

**STATE OF WISCONSIN
BEFORE THE ELECTIONS COMMISSION**

Glen Hogan, Joanne Lensing,
and David A. VanderLeest

Complainants,

v.

Celestine Jeffreys, in her capacity as
Clerk for the City of Green Bay

Respondent.

COMPLAINANTS' REPLY

Complainants submit the following reply in response to Respondent Celestine Jeffreys's Response (dated April 29, 2024), and in support of their Complaint:

In her response, Clerk Jeffreys concedes that she does not comply with the requirements of Wisconsin Statutes Section 6.56 concerning undeliverable EDR postcards. *See* Response at 3. Clerk Jeffreys also states that she "does not oppose Complainants' first request for relief," Response at 3, which is the following: "That Clerk Jeffreys be directed to conform her conduct to the law as described in Wis. Stat. § 6.56(3) and the EDR Guidance," Complaint at 10, Prayer for Relief, para. A.

Accordingly, Complainants request that WEC issue an order (1) finding that Clerk Jeffreys has violated Wis. Stat. § 6.56(3) and the EDR Guidance, and (2) ordering Clerk Jeffreys to conform her conduct to the law as described in Wis. Stat. § 6.56(3) and the EDR Guidance.

Complainants shall waive any entitlement they may have to recover costs and fees incurred in bringing this matter.

Dated this 15th day of May, 2024.

CRAMER MULTHAUF LLP
Attorneys for Complainants,

BY: Electronically signed by Matthew M. Fernholz
MATTHEW M. FERNHOLZ
(State Bar No. 1065765)

CRAMER MULTHAUF LLP
1601 East Racine Avenue • Suite 200
P.O. Box 558
Waukesha, WI 53187-0558
(262) 542-4278
mmf@cmlawgroup.com

PUBLIC INTEREST LEGAL FOUNDATION, INC.
Attorneys for Complainants,

BY: Electronically signed by Noel H. Johnson
NOEL H. JOHNSON
(State Bar No. 1068004)

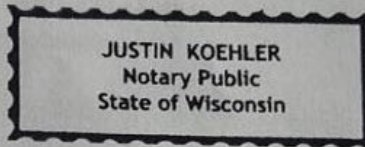
Public Interest Legal Foundation, Inc.
107 S. West Street, Suite 700
Alexandria, VA 22314
Tel. (703) 745-5870
njohnson@PublicInterestLegal.org

The Complainant, David VanderLeest, being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

David VanderLeest
Complainant

Subscribed and sworn to before me
this 14th day of May, 2024.

Justin Koehler
Notary Public, State of Wisconsin




My commission expires 2-18-2028

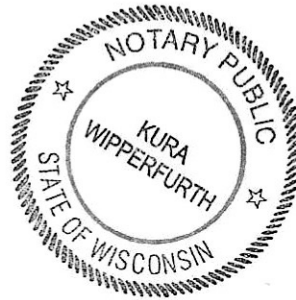
The Complainant, Allen L. Hogan being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

Complainant

Subscribed and sworn to before me
this 13th day of May, 2024.


Notary Public, State of Wisconsin

My commission expires 4-7-2026



The Complainant, Joanne Lensing, being first duly sworn, states that he has personally read the above document, and that the above allegations are based on information and belief and the complainant believes them to be true to the best of his knowledge.

Joanne Lensing
Complainant

Subscribed and sworn to before me
this 13th day of May, 2024.

Connie Behrendt
Notary Public, State of Wisconsin
My commission expires 08/03/2026
County of Brown

