

Appendix of Challenges Received by 3 p.m. 1/10/25

Appendix 1: Jennifer Weber v. Cortney Iverson (EL 25-4)

Appendix 2: Theresa Beck v. Cortney Iverson (EL 25-5)

JENNIFER L. WEBER

W155 Hillendale Drive
Oconomowoc, WI 53066
Jennifer.weber0610@gmail.com
Tele: 414-313-5700

January 9, 2025

Wisconsin Elections Commission
PO Box 7984
Madison, WI 53707-7984

Sent via Email to: Elections@wi.gov

Dear Commissioners:

Please find enclosed the verified complaint regarding eligibility for ballot access for Jefferson County Circuit Court Br. 2, candidate Cortney J. Iverson. All relevant documentation has been attached to the complaint. The basis for the complaint is that Ms. Iverson fails to meet the eligibility requirement for the position of Circuit Court Judge as she will not have been an attorney licensed to practice law in the State of Wisconsin for the immediately preceding 5 years to the election scheduled for April 1, 2025.

A copy of the verified complaint has been mailed to Cortney J. Iverson at the address listed on her Declaration of Candidacy.

Thank you for your attention to this matter.

Respectfully Submitted,



Jennifer L. Weber

cc: Cortney J. Iverson

**STATE OF WISCONSIN
BEFORE THE ELECTIONS COMMISSION**

The Complaint of: Eligibility of Candidacy of Cortney J. Iverson

Jennifer L. Weber
W155 Hillendale Drive
Oconomowoc, WI 53066,
Complainant

Against

Cortney J. Iverson
W9211 Red Feather Drive
Cambridge, WI 53523,
Respondent.

This complaint is under Wis. Stats. 5.02, Wis. Stats 8.21, Wis. Stats. 8.30(1)(c) and the Wisconsin Constitution, Article VII, Sections 7, 10, and 24.


I, Jennifer L. Weber, alleges that:

1. The Complainant, Jennifer L. Weber, is an adult resident, residing at W155 Hillendale Drive in the Town of Ixonia, Jefferson County, Wisconsin.
2. The Respondent, Cortney J. Iverson, is an adult resident, residing at W9211 Red Feather Drive in the Town of Oakland, Jefferson County, Wisconsin.
3. The Declaration of Candidacy is a sworn statement stating the candidate meets or will meet at the time office is assumed the applicable age, citizenship, residency and voting qualification requirements, if any prescribed by the constitutions and laws of the United States and the State of Wisconsin, and that the candidate will otherwise qualify for office, if nominated and elected, Wis. Stats. 8.21.
4. Pursuant to The Constitution of the State of Wisconsin, section 24(1), to be eligible for the office of supreme court justice or judge of any court of record, a person must be an attorney licensed to practice law in this state and have been so licensed for 5 years immediately prior to election or appointment.
5. Wisconsin Statute sec. 5.02(4) mean every public primary and election.
6. The Wisconsin Elections Commission issued a Notice of Spring Election on November 15, 2024. The Notice states an election is to be held in the towns, villages, cities, wards, and election districts of the State of Wisconsin, on Tuesday, April 1, 2025 and includes the judicial officers in Jefferson County Circuit Court, Br. 2.

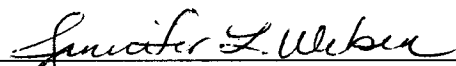
7. Cortney J. Iverson filed a Declaration of Candidacy with the Wisconsin Elections Commission on January 6, 2025.
8. Based upon information and belief, Cortney J. Iverson graduated from University of Wisconsin Law School in 2020.
9. Based upon information and belief, the Wisconsin State Bar records indicate her date of admission to practice law in the State of Wisconsin on May 27, 2020. The Clerk of the Wisconsin Supreme Court confirmed the date of admission to practice law in the State of Wisconsin as May 27, 2020.
10. At the time of the election for judicial officer of Jefferson County Circuit Court, Br. 2 on April 1, 2025, Cortney J. Iverson is not eligible for the office of judge of Jefferson County as she fails to meet the eligibility requirement. Cortney J. Iverson is ineligible as she has not been an attorney licensed to practice law in this state for 5 years immediately prior to election on April 1, 2025.
11. Pursuant to Wis. Stats. 8.30(1), the Wisconsin Elections Commission may refuse to place the candidate's name on the ballot if the candidate is ineligible to be nominated or elected or if the candidate could not qualify because of age, residence, or other impediment.

The facts set forth above in the complaint establish probable cause to believe that a violation occurred and that Cortney J. Iverson shall be denied ballot access as she is not eligible for the position.

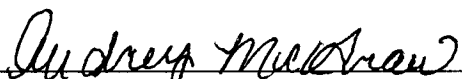
Dated this 9th day of January, 2025.

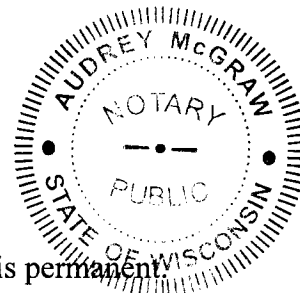

 Jennifer L. Weber

I, Jennifer L. Weber, being first duly sworn on oath state that I personally read the above complaint, and that the above allegations are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.


 Jennifer L. Weber

State of Wisconsin
 County of Jefferson
 Sworn to before me this 9th day of January, 2025


 Notary Public, State of Wisconsin
 My commissioner expires 6/5/2027 or _____ is permanent.



8.21 Declaration of candidacy.

- (1) Each candidate, except a candidate for presidential elector under s. 8.20 (2) (d), shall file a declaration of candidacy, no later than the latest time provided for filing nomination papers under s. 8.10 (2) (a), 8.15 (1), 8.20 (8) (a) or 8.50 (3) (a), or the time provided under s. 8.16 (2) or 8.35 (2) (c). A candidate shall file the declaration with the officer or agency with which nomination papers are filed for the office that the candidate seeks, or if nomination papers are not required, with the clerk or board of election commissioners of the jurisdiction in which the candidate seeks office.
- (2) The declaration of candidacy shall be sworn to before any officer authorized to administer oaths. The declaration shall contain the name of the candidate in the form specified under s. 8.10 (2) (b) for candidates for nonpartisan office or s. 8.15 (5) (a) or 8.20 (2) (a) for candidates for partisan office and shall state all of the following:
 - (a) That the signer is a candidate for a named office.
 - (b) That the signer meets, or will at the time he or she assumes office meet, applicable age, citizenship, residency, or voting qualification requirements, if any, prescribed by the constitutions and laws of the United States and of this state.
 - (c) That the signer will otherwise qualify for office if nominated and elected.
- (3) The declaration of candidacy shall include the candidate's name in the form in which it will appear on the ballot.
- (4) Each candidate for state and local office shall include in the declaration of candidacy all of the following:
 - (a) A statement that the candidate has not been convicted of any misdemeanor designated under state or federal law as a violation of the public trust or any felony for which the candidate has not been pardoned.
 - (b) A statement that discloses the candidate's municipality of residence for voting purposes, and the street and number, if any, on which the candidate resides.
- (5) The declaration of candidacy is valid with or without the seal of the officer who administers the oath.
- (6) A candidate for state or local office shall file an amended declaration of candidacy under oath with the same officer or agency if any information contained in the declaration of candidacy changes at any time after the original declaration of candidacy is filed and before the candidate assumes office or is defeated for election or nomination.

History: 1983 a. 484 s. 94; 1985 a. 304; 1987 a. 391; 1993 a. 140; 1999 a. 182; 2001 a. 109; 2005 a. 149.

Cross-reference: See also s. EL 6.04, Wis. adm. code.

A candidate for election to Congress need not be a resident of the district at the time he or she files nomination papers and executes the declaration of intent to accept the office if elected. A candidate for Congress must be an inhabitant of the state at the time of election. 61 Atty. Gen. 155.

Declaration of Candidacy

(See instructions for preparation on back)

FOR OFFICE USE ONLY

Is this an amendment?

Yes (if you have already filed a DOC for this election)

No (if this is the first DOC you have filed for this election)

I, Cortney Iverson, being duly sworn, state that
Candidate's name

I am a candidate for the office of Jefferson County Circuit Court Judge, Branch 2
Official name of office - Include district, branch or seat number

representing _____
If partisan election, name of political party or statement of principle - five words or less (Candidates for nonpartisan office may leave blank.)

and I meet or will meet at the time I assume office the applicable age, citizenship, residency and voting qualification requirements, if any, prescribed by the constitutions and laws of the United States and the State of Wisconsin, and that I will otherwise qualify for office, if nominated and elected.

I have not been convicted of a felony in any court within the United States for which I have not been pardoned.¹

My present address, including my municipality of residence for voting purposes is:

W9211	Red Feather Dr.	Cambridge, WI	53523	Town of <input checked="" type="checkbox"/>	Oakland
House or fire no.	Street Name	Mailing Municipality and State	Zip code	Village of <input type="checkbox"/>	
				City of <input type="checkbox"/>	

My name as I wish it to appear on the official ballot is as follows:

Cortney J. Iverson

(Any combination of first name, middle name or initials with surname. A nickname may replace a legal name.)

Cortney J. Iverson
(Signature of candidate)

STATE OF WISCONSIN

County of Dane
(County where oath administered)

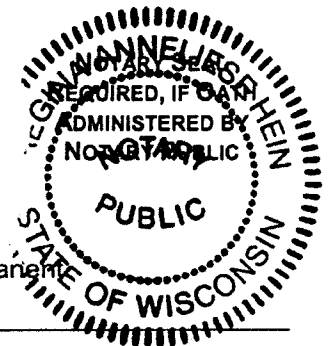
ss.

Subscribed and sworn to before me this 6th day of January, 2025.

Regina Anneliese Hein
(Signature of person authorized to administer oaths)

Notary Public or other official _____
(Official title, if not a notary)

If Notary Public: My commission expires 8/20/27 or is permanent



The information on this form is required by Wis. Stat. § 8.21, Art. XIII, Sec. 3, Wis. Const., and must be filed with the filing officer in order to have a candidate's name placed on the ballot. Wis. Stats. §§ 8.05 (1)(j), 8.10 (5), 8.15 (4)(b), 8.20 (6), 120.06 (6)(b), 887.01.

EL-162 | Rev. 2019-08 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984
608-266-8005 | web: elections.wi.gov | email: elections@wi.gov

¹ A 1996 constitutional amendment bars any candidate convicted of a misdemeanor which violates the public trust from running for or holding a public office. However, the legislature has not defined which misdemeanors violate the public trust. A candidate convicted of any misdemeanor is not barred from running for or holding a public office until the legislature defines which misdemeanors apply.

Justices and judges: eligibility for office; retirement. SECTION 24. [As created April 1955 and amended April 1968 and April 1977] (1) To be eligible for the office of supreme court justice or judge of any court of record, a person must be an attorney licensed to practice law in this state and have been so licensed for 5 years immediately prior to election or appointment.

(2) Unless assigned temporary service under subsection (3), no person may serve as a supreme court justice or judge of a court of record beyond the July 31 following the date on which such person attains that age, of not less than 70 years, which the legislature shall prescribe by law.

(3) A person who has served as a supreme court justice or judge of a court of record may, as provided by law, serve as a judge of any court of record except the supreme court on a temporary basis if assigned by the chief justice of the supreme court. [1953 J.R. 46, 1955 J.R. 14, vote April 1955; 1965 J.R. 101, 1967 J.R. 22 and 56, vote April 1968; 1975 J.R. 13, 1977 J.R. 7, vote April 1977]

ARTICLE VIII.

FINANCE

Rule of taxation uniform; income, privilege and occupation taxes. SECTION 1. [As amended Nov. 1908, April 1927, April 1941, April 1961, and April 1974] The rule of taxation shall be uniform but the legislature may empower cities, villages or towns to collect and return taxes on real estate located therein by optional methods. Taxes shall be levied upon such property with such classifications as to forests and minerals including or separate or severed from the land, as the legislature shall prescribe. Taxation of agricultural land and undeveloped land, both as defined by law, need not be uniform with the taxation of each other nor with the taxation of other real property. Taxation of merchants' stock-in-trade, manufacturers' materials and finished products, and livestock need not be uniform with the taxation of real property and other personal property, but the taxation of all such merchants' stock-in-trade, manufacturers' materials and finished products and livestock shall be uniform, except that the legislature may provide that the value thereof shall be determined on an average basis. Taxes may also be imposed on incomes, privileges and occupations, which taxes may be graduated and progressive, and reasonable exemptions may be provided. [1905 J.R. 12, 1907 J.R. 29, 1907 c. 661, vote Nov. 1908; 1925 J.R. 62, 1927 J.R. 13, vote April 1927; 1939 J.R. 88, 1941 J.R. 18, vote April 1941; 1959 J.R. 78, 1961 J.R. 13, vote April 1961; 1971 J.R. 39, 1973 J.R. 29, vote April 1974]

Appropriations; limitation. SECTION 2. [As amended Nov. 1877] No money shall be paid out of the treasury except in pursuance of an appropriation by law. No appropriation shall be made for the payment of any claim against the state except claims of the United States and judgments, unless filed within six years after the claim accrued. [1876 J.R. 7, 1877 J.R. 4, 1877 c. 158, vote Nov. 1877]

Credit of state. SECTION 3. [As amended April 1975] Except as provided in s. 7 (2) (a), the credit of the state shall never be given, or loaned, in aid of any individual, association or corporation. [1973 J.R. 38, 1975 J.R. 3, vote April 1975]

Contracting state debts. SECTION 4. The state shall never contract any public debt except in the cases and manner herein provided.

Annual tax levy to equal expenses. SECTION 5. The legislature shall provide for an annual tax sufficient to defray the estimated expenses of the state for each year; and whenever the expenses of any year shall exceed the income, the legislature shall provide for levying a tax for the ensuing year, sufficient, with other sources of income, to pay the deficiency as well as the estimated expenses of such ensuing year.

Public debt for extraordinary expense; taxation. SECTION 6. For the purpose of defraying extraordinary expenditures the state may contract public debts (but such debts shall never in the aggregate exceed one hundred thousand dollars). Every such debt shall be authorized by law, for some purpose or purposes to be distinctly specified therein; and the vote of a majority of all the members elected to each house, to be taken by yeas and nays, shall be necessary to the passage of such law; and every such law shall provide for levying an annual tax sufficient to pay the annual interest of such debt and the principal within five years from the passage of such law, and shall specially appropriate the proceeds of such taxes to the payment of such principal and interest; and such appropriation shall not be repealed, nor the taxes be postponed or diminished, until the principal and interest of such debt shall have been wholly paid.

Public debt for public defense; bonding for public purposes. SECTION 7. [As amended April 1969, April 1975, and April 1992] (1) The legislature may also borrow money to repel invasion, suppress insurrection, or defend the state in time of war; but the money thus raised shall be applied exclusively to the object for which the loan was authorized, or to the repayment of the debt thereby created.

