

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
(MILWAUKEE DIVISION)**

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NANCY A. STENCIL, DANIEL C.  
RUSSLER, LISA C. MUELLER, CHERYL  
L. MARANTO, GERARD D. LISI, JAMES  
B. KURZ, MARGARET L. DEMUTH, PAUL  
DEMAIN, JAMES R. BOTSFORD AND  
RICHARD BECHEN,

Plaintiffs,

vs.

RONALD H. JOHNSON, THOMAS P.  
TIFFANY, AND SCOTT L. FITZGERALD,

Defendants.

Case No. 22-cv-305

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**PLAINTIFFS' BRIEF IN OPPOSITION TO MOTION TO DISMISS OF DEFENDANTS  
THOMAS P. TIFFANY AND SCOTT L. FITZGERALD**

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## INTRODUCTION

Accused of participating in a vast conspiracy led by President Donald J. Trump to undermine the peaceful transition of presidential power on January 6, 2021, Defendants Thomas P. Tiffany and Scott L. Fitzgerald decry this lawsuit as a “political stunt.” (Def. Br. 3.) Defendants assert that Plaintiffs “are now unapologetically attempting to subvert the will of Wisconsin voters by asking the Court to issue a decision that would, in Plaintiffs’ view, prevent Congressman Tiffany and Fitzgerald from running for re-election in the 2022 election.” (*Id.* at 1.) They go on to claim that Plaintiffs, some of whom are their own constituents, have “set[] forth an elaborate and fantastical conspiracy theory[]” (*Id.* at 4) and the case should be thrown out on a multitude of legal grounds.

There’s good reason for Fitzgerald and Tiffany to flee the facts and trot out unavailing legal defenses. Discussing the facts about Defendants’ role in the conspiracy is the last thing they want. After all, we are learning by the day how close the United States came to a coup where the “will of Wisconsin voters” that Defendants claim to care so much about (Def. Br. 1) literally would have been set aside by the whims of an out-of-control President and a sycophantic set of enablers who chose power at all costs over the greater good of this Republic. Indeed, but for Vice President Michael R. Pence’s fidelity to his Constitutional duties that fateful day, the Defendants’ carefully contrived plan could have interrupted the peaceful transfer of power from one party to another in the wake of a Presidential election for the first time in our history.

Had that occurred, it would have been the culmination of the nefarious plans of Defendants and those they acted in concert with in the month leading up to the Joint Session of Congress. After all, each of the Defendants spent months fomenting distrust in the 2020 election outcome and Fitzgerald, for his part, went one blatant step further by providing access to the then-closed State Capitol building, thereby enabling the criminal conduct of 10 fraudulent electors who knowingly

perjured themselves when they submitted a false slate of electors for President Trump to the U.S. Senate on behalf of Wisconsin. (Compl., ¶¶ 16-18, 57-60, 101-102, 114.)

The Court need not take Plaintiffs' word for it, because other district courts across the country have already started to address this same plot to overthrow the election. The court's decision in *Eastman v. Thompson*, Case No. 8:22-cv-00099-DOC-DFM, 2022 WL 894256, \*22 (C.D. Cal. March 28, 2022), is a good place to start:

The illegality of the plan was obvious. Our nation was founded on the peaceful transition of power, epitomized by George Washington laying down his sword to make way for democratic elections. Ignoring this history, President Trump vigorously campaigned for the Vice President to single-handedly determine the results of the 2020 election. As Vice President Pence stated, "no Vice President in American history has ever asserted such authority." Every American—and certainly the President of the United States—knows that in a democracy, leaders are elected, not installed. With a plan this "BOLD," President Trump knowingly tried to subvert this fundamental principle. **Based on the evidence, the Court finds it more likely than not that President Trump corruptly attempted to obstruct the Joint Session of Congress on January 6, 2021.**

*Id.* at \*22 (emphasis added). The *Eastman* court further determined that "it is more likely than not that President Trump and Dr. Eastman **dishonestly conspired** to obstruct the Joint Session of Congress on January 6, 2021." *Id.* at \*24 (emphasis added). To reach this conclusion, the court lays out in detail how the conspirators' actions "more likely than not constitute attempts to obstruct an official proceeding."<sup>1</sup> *Id.* at \*21. Plaintiffs' claim here is that Fitzgerald and Tiffany engaged in overt acts in furtherance of this conspiracy to assist a sitting President to ignore the rule of law. (Compl., ¶¶ 34, 41, 101-102, 181-183.)

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<sup>1</sup> Save their rhetoric about the fantastical nature of Plaintiffs' Complaint, Defendants do not challenge Plaintiffs' factual allegations as being implausible under the governing legal standards set forth in *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007) and *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). Instead, they resort to myriad legal defenses that they believe will save them from the discovery process. Even if Defendants challenged the allegations of conspiracy, such a challenge would fail. Conspiracy does not require a heightened pleading standard. See *In re SSA Bonds Antitrust Litig.*, No. 16 CIV. 3711 (ER), 2020 WL 1445783 (S.D.N.Y. Mar. 25, 2020). There can be no debate that Plaintiffs plausibly allege a claim.

In this same vein, less than a month ago, a district court in Georgia rejected efforts by Representative Marjorie Taylor Greene to enjoin a state administrative action pursued by citizens challenging her right to be on the ballot based on the same claim that Plaintiffs advance here: namely, that Greene’s conduct in fraudulently attacking the election results constituted an insurrection in violation of Section 3 of the Fourteenth Amendment. *Greene v. Raffensperger*, No. 22-cv-1294-AT, 2022 WL 1136729 (N.D. Ga., April 18, 2022). The district court ruled that “Section 3 of the Fourteenth Amendment is an existing constitutional disqualification adopted in 1868—similar to but distinct from the Article I, Section 2 requirements that congressional candidates be at least 25 years of age, have been citizens of the United States for 7 years, and reside in the states in which they seek to be elected.” *Id.* at \*25. In so doing, the court rejected several arguments that are essentially indistinguishable from the positions Defendants assert here. (*See, e.g.*, Def. Br. 2, 19.)

Even more recently, on May 1, 2022, the U.S. District Court for the District of Columbia rejected arguments advanced by the Republican National Committee (“RNC”) designed to thwart the congressional investigation being undertaken over the January 6, 2021 insurrection and refused to quash a subpoena issued to Salesforce, which the RNC had used to send emails between November 3, 2020 and January 6, 2021 spreading disinformation about the 2020 election. *See Republican National Committee v. Pelosi*, Civil Action No. 22-659 (TJK), 2022 WL 1294509 (D.D.C., May 1, 2022). The court methodically rejected the RNC’s six arguments seeking to block the Select Committee’s access to the RNC’s records, most notably determining that the committee is properly authorized, that its subpoena to Salesforce had a valid legislative purpose, and that the First Amendment did not restrict the Select Committee’s access to the records because of the seriousness of the offenses being investigated. *Id.* at \*15-23.

While Defendants combatively suggest that Plaintiffs are just playing politics by pursuing this case, the decisions in *Eastman*, *Greene*, and *RNC* show that the conduct at issue in this lawsuit is no game. The gravity of Defendants' conduct is notably highlighted in a recent Op-Ed authored by highly respected former Fourth Circuit Court of Appeals judge J. Michael Luttig:

Nearly a year and a half later, surprisingly few understand what January 6 was all about.

