

Wisconsin Elections Commission

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Testimony of Don M. Millis on CR 24-032 Before the Joint Committee For the Review of Administrative Rules – April 21, 2025

Good afternoon. My name is Don Millis. I was appointed to the Wisconsin Elections Commission by Speaker Robin Vos in June of 2022 and was elected as chair of the Commission at the time of my appointment.

At the outset, let me explain that while I am a member of the Commission, my opinions are my own, I am not speaking on behalf of the Commission as a whole or my fellow Commissioners.

Almost as soon as I became chair, election observers and the rules that govern them came to the forefront. The aftermath of the 2020 general election prompted Republicans at the state and national level to commence a concerted effort to recruit and train election observers for the 2022 and, especially, the 2024 election. Within weeks of becoming chair of the Commission, I was approached by attorneys involved with training election observers for the Republican Pary of Wisconsin. They asked me to move the Commission to promulgate rules governing clerks, election officials and election observers. They pointed to complaints by Republican observers about the actions of some municipal clerks and election inspectors and the need to establish ground rules for clerks, chief inspectors and observers. Consequently, promulgating an election observer rule became a priority for me.

It is also worth noting that when the Legislature abolished the Government Accountability Board and replaced it with Wisconsin Election Commission, it mandated that the Commission promulgate election observer rules. 2015 Wis. Act 118, § 89.

At times the members of Commission have taken actions based on recommendations from the Election Commission staff. This rule is not one of them. For example, in working on this rule I cannot recall a single recommendation that came from the Commission's Administrator Meagan Wolfe.

The Commission knew many groups had a stake in these rules aside from Republicans and Democrats. Before putting pen to paper, the staff was directed to cast a wide net to recruit an advisory committee of disparate groups with disparate interests. We ended up with a 24-member advisory committee, with Republicans, Democrats, representatives of the Libertarian and Constitution parties, the media and other organizations such as True the

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl' | Robert Spindell | Mark L. Thomsen

Vote and Wisconsin Election Integrity Network. I believe every group that was asked to participate in fact did.

The charge to Commission staff was not to come up with a package agreed to by a majority of the advisory committee. Rather, the plan was to seek consensus where possible, but if there was disagreement, the positions of the dissenters was to be included in the report. When it later came time to put ideas on paper, the staff again consulted the advisory committee. The final product from the advisory committee was a tentative draft that included agreed upon provisions and where there was disagreement, language that represented both sides of the disagreement.

Once we had the tentative draft that contained the agreed upon provisions, as well as the competing provisions representing disagreements among the Advisory Committee, the six members of the Commission went through the rule line by line. Was there agreement on every point? No. We debated at length over many of the provisions. At the end of the day, the Commission came to an agreement and voted unanimously on March 20, 2024, to forward this rule on to the legislative clearinghouse.

The election observer statute—Wis. Stat. § 7.41—predates the Commission. As I mentioned before, when the legislature created the Commission in 2015, it recognized the need promulgate rules fleshing out the vague provisions of the observer statute. That's exactly what this rule does.

When may observers observe?

The observer statute does not say. However, the rule allows observation at the earlier of 7 a.m. or whenever the machines are zeroed out on election day through the end of voting and later to observe canvassing at the polling place. Moreover, if any observer is permitted access outside of this time frame, then all observers are permitted at the same time. Without this part of the rule, some clerks may seek to restrict the hours of observation.

What may the observer observe?

The observer statute authorizes the public to be present at any polling place, the place in the municipal clerk's public office where absentee ballots may be cast, and at an alternate site under Wis. Stat. § 6.855. The observer rule goes farther than the statute in specifying what an observer is entitled to observe. The rule allows observation of:

- 1. Each table where voters announce their names and addresses to be issued voter numbers
- 2. Each table where election officials announce the name of absentee voters.
- 3. Each table where voters register.
- 4. Each table where election inspectors remake any ballots.

The rule also explicitly allows the observers to see non-confidential voter information. Moreover, the rule allows observers to move between observation areas and requires election officials to repeat, at least once, the name and address of voters at the request of observers.

Without this rule election inspectors could direct poll workers to deny requests to repeat the name and address of a voter.

Without this rule observers could be excluded from witnessing the remaking of ballots.

Without this rule clerks and election officials may interpret the current observer law to be much more restrictive and prohibit the very access these rules explicitly provide.

What are the obligations of clerks and chief inspectors?