(2) Any other provision of this constitution to the contrary notwithstanding:

(a) The state may contract public debt and pledges to the payment thereof its full faith, credit and taxing power:

1. To acquire, construct, develop, extend, enlarge or improve land, waters, property, highways, railways, buildings, equipment or facilities for public purposes.

2. To make funds available for veterans' housing loans.

(b) The aggregate public debt contracted by the state in any calendar year pursuant to paragraph (a) shall not exceed an amount equal to the lesser of:

1. Three-fourths of one per centum of the aggregate value of all taxable property in the state; or

2. Five per centum of the aggregate value of all taxable property in the state less the sum of: a. the aggregate public debt of the state contracted pursuant to this section outstanding as of January 1 of such calendar year after subtracting therefrom the amount of sinking funds on hand on January 1 of such calendar year which are applicable exclusively to repayment of such outstanding public debt and, b. the outstanding indebtedness as of January 1 of such calendar year of any entity of the type described in paragraph (d) to the extent that such indebtedness is supported by or payable from payments out of the treasury of the state.

(c) The state may contract public debt, without limit, to fund or refund the whole or any part of any public debt contracted pursuant to paragraph (a), including any premium payable with respect thereto and any interest to accrue thereon, or to fund or refund the whole or any part of any indebtedness incurred prior to January 1, 1972, by any entity of the type described in paragraph (d), including any premium payable with respect thereto and any interest to accrue thereon.

(d) No money shall be paid out of the treasury, with respect to any lease, sublease or other agreement entered into after Jan-

5.02 Definitions. In chs. 5 to 12, unless the context requires otherwise:

- (1c)** “Automatic tabulating equipment” means apparatus which automatically examines and counts votes recorded on ballots or voting machines and tabulates the results.
- (1e)** “Ballot” means a ballot label, sheet of paper or envelope on which votes are recorded. The term also includes a sheet or card, filmstrip or other device listing or containing information relative to offices, candidates and referenda which is placed, projected or composed on the board or screen inside a voting machine.
- (1q)** “Block” means an area which is the smallest geographic area used by the U.S. bureau of the census for data collection and tabulation.
- (2)** “County clerk” includes the executive director of the county board of election commissioners and their authorized representatives.
- (3)** “Educational officer” means the state superintendent and school board members.
- (3m)** “Elected official” means an individual who is elected to a national, state or local office.
- (4)** “Election” means every public primary and election.
- (4c)** “Election district” means a municipality that is not divided into wards, except as otherwise provided in s. 8.17 (1) (b).
- (4e)** “Election official” means an individual who is charged with any duties relating to the conduct of an election.
- (4g)** “Election registration official” means an election official assigned under s. 6.28 (1) (a) or 7.30 to register electors.
- (4m)** “Electronic voting system” means a system in which votes are recorded on ballots, and the votes are subsequently counted and tabulated by automatic tabulating equipment. The term also includes a voting machine on which votes are recorded and tabulated by electronic means.
- (4s)** “Federal election” means any election at which a national office appears on the ballot.
- (4v)** For purposes of chs. 5 to 10 and 12, “filing officer” means the following:
- (a)** For a candidate for state office, as defined in sub. (23), the elections commission.
 - (b)** For a candidate seeking local office, the clerk of the most populous jurisdiction for which the candidate seeks office.
 - (c)** For a candidate for municipal judge elected under s. 755.01 (4), the county clerk or board of election commissioners of the county having the largest portion of the population in the jurisdiction served by the judge.
 - (d)** For a candidate for school board member, the school district clerk.
- NOTE: Sub. (4v) is created eff. 7-1-25 by 2023 Wis. Act 126.**
- (5)** “General election” means the election held in even-numbered years on the Tuesday after the first Monday in November to elect United States senators, representatives in congress, presidential electors, state senators, representatives to the assembly, district attorneys, state officers other than the state superintendent and judicial officers, and county officers other than supervisors and county executives.
- (6)** “Governing body” means the common council of a city, board of supervisors of a town or board of trustees of a village.
- (6m)** “Identification” means any of the following documents issued to an individual:
- (a)** One of the following documents that is unexpired or if expired has expired after the date of the most recent general election:
 1. An operator’s license issued under ch. 343.
 2. An identification card issued under s. 343.50.
 3. An identification card issued by a U.S. uniformed service.
 4. A U.S. passport.
 - (b)** A certificate of U.S. naturalization that was issued not earlier than 2 years before the date of an election at which it is presented.
 - (c)** An unexpired driving receipt under s. 343.11.
 - (d)** An unexpired identification card receipt issued under s. 343.50.
 - (e)** An identification card issued by a federally recognized Indian tribe in this state.

(f) An unexpired identification card issued by a university or college in this state that is accredited, as defined in s. 39.30 (1) (d), or by a technical college in this state that is a member of and governed by the technical college system under ch. 38, that contains the date of issuance and signature of the individual to whom it is issued and that contains an expiration date indicating that the card expires no later than 2 years after the date of issuance if the individual establishes that he or she is enrolled as a student at the university or college on the date that the card is presented.

NOTE: In *Luft v. Evers*, 963 F.3d 665 (2020), the U.S. Court of Appeals for the 7th Circuit affirmed the judgment in *One Wisconsin Institute, Inc. v. Thomsen*, 198 F. Supp. 3d 896 (2016), that “the student-ID provision is invalid” on the alternative ground that the restriction that a student ID card “is not sufficient for voting unless the student also shows proof of current enrollment” is unconstitutional.

(g) An unexpired veterans identification card issued by the veterans health administration of the federal department of veterans affairs.

(7) “Judge” means a court of appeals judge or a judge of a circuit court.

(8) “Justice” means a justice of the supreme court.

(8m) “Labor organization” means any employee organization in which employees participate and which exists primarily for the purpose of engaging in collective bargaining with any employer concerning grievances, labor disputes, wages, hours or conditions of employment, or the promotion and advancement of the professional or occupational standards and the welfare of its members and families and any organization established for the same purposes composed of individuals or affiliates of any such employee organization.

(9) “Local office” means any elective office other than a state or national office.

(10) “Municipal clerk” means the city clerk, town clerk, village clerk and the executive director of the city election commission and their authorized representatives. Where applicable, “municipal clerk” also includes the clerk of a school district.

(11) “Municipality” means city, town or village.

(12) “National office” means the offices of president and vice president of the United States, U.S. senator and representative in congress.

(12m) “Nickname” means a familiar or shortened form of a proper name by which an individual is commonly known.

(12n) “Overseas elector” means a U.S. citizen who is residing outside of the United States, who is not disqualified from voting under s. 6.03, who has attained or will attain the age of 18 by the date of an election at which the citizen proposes to vote, who was last domiciled in this state or whose parent was last domiciled in this state immediately prior to the parent’s departure from the United States, and who is not registered to vote or voting in any other state, territory, or possession.

(12s) “Partisan primary” means the primary held the 2nd Tuesday in August to nominate candidates to be voted for at the general election.

(13) “Political party” has the meaning given in s. 11.0101 (26).

(14) “Poll list” means the list which is compiled by election officials on election day showing the names and addresses of electors who actually cast votes in an election.

(15) “Polling place” means the actual location wherein the elector’s vote is cast.

(16) “Primary” means a primary election.

(16c) “Proof of identification” means identification that contains the name of the individual to whom the document was issued, which name conforms to the individual’s voter registration form, if the individual is required to register to vote, and that contains a photograph of the individual, except as authorized in s. 343.14 (3m) or 343.50 (4g).

(16g) “Qualified circulator” means a qualified elector of this state or any U.S. citizen age 18 or older who, if he or she were a resident of this state, would not be disqualified from voting under s. 6.03.

(16m) “Recognized political party” means a political party which qualifies for a separate ballot or column under s. 5.62 (1) (b) or (2).

(16s) “Referendum” means an election at which an advisory, validating or ratifying question is submitted to the electorate.

(17) “Registration list” means the list of electors who are properly registered to vote.

(19) “Special election” means any election, other than those described in subs. (5), (12s), (21), and (22), to fill vacancies or to conduct a referendum.

- (20)** “Special primary” means the primary held 4 weeks before the special election except when the special election is held on the same day as the general election the special primary shall be held on the same day as the general primary or if the special election is held concurrently with the spring election, the primary shall be held concurrently with the spring primary.
- (20g)** “Special purpose district” means any local governmental unit other than a county or municipality.
- (20r)** “Special referendum” means any referendum held at a special election which is not held concurrently with the elections described in sub. (5), (12s), (21), or (22).
- (21)** “Spring election” means the election held on the first Tuesday in April to elect judicial, educational and municipal officers, nonpartisan county officers and sewerage commissioners and to express preferences for the person to be the presidential candidate for each party in a year in which electors for president and vice president are to be elected.
- (22)** “Spring primary” means the nonpartisan primary held on the 3rd Tuesday in February to nominate nonpartisan candidates to be voted for at the spring election.
- (23)** “State office” means the offices of governor, lieutenant governor, secretary of state, state treasurer, attorney general, state superintendent, justice of the supreme court, court of appeals judge, circuit court judge, state senator, state representative to the assembly and district attorney.
- (24)** “State superintendent” means the state superintendent of public instruction.
- (24g)** “Voting device” means an apparatus other than a voting machine which the elector uses to record his or her votes on a ballot.
- (24r)** “Voting machine” means a machine which serves in lieu of a voting booth and which mechanically or electronically records the votes cast by electors, who depress levers or buttons located next to the choices listed on a ballot to cast their votes.
- (24w)** “Voting system” means:
- (a)** The total combination of mechanical, electromechanical, or electronic equipment, including the software, hardware, and documentation required to program, control, and support the equipment, that is used to define ballots, to cast and count votes, to report or display election results, and to maintain and produce any audit trail information.
- (b)** The practices and associated documentation for any of the following purposes:
1. To identify equipment components and versions of such components.
 2. To test the equipment during its development and maintenance.
 3. To maintain records of equipment errors and defects.
 4. To determine specific equipment changes to be made after the initial qualification of the equipment.
 5. To make available any materials to an elector.
- (25)** “Ward” means a town, village or city subdivision created for the convenience of the electors therein and to facilitate the division of such municipalities into election districts of substantially equal population numbers along common boundaries observing the community of interest of existing neighborhoods and other settlements.

History: 1971 c. 211; 1971 c. 304 ss. 2, 29 (2); 1973 c. 280, 334; 1975 c. 93; 1977 c. 107, 187, 394; 1977 c. 427 ss. 3 to 14; 1977 c. 449; 1979 c. 32, 89, 221; 1979 c. 260 ss. 1m, 73 to 75; 1979 c. 311, 328; 1981 c. 4, 391; 1983 a. 484 ss. 5, 5c, 124m, 128; 1985 a. 303; 1985 a. 304 ss. 1m, 2, 155; 1987 a. 391 ss. 1 to 1r, 66w; 1989 a. 31; 1991 a. 5; 1993 a. 140, 184; 1995 a. 16 s. 2; 1995 a. 27 s. 9145 (1); 1995 a. 219; 1997 a. 35; 2001 a. 16, 109; 2003 a. 24, 265; 2005 a. 177, 451; 2007 a. 1; 2009 a. 397; 2011 a. 23, 32, 45, 75; 2013 a. 165; 2015 a. 117, 118, 261; 2017 a. 369; 2023 a. 126; s. 35.17 correction in (4v) (a).

Municipal clerks are the officials primarily responsible for election administration in Wisconsin. A “board of election commissioners” is established in Wisconsin’s high population cities and counties to carry out the duties otherwise accomplished by municipal and county clerks everywhere else. The phrase “municipal clerk or board of election commissioners” appears in tandem all over the election statutes because that describes the duties of local election officials. *State ex rel. Zignego v. Wisconsin Elections Commission*, 2021 WI 32, 396 Wis. 2d 391, 957 N.W.2d 208, 19-2397.

Photographic identification is necessary for in-person voting. Students may use college-issued credentials under sub. (6m) (f), but only before an ID’s expiration date. There’s nothing wrong with a requirement that IDs be current. *Luft v. Evers*, 963 F.3d 665 (2020).

Treating students differently from other potential voters without a rational basis violates the equal protection clause. Under sub. (6m) (f), a student identification card, alone among the sorts of photo ID that Wisconsin accepts, is not sufficient for voting unless the student also shows proof of current enrollment. No other category of acceptable identification depends on ongoing affiliation of any sort. That differential treatment violates the equal protection clause of the 14th amendment to the U.S. Constitution. *Luft v. Evers*, 963 F.3d 665 (2020).

The requirements in sub. (6m) (f) that a student identification card must display: 1) an issuance date; 2) an expiration date; 3) an expiration date not more than two years after the issuance date; and 4) a signature, are rationally related to a legitimate governmental interest and do not violate the equal protection clause. *Common Cause v. Thomsen*, 574 F. Supp. 3d 634 (2021).

