helgeland*, 2008 WI 9, ¶¶43–44 (quoting *Bilder*, 112 Wis. 2d at 548–49).

DNC has several important and protected interests in the subject matter of this litigation. Plaintiff seeks to severely restrict Wisconsin voters’ ability to successfully exercise their right to vote absentee—an obstacle that would interfere with DNC’s core mission of supporting the election of Democratic candidates to federal, state, and local offices. Were the Court to adopt Plaintiff’s reading of Wis. Stat. § 6.855, DNC would have to divert time and resources away from its core work of voter persuasion, education, and “get-out-the-vote” (GOTV) efforts and instead direct some of those limited resources toward additional efforts to assist absentee voters regarding the barriers imposed by Plaintiff’s cramped reading of Wis. Stat. § 6.855. *See Reid Aff.* ¶6. As a result of these resources having to be diverted, fewer resources could be dedicated to the basic blocking-and-tackling activities that go towards winning an election. *Id.* In other words, DNC’s ability to invest in voter education and otherwise prepare for upcoming elections would be reduced, which would adversely affect DNC’s turnout efforts on behalf of Democratic candidates. *Id.* Thus, DNC has a strong interest in this litigation both on its own behalf, and on behalf of its voters whose rights are threatened.

Additionally, Plaintiff challenges WEC’s internal processes for adjudicating voter complaints under Wis. Stat. § 5.06 and asks for significant alteration of the rules under which WEC currently operates. DNC, as one of two national parties that consistently has candidates running in Wisconsin elections, has an interest in how elections are run statewide and the processes that WEC

employs in administering those elections and dealing with election-related challenges. Plaintiff's counsel has attempted to raise this delegation claim once before in *Pellegrini v. Wisconsin Elections Commission*, No. 2022CV4 (Waukesha Cnty.), and another plaintiff raised a similar claim in *Archambault v. Wisconsin Elections Commission*, No. 21CV1620 (Waukesha Cnty.). Because neither case made it past initial procedural challenges, DNC, despite having an interest in the delegation claim, never got involved in the litigation.

Although the “interest” requirement for intervention-of-right is less demanding than the Article III standing requirement in federal court, it is noteworthy that courts have regularly found this type of diversion of resources by political committees, including DNC, sufficient to confer Article III standing. *See, e.g., Crawford v. Marion Cnty. Election Bd.*, 472 F.3d 949, 951 (7th Cir. 2007) (concluding challenged law “injure[d] the Democratic Party by compelling the party to devote resources” that it would not have needed to devote absent new law), *aff'd*, 553 U.S. 181 (2008); *Issa v. Newsom*, No. 20-cv-1044, 2020 WL 3074351, at *3 (E.D. Cal. June 10, 2020) (granting intervention and citing this interest); *League of United Latin Am. Citizens (LULAC) of Wis. v. Deininger*, No. 12-C-0185, 2013 WL 5230795, at *1 (E.D. Wis. Sept. 17, 2013) (finding after discovery that increased expenditures by organizations to GOTV gave organizations standing to challenge recently adopted voter identification laws). Because those interests satisfy the more-stringent Article III test, they necessarily meet the requirement for intervention under Wisconsin law.

3. Disposition of the action in DNC’s absence would impair its ability to protect its interests.

DNC also readily satisfies the minimal burden required to meet the third element of intervention as of right, that disposition of this case may impair its ability to protect its interests. As with the other elements, Wisconsin courts take “a pragmatic approach” to this prong and “focus

on the facts of each case and the policies underlying the intervention statute.” *Helgeland*, 2008 WI 9, ¶79 & n.70 (citing 6 James Wm. Moore, et al., MOORE’S FEDERAL PRACTICE § 24.03[3][a], at 24–42 (3d ed. 2002)). The Wisconsin Supreme Court has identified two particular factors to weigh in considering this prong: (1) “the extent to which an adverse holding in the action would apply to the movant’s particular circumstances”; and (2) “the extent to which the action into which the movant seeks to intervene will result in a novel holding of law.” *Id.* ¶¶80–81. Intervention is more warranted when a novel holding is at stake because its stare decisis effect is “more significant when a court decides a question of first impression.” *Id.* ¶81.

Here, for the reasons discussed above, an adverse ruling would seriously impair DNC’s ability to protect its own interests and those of its members and constituents. When a proposed intervenor has protectible interests in the outcome of litigation, as DNC does here, courts have “little difficulty concluding” that its interests will be impaired. *Citizens for Balanced Use v. Mont. Wilderness Ass’n*, 647 F.3d 893, 898 (9th Cir. 2011). Intervention is especially warranted if the proposed remedy *directly* threatens to harm intervenors. *See, e.g., Flying J, Inc. v. Van Hollen*, 578 F.3d 569, 572 (7th Cir. 2009) (granting intervention when proposed intervenors “would be directly rather than remotely harmed by the invalidation” of challenged statute).