Fewer still understand why former President Donald Trump and Republicans persist in their long-disproven claim that the 2020 presidential election was stolen. Much less why they are obsessed about making the 2024 race a referendum on the "stolen" election of 2020, which even they know was not stolen.

January 6 was never about a stolen election or even about actual voting fraud. It was always and only about an election that Trump lost fair and square, under legislatively promulgated election rules in a handful of swing states that he and other Republicans contend were unlawfully changed by state election officials and state courts to expand the right and opportunity to vote, largely in response to the Covid pandemic.

The Republicans' mystifying claim to this day that Trump did, or would have, received more votes than Joe Biden in 2020 were it not for actual voting fraud, is but the shiny object that Republicans have tauntingly and disingenuously dangled before the American public for almost a year and a half now to distract attention from their far more ambitious objective.

That objective is not somehow to rescind the 2020 election, as they would have us believe. That's constitutionally impossible. Trump's and the Republicans' far more ambitious objective is to execute successfully in 2024 the very same plan they failed in executing in 2020 and to overturn the 2024 election if Trump or his anointed successor loses again in the next quadrennial contest.

The last presidential election was a dry run for the next.

See "The Republican Blueprint to Steal the 2024 Election," CNN (April 27, 2022),

[https://www.cnn.com/2022/04/27/opinions/gop-blueprint-to-steal-the-2024-election-](https://www.cnn.com/2022/04/27/opinions/gop-blueprint-to-steal-the-2024-election-luttig/index.html)

[luttig/index.html](https://www.cnn.com/2022/04/27/opinions/gop-blueprint-to-steal-the-2024-election-luttig/index.html), last accessed on May 2, 2022.

Because Fitzgerald and Tiffany desperately wish to turn the Court's attention away from their complicity in enabling a potential coup in 2020 and laying the groundwork for a successful

one in 2024, Defendants deploy legal arguments to avoid accountability out of the gate. None of the arguments serve as a basis to dismiss this lawsuit.

First, Defendants argue that Plaintiffs lack standing to pursue this case. But their position is inconsistent with the rules that allow citizens to pursue claims when they have suffered a particularized injury, caused by a defendant, that is redressable by the relief sought. Each of the Plaintiffs satisfy each of these requirements, because they have First Amendment rights to challenge a candidate's ballot eligibility, and because Defendants' insurrectionist conduct impairs Plaintiffs' First Amendment right to engage in political persuasion. A decision by this Court that Defendants engaged in insurrection under Section 3 will give Plaintiffs legal redress.

Second, Fitzgerald and Tiffany claim that Article 1, Section 5 of the Constitution (the "Qualifications Clause") divests this Court of subject matter jurisdiction because only Congress is empowered to adjudicate member qualifications. This argument overlooks that Plaintiffs do not seek to expel Defendants from their current seats in Congress and ignores the role in running elections for federal office that is assigned to the states by Article I, Section 4 – which in this case includes the requirement of Wisconsin law that Fitzgerald and Tiffany must assert under oath in their "Declaration of Candidacy" that they are qualified to be on the ballot.

Third, building on the false premise of their argument under Article I, Section 5, Defendants assert that this lawsuit must be dismissed because the declaratory judgment Plaintiffs seek will amount to an advisory opinion from the Court. This is false. This Court is best suited to answer the constitutional question presented: namely, whether the conduct alleged in the Complaint constitutes insurrection under Section 3 of the Fourteenth Amendment. In so doing, this Court will perform its Article III role and render a judgment finding that Defendants either did or did not violate Section 3. If Plaintiffs prevail and further proceedings before a different tribunal

are necessary (which will happen only if Defendants refuse to amend their sworn Declarations of Candidacy at that juncture), this Court's judgment will serve to preclude litigation of the Section 3 issues.

Fourth, Defendants argue that the case is not ripe because Congress has not acted to expel Fitzgerald or Tiffany, and because Article I, Section 5 provides the only basis for expulsion to occur, there is nothing for the Court to adjudicate. Yet, Plaintiffs are not seeking a declaration affecting Defendants' status in the 117<sup>th</sup> Congress. Instead, Plaintiffs ask the Court to declare that Defendants engaged in insurrection under Section 3 – which would affect only their eligibility to run for seats in the 118<sup>th</sup> Congress. Since both Tiffany and Fitzgerald are running for re-election this fall and must qualify for inclusion on the ballot in order to do so, this issue is assuredly ripe for adjudication by this Court.

Fifth, Fitzgerald and Tiffany claim any decision here will violate the political question doctrine and step on Congressional toes. While there are certainly political aspects to this litigation, at its heart the case presents a classic application of law to facts: did the actions of the Defendants leading up to the counting of electoral votes on January 6, 2021 qualify as engaging in insurrection under Section 3? Suggesting this is solely a political question that can be resolved only by Congress ignores the constitutional role of this Court in interpreting the law and the fact that courts have resolved in on Section 3 claims in the past.

Finally, Defendants argue that Plaintiffs fail to state a claim upon which relief can be granted. Their arguments fail because Plaintiffs are not making claims under the *Bivens* doctrine or under 42 U.S.C. §1983, and because this Court has the power to enter a declaratory judgment that safeguards Plaintiffs' First Amendment rights.

Fitzgerald and Tiffany’s motion to dismiss should be denied and the Court should set an expedited discovery schedule to allow prompt action on the Complaint that will ensure that only qualified candidates appear on the ballot in Wisconsin this fall.

## **ARGUMENT**

### **I. PLAINTIFFS HAVE STANDING TO PURSUE THEIR CLAIMS.**

Article III limits the power of federal courts to decide “Cases” or “Controversies.” U.S. Const., Art. III, §2. “The doctrine of standing implements this requirement by insisting that a litigant ‘prove that he has suffered a concrete and particularized injury that is fairly traceable to the challenged conduct, and is likely to be redressed by a favorable judicial decision.’” *Carney v. Adams*, 141 S.Ct. 493, 498 (2020) (quoting *Hollingsworth v. Perry*, 570 U.S. 693, 704 (2013)). Because Plaintiffs can meet their burden of showing they have standing to bring their claims, Defendants’ challenge must be denied.

#### **A. This Court May Go Beyond the Complaint to Evaluate Standing.**

“When a party raises the issue of subject matter jurisdiction, ‘[t]he district court may properly look beyond the jurisdictional allegations of the complaint and view whatever evidence has been submitted on the issue to determine whether in fact subject matter jurisdiction exists.’” *Fauley v. Drug Depot, Inc.*, 204 F.Supp. 3d 1008, 1009 (N.D. Ill. 2016) (quoting *Evers v. Astrue*, 536 F.3d 651, 656-57 (7th Cir. 2008)); *see also Capitol Leasing Co. v. F.D.I.C.*, 999 F.2d 188, 191 (7th Cir. 1993); *Donovan v. Eagleson*, 484 F.Supp. 3d 552, 555 (N.D. Ill. 2020). Defendants move under Fed. R. Civ. P. 12(b)(1), asserting that the lack of standing deprives this Court of subject matter jurisdiction. “The burden of proof on a 12(b)(1) issue is on the party asserting jurisdiction. . . . [a]nd the court is free to weigh the evidence to determine whether jurisdiction has been established.” *United Phosphorus, Ltd. v. Angus Chemical Co.*, 322 F.3d 942, 946 (7th Cir. 2003), *overruled on other grounds, Minn-Chem, Inc. v. Agrium, Inc.*, 683 F.3d 845 (7th Cir. 2012).