NOTICE OF SPRING ELECTION

State of Wisconsin

April 1, 2025

Election Details

An election is to be held in the towns, villages, cities, wards, and election districts of the State of Wisconsin, on Tuesday, April 1, 2025. The following officers are to be elected:

Department of Public Instruction

One (1) State Superintendent, for the term of four (4) years to succeed the present incumbent listed, whose term of office will expire on July 31, 2025:

STATE SUPERINTENDENT OF PUBLIC INSTRUCTION Jill Underly

Judicial Officers

One (1) Justice of the Supreme Court, for the term of ten (10) years, to succeed the present incumbent listed, whose term of office will expire on July 31, 2025:

JUSTICE OF THE SUPREME COURT Ann Walsh Bradley

Three (3) Court of Appeals Judges, for the term of six (6) years, to succeed the present incumbents listed, whose terms of office will expire on July 31, 2025:

COURT OF APPEALS JUDGE DISTRICT 2 Mark Gundrum
COURT OF APPEALS JUDGE DISTRICT 3 Lisa K. Stark
COURT OF APPEALS JUDGE DISTRICT 4 Jennifer Nashold

Thirty-seven (37) Circuit Court Judges, each for the term of six (6) years, to succeed the present incumbents listed, whose terms of office will expire on July 31, 2025:

BROWN COUNTY CIRCUIT COURT JUDGE BRANCH 3	Tammy Jo Hock
BROWN COUNTY CIRCUIT COURT JUDGE BRANCH 4	Samantha Wagner
BROWN COUNTY CIRCUIT COURT JUDGE BRANCH 7	Timothy A. Hinkfuss
CRAWFORD COUNTY CIRCUIT COURT JUDGE	Lukas Steiner
DANE COUNTY CIRCUIT COURT JUDGE BRANCH 2	Payal Khandhar
DANE COUNTY CIRCUIT COURT JUDGE BRANCH 16	Rhonda L. Lanford
DODGE COUNTY CIRCUIT COURT JUDGE BRANCH 3	Joseph G. Sciascia*
EAU CLAIRE COUNTY CIRCUIT COURT JUDGE BRANCH 2	Douglas Hoffer
GREEN COUNTY CIRCUIT COURT JUDGE BRANCH 2	Jane Bucher
JEFFERSON COUNTY CIRCUIT COURT JUDGE BRANCH 1	Will Gruber

Type A Notice (for counties) | Rev 2022-11 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984 | 608-261-2028 | web: elections.wi.gov | email: elections@wi.gov

JEFFERSON COUNTY CIRCUIT COURT JUDGE BRANCH 2
 LA CROSSE COUNTY CIRCUIT COURT JUDGE BRANCH 1
 LA CROSSE COUNTY CIRCUIT COURT JUDGE BRANCH 2
 LA CROSSE COUNTY CIRCUIT COURT JUDGE BRANCH 4
 LAFAYETTE COUNTY CIRCUIT COURT JUDGE
 LINCOLN COUNTY CIRCUIT COURT JUDGE BRANCH 2
 MANITOWOC COUNTY CIRCUIT COURT JUDGE BRANCH 1
 MARINETTE COUNTY CIRCUIT COURT JUDGE BRANCH 1
 MARINETTE COUNTY CIRCUIT COURT JUDGE BRANCH 2
 MARQUETTE COUNTY CIRCUIT COURT JUDGE
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 6
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 11
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 26
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 36
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 40
 MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 41
 MONROE COUNTY CIRCUIT COURT JUDGE BRANCH 1
 OZAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 1
 OZAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 2
 RACINE COUNTY CIRCUIT COURT JUDGE BRANCH 4
 RACINE COUNTY CIRCUIT COURT JUDGE BRANCH 7
 ROCK COUNTY CIRCUIT COURT JUDGE BRANCH 1
 ROCK COUNTY CIRCUIT COURT JUDGE BRANCH 2
 SAINT CROIX COUNTY CIRCUIT COURT JUDGE BRANCH 2
 WAUKESHA COUNTY CIRCUIT COURT JUDGE BRANCH 1
 WAUKESHA COUNTY CIRCUIT COURT JUDGE BRANCH 4
 WAUKESHA COUNTY CIRCUIT COURT JUDGE BRANCH 6

Theresa Beck
 Ramona A. Gonzalez
 Elliott M. Levine
 Scott L. Horne
 Jenna Gill
 Robert R. Russell
 Mark Rohrer
 Peggy Miller
 James A. Morrison
 Chad A. Hendee
 John Remington
 David Swanson
 William Pohan
 Laura A. Crivello
 Danielle Shelton
 Lena Taylor
 Todd L. Ziegler
 Adam Gerol
 Steve Cain
 Scott Craig
 Jon Fredrickson
 Karl R. Hanson
 Derrick A. Grubb
 Edward F. Vlack*
 Michael O. Bohren*
 Bridget Schoenborn
 Brad Schimel

**Candidates who have submitted non-candidacy forms*

County Executive

A County Executive (if required), for a term of four (4) years, to succeed the present incumbent listed, whose term will expire on April 14, 2025:

(insert name of incumbent)

County Supervisor

A County Supervisor for each county supervisory district (if required), for a term of two (2) years, to succeed the present incumbent listed, whose term will expire on April 14, 2025:

(insert district numbers and names of incumbents)

Information concerning county supervisory district boundaries may be obtained from (insert name and address of county clerk and any other source).

Type A Notice (for counties) | Rev 2022-11 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984 | 608-261-2028 | web: elections.wi.gov | email: elections@wi.gov

Municipal Judge

A Municipal Judge, serving more than one municipality, for a term of four years*, to succeed the present incumbent listed, whose term of office will expire on April 30, 2025:

(insert municipalities in jurisdiction and name of incumbent)

District Boundaries

Information concerning multi-jurisdictional municipal judge district boundaries may be obtained from (insert name and address of county clerk and any other source).

*(*Note: Multi-jurisdictional municipal judges have terms of 4 years unless a term of 2 or 3 years is provided by CHARTER ordinance. Consult the ordinances that created the judgeship to determine the length of the term.)*

For Candidates

The first day to circulate nomination papers is December 1, 2024, and the final day for filing nomination papers is 5:00 p.m. on Tuesday, January 7, 2025. Candidates for (list statewide and judicial titles) file nomination papers and declarations of candidacy with the Wisconsin Elections Commission. Candidates for (list county titles) file (insert your own office filing information).

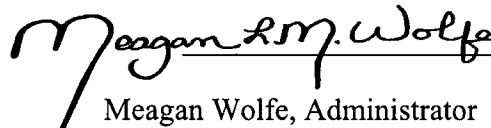
Primary Election

If a primary is necessary, the primary will be held on Tuesday, February 18, 2025.

Additional Information

Acceptable Photo ID will be required to vote at this election. If you do not have a photo ID, you may obtain a free ID for voting from the Division of Motor Vehicles.

DONE in the City of Madison on November 15, 2024



Meagan Wolfe, Administrator
Wisconsin Elections Commission
201 West Washington Avenue, 2nd Floor
P.O. Box 7984
Madison, Wisconsin 53707-7984
608-261-2028

Wisconsin Elections Commission

Candidate Tracking by Office

2025 Spring Election - 4/1/2025

Receipt #	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Staff Review
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Office : GREEN COUNTY CIRCUIT COURT JUDGE
BRANCH 2

Jane Bucher
2715 3RD ST
MONROE, 53566

Incumbent:	Jane Bucher	12/31/2024	12/23/2024	400	Approved
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Office Subtotal : 1

Office : JEFFERSON COUNTY CIRCUIT COURT
JUDGE BRANCH 1

Will Gruber
N7214 DEER LAKE LN
MARSHALL, 53559

Incumbent:	Will Gruber	12/02/2024	12/18/2024	389	Approved
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John Jack A. Chavez
1011 BREWSTER DR
LAKE MILLS, 53551

Incumbent:	John Jack A. Chavez	01/04/2025	01/02/2025	286	Approved
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Office Subtotal : 2

Office : JEFFERSON COUNTY CIRCUIT COURT
JUDGE BRANCH 2

Theresa Beck
363 E NORTH ST
JEFFERSON, 53549

Incumbent:	Theresa Beck	12/28/2024	01/02/2025	387	Approved
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Cortney J. Iverson
W9211 RED FEATHER DR
CAMBRIDGE, 53523

Incumbent:	Cortney J. Iverson	1/6/2025	01/06/2025	289	Pending
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Jennifer L. Weber
W155 HILLENDALE DR
OCONOMOWOC, 53066

Incumbent:	Jennifer L. Weber	01/06/2025	01/03/2025	248	Approved
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Office Subtotal : 3

Office : LA CROSSE COUNTY CIRCUIT COURT
JUDGE BRANCH 1

Joe Veenstra
213 PEARL ST
LA CROSSE, 54601

Incumbent:	Ramona A. Gonzalez (Filed Notification of Noncandidacy)	12/31/2024	01/03/2025	394	Approved
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ATTORNEY INFORMATION

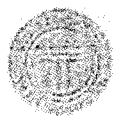


PHOTO NOT FOUND

Atty. Cortney Joy Iverson

County: Walworth

Member ID: 1116892

Graduation Year: 2020

Languages: English

Law School:

University of Wisconsin Law School

WI Admission: 05/27/2020

License Status:

Good Standing

Member Type:

Active

Full Profile

Current State Bar Memberships

No Current Memberships Listed

Courts of Admittance

None Provided

Other States Licensed

None Provided

Advanced Degrees

None Provided

Other Memberships

None Provided

Social Media Sites

None Provided

Biography

None Provided

Articles Authored

No Current Articles Authored

8.30 Candidates ineligible for ballot placement.

- (1) Except as otherwise provided in this section, the official or agency with whom declarations of candidacy are required to be filed may refuse to place the candidate's name on the ballot if any of the following apply:
 - (a) The nomination papers are not prepared, signed, and executed as required under this chapter.
 - (b) It conclusively appears, either on the face of the nomination papers offered for filing, or by admission of the candidate or otherwise, that the candidate is ineligible to be nominated or elected.
 - (c) The candidate, if elected, could not qualify for the office sought within the time allowed by law for qualification because of age, residence, or other impediment.
- (2) If no registration statement has been filed by or on behalf of a candidate for state or local office in accordance with s. 11.0202 (1) (a) by the applicable deadline for filing nomination papers by such candidate, or the deadline for filing a declaration of candidacy for an office for which nomination papers are not filed, the name of the candidate may not appear on the ballot. This subsection may not be construed to exempt a candidate from applicable penalties if he or she files a registration statement later than the time prescribed in s. 11.0202 (1) (a).
- (2m) The official or agency with whom nomination papers and declarations of candidacy are required to be filed shall not place a candidate's name on the ballot if the candidate's name is ineligible for ballot placement under s. 5.05 (2m) (d) 2., 15.61 (3), or 19.49 (2) (c) 2.
- (3) The official or agency with whom declarations of candidacy are required to be filed may not place a candidate's name on the ballot if the official or agency is prohibited from doing so under s. 19.43 (4) or an ordinance adopted under s. 19.59 (3) (b).
- (4) The official or agency with whom a declaration of candidacy is required to be filed may not place a candidate's name on the ballot if the candidate fails to file a declaration of candidacy within the time prescribed under s. 8.21.

History: 1975 c. 93; 1979 c. 120, 328; 1979 c. 355 ss. 28, 29; 1983 a. 484; 1985 a. 304; 1987 a. 391; 2001 a. 109; 2005 a. 149, 177; 2007 a. 1; 2015 a. 117, 118.

Cross-reference: See also ss. EL 2.09 and 2.11, Wis. adm. code.

A petitioner who timely filed with the county clerk rather than with the State Elections Board under former s. 8.10 (6) (a), 1975 stats., was barred from the ballot. State ex rel. Ahlgrimm v. State Elections Board, 82 Wis. 2d 585, 263 N.W.2d 152 (1978).

STATE OF WISCONSIN
WISCONSIN ELECTIONS COMMISSION

IN THE MATTER OF the Certificate of Candidacy for the
Office of Jefferson County Circuit Court Judge, Branch 2
with respect to the April 1, 2025 Election

THERESA A. BECK,
363 East North Street
Jefferson, WI 53549

Complainant,

v.

Case No. _____

CORTNEY J. IVERSON,
W9211 Red Feather Drive
Oakland, WI, 53523

Respondent.

VERIFIED COMPLAINT

1. This Verified Complaint is brought against Cortney J. Iverson (“Iverson”) pursuant to Wis. Stat. § 5.06, Wis. Stat. § 8.30(1), Wis. Admin. Code § EL 2.07, and other Wisconsin laws governing elections and election campaigns.

2. Iverson has submitted to the Wisconsin Elections Commission (“WEC”) a Declaration of Candidacy and nomination papers to be placed on the ballot as a candidate for the office of Jefferson County Circuit Court Judge, Branch 2, for the Spring Election, which will occur on April 1, 2025.

3. The Wisconsin Constitution provides that: “To be eligible for the office of supreme court justice or judge of any court of record, a person must be an attorney licensed to practice law in this state and have been so licensed for 5 years immediately prior to election or appointment.” Wis. Const. Art. VII, § 24(1).

4. According to Iverson’s profile with the State Bar of Wisconsin, she was not admitted to practice law in the State of Wisconsin until May 27, 2020. Thus, Iverson will not have been “licensed for 5 years immediately prior to election” as mandated by Wis. Const. Art. VII, § 24(1), she is ineligible for ballot placement, and the Commission must exclude her from the ballot.

PARTIES

5. Theresa A. Beck (“Complainant”) is a qualified Wisconsin elector residing at 363 East North Street, Jefferson, Wisconsin 53549.

6. In July 2024, Governor Evers appointed Complainant to serve as a Judge on the Jefferson County Circuit Court, with a term that expires on July 31, 2025.

7. Complainant currently holds the office of Judge on the Jefferson County Circuit Court, Branch 2.

8. Complainant has submitted to WEC a Declaration of Candidacy and nomination papers to be placed on the ballot in the April 1 Spring Election as a candidate for the same office she currently holds as a Judge on the Jefferson County Circuit Court, Branch 2. A true and correct copy of Complainant’s Declaration of Candidacy is attached hereto as **Exhibit A** to the Complaint.

9. On information and believe, Iverson is a qualified Wisconsin elector who resides at W9211 Red Feather Drive, Oakland, Wisconsin, 53523.

THE SPRING ELECTION

10. The 2025 Spring Election will occur on April 1, 2025. Wis. Stat. § 5.02(21).¹

¹ See also <https://elections.wi.gov/event/2025-spring-election> (last accessed January 8, 2025).

11. As an aspiring candidate for Circuit Court Judge, Iverson was required to file nomination papers and a Declaration of Candidacy with WEC before Tuesday January 7, 2025.

Wis. Stat. § 8.10(2)(a); Wis. Stat. § 8.21.

12. On information and belief, Iverson filed her Declaration of Candidacy and nomination papers with WEC on or around January 6, 2025.

13. A true and correct copy of Iverson’s Declaration of Candidacy, obtained through Badger Voters, is attached hereto as **Exhibit B**.

14. In her Declaration of Candidacy, Iverson was required to swear that, among other things, she would “qualify for office if nominated and elected.” Wis. Stat. § 8.21(2)(c); *see also* Exhibit B.

15. According to WEC, the deadline to file a challenge to Iverson’s candidacy is Friday January 10, 2025. *See* <https://elections.wi.gov/event/deadline-filing-ballot-access-challenges> (citing Wis. Stat. § 8.07, EL 2.07). Thus, this challenge is timely.²

IVERSON’S MAY 27, 2020 ADMISSION TO THE WISCONSIN BAR

16. According to Iverson’s profile with the State Bar of Wisconsin, she is a is a licensed attorney who was admitted to practice law in the State of Wisconsin on May 27, 2020.

A true and correct copy of Iverson’s State Bar of Wisconsin profile is attached hereto as **Exhibit C** to the Complaint.

² This is not a challenge to the “sufficiency of a nomination paper” and so the three-day deadline arguably does not apply. *See* Wis. Admin. Code EL § 2.07(1) (“Any challenge to the sufficiency of a nomination paper shall be filed within 3 calendar days after the filing deadline for the challenged nomination papers.”). Instead, Chapter 5 governs: “A complaint under this section shall be filed promptly so as not to prejudice the rights of any other party. In no case may a complaint relating to nominations, qualifications of candidates or ballot preparation be filed later than 10 days after the complainant knew or should have known that a violation of law or abuse of discretion occurred or was proposed to occur.” Wis. Stat. § 5.06(3). In any event, Complainant first learned on January 6, 2025 (when Iverson filed her Declaration of Candidacy) that Iverson in fact sought the office for which she is not qualified. Thus, this Verified Complaint is timely under either standard.

