



October 30, 2024

Wisconsin Election Commission
201 W Washington Ave
Madison, WI 53703

VIA Email: ELECTIONS@WI.GOV

Re: Complaint Alleging Potential Efforts to Commit Fraud or Corruption in the Voting Process

CPAC files this Complaint pursuant to Wis. Stat. § 5.05, Wis. Admin. Code § EL 2.07, and other Wisconsin laws governing elections and election campaigns. CPAC is an entity that seeks to preserve and protect the values of life, liberty, and property for every American. As part of its efforts to ensure elections are free and fair, CPAC submits this Complaint alleging potential efforts to commit fraud or corruption in the voting process by an unknown individual.

CPAC received reports of illicit ballot harvesting as outlined in the sworn declaration attached (Exhibit A). On October 25, 2024, at approximately 7:55 pm, Declarant witnessed an individual that appeared to empty the contents of a bag into the dropbox outside of the City Hall dropbox location at 200 E. Wells Street, Milwaukee, WI 53202.

Ballot harvesting is illegal under Wisconsin law. Wisconsin statute requires that completed absentee ballots be "mailed by the elector, or delivered in person, to the municipal clerk issuing the ballot or ballots" unless the elector is disabled. Wis. Stat. § 6.87(4)(b)1. CPAC believes the facts provided establish probable cause to believe a violation of Wisconsin law has occurred and urges the Wisconsin Election Commission to promptly investigate these allegations.

Exhibit A

STATE OF WISCONSIN


WISCONSIN ELECTIONS COMMISSION

THE MATTER OF:
POTENTIAL EFFORTS TO COMMIT FRAUD
OR CORRUPTION IN THE VOTING PROCESS

STATE OF WISCONSIN)
)
COUNTY OF MILWAUKEE COUNTY)

[REDACTED] declares as follows under penalty of perjury:

1. I am over 18 years of age.
2. I am an elector in the state of Wisconsin.
3. I resided at **[REDACTED]**.
4. I have personal knowledge of the matters set forth herein, and if called as a witness, I could and would testify competently as to the truth of such matters.
5. On October 25, 2024, at approximately 7:55 pm, I witnessed an individual who appeared to deposit a bag full of absentee ballots into a dropbox.
6. It is my understanding that ballot trafficking is a violation of Wisconsin state law and that each elector must deliver their own absentee ballot unless the elector is disabled.
7. I was sitting in my car with my son outside of the City Hall dropbox location at 200 E. Wells Street, Milwaukee, WI 53202.
8. An individual approached the dropbox carrying two bags.
9. One of the bags was a drawstring backup. The other bag was a large green bag with a zipper on the top.

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10. The green bag appeared to be full. I would estimate that the green bag could hold between 50 and 500 absentee ballots.
 11. The individual walked up to the drop box and reached. into the green bag at least five times to empty the contents of his bag into the dropbox.
 12. While walking away from the dropbox, I watched the individual fold up the now empty green bag and proceed to put it in the drawstring backup.
 13. When the individual realized I was watching and taking pictures, the individual sprinted away.
 14. I have attached four photos of the individual I was able to capture (Exhibit A).