Thus, Wisconsin courts have repeatedly allowed political parties and committees like DNC to intervene in these circumstances. This includes the prominent *Kormanik* and *Teigen* cases decided by the Wisconsin Supreme Court last year, in which the Waukesha County Circuit Court granted motions to intervene by DNC in *Kormanik* and by the Democratic Senatorial Campaign Committee (DSCC) in *Teigen*. *See State ex rel. Kormanik v. Brash*, 2022 WI 67, ¶3, 404 Wis. 2d 568, 980 N.W. 2d 948 (noting that circuit court granted DNC’s motion to intervene); *Teigen*, 2022 WI 64, ¶2 (noting that DSCC intervened in support of WEC election-law guidance documents).

Other courts have routinely allowed both Democratic and Republican party committees to intervene in high-stakes disputes over the interpretation and application of election laws. *See, e.g., La Union del Pueblo Entero v. Abbott*, 29 F.4th 299, 305–09 (5th Cir. 2022) (granting national and local political committees’ motions to intervene as of right in litigation challenging voter registration and absentee voting laws); *Thomas v. Andino*, 335 F.R.D. 364, 371 (D.S.C. 2020) (granting state political party’s motion to intervene permissively in challenge to enforcement of certain absentee voting requirements during COVID-19 pandemic); *DNC v. Bostelmann*, No. 20-cv-249-wmc, 2020 WL 1505640, at *5 (W.D. Wis. Mar. 28, 2020) (granting federal and state political committees’ motions to intervene permissively in litigation challenging application and enforcement of absentee voting laws during COVID-19 pandemic). This case warrants the same treatment. DNC’s interests would be directly harmed by Plaintiff’s requested relief, and the Court should permit DNC to defend those interests in this action.

4. No existing party adequately represents DNC’s interests.

Finally, no existing party adequately represents DNC’s interests. The burden to satisfy this factor is “minimal.” *Armada Broad., Inc.*, 183 Wis. 2d at 476 (quoting *Trbovich v. United Mine Workers*, 404 U.S. 528, 538 n.10 (1972)). Because the future course of litigation is difficult (if not impossible) to predict, the test is whether representation “may be” inadequate, not whether it *will* be inadequate. *Wolff*, 229 Wis. 2d at 747. The fact that WEC and/or Defendant McMenammin may share a “mutually desired outcome” with DNC and might make “similar arguments” as DNC does not bar intervention. *Id.* at 748. When there is a realistic possibility that the existing parties’ representation of the proposed intervenor’s interests *may* be inadequate, “all reasonable doubts are to be resolved in favor of allowing the movant to intervene and be heard on [its] own behalf.” 1 Jean W. Di Motto, *WIS. CIV. P. BEFORE TRIAL* § 4.61, at 41 (2d ed. 2002) (citing *Chiles v. Thornburgh*, 865 F.2d 1197, 1214 (11th Cir. 1989)).

Neither Defendant can adequately represent DNC's partisan interests. Indeed, DNC has "special, personal [and] unique interest[s]" distinct from government officials' interests. *Helgeland*, 2008 WI 9, ¶¶116–17. The Wisconsin Supreme Court has recognized that government entities cannot be expected to litigate "with the vehemence of someone who is directly affected" by the litigation's outcome. *Armada Broad. Inc.*, 183 Wis. 2d at 476. The U.S. Court of Appeals for the Fifth Circuit recently emphasized that a political party committee's "private interests are different *in kind* from the public interests of" a governmental agency or official. *La Union del Pueblo Entero*, 29 F.4th at 309 (emphasis added). A political group "represent[s] its members to achieve favorable outcomes," whereas "[n]either the State nor its officials can vindicate such an interest while acting in good faith." *Id.* No matter who the proper governmental defendants may be—and DNC agrees with Defendant McMenamini that she is certainly not the right defendant here—those public defendants' interests in this litigation are defined by their statutory duties to conduct elections and administer Wisconsin's election laws. *See, e.g., id.; see also Utah Ass'n of Counties v. Clinton*, 255 F.3d 1246, 1255–56 (10th Cir. 2001) ("[T]he government's representation of the public interest generally cannot be assumed to be identical to the individual parochial interest of a [political candidate] merely because both entities occupy the same posture in the litigation."); *Clark v. Putnam Cnty.*, 168 F.3d 458, 461–62 (11th Cir. 1999) (African-American voters granted intervention in challenge to court-ordered voting plan defended by county commissioners because commissioners represented all county citizens, including people adverse to proposed intervenors' interests); *Coal. of Ariz./N.M. Cntys. for Stable Econ. Growth v. Dep't of Interior*, 100 F.3d 837, 845 (10th Cir. 1996) (government defendants necessarily represent "the public interest" rather than the proposed intervenors' "particular interest[s]" in protecting their resources and the rights of their candidates and voters).