17. Likewise, according to a University of Wisconsin Hooding Ceremony Program, a true and correct copy of which is attached hereto as **Exhibit D** to the Complaint, Iverson graduated from the University of Wisconsin Law School on May 15, 2020.³

18. Under the governing Supreme Court Rules, Iverson could not have been admitted to practice law through Wisconsin's diploma privilege until after her May 15, 2020 graduation. *See* SCR 40.03 (Providing for diploma privilege for an "applicant who has been awarded a first professional degree in law from a law school in this state" and meets other criteria); SCR 40.02(2) (must satisfy SCR 40.03 or alternative legal competency requirements in order to "be admitted to practice law in this state").

ARGUMENT

I. Legal Standards.

19. The Wisconsin Supreme Court has recognized that "[w]hile the right to vote is an inherent or constitutional right, the right to be a candidate is not of that character. It is a political privilege which depends upon the favor of the people and this favor may be coupled with reasonable conditions for the public good." *State ex rel. Frederick v. Zimmerman*, 254 Wis. 600, 617, 37 N.W.2d 473 (1949).

20. Indeed, the State of Wisconsin has "an interest, if not a duty, to protect the integrity of its political processes from frivolous or fraudulent candidacies." *Bullock v. Carter*, 405 U.S. 134, 145 (1972). Thus, the Supreme Court of the United States has rejected the contention that "voters are entitled to cast their ballots for unqualified candidates," explaining "that limiting the choice of candidates to those who have complied with state election law requirements is the prototypical example of a regulation that, while it affects the right to vote, is eminently

³ On information and belief, the graduate listed as "Cortney Joy Runnels" is Iverson. "Runnels" is her maiden name.

reasonable.” *Burdick v. Takushi*, 504 U.S. 428, 440 n.10 (1992). “[I]t is both wasteful and confusing to encumber the ballot with the names of frivolous candidates.” *Anderson v. Celebrezze*, 460 U.S. 780, 788 n.9 (1983).

21. Consistent with the State’s “duty” to protect the ballot from frivolous candidacies, Wisconsin Statutes Section 8.30 addresses “candidates ineligible for ballot placement.” Under that statute, “[t]he official or agency with whom a declaration of candidacy is required to be filed may not place a candidate’s name on the ballot if the candidate fails to file a declaration of candidacy within the time prescribed under s. 8.21.” Wis. Stat. § 8.30(4).

22. Likewise, the Commission “may refuse to place the candidate’s name on the ballot if any of the following apply:”

- (a) The nomination papers are not prepared, signed, and executed as required under this chapter.
- (b) It conclusively appears, either on the face of the nomination papers offered for filing, or by admission of the candidate or otherwise, that *the candidate is ineligible to be nominated or elected*.
- (c) The *candidate, if elected, could not qualify* for the office sought within the time allowed by law for qualification because of age, residence, or other impediment.

Wis. Stat. § 8.30(1) (emphasis added).

II. The Commission must exclude Iverson from the ballot.

23. The Wisconsin Constitution provides that: “To be eligible for the office of supreme court justice or judge of any court of record, a person must be an attorney licensed to practice law in this state and have been so licensed for 5 years immediately prior to election or appointment.” Wis. Const. Art. VII, § 24(1); *see also In re Raineri*, 102 Wis. 2d 418, 421, 306 N.W.2d 699 (1981) (citing Art. VII, § 24(1) for the proposition that “the revocation of [Iron County Circuit Court]

Judge Raineri’s license to practice law in Wisconsin on April 14, 1981 rendered him ineligible for the office of judge of any court of record.”).

24. Iverson, therefore, must be excluded from the ballot under each of: (1) Section 8.30(4) (candidate did not file a valid declaration of candidacy); (2) Section 8.30(1)(b) (candidate is ineligible to be nominated or elected); and (3) Section 8.30(1)(c) (candidate, if elected, could not qualify).

25. This case is on all fours with a recent WEC decision in *Michael Hoffman v. Shiva Ayyadurai & Crystal Ellis*, Complaint No. EL 24-81.⁴ There, an independent presidential candidate’s ballot access was challenged on the basis that he was a naturalized citizen and not a “natural born citizen” as required of presidential candidates by Art. II, Section 1, Clause 5 of the U.S. Constitution (“Constitutional Citizenship”). (**Exhibit E** at 4 (p. 31)) Commission Staff recommended excluding the candidate under both Wis. Stat. §§ 8.30(1) (b) and (c). Commission Staff explained that “[w]hile there may be circumstances where the Commission cannot, or chooses not to, answer a constitutional question, in the context of candidate qualifications and ballot access, staff believe that the Commission has an obligation under Wis. Stat. § 8.30 to examine candidate qualifications, especially in the context of a sworn challenge.” (*Id.* at 6 (p. 33)) By a 5-1 vote, the Commission adopted the proposed motion from the Staff Memo providing that “the Commission exercises its authority under Wis. Stat. § 8.30(4) to exclude [the candidates] from

⁴ A true and correct copy of the Staff Memo from Complaint No. EL 24-81 is attached hereto as **Exhibit E**. Exhibit E includes pages 1-3 and 31-34 from within Open Session Packet for the August 27, 2024 Commission meeting. Because the full materials are 193 pages long, Complainant includes only the relevant pages within Exhibit E. The full packet is available on the Commission website at: https://elections.wi.gov/sites/default/files/documents/Open%20Session%208.27.24%202_0.pdf (last accessed January 8, 2025).

the ballot because Candidate Ayyadurai does not meet the constitutional requirements for the Office of President of the United States.”⁵

26. The Commission’s decision to exclude Ayyadurai was later affirmed by the District Court for the Eastern District of Wisconsin in *Marshall v. WEC*, No. 24-C-1095 (E.D. Wis. Sep. 10, 2024). A true and correct copy of the District Court’s Memorandum and Order is attached hereto as **Exhibit F** to the Complaint. In *Marshall*, the Eastern District concluded that, because Ayyadurai was not a natural born citizen, “he could not submit a *valid* declaration of candidacy” and “*WEC was required by statute* to prohibit his name from being on the ballot. Wis. Stat. § 8.30(4).” *Id.* at 3-4 (emphasis added).⁶

27. As with Ayyadurai, Iverson was required to swear that she “will ... qualify for office if nominated and elected.” Wis. Stat. § 8.21(2)(c). But because she was not admitted to practice until May 27, 2020—*less than* five years before the April 1 Spring Election—it is *impossible* for her to have been “an attorney licensed to practice law in this state and have been so licensed for 5 years immediately prior to election” on April 1, 2025 as mandated by the Wisconsin Constitution. Consequently, she will not qualify because she *cannot*. Iverson therefore did not file a “valid declaration of candidacy,” and “WEC [is] required by statute to prohibit [her] name from being on the ballot.” **Exhibit F** at 3-4. Likewise, because Iverson will not have practiced law for the constitutionally prescribed minimum length of time, she “is ineligible to be nominated or

⁵ A true and correct copy of the minutes of the August 27, 2024 hearing at which this vote occurred is attached hereto as Exhibit F and also available on WEC’s website: <https://elections.wi.gov/sites/default/files/documents/August%2027%2C%202024%2C%20Open%20Session%20Minutes%20APPROVED.pdf> (last accessed January 8, 2025).

⁶ The Plaintiffs in *Marshall* filed an appeal that remains pending. See *Marshall v. WEC*, Seventh Circuit Case No. 24-2756. However, WEC is rightly opposing that appeal, and should follow its own precedent and the district court precedent unless and until the Seventh Circuit reverses that decision.

elected” and “if elected, could not qualify,” Wis. Stat. § 8.30(1)(b) (c). WEC should exclude her on that independent basis as well.

28. Wisconsin not an outlier. States do not place a candidate on the ballot when they cannot possibly win the election and assume the office. *See Am. Party of Texas v. White*, 415 U.S. 767, 782 (1974) (holding that states may “insist that political parties appearing on the general ballot demonstrate a significant, measurable quantum of community support”); *Lindsay v. Bowen*, 750 F.3d 1061, 1063 (9th Cir. 2014) (excluding a candidate from a ballot “based on undisputed ineligibility due to age do not limit political participation by an identifiable political group whose members share a particular viewpoint, associational preference or economic status” (internal quotations omitted)); *Hassan v. Colorado*, 495 F. App’x 947, 948-49 (10th Cir. 2012) (affirming decision to exclude a naturalized citizen, ineligible to hold office, from the presidential ballot); *Socialist Workers Party of Ill. v. Ogilvie*, 357 F. Supp. 109, 113 (N.D. Ill. 1972) (*per curiam*) (affirming Illinois’ exclusion of a thirty-one-year-old candidate from the presidential ballot).

29. For example, in a case decided by then-Circuit Judge Gorsuch, a candidate argued that even if he was “ineligible to *assume the office* of president [...] it was still an unlawful act of discrimination for the state to deny him *a place on the ballot*.” *Hassan*, 495 F. App’x at 948 (emphasis in the original). Justice Gorsuch rejected that contention, concluding that “a state’s legitimate interest in protecting the integrity and practical functioning of the political process permits it to exclude from the ballot candidates who are constitutionally prohibited from assuming office.” *Id.* So too here.

30. Accordingly, the Commission should follow its precedent of excluding ineligible candidates from the ballot under Wis. Stat. § 8.30.

CONCLUSION

Complainant respectfully requests that, pursuant to Wis. Stat. § 8.30, the Wisconsin Elections Commission refuse to place Cortney J. Iverson's name on the ballot for Jefferson County Circuit Court Judge, Branch 2 for the spring election in April 2025.

Dated January 10, 2025.

Complaint prepared by:

STAFFORD ROSENBAUM LLP

Douglas M. Poland, SBN 1055189

David P. Hollander, SBN 1107233

Zoe A. Pawlisch, SBN 1119278

Attorneys for Complainant Theresa A. Beck

222 West Washington Ave., Suite 900

Madison, Wisconsin 53703-2744

dpoland@staffordlaw.com

dhollander@staffordlaw.com

zpawlisch@staffordlaw.com

608.256.0226

VERIFICATION

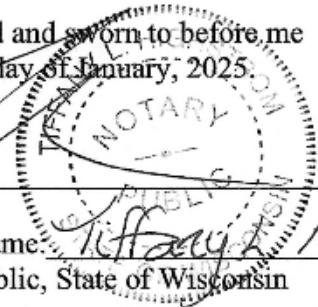
Theresa A. Beck, being duly sworn, on oath, deposes and states that:

1. Theresa A. Beck is a qualified elector and resident of the State of Wisconsin.
2. Theresa A. Beck has read the foregoing Verified Complaint and avers that the facts alleged therein are true and correct to the best of her knowledge, except as to those matters therein stated upon information and belief, as to which matters she believes them to be true.

Signed in Jefferson, Wisconsin this 10th day of January, 2025.

Theresa Beck
Theresa A. Beck

Subscribed and sworn to before me
this 10th day of January, 2025.



Printed Name: Tiffany A. Highstreet
Notary Public, State of Wisconsin

My commission expires ^{is} permanet.

✓

Declaration of Candidacy

(See instructions for preparation on back)

FOR OFFICE USE ONLY

Is this an amendment?

Yes (if you have already filed a DOC for this election)

No (if this is the first DOC you have filed for this election)

I, Theresa A. Beck, being duly sworn, state that
I am a candidate for the office of Jefferson County Circuit Court, Br. 2
Official name of office - include district, branch or seat number

representing _____
If partisan election, name of political party or statement of principle - five words or less (Candidates for nonpartisan office may leave blank.)

and I meet or will meet at the time I assume office the applicable age, citizenship, residency and voting qualification requirements, if any, prescribed by the constitutions and laws of the United States and the State of Wisconsin, and that I will otherwise qualify for office, if nominated and elected.

I have not been convicted of a felony in any court within the United States for which I have not been pardoned.¹

My present address, including my municipality of residence for voting purposes is:

363	East North St	Jefferson, WI	53549	<input type="checkbox"/> Town of <input type="checkbox"/> Village of <input checked="" type="checkbox"/> City of
<small>House or fire no.</small>	<small>Street Name</small>	<small>Mailing Municipality and State</small>	<small>Zip code</small>	<small>Municipality of Residence for Voting</small>

My name as I wish it to appear on the official ballot is as follows:

Theresa Beck

(Any combination of first name, middle name or initials with surname. A nickname may replace a legal name.)

Justice
(Signature of candidate)

STATE OF WISCONSIN

County of Jefferson } ss.
(County where oath administered)

Subscribed and sworn to before me this 20th day of September, 2024

[Signature]
(Signature of person authorized to administer oaths)

NOTARY SEAL
REQUIRED, IF OATH
ADMINISTERED BY
NOTARY PUBLIC



Notary Public or other official _____
(Official title, if not a notary)

If Notary Public: My commission expires _____ or is permanent.

The information on this form is required by Wis. Stat. § 8.21, Art. XIII, Sec. 3, Wis. Const., and must be filed with the filing officer in order to have a candidate's name placed on the ballot. Wis. Stats. §§ 8.05 (1)(j), 8.10 (5), 8.15 (4)(b), 8.20 (6), 120.06 (6)(b), 887.01.

EL-162 | Rev. 2019-08 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984
608-266-8005 | web: elections.wi.gov | email: elections@wi.gov

¹ A 1996 constitutional amendment bars any candidate convicted of a misdemeanor which violates the public trust from running for or holding a public office. However, the Legislature has not defined which misdemeanors violate the public trust. A candidate convicted of any misdemeanor is not barred from running for or holding a public office until the legislature defines which misdemeanors apply.

Declaration of Candidacy

(See instructions for preparation on back)

WEG 06 JAN 2025 AM 11:39
FOR OFFICE USE ONLY
 WEG 06 JAN 2025 AM 11:39

Is this an amendment?

Yes (if you have already filed a DOC for this election) **No** (if this is the first DOC you have filed for this election)

I, Cortney Iverson, being duly sworn, state that
Candidate's name

I am a candidate for the office of Jefferson County Circuit Court Judge, Branch 2
Official name of office - Include district, branch or seat number

representing _____
If partisan election, name of political party or statement of principle - five words or less (Candidates for nonpartisan office may leave blank.)

and I meet or will meet at the time I assume office the applicable age, citizenship, residency and voting qualification requirements, if any, prescribed by the constitutions and laws of the United States and the State of Wisconsin, and that I will otherwise qualify for office, if nominated and elected.

I have not been convicted of a felony in any court within the United States for which I have not been pardoned.¹

My present address, including my municipality of residence for voting purposes is:

W9211	Red Feather Dr.	Cambridge, WI	53523	Town of <input checked="" type="checkbox"/>	Oakland
House or fire no.	Street Name	Mailing Municipality and State	Zip code	Village of <input type="checkbox"/>	
				City of <input type="checkbox"/>	

My name as I wish it to appear on the official ballot is as follows:

Cortney J. Iverson

(Any combination of first name, middle name or initials with surname. A nickname may replace a legal name.)