Among the complaints the Commission heard from observers were the excessive limitations placed on observers by some clerks. These limitations included prohibiting observers to sit on chairs and denying access to bathrooms that were available to election workers. The rule explicitly forbids these practices, and requires clerks to ensure the observation area is accessible to observers with disabilities and includes sufficient space for mobility equipment, chairs, or other disability aids brought by an observer.

If a clerk needs to limit the number of observers, the clerk must impose the same limit on all organizations' observers.

If an election official is not able to accommodate observation mandated by the rule, the official must report the reasons for noncompliance within 60 days to the Commission.

If an election official determines that there is only room for 3 observers at each table, are we okay with the official allowing 2 observers from the Democratic Party and 1 from Republican Party? Without this rule, what is to stop an election official from making such a decision?

What about the power of clerks to exclude observers?

Current law gives sweeping authority to election inspectors to control a polling place and exclude observers. Here are excerpts from Wis. Stat. § 7.37(2):

7.37(2) PRESERVE ORDER. The inspectors shall possess full authority to maintain order and to enforce obedience to their lawful commands during the election and the canvass of the votes. ... They shall enforce s. 5.35 (5) [which authorizes the "municipal clerk and election inspectors [to] prevent interference with and distraction of electors at polling places] ... If any person refuses to obey the lawful commands of an inspector, or is disorderly in the presence or hearing of the inspectors, interrupts or disturbs the

proceedings, they may order any law enforcement officer to remove the person from the voting area or to take the person into custody.

This authority is sweeping. What constitutes interruption or disturbance of proceedings? In the absence of this rule, this question will be answered by individual clerks and election officials.

This rule seeks to provide safe harbors for observers so that reasonable actions are not considered removable offenses.

What is to stop a clerk from removing an observer for moving between observations areas?

In the absence of this rule, why can't a clerk decide that asking a question of a designated election official disturbing the proceeding?

Without this rule, can a clerk order an observer removed because the observer texts or emails from a smartphone?

What about a clerk excluding observers for conversing amongst themselves?

Without this rule, observers are subject to the complete discretion of clerks.

Finally, where may observers observe?

The observer law is explicit and specific. Wis. Stat. § 7.41(2) provides in part:

... The observation areas shall be not less than 3 feet from nor more than 8 feet from the table at which electors announce their name and address to be issued a voter number at the polling place, office, or alternate site and not less than 3 feet from nor more than 8 feet from the table at which a person may register to vote at the polling place, office, or alternate site. ...

Some observer groups want the rule to permit "roaming" outside of these confines. This is one aspect of the observer statute that is very specific. The Commission lacks the authority to "modify" this portion of the statute.

In the end, we can certainly debate about whether the rule provides enough latitude and protection for observers. I do not agree with everything in the rule. But I don't want the perfect to be the enemy of the good.

Without this rule, municipal clerks have wide-ranging authority to manage polling places as they see fit. There is no reasonable argument that observers are better off without this rule.

Thank you.



Wisconsin Elections Commission

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Testimony of Ann S. Jacobs, Chair of the Wisconsin Elections Commission on CR 24-032 Before the Assembly Committee on Campaigns and Election

April 21, 2025

Good afternoon. My name is Ann Jacobs. I currently serve as Chair of the Wisconsin Elections Commission. I was appointed to the Wisconsin Elections Commission by senate minority leader Jen Schilling when the Commission was created in 2016, and I was reappointed in 2021 by senate minority leader Janet Bewely.

I am here with my fellow Commissioner Don Millis. Like him, I speak on my own behalf, and not that of my fellow Commissioners or the Commission as a whole. We are appearing together in support of this rule even though we have significant political differences and we both urge this Committee to recommend its adoption.

I was provided with a form letter that I understand may have been sent to members of this committee with concerns about the rule, and was a part of the record in front of the Assembly Committee on Campaigns and Elections. I would like to address the claims that were made in those letters (and some of those brought up in the previous hearing) as I believe they demonstrate some confusion about the rules, why the rules exist, and how they should function.

1. "Positioning of Observers is too restrictive"

The rule does not restrict observers to a single area. In fact, Observers are guaranteed the ability to be 3-8 feet from the check-in table, registration table (both in statute), and <u>also</u> 3-8 feet from the table where absentee names are read and where ballots are remade (not expressly in statute). Some poll sites may allow observation of all these

things from one location, but if they cannot all be observed from one location, they would need to have more than one observer area. See EL 4.02(16) and EL 4.03(1)(a).

2. "Observers are prohibited from observing tabulator zeroing, or being present before 7 am."