As one court explained in granting intervention under similar circumstances:

Although Defendants and the Proposed Intervenors fall on the same side of the dispute, Defendants' interests in the implementation of the [challenged law] differ from those of the Proposed Intervenors. While Defendants' arguments turn on their inherent authority as state executives and their responsibility to properly administer election laws, the Proposed Intervenors are concerned with ensuring their party members and the voters they represent have the opportunity to vote in the upcoming federal election ... and allocating their limited resources to inform voters about the election procedures. As a result, the parties' interests are neither "identical" nor "the same."

Issa, 2020 WL 3074351, at *3 (citation omitted). Political party entities, including Republican entities, are regularly granted intervention in cases where the state is defending against challenges to voting laws. *See, e.g., Black Voters Matter Fund v. Raffensperger*, 1:20-cv-4869, ECF No. 42 (N.D. Ga. Dec. 9, 2020) (granting intervention to Republican National Committee (RNC) and Georgia Republican Party); *Nielsen v. DeSantis*, 4:20-cv-236-RH-MJF, ECF No. 216 (N.D. Fla. June 10, 2020) (granting intervention to RNC, National Republican Campaign Committee, and Republican Party of Florida); *Bostelmann*, 2020 WL 1505640, at *5 (granting intervention to RNC and Republican Party of Wisconsin).

Because DNC cannot rely on either Defendant to fully protect its distinct interests in this litigation, it satisfies the fourth requirement of Wis. Stat. § 803.09(1) and is entitled to intervention as of right. *Issa*, 2020 WL 3074351, at *4.

B. In the alternative, DNC is entitled to permissive intervention.

In addition to granting intervention as a matter of right, this Court can and should exercise its broad discretion to permit DNC to intervene. Permissive intervention is appropriate when the "movant's claim or defense and the main action have a question of law or fact in common," intervention will not "unduly delay or prejudice the adjudication of the rights of the original parties," and the motion is timely. Wis. Stat. § 803.09(2); *see also Helgeland*, 2008 WI 9, ¶¶119–20; *Sokaogon Chippewa Cmty. v. Babbitt*, 214 F.3d 941, 949 (7th Cir. 2000) ("Permissive

intervention under Rule 24(b) is wholly discretionary.”). Even when courts deny intervention as of right, they often hold that permissive intervention is appropriate. *See, e.g., City of Chi. v. Fed. Emergency Mgmt. Agency*, 660 F.3d 980, 986 (7th Cir. 2011); *Solid Waste Agency of N. Cook Cnty. v. U.S. Army Corps of Eng’rs*, 101 F.3d 503, 509 (7th Cir. 1996); *Bostelmann*, 2020 WL 1505640, at *5.

DNC readily meets the criteria for permissive intervention. The motion to intervene is timely and, given that this litigation is at a very early stage, intervention will not unduly delay or prejudice the adjudication of the original parties’ rights. DNC is also prepared to proceed in accordance with the schedule that this Court sets, and its intervention will serve to contribute to the complete development of the factual and legal issues before this Court.

V. CONCLUSION

For the reasons stated above, this Court should grant DNC’s motion to intervene as a matter of right. In the alternative, this Court should in the exercise of its discretion grant DNC permissive intervention.

Dated: February 10, 2023

Respectfully submitted,

Electronically signed by Jeffrey A. Mandell

Jeffrey A. Mandell (SBN 1100406)
jmandell@staffordlaw.com
STAFFORD ROSENBAUM LLP
222 West Washington Ave., Suite 900
Madison, WI 53701
Telephone: (608) 256-0226
Facsimile: (608) 259-2600

Carly Gerads (SBN 1106808)
cgerads@staffordlaw.com
STAFFORD ROSENBAUM LLP
1200 North Mayfair Rd., Suite 430
Milwaukee, WI 53226
Telephone: (414) 982-2881
Facsimile: (414) 982-2889

Charles G. Curtis, Jr. (SBN 1013075)
ccurtis@perkinscoie.com
PERKINS COIE LLP
33 East Main St., Suite 201
Madison, WI 53703
Telephone: (608) 663-5411
Facsimile: (608) 663-7499

John M. Devaney*
jdevaney@perkinscoie.com
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 800
Washington, D.C. 20005
Telephone: (202) 654-6200
Facsimile: (202) 654-6211

Jessica R. Frenkel*
jfrenkel@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth St., Suite 1400
Denver, CO 80202
Telephone: (303) 291-2305
Facsimile: (303) 291-2405

*Motion for Admission Pro Hac Vice
forthcoming

Attorneys for Proposed Intervenor-Defendant Democratic National Committee

CERTIFICATE OF SERVICE

I certify that, in compliance with Wis. Stat. § 801.18(6), I am electronically filing this Brief in Support of Proposed Intervenor-Defendant Democratic National Committee's Motion to Intervene with the Clerk of Court using the Wisconsin Circuit Court Electronic Filing System, which will accomplish electronic notice and service for all participants who are registered users.

Respectfully submitted this 10th day of February 2023.

Electronically signed by Jeffrey A. Mandell
Jeffrey A. Mandell (SBN 1100406)

RETRIEVED FROM DEMOCRACYDOCKET.COM