Cortney J. Iverson
(Signature of candidate)

STATE OF WISCONSIN }
 County of Dane } ss.
(County where oath administered)

Subscribed and sworn to before me this 6th day of January, 2025.
Regina Anneliese Hein
(Signature of person authorized to administer oaths)

Notary Public or other official _____
(Official title, if not a notary)

If Notary Public: My commission expires 8/20/27 or is permanent



The information on this form is required by Wis. Stat. § 8.21, Art. XIII, Sec. 3, Wis. Const., and must be filed with the filing officer in order to have a candidate's name placed on the ballot. Wis. Stats. §§ 8.05 (1)(j), 8.10 (5), 8.15 (4)(b), 8.20 (6), 120.06 (6)(b), 887.01.

EL-162 | Rev. 2019-08 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984
 608-266-8005 | web: elections.wi.gov | email: elections@wi.gov

¹ A 1996 constitutional amendment bars any candidate convicted of a misdemeanor which violates the public trust from running for or holding a public office. However, the legislature has not defined which misdemeanors violate the public trust. A candidate convicted of any misdemeanor is not barred from running for or holding a public office until the legislature defines which misdemeanors apply.



WisBar's Lawyer Search provides basic information about attorneys licensed to practice law in Wisconsin. The information provided is reported to the State Bar by its members, who are required by Supreme Court Rule 10.03 to maintain current address information with the State Bar. Optional profile information is added and maintained by individual State Bar members. Members can update select profile information by visiting [myStateBar](#) at the top of this site or contacting [Customer Service](#) at (800) 728-7788 for assistance.

To find pending public disciplinary cases or to view public disciplinary histories regarding a specific attorney, visit the Wisconsin Court System's [database](#).

To provide you with greater control over how your personal information displayed in the Lawyer Directory, the State Bar is introducing more selective privacy options. Please [visit the updated Lawyer Directory Preferences](#) or [read about these changes in InsideTrack](#).

ATTORNEY INFORMATION



Atty. Cortney Joy Iverson

County: Walworth

Member ID: 1116892

Graduation Year: 2020

Languages: English

Law School:

University of Wisconsin Law School

WI Admission: 05/27/2020

License Status:

Good Standing

Member Type:

Active

You must [Login](#) to view full profile

LAWYER SEARCH

LAST NAME

FIRST NAME

COUNTY

SEARCH

ADVANCED

[myStateBar](#)

[myMedia](#)







**UNIVERSITY OF WISCONSIN
LAW SCHOOL**

**CLASS OF 2020
GRADUATE CEREMONY**

FRIDAY, MAY 15, 2020
3 P.M.

PROGRAM

- Introduction & Welcome Dean Margaret Raymond
- Keynote Address The Honorable James D. Peterson
- Remarks by Student Representatives
 Nancy Cruz
 Taijae Evans
 Daniela Fachiano Nakano
- Remarks by Faculty Representative
 Professor Howard Erlanger
- Presentation of Candidates
- Farewell Dean Margaret Raymond

#UWLAWGRAD



facebook.com/uwlaw



twitter.com/WisconsinLaw

Share your 2020 UW Law School Graduate Ceremony memories on Facebook and Twitter using #uwlawgrad

SPEAKER BIOGRAPHIES



KEYNOTE SPEAKER

James D. Peterson

James D. Peterson has served as Chief United States District Judge of the United States District Court for the Western District of Wisconsin since 2017. He joined the federal judiciary in 2014, after being nominated by President Barack Obama.

Prior to his appointment to the bench, Judge Peterson was a shareholder with the law firm of Godfrey & Kahn. There, he was a member of the litigation and intellectual property practice groups, and the leader of the intellectual property litigation working group. He also taught at the UW Law School as an adjunct professor.

Before his legal career, Judge Peterson was a professor of film and television history and production at the University of Notre Dame. He returned to Wisconsin to study law, earning his JD from the University of Wisconsin Law School in 1998, graduating Order of the Coif. After law school, he clerked with David G. Deininger of the Wisconsin Court of Appeals.

In addition to his law degree, he received a bachelor's degree in 1979, a master's degree in 1984, and a PhD in 1986, all from the University of Wisconsin, making Judge Peterson a quadruple Badger.

STUDENT SPEAKERS

Nancy Cruz

Nancy Cruz was born and raised in Tulare, California, and also lived in Leon, Guanajuato, Mexico, for a couple of years. She received her bachelor's degree in European history with a focus on late-modern Europe from the University of California, Berkeley. Post-graduation, she worked in San Francisco for two years as a business immigration paralegal.

During her time in law school, Nancy served as the president of the Moot Court Board, vice president of academic affairs for the Student Bar Association, and for two years as co-president of UW's Latinx Law Student Association. She also worked with the Immigrant Justice Clinic. Locally, Nancy volunteered with the non-profit Centro Hispano's Juventud program, mentoring Latinx middle school students. She received the Foreign Language Area Studies Scholarship and studied the German language.

During her summers, Nancy interned at a local non-profit, Community Justice Inc., and she was a summer associate at Michael Best & Friedrich, where she will be returning as a full-time associate in the fall. She is extremely honored that her classmates selected her to speak and would like to thank her family, friends, and classmates who have always believed in her and supported her along the way.

Taijæ W. Evans

Taijæ Evans was born and raised in Canton, Ohio. He earned an associate degree in intelligence operations from Cochise College, bachelor's degrees in criminal justice and political science from Kent State University, and a master's degree in criminal justice focusing on criminology from Boston University. Prior to attending law school, Taijæ was an active-duty intelligence analyst in the United States Army.

During law school, Taijæ served as the vice president of the Labor and Employment Student Association, the community service liaison and director of education for the Black Law Students Association, and the secretary for the Middle Eastern Law Students Association. Taijæ competed in UW Law's Mock Trial program, and he competed in and coached the International Commercial Arbitration Moot Court Team in Vienna, Austria. He was active in the Unemployment Appeals Clinic and Victims of Crime Act Restraining Order Clinic. Additionally, Taijæ participated in Legal Assistance for Disaster Relief, a pro bono student organization, assisting victims of natural disasters in New Orleans and Houston. He worked as a law clerk at Alliant Energy and as a summer associate at Stafford Rosenbaum.

Taijæ was inducted into the University of Wisconsin Law School Pro Bono Society with special recognition for providing 150 or more hours of pro bono service during his tenure at the Law School. He is continuing his public service as a Judge Advocate General in the United States Navy. Taijæ is extremely honored that his fellow classmates have chosen him to speak and would like to thank the faculty, his classmates, and his loved ones for their continued support.

Daniela Fachiano Nakano

Daniela Fachiano Nakano was born and raised in Presidente Prudente, a city in the countryside of the state of São Paulo, Brazil. She received her bachelor in laws degree from Antônio Eufrásio de Toledo University in her hometown. While in law school in Brazil, she was part of the summer internship program of the Organization of the American States (OAS) at the Inter-American Commission on Human Rights in Washington, DC.

Daniela was always passionate about social justice, and during law school she nurtured an interest in international human rights law. After graduating, she worked as a teaching fellow with the international law chair of her university. The experience brought her to UW Law School to pursue her master's degree and become a professor. At UW Law, Daniela volunteered with the Immigrant Justice Clinic and was a member of the Indigenous Law Students Association. She would like to thank both organizations for warmly welcoming her to take part in their inspiring work.

Daniela is honored to represent graduate law students and her fellow classmates, who, regardless of circumstances, always take care of each other. Finally, she would like to thank her family and friends who supported her throughout this year.

FACULTY SPEAKER

Howard S. Erlanger

Howard S. Erlanger is Voss-Bascom Professor of Law Emeritus and Professor of Sociology Emeritus at the University of Wisconsin-Madison, where he served as a full-time faculty member from 1971 to 2013. He continues to teach part-time. He holds a PhD in sociology from the University of California, Berkeley and a JD from the University of Wisconsin Law School.

Professor Erlanger is the recipient of a number of awards for his teaching and research, including the Emil H. Steiger Teaching Award from the UW-Madison, the Underkofler Excellence in Teaching Award from the UW System, and the Stan Wheeler Mentorship Award from the Law & Society Association. He is an academic fellow of the American College of Trust and Estate Counsel, and a former president of the Law & Society Association. This is the seventh time that he has been invited as faculty commencement speaker.

Professor Erlanger served for many years as director of the Institute for Legal Studies at UW Law and as director of the Center for Law, Society & Justice in UW's College of Letters and Science.

He was a reporter for a committee of the State Bar of Wisconsin that prepared a comprehensive revision of the Wisconsin Probate Code, and he has served as review section editor of the interdisciplinary journal *Law & Social Inquiry* since 1982. His own socio-legal research focused on the legal profession — especially on the careers of lawyers in public interest practice and the socialization of law students — and on topics related to dispute resolution and to organizational implementation of law.

GRADUATES



CANDIDATES FOR JURIS DOCTOR DEGREE

Hannah R. Albrecht

Jacob M. Alonzo

Advanced Opportunity Program Fellowship

Dean's List

Susan Steingass Outstanding Trial Advocacy Award, 2020

Dallas Tate Andersen

Sarah Arbaje

Best Performance in a Course, 2018

Dean's List

Leakhena Au

Advanced Opportunity Program Fellowship

Dean's List

Outstanding 3L Award, Asian Law Students Association

Austin D. Auleta

Dean's List

Nikolas Alexander Austin

Mason Richard Baranczyk

Octavio Tengco Barretto

Steven R. Beckham

Joseph Samuel Beckmann

Advanced Opportunity Program Fellowship

Bruce F. Beilfuss Memorial Award, 2020

Cheryl Weston Outstanding Mensch Award

Outstanding 3L Award, Jewish Law Students Association

Pro Bono Society Membership and Award of Distinction, Tier One

Ray and Ethel Brown Award, 2019

Wisconsin Hispanic Lawyers Association Scholarship, 2019

Paul D. Beery

Dean's Academic Achievement Award

Dean's List

Cricket Beeson

Gwynette E. Smalley Law Review Prize, 2020

Thorin A. Blitz

Joshua Alec Blumenfeld

Cheryl Weston Outstanding Mensch Award

Dean's List

Brian Francis Bradley

Best Performance in a Course, 2019

Daniel H. Grady Award, 2020

Dean's Academic Achievement Award

Dean's List

Nicholas Dean Bratsos
Dean's Academic Achievement Award
Dean's List

Deborah Brauer
Amy Buchmeyer
Dean's Academic Achievement Award
Dean's List

Conor M. Cannon

Jack T. Carroll
Dean's Academic Achievement Award
Dean's List

Kyle Clinton Caudill
Best Performance in a Course, 2017
Dean's List
Pro Bono Society Membership and Award of Distinction, Tier Two

Brian P. Cawley
Burton Distinguished Legal Writing Award, 2020
Dean's Academic Achievement Award
Dean's List
George Laikin Award, 2020
Mathys Memorial Award for Excellence in Moot Court Competitions, 2019

Bryan A. Charbogian

Colton J. Chase
Best Performance in a Course, 2017, 2018
Dean's Academic Achievement Award
Dean's List
J. Michael Riley Award, 2019

Hannah Claire Chelimsky
Katherine Held Memorial Award, 2020
Susan Steingass Outstanding Trial Advocacy Award, 2020

Tyler A. Chriscoe
Best Performance in a Course, 2019
Dean's Academic Achievement Award
Dean's List

M. Parker Conover

Patrick J. Courteau
Dean's Academic Achievement Award
Dean's List

William H. Cowell
Best Performance in a Course, 2018, 2019
Dean's Academic Achievement Award
Dean's List
Gwynette E. Smalley Law Review Prize, 2020

John James Crawford

Michael T. Crosby

Dean's List

Nancy Cruz

Advanced Opportunity Program Fellowship

Bruce F. Beilfuss Memorial Award, 2020

Dean's List

Mathys Memorial Award for Outstanding Service to the Moot Court Board, 2019

Outstanding 3L Award, Latinx Law Student Association

Pro Bono Society Membership and Award of Distinction, Tier Two

Jared John Dakovich

Dean's List

Ian Scott Davis

Best Performance in a Course, 2018

Jedidiah Dodge

Dean's List

Sophia Patricia Dolan

Catherine Manning Memorial Award, 2019

Lindsey Douglass

Dean's Academic Achievement Award

Dean's List

Samuel James Erickson

Dean's List

Taijae Williams Evans

Advanced Opportunity Program Fellowship

Pro Bono Society Membership and Award of Distinction, Tier One

Spencer Carter Ezell

Dean's List

Farah N. Famouri

Dean's Academic Achievement Award

Dean's List

Mary Kelly Quackenbush Memorial Award, 2019

Melvin J. Friedman Memorial Scholarship, 2019

Jesse Fernandez

Advanced Opportunity Program Fellowship

Emery Benton Flaherty

Dean's List

Samuel David Frasher

Pro Bono Society Membership and Award of Distinction, Tier Two

Nathan Froemming

Dean's List

Natalie Lauren Gerloff

Dean's Academic Achievement Award

Dean's List

Jared S. Gjertson

Barbara B. Crabb Award, 2019

Dean's List

Habush Habush & Rottier Outstanding Trial Advocacy Award, 2020

Pro Bono Society Membership and Award of Distinction, Tier One

Unemployment Compensation Appeals Clinic Outstanding Student Advocate Award

Michael Reed Glawe

Megan Gomez

Advanced Opportunity Program Fellowship

Pro Bono Society Membership and Award of Distinction, Tier One

Nadia L. Gonzalez

Advanced Opportunity Program Fellowship

Dean's List

Gwynette E. Smalley Law Review Prize, 2020

Kathleen Marie Gresham

Dean's Academic Achievement Award

Dean's List

Mathys Memorial Award for Excellence in Moot Court Coaching, 2020

Zachary A. Guerin

Sydney L. Handrich

Amy T. Harriman

Abner Brodie Award, 2019

Bruce F. Beilfuss Memorial Award, 2020

Pro Bono Society Membership and Award of Distinction, Tier One

Women's Law Student Association Summer Scholarship

Emily Jane Hicks

Best Performance in a Course, 2018

Dean's List

Sarah Jeanette Horner

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Emily Jane Hyde

Dean's List

Julia Johanna Jagow

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Institute for Regional and International Studies International Research and Training Grant, 2017

Joseph Davies Award, 2019

Pro Bono Society Membership and Award of Distinction, Tier One

Ray and Ethel Brown Award in Legal Writing, 2020

William Herbert Page Award, 2020

Jonas Oren Jakobson
Dean's List
Peter Hoepfer Solo and Small Practice Award, 2020

Karin Jonch-Clausen
Melvin J. Friedman Memorial Scholarship

Benjamin Jordan
Dean's List
Mathys Memorial Award for Outstanding Service to the Moot Court Board, 2020

E'bria M. Karega
Bruce F. Beilfuss Memorial Award, 2020

Gordon Kochman

Kevin G. Koelling
Dean's List

Kirsten Adrienne Koschnick
Best Performance in a Course, 2018
Dean's Academic Achievement Award
Dean's List