This is incorrect. This section focuses on when the zeroing of the tabulators take place, and the rule expressly allows observation of that process regardless of the hour:

EL4.05(1)(a): The designated election official shall permit an observer to observe beginning at 7 a.m. or whenever machines are zeroed out on election day, whichever is earlier.

If the zeroing takes place before 7 a.m., this rule mandates that observers must be able to be present. In practice, this will often be slightly before 7 a.m.

3. "Statute requires that Observers be permitted into the rooms of persons in care homes."

The statue applicable to voting at care facilities is Wis. Stat. § 6.875. That statute specifically states that the "home or facility shall be treated as a polling place." It does not say an individual's private room. Some individuals have disabilities that prevent them from traveling to a common area to cast their ballots. It is correct that SVD facilities are treated as polling places and observers are allowed to view the process, but even in a polling place, observers are not allowed to know who a person is voting for. This situation is most similar to a voter at a poll site who requests help from a poll worker filling out their ballot – observers are not permitted to see or hear that interaction. This clause was very important to members of our disability community who wished to maintain the privacy and dignity of residents in their residences while allowing them to exercise their right to vote.

4. "The rule limits observing ballot returns in some cases."

Prior to election day, observation is permitted during in-person absentee voting hours at those locations where that voting is taking place. If the mail carrier brings mail

through those areas, presumably an observer would see the mail carrier do so. However, observers are only entitled to observe the **public** aspects of **voting**. They do not have 24/7 access to clerk's offices or county mail rooms. They do not have the right to be seated in a clerk's office to watch returned absentee ballot envelopes be alphabetized. Nor do they have the right to demand access to every office or closet in a clerk's office or absentee voting location or central count location. A clerk may permit observation of mail delivery if the clerk so chooses, but there is nothing in statute that demands it.

5. "Observers are not permitted to take photos but members of the media are."

Media are not guaranteed *any* rights *unless* they sign in as observers. Otherwise, and only if they are <u>outside</u> of the voting area, they are able to film if permitted by the designated election official. The official has complete discretion and does not need to permit any filming. The Commission balanced the importance of First Amendment access by the press with the orderly running of poll sites.

6. "Access to restroom issues have been resolved so no rule is needed."

Observers were denied access to restrooms in one community. This basic requirement set forth in the rule protects Observers from this happening again. There are approximately 3,500 poll sites during a presidential election, each with an election official with the right to establish rules for that site. Simply because one election official agreed to not prohibit bathroom access in the future does not mean this will not come up again. Mandating this rule was an important effort to ensure Observers were treated with dignity.

7. "EL 4.03(5) is confusing."

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This rule requires that any election official who cannot accommodate observation of certain areas of a poll site must document and explain why they cannot. Again, this clause very specifically protects Observers, and provides a process whenever a limitation is placed on their ability to observe.

8. "No consequences for rogue election officials." / "No immediate recourse for observer complaints."

Without a rule such as this, there are very limited consequences for an election official who improperly interferes with observing. The statutes regarding observation are very sparse. With this rule in place, a complaint can be made to the Commission or to the clerk of the municipality regarding the actions of an election official. It is unclear what sort of "immediate" recourse is being sought, but the rule gives a complaining observer a formal basis to ask for a change in action by an election official.

9. "Observing should include both seeing and hearing."

EL 4.02(12) explicitly states: "Observe' means to see or hear ..." Thus the rule states specifically that observation includes both.

10. "Observers shouldn't have to show ID."

The photo ID requirement is minimal and is merely a minor check to ensure the person is providing their real name on the sign-in sheet: "The photo identification does not need to conform to the requirements of s. 5.02 (6m), Stats." Anything with a picture and their name would work. Observers who have driven to the site should have no difficulty in complying. While 7.41(1) does not mention ID, the requirement that observers shall sign their name permits the Commission to require some minimal assurance that the name provided is correct.

In conclusion, the proposed rule does an excellent job of ensuring that voters can vote without harassment or intimidation, while also permitting observers to watch the process. It establishes clear guidelines and creates accountability for the actions of both observers and election workers.

This is a bipartisan effort that had the input of voting advocates across the political spectrum. I urge this committee to recommend its adoption.

Testimony on Clearinghouse Rule 24-032

Joint Committee for Review of Administrative Rules
April 21, 2025

Thank you, Chairman Nass and Chairman Neylon, for the opportunity to submit testimony on Clearinghouse Rule 24-032.