**B. Plaintiffs' Status as Activist Voters Asserting Their First Amendment Rights Establishes That They Have Standing.**

All ten Plaintiffs have filed declarations supporting this brief,<sup>2</sup> presenting facts that summarize their interests in bringing this suit and explaining why allowing the Defendants to remain on the ballot for 2022 elections causes them to suffer injuries that a favorable decision from this Court will remedy. We discuss the facts established by those declarations in detail below; for the moment it is enough to note that in addition to their involvement in politics as voters, all of the Plaintiffs have taken an active role in politics in their communities, ranging from supporting candidates in national and local elections (Mueller Decl. ¶ 2; Maranto Decl. ¶ 2; Lisi Decl. ¶¶ 2-4; Kurz Decl. ¶ 2; DeMuth Decl. ¶ 2; DeMain Decl. ¶ 3; Bechen Decl. ¶ 2), to working as “fair maps” advocates on legislative reapportionment (Stencil Decl. ¶¶ 2-3; Russler Decl. ¶ 2; Mueller Decl. ¶ 2; Maranto Decl. ¶¶ 2-3), to running for office themselves (Lisi Decl. ¶ 4; DeMain Decl.), as well as many other political activities (*see generally* Pls.’ Decl.).

For purposes of deciding the threshold standing issue in this case, two sets of facts from the Plaintiffs’ declarations are dispositive. First, because Defendants continue to flout Section 3 by insisting on running for re-election notwithstanding their involvement in and promotion of the insurrection against the 2020 election results, Plaintiffs must divert time and effort that they would have otherwise devoted to activism and persuasion on substantive policy issues to combating the

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<sup>2</sup> Not only does the law allow evidence beyond the pleadings to be submitted and considered on a Rule 12(b)(1) motion challenging standing through a lack of subject matter jurisdiction, in this Circuit “[a] motion to dismiss for lack of standing should not be granted unless there are no set of facts consistent with the complaint’s allegations that could establish standing.” *Lac Du Flambeau Band of Lake Superior Chippewa Indians v. Norton*, 422 F.3d 490, 498 (7th Cir. 2005). Plaintiffs’ declarations submitted with this brief are entirely consistent with their Complaint; by filing them, Plaintiffs have aided the Defendants and the Court by presenting specific and sworn factual evidence when, under *Lac Du Flambeau*, they could simply have asserted those facts in this brief. Even if this were not enough, Plaintiffs could amend the Complaint as of right to include all of the facts stated in their declarations. Against this background, any result other than proceeding directly to the merits of Defendants’ challenge to standing based on the facts of record is empty formalism.



“Big Lie” and explaining to voters that Defendants should not be on the ballot at all. (Stencil Decl. ¶ 4; Russler Decl. ¶ 5; Mueller Decl. ¶¶ 4-5; Maranto Decl. ¶¶ 4-5; Lisi Decl. ¶¶ 5-6; Kurz Decl. ¶ 5; DeMuth Decl. ¶ 5; DeMain Decl. ¶¶ 4-6; Botsford Decl. ¶¶ 5-6; Bechen Decl. ¶ 5.) Second, their actions in bringing this lawsuit – and in taking a favorable decision from this Court to other forums if that becomes necessary – implicate their First Amendment right to petition for redress of grievances.

The Supreme Court has made clear that the First Amendment “has its fullest and most urgent application precisely to the conduct of campaigns for political office.” *Monitor Patriot Co. v. Roy*, 401 U.S. 265, 272 (1971). “[T]he First Amendment safeguards an individual’s right to participate in the public debate through political expression and political association.” *McCutcheon v. Federal Election Comm’n*, 572 U.S. 185, 203 (2014). Plaintiffs prefer to devote their time to persuading their fellow citizens to support their positions on important substantive political issues, but Defendants’ potential presence on the ballot for the 2022 elections compels Plaintiffs to spend time discussing and debating Defendants’ inflammatory lies and insurrectionist actions, rather than the important substantive public policy issues they would prefer to discuss.

In addition, the First Amendment protects a separate, vital right that supports Plaintiffs’ claims in this case: the right to petition the government for redress of grievances. “The right of access to the courts is indeed but one aspect of the right of petition.” *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510 (1972). In *Bill Johnson’s Restaurants, Inc. v. NLRB*, 461 U.S. 731, 743 (1983), the Supreme Court identified “the [F]irst [A]mendment interests in private litigation – compensation for violated interests, the psychological benefits of vindication, public airing of disputed facts[.]” Violation of these interests demonstrates injury-in-fact.

Finally, even an unsuccessful suit supports First Amendment interests: “[T]he ability to lawfully prosecute even unsuccessful suits adds legitimacy to the court system as a designated alternative to force.” *BE&K Const. Co. v NLRB*, 536 U.S. 516, 532 (2002). This function of the First Amendment contrasts starkly with Defendants’ support for the illegal conspiracy intended to overturn the legitimate result of the 2020 presidential election, to say nothing of the violence that flowed from the endless stream of falsehoods from Defendants and their co-conspirators.

**C. Standing Is Not A Hypertechnical Requirement That Provides An Excuse To Close Courthouse Doors.**

1. A Widely Shared Injury Can Be “Particularized.”

Defendants rightly point out (Def. Br. 10) that a plaintiff cannot establish standing by claiming an “injury-in-fact” by asserting “an abstract and generalized harm to a citizen’s interest in the proper application of the law[.]” *Carney*, 141 S.Ct. at 498. Nevertheless, a widely shared injury can support standing, so long as the requirements of the injury-in-fact test are met. For example, in *Public Citizen v. U.S. Dep’t of Justice*, 491 U.S. 440 (1989), the Supreme Court ruled that a widespread injury established standing: “The fact that other citizens or groups of citizens might make the same complaint after unsuccessfully demanding disclosure under FACA does not lessen appellants’ asserted injury, any more than the fact that numerous citizens might request the same information under the Freedom of Information Act entails that those who have been denied access do not possess a sufficient basis to sue.” *Id.* at 449-50.

2. Even Minor Injuries Fully Establish Standing.

The law is clear that an injury cannot be classified as “conjectural or hypothetical,” *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560-61 (1992) and thus insufficient to establish standing, merely because some or even many people would not consider it to be serious. Indeed, the exact opposite is true: “The defendants claim that [plaintiff’s] injury is insubstantial, but the ‘injury-in-

fact necessary for standing need not be large, an identifiable trifle will suffice.” *Sierra Club v. Franklin County Power of Illinois, LLC*, 546 F.3d 918, 925 (7th Cir. 2008) (quoting *LaFleur v. Whitman*, 300 F.3d 256, 270 (2d Cir. 2002)); *see also Doe v. County of Montgomery*, 41 F.3d 1156, 1159 (7th Cir. 1994) (“[A]n identifiable trifle is enough for standing to fight out a question of principle . . .”).