Nathan Mark Kuenzi
Dean's Academic Achievement Award
Dean's List
Gwynette E. Smalley Law Review Prize, 2020
Ray and Ethel Brown Award, 2019

Samuel Thomas Kuzniewski
Best Performance in a Course, 2017, 2018, 2019
Dean's Academic Achievement Award
Dean's List
Pro Bono Society Membership and Award of Distinction, Tier One

Lauren Elaine LaCasto

Abigail Levenhagen
Dean's List

Alex Shafran Levy

Robert M. Ling III
Best Performance in a Course, 2017
Dean's List

Adam Jose Lowe
Dean's List

Jacob R. Lund
Dean's Academic Achievement Award
Dean's List

Megan E. Lyneis

Thomas John Lyneis
Dean's List

Keegan John Madden

Mathys Memorial Award for Excellence in Moot Court Competitions, 2019

Katherine Aileen Mahoney

Donnie Malchow

Dean's Academic Achievement Award

Dean's List

Gwynette E. Smalley Law Review Prize, 2020

Pro Bono Society Membership and Award of Distinction, Tier Two

Patrick F. Malloy

Best Performance in a Course, 2018

Dean's List

Tyler T. Manley

John Duero Mathie

Catherine Manning Memorial Award, 2020

Dean's List

Gracie Public Interest Fellowship

Leon Feingold Memorial Award, 2020

Pro Bono Society Membership and Award of Distinction, Tier One

Larenda Jean Maulson

Advanced Opportunity Program Fellowship

Bruce F. Beilfuss Memorial Award, 2019

Outstanding 3L Award, Indigenous Law Students Association

John C. McCarthy

Olivia G. McCarthy

Ezekial Craig McDonald-Lewis

Joseph Frederick McDonald

Kelly Ann McGraw

Best Performance in a Course, 2019

Dean's Academic Achievement Award

Dean's List

Gwynette E. Smalley Law Review Prize, 2020

Douglas Christopher McIntosh

Best Performance in a Course, 2019

Dean's Academic Achievement Award

Dean's List

Ray and Ethel Brown Award in Legal Writing, 2020

Adam J. Meyers

Dean's List

Miles J. Miannecki

Dean's List

Foreign Language and Area Studies Fellowship

Public Interest Law Foundation Scholar Award, 2018

Devan Montgomery

Samuel Geoffrey Morris

Best Performance in a Course, 2018, 2019
Dean's Academic Achievement Award
Dean's List

Dania Nadeem

American Academy of Matrimonial Lawyers Leonard Loeb Award, 2019
Children's Justice Project Fellowship
Outstanding 3L Award, Middle Eastern Law Students Association

Nina Marie Neff

Barbara B. Crabb Award, 2020
Bercovici Prize for Jurisprudence and Legal Philosophy, 2020
Dean's Academic Achievement Award
Dean's List
Foreign Language and Area Studies Fellowship
Joe and Barbara Weston Corry Scholarship, 2019
Julie Stearns Memorial Award, 2019
Ms. JD Fellowship, 2019
QLaw Book Scholarship, 2018

Westen Newman

Dean's List
Pro Bono Society Membership and Award of Distinction, Tier Two

Peter Thomas Nowak

Dean's Academic Achievement Award
Dean's List

Angela Brianne O'Brien

Best Performance in a Course, 2017, 2018, 2019
Dean's Academic Achievement Award
Dean's List
Mathys Memorial Award for Excellence in Moot Court Coaching, 2020
Mathys Memorial Award to Outstanding Moot Court Oralist, 2019
Pro Bono Society Membership and Award of Distinction, Tier One

Abby D. Padlock

Cody W. Pansing

Vanja Pamac

American Association for Justice Mike Eidson Scholarship, 2019
Serbian Bar Association of America Sasich/Kordich Memorial Scholarship
Susan Steingass Outstanding Trial Advocacy Award, 2019

Tyler Alan Fisher Piddington

Bascom Brick Award
Best Performance in a Course, 2017, 2018, 2019
Dean's Academic Achievement Award
Dean's List
Pro Bono Society Membership and Award of Distinction, Tier One
Stewart Macaulay Award, 2020

Liam M. Pisan

Dean's List

Gabriel Andres Pollak

Wisconsin International Law Journal Outstanding 3L Editor

Kathryn Elizabeth Potratz

Dean's List

McKenna Marie Quinter

Children's Justice Project Fellowship

Olivia S. Radics

American Intellectual Property Law Association Robert C. Watson Award, 2019-2020

Best Performance in a Course, 2019

Constitution Award, 2020

Davis Award in Constitutional Law, 2019, 2020

Dean's Academic Achievement Award

Dean's List

Gwynette E. Smalley Law Review Prize, 2019, 2020

Salmon Dalberg Award, 2020

Matthew Alexander Repp

Steven W. Ripley

Dean's Academic Achievement Award

Dean's List

Catherine Cornelia Rose Roen

Best Performance in a Course, 2019

Dean's Academic Achievement Award

Dean's List

Edward and Esther Bloedorn Award, 2020

Perla J. Rubio Terrones

Advanced Opportunity Program Fellowship

Julie Strasser Scholarship, 2020

Pro Bono Society Membership and Award of Distinction, Tier One

Cortney Joy Runnels

Noah T. Rusch

Alyssa M. Schaefer

Dean's Academic Achievement Award

Dean's List

Katherine Held Memorial Award, 2020

Daniel W. Schwartz

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Brian J. Seidl

Leah E. Selmek

Advanced Opportunity Program Fellowship

Pro Bono Society Membership and Award of Distinction, Tier Two

Kevin M. Smith

Cum Laude

Dean's Academic Achievement Award

Dean's List

Bella Abla Sobah

Advanced Opportunity Program Fellowship

Bruce F. Beilfuss Memorial Award, 2019, 2020

Outstanding 3L Award, Black Law Students Association

Meg Hannah Sternitzky

Dean's List

Gwynette E. Smalley Law Review Prize, 2020

Hannah Marie Stewart

Bruce F. Beilfuss Memorial Award, 2019

Dean's List

Gwynette E. Smalley Law Review Prize, 2020

Mettner Foundation Public Interest Fellowship, 2019

Pro Bono Society Membership and Award of Distinction, Tier One

William David Straube

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Outstanding 3L Award, QLaw

Erika-Dorothy C. Strebel

Pro Bono Society Membership and Award of Distinction, Tier Two

Laina Petersen Stuebner

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Kimberly Dawn Sweatt

Erika Joy Tecua

Dean's List

Erik L. Tierney

Cara Tolliver

Advanced Opportunity Program Fellowship

Best Performance in a Course, 2018

Dean's Academic Achievement Award

Dean's List

Outstanding 1L Award, Asian Law Students Association

Amanda M. Trecartin

Dean's List

Gwynette E. Smalley Law Review Prize

Kristopher Michael Turner

Dean's List

John Robert VanDeHey

Dean's List

Lisa Vang

Pro Bono Society Membership and Award of Distinction, Tier Two

Gregory A. Venturini

Aaron Thomas Vruwink

Best Performance in a Course, 2019

Dean's List

Peter Hooper Solo and Small Practice Award, 2019

Scott Robert Wellhausen

Dean's Academic Achievement Award

Dean's List

Justice William Bablitch Remington Center Award, 2020

Gideon William O. Wertheimer

Dean's List

Sarah Maguire Wertz

Best Brief Award, 2018

Best Performance in a Course, 2018, 2019

Dean's Academic Achievement Award

Dean's List

Kelly Theresa Wilfert

Best Performance in a Course, 2018, 2019

Dean's List

James J. and Dorothy T. Hanks Memorial Award, 2020

Pro Bono Society Membership and Award of Distinction, Tier Two

Ryan McKinley Williams

Advanced Opportunity Program Fellowship

Thomas Evan Witzel

Dean's List

Brad D. Woods

Xiaofan Zhang

Dean's List

Samantha M. Zlevor

Best Performance in a Course, 2019

Dean's List

*Honor designations of cum laude, magna cum laude, and summa cum laude are listed for December 2019 graduates. Honors for May 2020 graduates will be designated upon degree completion.

CANDIDATES FOR DOCTOR OF JURIDICAL SCIENCE DEGREE

Koffi Dogbevi

Dissertation: "Seeds, Patent Infringement, and Food Sovereignty in Africa"

Yuanyuan Ren

CANDIDATES FOR MASTER OF LAWS— LEGAL INSTITUTIONS DEGREE

Hewan Areaya

Victor Beltran Roman

ShuangXiong Chen

Roberto Cordova Guerra

Daniela Fachiano Nakano

Luying Fang

Luqi Han

Shiwei He

Liangqin Hong

Dongya Huang

Han-I Huang

Maryam Ismail

Hui Jiang

Jiaqi Li

Wen-Yu Li

Yanan Li

Best Performance in a Course, 2019

Xinyi Liu

Lovelyn Loresca

Yicheng Ma

Anastasia Martyanova

Tianchun Mo

Ke Peng

Settakij Phongputthangkoon

David Preminger Samet

Soromnear Sin

Betelhem Tafere

Kanokkorn Viriyasutum

Xiqi Wang

Xiaoyu Xia

Jun Yang

Yue Yu

Dacheng Zhang

Ke Zhang

Jiatong Zhong

Zhou Zhou

Best Performance in a Course, 2019

AWARD LISTINGS



AWARDS

Members of the Class of 2020 have earned accolades for scholastic achievement, contributions to their community, and outstanding service to the Law School and the legal profession. This list includes honors and awards as reported by students and faculty.

ACADEMIC EXCELLENCE AWARDS

Advanced Opportunity Program Fellowship

To highly qualified underrepresented graduate students at UW-Madison

American Academy of Matrimonial Lawyers Leonard Loeb Award

For excellence in family law and dedication to community service

Bascom Brick Award

For outstanding performance in commercial property development

Bercovici Prize for Jurisprudence and Legal Philosophy

For excellence in the study of jurisprudence and legal philosophy

Best Brief Award

For outstanding legal writing by a first-year law student

Best Performance in a Course

Best performance in at least one Law School course, as awarded by their instructors

Burton Distinguished Legal Writing Award

To ten students nationally for excellence in legal writing

Constitution Award

For excellence in the study of constitutional law

Daniel H. Grady Award

To the top-ranking student in the graduating class

Dean's Academic Achievement Award

For students graduating with a cumulative GPA of 3.35 or higher

Dean's List

For students meeting high GPA requirements during at least one semester of law school

Edward and Esther Bloedorn Award
For excellence in labor and employment law

J. Michael Riley Award
For excellence in the study of torts law

James J. and Dorothy T. Hanks Memorial Award
For excellence in the study of corporate law

Salmon Dalberg Award
To an outstanding member of the graduating class

Ray and Ethel Brown Award in Legal Writing
For excellence in legal research and writing

Stewart Macaulay Award
For excellence and leadership in contract law

CLINICAL AWARDS

Abner Brodie Award
For outstanding achievement in legal study and practical application of law

Catherine Manning Memorial Award
For outstanding contributions to the Legal Assistance to Institutionalized Persons Project

Julie Strasser Scholarship
For demonstrating concern for the needy and working to benefit society

Justice William Bablitch Remington Center Award
For a student in the Remington Center who has expressed a desire to pursue a career in public service

Melvin J. Friedman Memorial Scholarship
For exemplary work in the Wisconsin Innocence Project

MOOT COURT AWARDS

Mathys Memorial Awards for Appellate Advocacy
To outstanding Moot Court oralist
For outstanding service to the Moot Court Board
For excellence in Moot Court coaching
For excellence in Moot Court competitions

SERVICE, COMMITMENT, AND CONTRIBUTIONS

American Association for Justice Mike Eidson Scholarship

For female students who have demonstrated a commitment to a career as a plaintiff lawyer or criminal defense lawyer

American Intellectual Property Law Association Robert C. Watson Award

For students interested in intellectual property issues

Barbara B. Crabb Award

For promoting the ideals of honesty, fairness, and equality

Bruce F. Beilfuss Memorial Award

For outstanding service to the Law School

Cheryl Weston Outstanding Mensch Award

In recognition of tremendous support and tireless contribution to the Jewish community and the Jewish Law Students Association

Children's Justice Project Fellowship

For outstanding contributions and commitment to children's law

Foreign Language and Area Studies Fellowship

For meritorious students undergoing training in modern foreign languages or international studies

Gracie Public Interest Fellowship

For students demonstrating a commitment to public interest law

Habush Habush & Rottier Outstanding Trial Advocacy Award

For outstanding trial advocacy throughout a law student's career at UW Law School

Institute for Regional and International Studies International Research and Training Grant

For internationally- or area-studies-oriented graduate students in all fields

Joe and Barbara Weston Corry Scholarship

To support an exceptional student who is a single parent

Julie Stearns Memorial Award

For contribution and commitment to the LGBTQ and Law School community

Leon Feingold Memorial Award

For outstanding commitment to the Law School and greater community

Mettner Foundation Public Interest Fellowship
For law students interested in a career in public service

Ms. JD Fellowship
For outstanding academic achievement, involvement, passion for the legal profession, and commitment to Ms. JD's mission

Outstanding Student Awards
For outstanding contributions by law students to their respective student organizations

Peter Hoepfer Solo and Small Practice Award
To a second- or third-year law student with an expressed interest in solo/small practice in rural Wisconsin

Pro Bono Society Membership and Award of Distinction
For exemplary pro bono service
Tier One (100+ hours of service)
Tier Two (50+ hours of service)

Public Interest Law Foundation Scholar Award
In recognition of students who demonstrated academic excellence, consistent service, and dedication to a public interest career

QLaw Book Scholarship
For commitment and service to the LGBTQ and Law School community

Ray and Ethel Brown Award
For character, leadership, and service demonstrated by first- or second-year students

Serbian Bar Association of America Sasich/Kordich Memorial Scholarship
In recognition of the ideals put forth by Milan and Jelena Sasich and Nikola and Desa Kordich and in support of Serbian causes

Susan Steingass Outstanding Trial Advocacy Award
For outstanding performance in the Mock Trial program

Unemployment Compensation Appeals Clinic Outstanding Student Advocate Award
For excellent work with the Unemployment Compensation Appeals Clinic

Wisconsin Hispanic Lawyers Association Scholarship
For Hispanic law students who best exemplify achievement and commitment to professional development and service within the Hispanic community

Women's Law Student Association Summer Scholarship
For students who have demonstrated a commitment to advancing women's issues

JOURNAL AWARDS

George Laikin Award

For best article on a general interest topic in the *Wisconsin Law Review*

Gwynette E. Smalley Law Review Prize

For scholarship and service to the *Wisconsin Law Review*, or
For special contributions to the *Wisconsin Law Review*

Joseph Davies Award

For outstanding service to the *Wisconsin Law Review* by a second-year student

Katherine Held Memorial Award

For outstanding contributions to the *Wisconsin Journal of Law, Gender & Society*

Mary Kelly Quackenbush Memorial Award

For the outstanding student article in the *Wisconsin International Law Journal*

Outstanding 3L Editor

For scholarship and service to the *Wisconsin International Law Journal*

William Herbert Page Award

For best student article on a Wisconsin-specific topic in the *Wisconsin Law Review*

REMARKS



Joseph Beckman

Dearest Class of 2020,

CONGRATULATIONS! We made it against some very unique odds. It has been a pleasure experiencing these three years together. I am both humbled and honored to have served as your Student Bar Association president. It was rewarding and exhilarating, and I hope that my efforts provided you with at least one pleasant memory during law school.