As Chairman of the Assembly Committee on Campaigns and Elections, I had the opportunity to hear this rule during a public hearing on February 4, 2025. As required by statute, our committee formally reviewed the proposal. What became clear during that hearing—through both public testimony and questions from members—is that there are serious concerns with how this rule is written and what it attempts to do.

The proposed rule would make a number of changes to how election observers are treated in Wisconsin. Some of the provisions reflect current practice or internal guidance from the Wisconsin Elections Commission. Others go further and, in some cases, depart from what the law currently allows. Below is a summary of several key differences:

Observer Check-In Procedures

- Current Law: Requires observers to sign and date a log. There is no requirement to present photo identification, provide an address, or disclose organizational affiliation.
- *Proposed Rule*: Requires observers to present photo identification, and to print their full name, street address, municipality, and any organizational affiliation in the observer log. Also seeks to standardize the manner in which election officials may limit multiple observers representing the same organization.

Use of Recording Devices

- *Current Law*: Silent on the use of cameras or audio/video recordings at polling places. However, statutory provisions ensure ballot secrecy and protect confidential voter information.
- *Proposed Rule*: Explicitly prohibits photography, video, or audio recording while voting is underway. Permits such recordings during canvassing, absentee ballot tabulation, central count operations, and recounts.

Observer Conduct and Electioneering

- *Current Law*: Prohibits electioneering within or near polling places but lacks specific restrictions tailored to observer behavior beyond general authority to maintain order.
- *Proposed Rule*: Prohibits observers from displaying the name, image, or messaging related to any candidate, political party, or referendum. Additionally prohibits conversations about ballot content and actions that might suggest the observer is an election official.

Removal of Observers

- Current Law: Grants election officials broad authority to remove disruptive individuals, including observers, but does not establish a formal removal process or documentation requirement.
- Proposed Rule: Establishes a defined process for removal, including a mandatory warning, written justification, and reporting of the incident to the Wisconsin Elections Commission. If the removing official is party-affiliated, a representative from the opposing party must be given an opportunity to review and comment on the removal.

Observers in Facilities Served by Special Voting Deputies

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- Current Law: Allows one observer per major political party in the common areas of qualifying care facilities. Observers may not enter private rooms.
- Proposed Rule: Clarifies that up to two observers per major political party may be present. Confirms that observers may not enter voters' private rooms and imposes an affirmative duty on special voting deputies to safeguard ballot secrecy.

While some of these provisions might sound reasonable on paper, they raise important questions about whether they reflect legislative intent. The proposed rule creates greatly expanded requirements to be imposed statewide. The Assembly Committee on Campaigns and Elections determined that expanding the rules in such a significant manner should be subject to the full legislative process and, if it is the will of the legislature, enacted into law.

Ultimately, the rules that govern elections should be made by the legislative branch, by the officials elected to represent the people of Wisconsin—not by administrative action from an agency.

On March 11, 2024, the Assembly Committee on Campaigns and Elections formally objected to Clearinghouse Rule 24-032 under s. 227.19(4)(d), Wis. Stats., on the grounds that the rule fails to comply with legislative intent. The objection was adopted on a vote of 5–2.

I urge the committee to support this objection and reaffirm that changes to our election laws should be made by elected representatives through the legislative process. Thank you for your consideration.

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Brandtjen, Janel

From:

Brandtjen, Janel

Sent:

Monday, April 21, 2025 9:51 AM

To:

Brandtjen, Janel

Subject:

Election Observer Retaliation - Green Bay

GREEN BAY, Wis. (WLUK) -- A federal civil rights complaint is being planned against the City of Green Bay after a judge threw out a disorderly conduct citation against an election observer – claiming the city issued it as an act of retaliation.

A federal civil rights complaint is being planned against the City of Green Bay after a judge threw out a disorderly conduct citation against an election observer – claiming the city issued it as an act of retaliation. (WLUK)

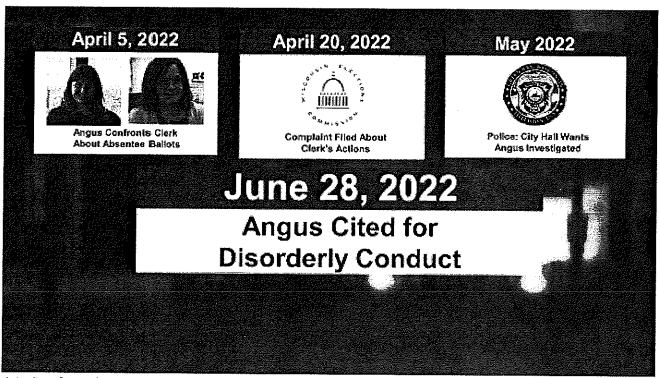
Erick Kaardal, an attorney for election observer Janet Angus, told FOX 11 the next legal actions are being taken in hopes of preventing the city from taking similar action against anyone else.