Courts routinely find an “injury,” and thus standing, when a defendant’s unlawful actions cause a plaintiff to undergo inconvenience, even if that inconvenience is very brief and even if the inconvenience is a product of the plaintiffs’ own choices. For example, a woman who was unlawfully ejected from an auditorium for five minutes by law enforcement officers suffered an injury sufficient to give her standing: “The Court believes that the five minute timespan that [plaintiff] was barred from the auditorium does not render her legally protected interest insubstantial.” *Marshall v. Town of Merrillville*, 228 F. Supp. 3d 853, 862 (N.D. Ind. 2017). Similarly, in a case under the Telephone Consumer Protection Act, a court found standing for a plaintiff who spent a few minutes taking an automated telephone survey, even though he took the survey voluntarily and could have hung up at any time. *Leung v. XPO Logistics, Inc.*, 164 F. Supp. 3d 1032 (N.D. Ill. 2015). Simply because the plaintiff (and others like him) “could have reacted differently to the respective defendants’ conduct and reduced or avoided their injuries does not mean that they were not injured.” *Id.* at 1036. The court went on to hold that the duration of the survey call was immaterial: “When a defendant’s allegedly wrongful conduct costs the plaintiff time, the plaintiff has suffered an injury in fact.” *Id.* at 1037.

The principle that small injuries support Article III standing applies with full force to First Amendment claims. In *American Civil Liberties Union v. City of St. Charles*, 794 F.2d 265 (7<sup>th</sup> Cir. 1986), plaintiffs argued they had standing to bring a challenge under the First Amendment’s

Establishment Clause to a city’s placement of a large lighted cross on a public building because “they have been led to alter their behavior—to detour, at some inconvenience to themselves, around the streets they ordinarily use.” *Id.* at 268. The Seventh Circuit held that this inconvenience gave them standing:

The curtailment of their use of public rights of way is similar to the alleged curtailment of the plaintiffs’ use of the national parks in *United States v. SCRAP* [citation omitted]. The cost in this case is no doubt slight, but it was even slighter in *SCRAP*, and the willingness of plaintiffs (or even just one of them) to incur a tangible if small cost serves to validate, at least to some extent, the existence of genuine distress and indignation, and to distinguish the plaintiffs from other objectors to the alleged establishment of religion by St. Charles.

*Id.* The *St. Charles* court also ruled that it was irrelevant that plaintiffs had subjected themselves to the detour. *Id.* at 268-69.

3. Diversion of Time and Resources Establishes an Injury for Standing Purposes.

*St. Charles* also follows the rule in First Amendment cases that plaintiffs who incur inconvenience, lost time, or expense because of an alleged violation of the First Amendment have standing. *Id.* Most often, such “diversion of resources” claims are advanced by organizations rather than individuals. For example, in *Crawford v. Marion County Election Bd.*, 472 F.3d 949 (7th Cir. 2007), the Seventh Circuit held that the Democratic Party had standing to challenge a voter identification law because the law “injures the [party] by compelling [it] to devote resources to getting to the polls those of its supporters who would otherwise be discouraged from the new law from bothering to vote.” *Id.* at 951.<sup>3</sup>

In another organizational standing case, *Common Cause Indiana v. Lawson*, the Seventh Circuit held that the plaintiff, an organization that promoted the right to vote, had standing because

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<sup>3</sup> Notably, *Crawford* also affirms the principle that even a slight detriment is enough to establish standing: “The fact that the added cost has not been estimated and may be slight does not affect standing, which requires only a minimal showing of injury.” 472 F.3d at 951.

a state law that purged voter rolls required the plaintiff to spend time, resources and money challenging the law and helping voters who had been incorrectly removed remedy the errors. 937 F.3d 944, 950-51 (7th Cir. 2019). “We are not alone in this assessment. Our sister circuits have upheld the standing of voter-advocacy organizations that challenged election laws based on similar drains on their resources. Like us, they have found that the organizations demonstrated the necessary injury in fact in the form of the unwanted demands on their resources.” *Id.* at 952.

Notably, the concurring opinion of Judge Brennan in *Common Cause* recognizes that “[t]he test for organizational standing . . . is the same as that for any other plaintiff: Has the plaintiff demonstrated a concrete, particularized injury to its own interests, or is it complaining of a generalized grievance shared broadly with other members of the public?” *Id.* at 964. This makes perfect sense: individuals, like organizations, can be required by the unlawful actions of a defendant to spend time or devote resources in ways that impair their objectives or cause them to do something they would prefer not to do. Thus, the “diverted resources” rationale of *Crawford*, *Common Cause*, and other organizational standing cases applies with full force to support Plaintiffs’ arguments for standing here.

#### **D. Plaintiffs Establish Injury-In-Fact.**

Applying these established tests, it cannot reasonably be doubted that Plaintiffs have shown injury in fact. First, they have lost time and resources because Defendants insist on remaining on the ballot for the 2022 election cycle despite their participation in acts of insurrection against the Constitution and the United States. In the eloquent words of Plaintiff Margaret DeMuth:

As a result of the actions of Defendants that discredit the offices they hold, I am compelled to devote time and effort in my political activity to assuring that my fellow citizens are educated on these matters in addition to policy topics. This additional effort is necessary in order to help people feel that citizen action such as voting is worth their time. In recent months of phoning and canvassing neighbors to talk about voting and to learn about what matters to them, I am hearing a fervent concern that politicians are corrupt and cannot be trusted. This detracts from the

essential work of understanding the choices that impact voters in the 2022 and future elections. This burden would be greatly relieved if Senator Johnson and Representatives Fitzgerald and Tiffany were disqualified from the ballot.

(DeMuth Decl. ¶ 5; *see also* Stencil Decl. ¶¶ 4-5; Russler Decl. ¶ 5; Mueller Decl. ¶¶ 4-5; Maranto Decl. ¶¶ 4-5; Lisi Decl. ¶¶ 6-7; Kurz Decl. ¶¶ 4-5; DeMain Decl. ¶ 4; Botsford Decl. ¶¶ 5-6; Bechen Decl. ¶¶ 5-6.) This lost-time and lost-resources injury is exactly the same kind of harm found sufficient to confer standing in *St. Charles*, *Crawford*, *Common Cause*, *Marshall*, and *Leung*: because of unlawful conduct by defendants, plaintiffs felt compelled to devote time and resources to dealing with the effects of defendants' conduct rather than on activities they would have preferred to be involved in. Nothing more is required.

Plaintiffs also prove injury-in-fact through this lawsuit and other proceedings they may have to bring if they succeed here. The filing of a challenge to a political candidate's placement on a ballot based on that candidate's involvement in insurrection is protected by the First Amendment. *Greene* recognizes "citizens' own First Amendment rights to file complaints regarding the operation of the electoral process that the Challenge Act recognizes." 2022 WL 1136729 at \*18. It does not matter that the *Greene* court recognized this right in the context of a challenge mounted in the Georgia administrative process.<sup>4</sup> If Plaintiffs prevail on the merits of this case and Defendants do not amend their Declarations of Candidacy to make their representations about eligibility required by Wis. Stat. §8.21(2)(c) accurate, then Plaintiffs will initiate proceedings before the Wisconsin Election Commission ("WEC") or the state courts of Wisconsin to enforce this Court's judgment. As we demonstrate in greater detail in Section III of this

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<sup>4</sup> Plaintiffs did not bring this challenge before WEC in the first instance because they have no rights to discovery under Wis. Stat. §5.05(2m) and no control over the investigation conducted into a complaint under Wis. Stat. §5.05(2). Further, Wis. Stat. §5.06 does not authorize a complaint because, as of now, no "election official" has acted or failed to act with respect to Defendants' ballot eligibility. In any event, even if WEC were empowered to adjudicate Plaintiffs' Constitutional claims, they are still entitled to a federal forum for those claims. *See Zwickler v. Koota*, 389 U.S. 241, 248 (1967).