If the quarantine has taught us anything, it is to not take things for granted. Our class is entering into a profession that is vital to the development of our local, national, and international communities. We are positioned to help advance causes for which we are passionate and to improve the lives of many. We also need to support one another and help each other grow. Do not take these responsibilities lightly. I hope that we stay connected and that each of us sees great success.

Cheers,
Joseph



Koffi Dogbevi

Doctorate of Juridical Science and PhD minor in Political Science

“WISCONSIN IDEA” FOR THRIVING THROUGH DIFFICULT TIMES

One thing we learn as Badgers is the Wisconsin Idea: “[We] shall never be content until the beneficent influence of the University reaches every family of the State.” (Van Hise, 1905). My journey during these past years was not an easy one, especially when I lost my brother at age 39. However, I overcame these challenges because of the support I received from faculty, staff, and friends.

Today, the very foundation of our society is shaken to its core, due to the COVID-19 pandemic. The ideals of our life and institutions are threatened, and the economy is in the midst of the worst recession the world has ever seen.

As I graduate today, I reflect on the Wisconsin Idea, and I see a world with immense and limitless opportunities. Go Badgers!

Farah Famouri

What will you miss most about your law school experience?

I will miss the Remington Center! My clinical work through the center has been my favorite part of law school, and I will miss interacting with my fellow clinicians and discussing our cases. Even knowing that some of us will be defense attorneys, some of us prosecutors, and some of us will never practice criminal law again, it was great to work in an environment where we focused only on the client. I can't say that I will miss the tiny desk in the office, but I will absolutely miss the people.

What advice would you give your classmates at this moment?

Stay in touch! Although we are unfortunate to be the COVID-19 graduating class, we are fortunate to be a group of highly motivated, competent folk, who I am sure will make big changes in Wisconsin and beyond.



Nadia Gonzalez

I am deeply saddened that our final semester of law school was cut short. However, I will always be proud to be a member of this graduating class with all of you. Regardless of the route our law degrees will take us, whether it be the law firm life or the public interest route, I am confident that we will do great things. If our conversations in the atrium over the last three years are indicative of anything, it is that we are strong-willed and passionate individuals. Thank you for the last three years; it's been a wild ride.



Angela O'Brien

What advice would you give your classmates at this moment?

Eventually, opportunities will come that will put us in a position where we have to take a risk and bet on ourselves. Everyone in this graduating class is talented, capable, and resourceful, so I hope when that moment comes, we all bet big.

What hope or wish do you have for your classmates?

I hope that we all remember to leave time in our busy work weeks to donate our considerable talent, skill, and resources by offering free or low-cost legal representation to those who need it most. I hope we can all use the law to fight for the causes we are passionate about so that no vulnerable person ever has to face the legal system alone.

Bella Sobah


My life has been an ongoing battle of challenging both the external and internal voices telling me what I can and cannot do. The last three years have been an exploration into what “can” and “cannot” mean as it relates to me and the world. Can I actually not do something because it just is not in my wheelhouse? *See Torts Grade*. Or are there larger, systemic barriers entrenched in our society that impact the way I and other people relate to and exist in the world? *See all of American History on Race, Disability, Gender, etc*. Law school helped me navigate answering both questions.

In the event that the answer to the first question is “yes,” I have learned that, instead of accepting defeat, I can look towards my colleagues, friends, and professors for support. Even in a hyper-competitive space such as law school, I still found when it’s two in the morning and you’re trying to finish the impossible feat of writing a 20-page paper while studying for another class’s final, someone will send you an outline for that class because they are good. You can always choose to be good to others. Be good.

As for the second question: this is the reason I came to law school. This is why I pushed through those impossibly late nights and took advantage of opportunities that pushed me outside of my comfort zone. I have every intention of using this degree to help dismantle oppressive societal structures that seek to disadvantage black and brown people, disabled people, LGBT+ people, or poor people. The last three years have given me invaluable tools to examine and analyze these structures and find solutions to seemingly unanswerable questions.

I am forever grateful to those friends who did share those outlines and who sent me words of encouragement when I had thoughts of defeat. I am grateful for the professors who pushed me to think about why our world is the way it is and for giving me the tools and resources to change what I believe needs changing.





UNIVERSITY OF WISCONSIN LAW SCHOOL
975 BASCOM MALL | MADISON, WI 53706
608-262-2240 | LAW.WISC.EDU



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

Wisconsin Elections Commission

Quarterly Meeting

Wisconsin Capitol Building, Room 412E

Madison, Wisconsin

10:00 a.m. June 27, 2024

Open Session Minutes

Present: Commissioner Marge Bostelmann, Commissioner Ann Jacobs, Commissioner Don M. Millis, Commissioner Carrie Riepl, Commissioner Robert Spindell Jr., and Commissioner Mark Thomsen, all in person.

Staff present: Ahna Barreau, Sharrie Hauge, Brandon Hunzicker, Matthew Kabbash, Robert Kehoe, Anna Langdon, Benji Pierson, Angela Sharpe, Riley Vetterkind, Riley Willman, Jim Witecha, and Meagan Wolfe, all in person.

A. Call to Order

Commission Chair Jacobs called the meeting to order at 10:06 a.m. and called the roll. All Commissioners were present.

B. Administrator's Report of Appropriate Meeting Notice

Administrator Meagan Wolfe informed the Commission that the meeting was noticed in accordance with Wisconsin's open meetings laws.

C. Public Comment

Chair Jacobs announced that the Commission would hear from in-person speakers first, then move on to speakers appearing via Zoom. She also noted that speakers would get three minutes to speak.

Bianca Shaw

Bianca Shaw, representing All Voting is Local, appeared in person and called for Commissioner Spindell to resign.

Discussion.

Nick Ramos

Wisconsin Elections Commissioners

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

Administrator
Meagan Wolfe

1

Nick Ramos, the executive director of the Wisconsin Democracy Campaign, appeared in person and called for Commissioner Spindell to resign.

Rebecca Alwin

Rebecca Alwin of Middleton appeared in person and expressed dissatisfaction with the partisan nature of the Commission.

Rev. Greg Lewis

Rev. Greg Lewis, Executive Director of Souls to the Polls, appeared in person and called on Commissioner Spindell to resign.

Vaun Mayes

Vaun Mayes, representing Community Task Force Milwaukee, appeared in person and called for accountability from individuals in positions of power.

Barbara Beckert

Barbara Beckert appeared via Zoom and expressed support for the emergency rule pertaining to election observers.

Discussion.

Delany Zimmer

Delany Zimmer appeared on behalf of the League of Women Voters Wisconsin via Zoom and encouraged the Commission to provide sample ballots translated into Spanish on the MyVote Wisconsin website.

Discussion.

Lane Ruhland

Lane Ruhland appeared via Zoom and encouraged the Commission to appeal the DRW v. WEC circuit court order.

Vicki Aro-Shackmuth

Vicki Aro-Shackmuth appeared via Zoom and questioned Commissioner Spindell's fitness to serve on the Commission.

Kathryn Bartelli

Kathryn Bartelli of Waukesha County appeared via Zoom and provided comments regarding a temporary injunction in Oldenburg v. WEC.

Debra Morin

Debra Morin appeared via telephone and encouraged the Commission to act with decorum. She expressed concern regarding 17-year-olds' potential to register to vote under current DMV and WEC policies.

Ms. Klinge

Ms. Klinge appeared in person and questioned Commissioner Spindell's fitness to serve on the Commission.

D. Written Comments

Chair Jacobs noted the significant number of written comments submitted to the Commission.

E. Approval of Previous Meeting Minutes

- a. May 14, 2024**
- b. May 16, 2024**
- c. June 10, 2024**

MOTION: Approve the May 14, 2024, May 16, 2024, and June 10, 2024, open session minutes.

Moved by Commissioner Thomsen. Seconded by Commissioner Riepl.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

F. Discussion and Potential Action Related to the Recall Petition Pertaining to Assembly Representative Robin Vos, and Any Related Recall Policy Considerations and Action.

Staff Attorney Brandon Hunzicker presented the agenda item following the sequence of the corresponding memo.

Discussion.

Matthew Fernholz presented arguments on behalf of Rep. Vos. Five minutes were allowed for each side's initial presentation.

The Commissioners followed up with questions.

Kevin Scott presented arguments on behalf of the Racine Recall Committee.

The Commissioners followed up with questions.

declaration of candidacy is valid with or without the seal of the officer administering the oath. Accordingly, if the Legislature intended a declaration of candidacy to be valid even if a notary seal were missing, it must have also intended a declaration of candidacy to be valid even if there are other minor errors or omissions in the jurat that do not affect the ability to confirm that the declaration was sworn before an official authorized to give oaths.

Recommended Motion:

The Commission does not sustain the challenge of David Strange to the declarations of candidacy of Cornel West and Melina Abdullah and will not exercise its authority under Wis. Stat. § 8.30(4) to exclude them from the ballot for failure to timely file a declaration of candidacy. The Commission adds Cornel West and his running mate Melina Abdullah to the list of candidates to be approved for ballot access. Commission staff shall issue a closure letter to the parties consistent with this motion.

EL 24-81 – Michael Hoffman v. Shiva Ayyadurai & Crystal Ellis

Challenger Name: Michael Hoffman

Candidate Name: Shiva Ayyadurai & Crystal Ellis

Office Sought: President and Vice President of the United States

Signatures Required: 2,000-4,000

Signatures Filed (After Facial Review): 3,014

Signatures Challenged: None – Challenge to Natural Born Citizenship Status as Required by Art. II, Section 1, Clause 5 of the U.S. Constitution

Supplemental Signatures: 0

Correcting Affidavits: 0

Final Staff Recommendation: 3,014 - But Deny Ballot Access on Eligibility Grounds

Commission staff verified that Candidates Ayyadurai and Ellis had 3,014 signatures. Based on the analysis below, staff assert that Challenger Hoffman has met his burden to show by clear and convincing evidence that Candidate Shiva Ayyadurai does not meet the legal requirements for the office he seeks because he is not a natural born citizen of the United States. *See* Wis. Admin. Code EL § 2.07(4). Accordingly, staff recommend that the Commission sustain the challenge and deny ballot access for Candidates Ayyadurai and Ellis.

Challenger Hoffman is not challenging the sufficiency of anything on the nomination papers of Candidates Ayyadurai and Ellis, per se, although a candidate does attest to their qualifications for the office sought. Instead, he is challenging whether Candidate Ayyadurai is a “natural born citizen” as required of presidential candidates by Art. II, Section 1, Clause 5 of the U.S. Constitution (“Constitutional Citizenship”). Challenger Hoffman brings this challenge under the provisions found in Wis. Admin. Code § EL 2.07 and Wis. Stat. § 8.20. Specifically, Challenger Hoffman concedes that Candidate Ayyadurai has been a lawfully naturalized citizen since 1983 but argues that Constitutional Citizenship requires that only “...those individuals who are a ‘natural born citizen,’ at least ‘thirty five years’ of age, and a resident of the United States for at least 14 years qualify to be ‘eligible to the Office of President.’” In essence, Challenger Hoffman asserts that there is a difference between being a “natural born” citizen and an individual who has gained citizenship through naturalization under 8 U.S.C. § 1427.

Challenger Hoffman provided exhibits supporting this contention, including a Certificate of Nomination of Unaffiliated Candidate filed by, or caused to be filed by, Candidate Ayyadurai in the State of Utah. This filing expressly states that Candidate Ayyadurai "attest[s]" that he "was 'naturally born' in Bombay, India, on December 2, 1963." Additionally, Challenger Hoffman filed another exhibit in support of these claims — a recent decision of the United States District Court for the District of Columbia in which the court found that "Dr. Ayyadurai was born in Mumbai, India, and became a naturalized American citizen in November 1983."

In the response, Candidate Ayyadurai does not address or refute claims that he is not a natural born U.S. citizen and does not admit or deny that he was born outside the United States and gained citizenship through naturalization. Instead, he argued the Commission lacks subject matter and personal jurisdiction over the

nomination papers, and also contends there is a lack of standing related to Challenger Hoffman and his ability to bring the matter. The cited authority for those defenses was Wis. Stat. Chapter 801, which relates specifically to civil procedure in a court of law. However, Candidate Ayyadurai further elaborates that "...the Challenger's petition has not provided any evidence challenging the Electors' nomination papers pursuant to *Wis. Admin. Code EL § 2.07* and *Wisconsin Legislature: 8.20* or pursuant to the kind of challenges identified in the publication entitled *Wisconsin Nomination Paper Challenges*." Candidate Ayyadurai then further argues that it would be an overreach of the jurisdiction of the Commission, a state entity, to impede the processes of the Electoral College.

The Commission also received a sworn declaration from Elector Frank Marshall, one of the designated presidential electors for the challenged candidates. Primarily, Elector Marshall contends that he and the other electors were not named as respondents and were never served with notice of this challenge filing. The implication appears to be that Elector Marshall is supporting the arguments of Candidates Ayyadurai and Ellis that the Commission is improperly impeding the Electoral College process and that Commissioners lack jurisdiction over those procedures and parties.

The verified rebuttal of Challenger Hoffman notes that Candidates Ayyadurai and Ellis do not respond to the only challenge actually raised against the nomination papers — that he [Candidate Ayyadurai] was born in Bombay, India, and, therefore, does not meet the qualification of being a "natural born citizen," as required by the U.S. Constitution. Challenger Hoffman further argues that, "A failure to contest an argument is deemed as a concession." *Charolais Breeding Ranches, Ltd. v. FPC Secs. Corp.*, 90 Wis. 2d 97, 109,279 N.W.2d 493 (Ct. App. 1979) (Unrefuted arguments are deemed admitted.)

Challenger Hoffman, thus, posits that it is undisputed in the record that Candidate Ayyadurai was not born in the United States. Additionally, Challenger Hoffman argues that Candidates Ayyadurai and Ellis instead chose to argue "inapplicable and irrelevant aspects of the Electoral College" instead of addressing the merits. The challenger cites further case law which he believes supports the Commission's authority and duty to determine presidential candidate qualifications for state ballot access.