"We'll be looking at a federal civil rights complaint against the City of Green Bay," said Kaardal. "It's the worst case of retaliation that I've ever seen. Judge Hock's comments confirm that."

Kaardal has filed dozens of election integrity lawsuits for conservative groups since the 2020 election. He was also a top investigator for <u>Michael Gableman's taxpayer-funded probe</u> into the 2020 presidential election that provided no evidence of widespread fraud.

Kaardal, however, says Angus' case isn't really about election integrity.

"This is about can the city office use its prosecutorial power to go after people who are criticizing the government," said Kaardal.



A timeline of events between Janet Angus and the City of Green Bay over an April 5, 2022 incident at City Hall.

On April 5, 2022, Angus questioned City Clerk Celestine Jeffreys about accepting two absentee ballots from one person, which is only allowed when someone is turning in a ballot for a voter with a disability.

A <u>complaint about Jeffrey's actions</u> was filed with the Wisconsin Elections Commission on April 20.

A Green Bay Police Department detective says about a month after the original incident, he was told city hall called and wanted an investigation into Angus' actions.

The investigation resulted in Angus being issued a disorderly conduct citation on June 28.

Last Friday, Brown County Circuit Judge Tammy Jo Hock threw out the citation.

I don't find that Miss Angus' behavior was disorderly, but I will observe that it does appear that this municipal citation was retaliatory due to the Wisconsin Elections complaint that was filed," said Judge Hock.

"The use of law to suppress people, that is tyranny," said Kaardal. "We don't use that word much, but think about this situation where Ms. Angus was in a calm way pointing out that the government was violating the law and Clerk Jeffreys and the City of Green Bay went after her for complaining about an actual violation of law."

Green Bay City Attorney Joanne Bungert issued FOX 11 a statement.

"We respect the decision made by Brown County Circuit Court Judge Tammy Jo Hock," wrote Bungert. "The result from last week's appeal hearing was part of the judicial process. The Municipal Court found Ms. Angus guilty while the Circuit Court disagreed. The City proceeded in this case as it would in any other."

FOX 11 asked the city for a response to Kaardal's threat of a civil rights complaint, but Bungert said they had nothing else to release at this time.

In December of last year, the Wisconsin Elections Commission <u>upheld the complaint</u> filed against the city about the incident Angus questioned. The commission said there was probable cause Clerk Jeffreys violated state law.

READ THE COMMENTS (1)

Jeffreys has said city policy was corrected shortly after the incident.

ROCK COUNTY, WISCONSIN

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April 21, 2025

Joint Committee for Review of Administrative Rules:

Testimony for Public Hearing – Clearinghouse Rule CR 24-032

Chair Nass and Committee Members:

Thank you for allowing testimony today.

Clearinghouse Rule CR 24-032 - CHAPTER EL 4 ELECTION OBSERVERS

INFORMATIONAL

The Clearinghouse Rule for Election Observers provides clarification. Basically, spelling out what is already in practice.

There are a few areas where this rule would jeopardize the anonymity of a voter's ballot.

Under this chapter, observers are not allowed to create or transmit photographs, video, or audio recording of any observable location except as expressly permitted by this chapter.

EL 4.04 Conduct of observers.

 (7) No observer may create or transmit photographs, videos, or audio recordings of any observable location except as expressly permitted by this chapter.

My concern is where this rule (Chapter EL 4) permits observers to create or transmit photographs, videos, or audio recordings. Those locations are at the Board of Absentee Canvassers, Recounts and Central Count locations.

Under §7.52(3)(a) ...The board of absentee ballot canvassers shall mark the poll list number of each elector who casts an absentee ballot on the back of the elector's ballot... That poll list number is also listed on the absentee ballot log next to the voter's name and the voter's absentee envelope. Absentee ballot logs can be requested from the municipality or the county. All of these items can be requested as a public record. If an image of ballot with a voter number is obtained, then how an elector voted their ballot can be determined.

When clerks receive public records requests for ballot images with poll list numbers listed on the ballots, we redact those numbers before the images are released to protect our voters.