Argument, enforcing a judgment from this Court in Plaintiffs' favor in some other forum does not transform this case into a quest for an advisory opinion. Nor does it diminish the injury that plaintiffs have suffered.

**E. Plaintiffs Assert a Causal Relationship Between Defendants' Insurrectionist Acts and Their Injuries.**

The second element of Article III standing requires Plaintiffs to demonstrate “a causal connection between the injury and the conduct complained of – the injury has to be ‘fairly . . . trace[able] to the challenged action of the defendant, and not . . . th[e] result [of] the independent action of some third party not before the court.’” *Lujan*, 504 U.S. at 560. Plaintiffs filed this case as a direct consequence of Defendants' running for re-election to Congress despite their insurrectionist conduct. Although the conspiracy that Defendants were part of involved many other people, Plaintiffs are not suing those other people. They are suing the three individuals whose presence on the ballot is causing **them** to spend time explaining to voters the grievous harm that was done by participation in the insurrection. The requisite causal relationship is present.

**F. Plaintiffs Assert Injuries that This Court Can Redress.**

The redressability requirement of standing requires that Plaintiffs “only show that the requested relief will likely cure the alleged injury . . . . Put differently, the plaintiffs must show that they would benefit in a tangible way from the district court's intervention.” *Krislov v. Rednour*, 226 F.3d 851, 858 (7th Cir. 2000).

Depending on how Defendants respond to a decision in Plaintiffs' favor, that decision alone might give Plaintiffs everything they want. As part of their Declarations of Candidacy required by Wisconsin law, Defendants are obligated to swear under oath that they “otherwise qualify for office if nominated and elected.” Wis. Stat. §8.21(2)(c). If this Court issues a judgment that Defendants engaged in insurrection in violation of Section 3 of the Fourteenth Amendment, they

will be ineligible to hold the offices to which they seek election. Such a judgment should cause them to amend their Declarations of Candidacy to reflect their ineligibility.

Alternatively, Defendants might not voluntarily admit that they are ineligible for office even if this Court rules in Plaintiffs' favor. Depending on how Defendants chose to act after entry of the judgment, Plaintiffs would seek to enforce the judgment in proceedings before the WEC or a Wisconsin circuit court. Such a judgment would have a preclusive effect before another tribunal because this case gives Defendants a full opportunity to litigate the issue whether they violated Section 3. *See, e.g., Matrix IV, Inc. v. Am. Nat'l Bank & Trust Co.*, 649 F.3d 539, 547 (7th Cir. 2011). That preclusive effect, in turn, is sufficient to make Plaintiffs "benefit in a tangible way" under *Krislov* from a decision in their favor, and thus also sufficient to establish redressability.<sup>5</sup>

Plaintiffs have standing to proceed.

## **II. THE QUALIFICATIONS CLAUSE DOES NOT DIVEST THIS COURT OF JURISDICTION.**

Defendants claim that this Court does not have authority to issue the declaratory relief sought by Plaintiffs because Article I, Section 5 of the U.S. Constitution "emphatically and categorically vests each House of Congress with the power to establish and apply standards for the qualification **of its members.**" (Def. Br. 15; emphasis added.) They further assert that action by this Court would ignore the separation of powers because Plaintiffs seek "a judicial determination of an issue that the Constitution expressly reserves for Congress." (*Id.*) In Fitzgerald and Tiffany's view, the "storied history" of Congress demonstrates that "both Houses of Congress have consistently asserted and exercised their rights under Article I, Section 5 to adjudicate the elections and qualifications of their respective members." (*Id.*) In support of their assertions, Defendants

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<sup>5</sup> Of course, Defendants' argument that Plaintiffs' injuries cannot be redressed (Def. Br. 13-14) assumes the correctness of Defendants' argument that Congress has the exclusive power to decide Defendants' eligibility for re-election to Congress. We deal with the flaw in that argument below.



rely on a host of state and federal cases that purport to establish that the Qualifications Clause “gives final and exclusive jurisdiction to each House of Congress to determine election contests relating to its members.” (Def. Br. 15-19.)

Their argument wrongly assumes that this litigation seeks the expulsion of Fitzgerald and Tiffany from the current 117<sup>th</sup> Congress, which convened on January 3, 2021.<sup>6</sup> But that’s not at issue. Rather, Plaintiffs ask this Court to resolve a federal constitutional question integral to the determination of Fitzgerald and Tiffany’s right to access the August 9, 2022 primary and November 6, 2022 general election ballots in Wisconsin. (Compl., ¶¶ 25-26.) Because compliance with Section 3 of the Fourteenth Amendment is a prerequisite to holding federal and state office, whether Fitzgerald and Tiffany’s conduct amounts to insurrection is a question that must be answered before they are entitled to have their names placed on the ballot.<sup>7</sup> While ballot access in Wisconsin is governed by Chapter 8 of the Wisconsin Statutes (“Nominations, Primaries, Elections”) and administered by the WEC, this case is a necessary first step to provide an answer to a federal constitutional question that this Court is best suited to resolve.

Because Defendants start with the wrong premise in their Qualifications Clause argument, all the cases on which they rely (Def. Br. 15-19) do not control here. In fact, all of them (save one) stand for the unremarkable proposition that the Qualifications Clause gives Congress the authority to address who shall sit as a member **once an election has occurred**. Nothing Fitzgerald and

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<sup>6</sup> See [https://ballotpedia.org/117th\\_United\\_States\\_Congress](https://ballotpedia.org/117th_United_States_Congress), last accessed on April 30, 2022.

<sup>7</sup> Defendants’ argument about Congress’ plenary power ignores that Section 3 of the Fourteenth Amendment also serves to disqualify insurrectionists from holding “any office, civil or military, . . . **under any State . . .**” U.S. Const. amend. XIV, § 3. If Defendants are right, then only Congress can decide whether a local sheriff or state legislator who engaged in insurrection must be barred from office. That is not what Section 3 says, and there is no reason to suppose that those who framed and ratified the Fourteenth Amendment meant to make such a radical change.

Tiffany cite supports the idea that Congress is vested with plenary authority to adjudicate ballot access issues in the first instance before ballots are prepared or any election occurs. Indeed, Defendants' argument over Article I, Section 5 would render a nullity the power of each state pursuant to Article I, Section 4 of the Constitution to regulate ballot access and elections **before an election has occurred**. It would also read into Section 3 an exclusivity restriction that simply is not there.

The one case Defendants cite that seems to implicate Article I, Section 5 before an election, *State ex rel. Chavez v. Evans*, 446 P.2d 445 (N.M. 1968), is of no help to Defendants. First, it predates the Supreme Court's decision in *U.S. Term Limits v. Thornton*, 514 U.S. 779, 787 n.2 (1995), which determined that "qualifications" for holding Congressional office may include more than those identified in Article I, Section 2 of the Constitution (which is what *Chavez* relied on extensively) and that Section 3 of the Fourteenth Amendment became "part of the text of the Constitution" when added in 1868. Second, *Chavez* ignores the extensive case law discussed at length below that confirms the right of each state to regulate election processes before elections occur. (*See, infra*, Sections III-V.)

In resolving Defendants' motion, the Court should take judicial notice that Fitzgerald and Tiffany are running for re-election and are seeking to have their names placed on the August 9, 2022 primary ballot. First, both have robust campaign websites that promote their 2022 re-election ambitions.<sup>8</sup> Second, each has reported to the Federal Election Commission significant fundraising in support of their candidacies:<sup>9</sup>

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<sup>8</sup>See <https://scottfitzgeraldforcongress.com/> and <https://tomtiffany.com/>, last accessed April 30, 2022.