Discussion

As a preliminary matter, there are a few ways an individual can gain U.S. citizenship under federal law, though only two are pertinent to this challenge. First, all individuals born in the U.S. gain citizenship immediately upon birth and are not required to qualify for and apply for it. U.S. CONST. AMEND. 14. This is commonly known as "birthright citizenship." Second, qualifying individuals may apply for U.S. citizenship through a process called naturalization, usually after holding a green card for a certain number of years and meeting other legal requirements. 8 U.S.C. § 1427.

The Supreme Court has upheld the distinction between natural-born and naturalized citizens' eligibility to be President. *Schneider v. Rusk*, 377 U.S. 163 (1964) ("...the rights of citizenship of the native born and of the naturalized person are of the same dignity and are coextensive. The only difference drawn by the Constitution is that only the 'natural born' citizen is eligible to be President."); *see also Hassan v. Federal Election Com'n*, 893 F.Supp.2d 248, 256-57 (D.D.C. 2012) (holding that the Fifth and Fourteenth Amendments did not implicitly repeal the natural-born citizen requirement). Thus, Commission staff recommend that the Commission conclude that a naturalized citizen does not meet the constitutional requirement to be a "natural born citizen." A naturalized citizen would not meet the requirements of Constitutional Citizenship, and subsequently, would not be qualified to run for the Office of President of the United States.

Commission staff agree with Challenger Hoffman's argument that it is uncontested within the administrative record that Candidate Ayyadurai was born in India, and that the "natural born citizen" arguments were essentially unaddressed in the candidates' response filings. The challenger also submitted sufficient exhibits to create a record of Candidate Ayyadurai's country of birth and subsequent naturalization as a United States citizen. Commission staff also agree with Challenger Hoffman that the Electoral College arguments were vague and irrelevant. Regardless, Commission staff provide analysis below to refute the argument that the Commission cannot consider

this matter. This leaves the Commission to answer only two questions pertaining to the challenge — whether naturalization as a citizen fails to meet the Constitutional requirements for presidential ballot access, and whether the Commission has the authority to consider constitutional questions in this context.

Challenger Hoffman provided, as Exhibit B, a Westlaw case file for *Shiva Ayyadurai v. Merrick Garland et al.*, Civil Action No. 23-2079 (D.D.C. 2024). The challenger’s purpose appears to have been establishing a record of Candidate Ayyadurai’s own admission, and a court record, that Candidate Ayyadurai was born in India and subsequently naturalized as a United States citizen in 1983. Commission staff independently reviewed the case and believe that Candidate Ayyadurai’s birth location and naturalized citizenship status has been sufficiently established and undisputed in the administrative record. It is thus recommended that the Commission conclude the same.

The *Garland* case also raises an important point. Candidate Ayyadurai’s own arguments in that case centered on a belief that his "campaign will be hampered by a variety of state and federal officials who will refuse to permit ballot access to [him] on the basis of his place of birth." This evidences Candidate Ayyadurai’s own, though premature, concern that his Constitutional qualification for office would be called into question. The *Garland* Court found that these arguments were premature and granted motions to dismiss in favor of the defendants. The matter was dismissed without prejudice. The *Garland* Court’s decision was largely based on its assessment that certain states had only sought further clarification of Candidate Ayyadurai’s citizenship status, but none had made an affirmative denial of his ballot access at that time.

A staff search of LexisNexis on August 15, 2024, at 8:05 a.m., yielded no results to evidence that Candidate Ayyadurai had appealed that decision or subsequently filed a timelier lawsuit on these questions of law on a country-wide basis. Further, the consistent interpretation of Art. II, Section I, Clause 5 of the U.S. Constitution has been that it precludes a naturalized citizen from running for the Office of President of the United States.

This leaves only the second question, that being whether the Commission has the authority to consider Constitutional Citizenship questions in the context of ballot access decisions at the state level. This question is not without precedent, even in the instant matter. While there may be circumstances where the Commission cannot, or chooses not to, answer a constitutional question, in the context of candidate qualifications and ballot access, staff believe that the Commission has an obligation under Wis. Stat. § 8.30 to examine candidate qualifications, especially in the context of a sworn challenge. Likewise, while the Supreme Court has concluded that it would be undesirable to leave certain constitutional questions of candidate eligibility up to the states out of fears of a patchwork of inconsistent ballot access results, this challenge presents a much more direct question that staff believe the Commission is directed by statute to answer. *Trump v. Anderson*, 601 U.S. 100 (2024). Here, the Constitution prescribes a “yes” or “no” requirement — is the candidate for president a natural born citizen? The parties in this matter appear to agree that he is not.

The Commission is authorized by statute to consider this very type of qualification in determining ballot access. Wisconsin Statute § 8.30, “Candidates ineligible for ballot placement,” provides:

- (1) Except as otherwise provided in this section, the official or agency with whom declarations of candidacy are required to be filed may refuse to place the candidate's name on the ballot if any of the following apply:
 - (a) The nomination papers are not prepared, signed, and executed as required under this chapter.
 - (b) It conclusively appears, either on the face of the nomination papers offered for filing, or by admission of the candidate or otherwise, that the candidate is ineligible to be nominated or elected.
 - (c) The candidate, if elected, could not qualify for the office sought within the time allowed by law for qualification because of age, residence, or other impediment. (Emphasis added)

This provision allows the Commission to consider all types of nomination papers and all facets of candidate qualification and eligibility, which Commission staff believe includes Constitutional Citizenship as required by the U.S. Constitution for the Office of President of the United States. The statute also authorizes the Commission to refuse ballot placement under those circumstances in its discretion. This argument is supported by additional statutory requirements pertaining to the very documents Candidate Ayyadurai filed. For instance, Wis. Stat. § 8.21(2)(b) requires the signer of a declaration of candidacy to attest that they will meet the requirements of the office sought, including citizenship. As such, Commission staff contend that the Commission does have the authority to consider Constitutional Citizenship and deny ballot access if it so chooses.

Recommended Motion:

The Commission sustains the challenge of Michael Hoffman against Candidate Shiva Ayyadurai and Candidate Crystal Ellis, and the Commission exercises its authority under Wis. Stat. § 8.30(4) to exclude them from the ballot because Candidate Ayyadurai does not meet the constitutional requirements for the Office of President of the United States. The Commission directs staff not to add Shiva Ayyadurai and his running mate Crystal Ellis to the list of candidates to be approved for ballot access. Commission staff shall issue a closure letter to the parties consistent with this motion.



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

Wisconsin Elections Commission

Ballot Access Meeting

201 W. Washington Avenue, Second Floor

Madison, Wisconsin

11:00 a.m. August 27, 2024

Open Session Minutes

Present: Commissioner Marge Bostelmann, Commissioner Ann Jacobs, Commissioner Don M. Millis, Commissioner Carrie Riepl, Commissioner Robert Spindell Jr., and Commissioner Mark Thomsen, all by teleconference.

Staff present: Ahna Barreau, Sharrie Hauge, Brandon Hunzicker, Robert Kehoe, Anna Langdon, Angela Sharpe, Riley Vetterkind, Riley Willman, Jim Witecha, and Meagan Wolfe, all by teleconference.

A. Call to Order

Commission Chair Jacobs called the meeting to order at 11:03 a.m. and called the roll. All Commissioners were present.

B. Administrator's Report of Appropriate Meeting Notice

Administrator Meagan Wolfe informed the Commission that the meeting was noticed in accordance with Wisconsin's open meetings laws.

C. Approval of Previous Meeting Minutes

- a. June 27, 2024**
- b. July 11, 2024**
- c. July 26, 2024**
- d. July 30, 2024**
- e. August 8, 2024**

MOTION: Approve all five sets of minutes.

Moved by Commissioner Riepl. Seconded by Commissioner Bostelmann.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Wisconsin Elections Commissioners

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

Administrator
Meagan Wolfe

Motion carried 6-0.

D. Ballot Access Challenges and Issues for Challenges Timely Received by 4:30 p.m. on Friday, August 9, 2024

a. EL 24-80 – David Strange v. Cornel West & Melina Abdullah

Staff Attorney Angela Sharpe presented an overview of staff’s memo and recommendations to the Commission.

Discussion.

Chair Jacobs noted that individuals presenting arguments for the challenger and candidate would have five minutes to present.

David Hollander appeared and presented arguments on behalf of Challenger Strange.

Discussion.

Oliver Hall appeared and presented arguments on behalf of Candidate West and Candidate Abdullah.

Discussion.

MOTION: The Commission does not sustain the challenge of David Strange to the declarations of candidacy of Cornel West and Melina Abdullah and will not exercise its authority under Wis. Stat. § 8.30(4) to exclude them from the ballot for failure to timely file a declaration of candidacy. The Commission adds Cornel West and his running mate Melina Abdullah to the list of candidates to be approved for ballot access. Commission staff shall issue a closure letter to the parties consistent with this motion.

Moved by Commissioner Millis. Seconded by Commissioner Spindell.

Discussion.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	No	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 5-1.

The Commission took a break at 11:55 a.m. and returned at 12:05 p.m.

b. EL 24-81 – Michael Hoffman v. Shiva Ayyadurai

Chief Legal Counsel Jim Witecha presented an overview of staff’s memo and recommendations to the Commission.

Discussion.

No one appeared on behalf of the challenger.

Candidate Shiva Ayyadurai appeared and presented arguments.

Discussion.

Frank Marshall appeared and presented arguments.

Discussion.

MOTION: The Commission sustains the challenge of Michael Hoffman against Candidate Shiva Ayyadurai and Candidate Crystal Ellis, and the Commission exercises its authority under Wis. Stat. § 8.30(4) to exclude them from the ballot because Candidate Ayyadurai does not meet the constitutional requirements for the Office of President of the United States. The Commission directs staff not to add Shiva Ayyadurai and his running mate Crystal Ellis to the list of candidates to be approved for ballot access. Commission staff shall issue a closure letter to the parties consistent with this motion.

Moved by Commissioner Spindell. Seconded by Commissioner Riepl.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	No	Thomsen:	Aye

Motion carried 5-1.

E. Ballot Access Report and Certification for Presidential and Vice-Presidential Candidates for the General Election

Elections Supervisor Riley Willman presented staff's ballot access memo. He noted that Wisconsin Green party vice presidential candidate Butch Ware should be listed as Rudolph Ware, according to his declaration of candidacy received by staff after the Commission's materials had been published.

MOTION: Staff recommends that the Commission grant ballot access to the following candidates, who will appear on the November 5, 2024 General Election ballot as the national nominees for President and Vice President for their respective parties:

- a. Kamala D. Harris and Tim Walz as the nominees for the Democratic party.
- b. Donald J. Trump and JD Vance as the nominees for the Republican party.
- c. Randall Terry and Stephen Broden as the nominees for the Constitution party.
- d. Chase Russell Oliver and Mike ter Maat as the nominees for the Libertarian party.
- e. Jill Stein and Rudolph Ware as the nominees for the Wisconsin Green party.

Moved by Commissioner Millis. Seconded by Commissioner Spindell.

Chair Jacobs noted that the Constitution, Libertarian, and Wisconsin Green parties did not run any candidates for state senate or assembly. The Commission discussed whether this constituted noncompliance with Wis. Stat. § 8.18 and made the parties' nominated candidates ineligible for ballot access.

AMENDMENT: Divide the question so that the Democratic and Republican parties are voted on in one motion and the Constitution, Libertarian, and Wisconsin Green parties are voted on in a separate motion.

Moved by Chair Jacobs. Seconded by Commissioner Thomsen.

Roll call vote:	Bostelmann:	No	Riepl:	Aye
	Jacobs:	Aye	Spindell:	No
	Millis:	No	Thomsen:	Aye

Amendment failed 3-3.

Discussion.

Chair Millis clarified that his motion was moved with the understanding that the last clause, “dependent on the timely receipt of the necessary ballot access documents as described in Wis. Stat. § 8.16(7)” was removed.

ORIGINAL MOTION: Staff recommends that the Commission grant ballot access to the following candidates, who will appear on the November 5, 2024 General Election ballot as the national nominees for President and Vice President for their respective parties:

- a. Kamala D. Harris and Tim Walz as the nominees for the Democratic party.
- b. Donald J. Trump and JD Vance as the nominees for the Republican party.
- c. Randall Terry and Stephen Broden as the nominees for the Constitution party.
- d. Chase Russell Oliver and Mike ter Maat as the nominees for the Libertarian party.
- e. Jill Stein and Rudolph Ware as the nominees for the Wisconsin Green party.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	No	Spindell:	Aye
	Millis:	Aye	Thomsen:	No

Motion carried 4-2.

Chair Jacobs noted that Robert F. Kennedy, Jr. had publicly withdrawn from the presidential race.

MOTION: Based on the review of the nomination papers, and the conclusion of the challenges, the Commission grant ballot access to the following candidates, who will appear on the November 5, 2024 General Election ballot as independent candidates for President and Vice President:

- a. Cornel West and Melina Abdullah as independent candidates representing the Justice For All party.
- b. Claudia De la Cruz and Karina Garcia as independent candidates representing the Party for Socialist and Liberation party.

(c) and (d) are removed based on withdrawal and Commission prior action, respectively.

Moved by Commissioner Millis. Seconded by Commissioner Spindell.

The Commission discussed the application of Wis. Stat. § 8.35(1) to the current situation.

Roll call vote:	Bostelmann:	Aye	Riepl:	No
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Jacobs:	No	Spindell:	Aye
Millis:	Aye	Thomsen:	No

Motion failed 3-3.

MOTION: Based on the review of the nomination papers, and the conclusion of the challenges, the Commission grant ballot access to the following candidates, who will appear on the November 5, 2024 General Election ballot as independent candidates for President and Vice President:

- a. Cornel West and Melina Abdullah as independent candidates representing the Justice For All party.
- b. Claudia De la Cruz and Karina Garcia as independent candidates representing the Party for Socialist and Liberation party.
- c. Robert F. Kennedy and Nicole Shanahan for the We The People party.

Moved by Commissioner Thomsen. Seconded by Commissioner Riepl.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	No
Millis:	Aye	Thomsen:	Aye

Motion carried 5-1.

F. Discussion, Review, and Possible Action Pertaining to Ballot Proofing Best Practices

Administrator Meagan Wolfe summarized the draft clerk communication before the Commission. She clarified that the Commission proofs and approves ballot templates and county clerks generate the actual ballot styles.

Discussion.

MOTION: Approve the publication and distribution of the memo found on page 177 of the Commission's materials.

Moved by Commissioner Thomsen. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

G. Closed Session

MOTION: Move into closed session pursuant to Wis. Stat. § 19.85(1)(g).

Moved by Commissioner Thomsen. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye

Millis: Aye Thomsen: Aye

Motion carried 6-0.

The Commission left open session at 2:01 p.m.

H. Adjourn

The Commission adjourned in closed session at 2:38 p.m.

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August 27, 2024, Wisconsin Election Commission meeting minutes prepared by:



Anna Langdon, Help Desk Staff

October 4, 2024

August 27, 2024, Wisconsin Election Commission meeting minutes certified by:



Marge Bostelmann, Commission Secretary

October 4, 2024