If an observer is allowed to record a ballot with a poll list number on it, then the anonymity of that ballot is lost.

I recommend adding language to not allow an observer to create or transmit photographs, videos, or audio recordings when ballots marked with poll list numbers are viewable to protect the anonymity of our electors' ballots.

After the April 2024 Spring Election, Rock County had two recounts. Both were County Supervisory races involving the City of Beloit. The City of Beloit uses Central Count to process their absentee ballots. They mark the poll list numbers on the back of their ballots. During the recounts, we allowed recording of the process until we began reviewing the election materials from Central Count. We required anyone video recording to stop explaining the need to protect the anonymity of our voters. Those present agreed and stopped recording to protect our voters.

Thank you for your consideration,

Lisa Tollefson

TO:

Chairman Nass, Chairman Neylan, and Committee Members

Joint Committee for Review of Administrative Rule

DATE: April 21, 2025

Good afternoon,

Chairman Nass, Chairman Neylan, and Committee Members – thank you for the opportunity to speak before you today.

My name is Lorri Pickens, and I am here representing myself as an elector residing in Wisconsin as well as an active participant in the WI Election Integrity Network Coalition, a group whose sole focus is on ensuring our elections are conducted in accordance with state and federal statutes.

I respectfully request that you oppose the adoption of both the proposed Clearinghouse Rule 24-032 Relating to the conduct, regulation, and accommodation of election observers and Clearinghouse Rule 24-043 Relating to the certification and training of municipal clerks.

Clearinghouse Rule 24-032 - Observer Rules:

There are no Federal laws on election observers, yet Wisconsin Elections Commission is proposing 14 pages of rules not laws, for observers who only have the power to object or call an attorney in the event they witnesses a process, a ballot, or election operation that they believe may not be lawfully executed.

Multiple WEC meetings were held on observer rules that really only dealt with how close observers can get and did not address transparency concerns that have been raised.

And despite the multiple meetings held, WEC did not provide any protection for observers in the event clerks act inappropriately. Clerks are being given superpowers which can lead to the arrest of election observers and potential criminal charges without the observers having any ability to defend themselves - they do not even have the ability to record how clerks interact with observers or conduct their election duties.

And none of these rules deal with guaranteeing full access to observe, especially when observers were kept from viewing specific locations and processes at MKE central count.

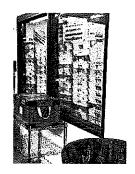
I went to Milwaukee Central Count on February 18, 2025, for the spring primary election where I witnessed the window to the room in the front of the building where absentee ballots are delivered was covered with a blue tarp. When I inquired about it, I was told that the receiving of incoming absentee ballots was an administrative process, and that the public was not entitled to observe.

I went back to Milwaukee Central Count on April 1, 2025, for the spring general election, and this time the tarp was removed, but replaced with a frosted window and a poster over it. And this time, the room where absentee ballots are sorted by districts was not observable as one of the windows was obstructed by stacked postal bins and the other window was frosted over with paint.

An increasing number of Americans distrust the outcome of our elections – it doesn't matter whether or not that distrust is based on perception or reality. There is no legitimate reason that Milwaukee Central Count would obstruct the view of incoming absentee ballots nor the sorting process of those ballots. It only adds to the distrust of our election process.









Pictures left to right: MKE Central Count 2/18/25 Absentee Ballot receiving room window; MKE Central Count 4/1/25 Absentee Ballot receiving room window; MKE Central Count 4/1/25 Absentee Ballot sorting room windows.

Clearinghouse Rule 24-043 Clerk training

WEC missed so many opportunities to determine what training is needed, how to handle interim clerks, and vacancy questions.

The way the proposed rule reads is that WEC will notify clerks of training deficiencies. After the election is over? WEC will tell (someone) not sure who, AFTER the election that they aren't certified. WEC will notify the top elected official.

- Who's the top elected official municipal clerks run the local elections and are appointed by a town board, a mayor, or a city manager. Does WEC mean the county clerk, county board, common council?
- Who is accountable and what does accountability look like?

Elections are the hallmark of our great Republic, and as such should be held to the highest standard of integrity. The public is owed that much, yet we find instances which lack transparency, accountability, and adequate training in our Wisconsin elections.

Our municipal clerks bear a great burden and are put on an island without adequate support and resources to do a job that on paper represents maybe 20% of their responsibilities but requires 80% of their attention.

We can and must do better!

Thank you for your time and consideration.

Lorri Pickens lorri.pickens@gmail.com