<sup>9</sup>See <https://www.fec.gov/data/elections/?cycle=2022&state=WI>, last accessed on May 1, 2022. Defendant Ron Johnson, who has filed a separate motion to dismiss, has raised \$10,847,873.37 as of March 31, 2022.

Candidate	Total Receipts as of 3/31/22
Fitzgerald	\$570,059.56
Tiffany	\$554,062.78

Finally, each of them must file a sworn Declaration of Candidacy with the WEC by June 1, 2022 as required by Wis. Stat. § 8.21.<sup>10</sup> As of May 4, 2022, Tiffany has already done so.<sup>11</sup>

The filing of the Declaration of Candidacy is necessary for any candidate from Wisconsin (save one running for President) to be considered for placement on the ballot – even those running for federal office. In the Declaration, a candidate must affirm under oath as follows:

- (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.**

Wis. Stat. § 8.21(2)(a-c) (emphasis added).

Defendants’ assertion that the Qualifications Clause deprives this Court of jurisdiction to resolve the constitutional question presented by Plaintiffs’ claims must fail, because the State of Wisconsin is primarily responsible for the orderly administration of its elections. We know this because “[t]he U.S. Constitution assigns responsibilities to both Congress and the states with respect to the election of congressional candidates.” *Greene*, 2022 WL at \*26 (citing *Hutchinson*

<sup>10</sup>See <https://elections.wi.gov/sites/elections/files/2021-12/2022-2023%20Calendar%20of%20Election%20Events%20PDF.pdf>, last accessed on May 1, 2022 (showing that nomination papers and Declarations of Candidacy must be filed by June 1, 2022).

<sup>11</sup> See <https://elections.wi.gov/sites/elections/files/2022-04/Candidates%20Tracking%20By%20Office%20as%20of%204.29.2022.pdf>, p. 7, last accessed on April 30, 2022. For ease of reference, Plaintiffs have attached to this brief as **Exhibit A** the WEC’s candidate tracking form which shows that Tiffany has already filed his Declarations of Candidacy, that Fitzgerald has not yet done so, and that ballot status (for Tiffany and all other candidates listed) remains “pending.” The WEC last updated this document on May 4, 2022.

*v. Miller*, 797 F.2d 1279, 1284 (4th Cir. 1986) (acknowledging the “shared responsibility for the legitimization of electoral outcomes” between Congress and the states)). The authority of states to regulate the “Times, Places, and Manner” of elections under Article I, Section 4 of the U.S. Constitution “has been interpreted broadly.” *Id.* The Supreme Court has held that the “comprehensive words” found in Article I, Section 4 provide a “complete code for congressional elections.” *Roudebush v. Hartke*, 405 U.S. 15, 24 (1972). It explained that the states have authority

not only as to times and places, but in relation to notices, registration, supervision of voting, protection of voters, prevention of fraud and corrupt practices, counting of votes, duties of inspectors and canvassers, and making and publication of election returns; in short, to enact the numerous requirements as to procedure and safeguards which experience shows are necessary in order to enforce the fundamental right involved.

*Id.* at 24-25. The Supreme Court has further confirmed the interest of each state in “avoiding ‘voter confusion, ballot overcrowding, or the presence of frivolous candidacies,’ in ‘seeking to assure that elections are operated equitably and efficiently,’ and in ‘guarding against irregularity and error in the tabulation of votes[.]’” *U.S. Term Limits*, 514 U.S. at 834 (quoting *Munro v. Socialist Workers Party*, 479 U.S. 189, 194-95 (1986)).

As the *Greene* court recently ruled, “federal appellate courts have held that states have the power to exclude from the ballot constitutionally unqualified or ineligible candidates.” 2022 WL at \*26. In *Hassan v. Colorado*, for example, the Tenth Circuit held that Colorado “had a legitimate interest in excluding the plaintiff from the ballot because he was constitutionally prohibited from assuming the office of President of the United States under Article II” due to the fact that he was a naturalized citizen (and not a “natural born Citizen” as required). *Greene*, 2022 WL at \*26 (citing *Hassan*, 495 F. App’x 947, 948 (10th Cir. 2012)). The Court of Appeals in *Hassan* determined 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.” 495 F. App’x at 948. In this same vein, the Ninth Circuit ruled that the State of California was authorized to exclude from the ballot a 27-year-old who was constitutionally ineligible to become president due to her age. *See Lindsay v. Bowen*, 750 F.3d 1061, 1064 (9th Cir. 2014).

In short, Defendants are not eligible for this year’s ballot if they are determined to be “constitutionally prohibited from assuming office.” *Hassan*, 495 F. App’x at 948; *Lindsay*, 750 F.3d at 1064. The court in *Greene* rightly determined that, just like the qualifications imposed in *Hassan* and *Lindsay*, the Disqualification Clause found in Section 3 of the Fourteenth Amendment is an existing Constitutional provision that Congressional candidates must meet in order to be ballot-eligible. *Greene*, 2022 WL at \*27. In rejecting Representative Greene’s argument that Article I, Section 5 rendered a voter challenge to her qualifications in a Georgia administrative proceeding unconstitutional, the district court questioned whether Article I, Section 5 authorizes the current Congress “to assess the qualifications of a candidate . . . for the 118<sup>th</sup> Congress.” *Id.* In so deciding, the court rejected the contention that the Qualifications Clause could be used to override state requirements for ballot qualification. To hold otherwise would “invite the possibility that fraudulent or unqualified candidates such as minors, out-of-state residents, or foreign nationals could be elected to Congress – and the state would be powerless to prevent it from happening.” *Id.*

The fact that the final decision on ballot eligibility belongs to Wisconsin does not affect this Court’s power to adjudicate the specific issue of whether Defendants engaged in insurrection within the meaning of Section 3 of the Fourteenth Amendment. Plaintiffs have First Amendment claims, and when they choose to present those claims to a federal court for resolution, that choice must be honored (with very rare exceptions). By enacting the original version of 28 U.S.C. §1331 in 1875,

Congress imposed the duty upon all levels of the federal judiciary to give due respect to a suitor's choice of a federal forum for the hearing and decision of his federal constitutional claims. Plainly, escape from that duty is not permissible merely because state courts also have the solemn responsibility, equally with the federal courts, '\* \* \* to guard, enforce, and protect every right granted or secured by the constitution of the United States \* \* \*'. . . 'We yet like to believe that wherever the Federal courts sit, human rights under the Federal Constitution are always a proper subject for adjudication, and that we have not the right to decline the exercise of that jurisdiction simply because the rights asserted may be adjudicated in some other forum.'

*Zwickler*, 389 U.S. at 248 (citations omitted).<sup>12</sup>

Few cases have interpreted Section 3 of the Fourteenth Amendment since its ratification in 1868. *See, e.g., U.S. v. Powell*, 65 N.C. 709 (1871); *Worthy v. Barrett*, 63 N.C. 199 (1869). This is because there has been no need for judicial intervention on the topic of insurrection since the Civil War – until now. This Court is empowered to decide whether the conduct alleged (and revealed through discovery) constitutes insurrection within the scope of Section 3. Once it does so, the candidates whose qualifications are being challenged will have a binding legal decision upon which they can rely (if they were to prevail) or by which they can abide (if they were to lose). If they lose, we expect that Defendants will amend the sworn Declarations of Candidacy required by Wis. Stat. § 8.21(2)(a-c) to reflect their ineligibility for office, or (more to the point) rescind those Declarations completely.<sup>13</sup>

### **III. PLAINTIFFS DO NOT SEEK AN ADVISORY OPINION.**

Fitzgerald and Tiffany contend that issuance of a declaratory judgment here would result in this Court providing an improper advisory opinion to Congress. (Def. Br. 19-21.) Yet again,

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<sup>12</sup> *Zwickler* has been controlling law on this point from the day it was handed down through the present. *See, e.g., Cook v. Harding*, 879 F.3d 1035, 1040 (9th Cir. 2018); *Harris v. Ariz. Independent Redistricting Comm'n*, 993 F. Supp.2d 1042, 1066 (D. Ariz. 2014); *Bown v. Gwinnett County Sch. Dist.*, 895 F. Supp. 1564, 1571 (N.D. Ga. 1995); *Holiday Magic, Inc. v. Warren*, 497 F.2d 687, 695 (7th Cir. 1974).

<sup>13</sup> *See* [https://elections.wi.gov/sites/elections/files/2021-10/Ballot%20Access%20Manual\\_4\\_0.pdf](https://elections.wi.gov/sites/elections/files/2021-10/Ballot%20Access%20Manual_4_0.pdf), p. 3, last accessed on May 1, 2022.

Defendants attack a straw man, because Plaintiffs do not seek to have Defendants expelled from the 117<sup>th</sup> Congress. As established above, this action will resolve whether Defendants disqualified themselves from eligibility to run for future office under Section 3 of the Fourteenth Amendment. If they are required to amend their Declarations of Candidacy with the WEC to reflect a judgment in favor of Plaintiffs, they will be admitting that they are not qualified to hold office. Should they refuse to do so, Plaintiffs will present this Court’s judgment to WEC, which is responsible for excluding “from the ballot constitutionally unqualified or ineligible candidates,” *Greene*, 2022 WL at \*26 (referring to the similar role of Georgia’s electoral commission), or to a state court through mandamus directed at the WEC, depending on how the issue arises.

Accordingly, a decision from this Court that Fitzgerald and Tiffany are ineligible under Section 3 would not be merely advisory. The rule against advisory opinions was designed to prevent courts from providing advance legal judgment on issues that “are not pressed before the Court with that clear concreteness provided when a question emerges precisely framed and necessary for decision from a clash of adversary argument exploring every aspect of a multifaceted situation embracing conflicting and demanding interests.” *Flast v. Cohen*, 392 U.S. 83, 96–97, (1968) (quoting *U.S. v. Fruehauf*, 365 U.S. 146, 157 (1961)).

Federal law expressly allows that courts “may declare the rights and other legal relations of any interested party seeking [a] declaration, **whether or not further relief is or could be sought.**” 28 U.S.C. § 2201(a) (emphasis added). A declaratory judgment is not an advisory opinion. *MedImmune, Inc. v. Genentech, Inc.*, 549 U.S. 118, 126 (2007). Rather, a declaratory judgment resolves an actual case or controversy under Article III so long as it “presents ‘a difference or dispute . . . that is ‘appropriate for judicial determination,’ ‘(not) hypothetical or abstract . . . academic or moot . . . (but) definite and concrete, touching the legal relations of parties

having adverse legal interests. It must be a real and substantial controversy admitting of specific relief through a decree of a conclusive character.” *Wacker v. Bisson*, 348 F.2d 602, 605 (5th Cir. 1965) (quoting *Aetna Life Ins. Co. v. Haworth*, 300 U.S. 227, 240-41 (1937)). If the parties in this case can agree on anything, it is that each side will vigorously seek to persuade this Court through a “clash of adversary argument” that it is right about whether Defendants ran afoul of Section 3 because they engaged in insurrection. There is no need for concern that the dispute presented here is hypothetical or abstract.

In fact, federal courts commonly decide limited issues that are important to the resolution of other disputes before other tribunals, or that are necessary first steps on the path to obtain relief in a different forum. In *Matter of Shondel*, 950 F.2d 1301, 1309 (7th Cir. 1991), for example, the Seventh Circuit held that a bankruptcy court’s decision to modify its previous injunction to allow a wrongful death claimant to proceed in state court against a bankruptcy estate was not an advisory opinion because it affected the legal rights of the parties and was a “case” within the meaning of Article III.

Similarly, insurance companies often file federal declaratory judgment actions seeking determinations of their duties to defend and indemnify defendants in state court proceedings, *see, e.g., Allstate Ins. Co. v. Fishel*, No. 16-82032-CIV, 2017 WL 5634951, at \*2 (S.D. Fla. June 13, 2017), and those federal courts have rejected motions to dismiss in which defendants argued that the insurers were seeking improper advisory opinions. *See id.* (citing a string of similar cases in which “federal district courts in this [Eleventh] Circuit routinely find the matter [of the duty to defend in state court] ripe for decision and exercise jurisdiction”). In yet another example, a district court in Kansas rejected the argument that its order resolving certain HIPAA concerns raised by third-party medical providers in a personal injury case would be “nothing more than an advisory



opinion to a nonparty to do some act outside of this judicial proceeding that the Court cannot enforce, monitor, sanction or effectively review” and instead ruled that it was a valid procedural safeguard consistent with federal law. *Callahan v. Bledsoe*, No. 16-2310-JAR-GLR, 2017 WL 590254, at \*2 (D. Kan. Feb. 14, 2017).

While it may have been true in Congressman Victor Berger’s situation that Congress (under its authority in Article I, Section 5) would “determine for itself” the issue of whether to seat Berger in Congress without respect for previous judicial rulings (Def. Br. 19), any argument that the Disqualification Clause is, in reality, an additional qualification (*id.* at 2, 19) misses the point. The Constitution gives states the power to determine whether a candidate is qualified under law to be on a ballot. Therefore, Defendants’ reliance on Justice Black’s concurrence in *Coleman v. Miller*, 307 U.S. 433, 459–60 (1939) and the district court’s decision in *Dyer v. Blair*, 390 F.Supp. 1291, 1309 (N.D. Ill. 1975), is misplaced. As they so often do, Fitzgerald and Tiffany conflate the right to **run** for Congress with the right to **serve** in Congress. Only the latter is even arguably subject exclusively to Article I, Section 5.

Finally, Fitzgerald and Tiffany lament that a decision from this Court cannot bind nonparties, which is as fanciful as their other arguments. (Def. Br. 20-21.) After all, if the Court determines that Defendants engaged in insurrection under Section 3, they (as parties to this litigation) will be bound by the Court’s judgment and cannot legitimately continue to claim to the WEC or the electorate that they are otherwise qualified for office as provided in Wis. Stat. § 8.21(2)(b) and (c). *See Matrix IV*, 649 F.3d at 547 (elements of issue preclusion). At that point, Defendants will be left with two choices: amend or rescind their Declarations of Candidacy because they can no longer rightly claim under oath that they are qualified for the office to which

they seek re-election, or allow their existing Declarations to stand despite the fact that they would be untruthful.

#### IV. PLAINTIFFS' CASE IS RIPE FOR ADJUDICATION.

Fitzgerald and Tiffany contend this case is not ripe for adjudication. (Def. Br. 21-22.) First, they again improperly characterize Plaintiffs' action as being about Defendants' **existing rights** to remain seated in the 117<sup>th</sup> Congress. They argue that since there has been no action by Congress to expel Defendants under Article I, Section 5, there is no role for the Court to play because there is no need for judicial oversight of legislative action on the expulsion. (*Id.* at 21.) Again, Plaintiffs are not seeking to unseat the Congressmen. Because this isn't about judicial oversight of Congress' actions under Article I, Section 5 (Def. Br. 22), Plaintiffs are not asking the Court to take any action on Defendants' **existing** status. Defendants' first ripeness argument is thus a red herring.

Defendants' second ripeness argument fares no better. They argue that "it is . . . entirely speculative whether [Defendants] will prevail in their Primary and General elections. And, absent winning the General election, there is simply no occasion to decide whether either "engaged in insurrection or rebellion" within the meaning of the Disqualification Clause." (Def. Br. 21-22.) The argument puts the cart before the horse: this case is about whether Defendants can **run** for Congress, not whether they can **serve** in Congress. This Court has the power to decide whether Defendants' conduct violated Section 3 – the dispositive question is whether they can run in the first place due to Plaintiffs' challenge to their qualifications.

The U.S. Supreme Court has ruled that the requirement imposed by Section 3 of the Fourteenth Amendment became "part of the text of the Constitution" and that "qualifications" as that term is used in relation to Article I, Section 2 of the Constitution, which establishes age, citizenship, and residency requirements for members of the House of Representatives, may include more than the items stated in Article I, Section 2. *U.S. Term Limits*, 514 U.S. at 767 n.2. As the

district court recently held in *Greene*, Section 3 imposes a threshold requirement for access to the ballot. 2022 WL at \*25. That issue is squarely presented by Plaintiffs' Complaint, and Defendants' intent to run in the impending elections means that the dispute is ripe for this Court to resolve it.

**V. WHETHER THE DEFENDANTS TOOK PART IN AN INSURRECTION IS JUSTICIABLE.**

Defendants' argument that this Court may not "adjudicate a non-justiciable political question" rests on their flawed premise that "the Constitution exclusively entrusts Congress with the task of determining the qualification of its members." (Def. Br. 22-23.) Defendants are wrong for all the reasons set forth in Argument Section II above – not the least of which is the distinction that this action does not challenge Fitzgerald and Tiffany's qualifications as **members** of the 117<sup>th</sup> Congress, but rather their qualifications as **candidates** for the 118<sup>th</sup> Congress. Nevertheless, Defendants plow ahead undeterred, arguing that three of the "political question" factors of *Baker v. Carr*, 369 U.S. 186 (1962)<sup>14</sup> weigh against this Court's power to decide whether Defendants violated Section 3 by engaging in insurrection. (Def. Br. 23-24.)

The first *Baker* test focuses on whether there is a "textually demonstrable constitutional commitment of the issue to a coordinate political department." 369 U.S. at 217. Fitzgerald and Tiffany claim that "the Supreme Court has recognized that Article I, Section 5 of the Constitution is a 'textually demonstrable commitment' to Congress to judge only the qualifications expressly set forth in the Constitution." (Def. Br. 23-24) (*citing Powell v. McCormack*, 395 U.S. 486, 548 (1969)). *Powell* is factually akin to this pending action in that it also involved a challenge to the qualifications of a candidate seeking to be seated in a future Congress, which is why Defendants'

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<sup>14</sup>*Baker* outlines six considerations (in descending order of importance) relevant to whether an issue presents a political question, *id.*, 369 U.S. at 217, but Fitzgerald and Tiffany apparently concede the second, third, and fifth most significant considerations, as they forgo any argument on those points. (Def. Br. 23-24.)

glaring omission of the sentence immediately following the one they quote in their brief is particularly damning. It states: “Therefore, the ‘textual commitment’ formulation of **the political question doctrine does not bar federal courts from adjudicating petitioners’ claims.**” *Id.* (emphasis added). Defendants’ subsequent discussion of the *Nixon* case, which they argue “supports” and is “consistent” with *Powell* (Def. Br. 24), fails to support their position.<sup>15</sup> The first (and most important) *Baker* test does not prevent this Court from taking up the question that Plaintiffs present.

The *Powell* Court also made clear that a “potentially embarrassing confrontation between coordinate branches” of government caused by a “lack of respect,” or “multifarious pronouncements by various departments on one question,” do not prevent the judiciary from deciding whether a candidate is qualified to assume federal office. *Powell*, 395 U.S. at 548-49 (citing *Baker*, 369 U.S. at 217). To the contrary, it is unquestionably the courts’ responsibility to interpret the Constitution. *Id.*; citing *Marbury v. Madison*, 5 U.S. 137 (1803). Moreover, the potential for conflict is especially low here because – as Defendants emphasize repeatedly throughout their opposition brief – “Congress has not taken any action to expel or exclude Messrs. Tiffany and Fitzgerald” or “**even [decided] whether to take up the issue.**” (Def. Br. 25-26; emphasis in original). The present declaratory action clearly does not present a political question from which this Court must abstain.

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<sup>15</sup>*Nixon* is easily distinguishable from *Powell*, because *Nixon* focuses on the Impeachment Trial Clause, which grants the Senate the “Sole Power to try all Impeachments,” exclusionary language that the *Nixon* court considered important to its analysis. (Def. Br. 24) (citing *Nixon*, 506 U.S. at 229-31). *Powell*, on the other hand, deals with the Qualifications Clause, which provides no such plenary authority as described elsewhere in this brief. (U.S. Const., art. I, § 5.)

## VI. PLAINTIFFS' COMPLAINT STATES A VALID CLAIM FOR RELIEF.

Defendants conclude with a cluster of arguments with a common theme: the Complaint does not set forth a cognizable legal claim for relief. (Def. Br. 26-30.) Some are simply misplaced. For example, Plaintiffs are not making a claim under 42 U.S.C. §1983 (*id.*), because Plaintiffs do not base their substantive claim or their request for declaratory judgment on an assertion that Defendants acted “under color of state law.” Similarly, Defendants’ argument that Plaintiffs cannot assert a *Bivens* claim for an implied right against federal defendants also misses the mark, because *Bivens*-type claims seek damages, *see Ziglar v. Abbasi*, 137 S.Ct. 1843 (2017), and Plaintiffs do not seek damages but a declaratory judgment.

Nor can the Complaint be dismissed because Plaintiffs do not assert a legal theory. They are not obligated to do so. “A complaint should limn the grievance and demand relief. It need not identify the law on which the claim rests, and different legal theories therefore do not multiply the number of claims for relief.” *N.A.A.C.P. v. Am. Fam. Mut. Ins. Co.*, 978 F.2d 287 (7th Cir. 1992) “Complaints need not plead facts and need not narrate events that correspond to each aspect of the applicable legal rule. Any decision declaring that ‘this complaint is deficient because it does not allege X’ is a candidate for summary reversal, unless X is on the list in Fed. R. Civ. P. 9(b).” *Kolupa v. Roselle Park Dist.*, 438 F.3d 713, 715 (7th Cir. 2006), abrogation on other grounds recognized by *E.E.O.C. v. Concentra Health Servs., Inc.*, 496 F.3d 773, 777 (7th Cir. 2007).

As the *Greene* court ruled, citizens have a First Amendment right to challenge a putative candidate’s right to be on a ballot. 2022 WL at \*18. Parties may sue federal officials for declaratory judgments to enforce First Amendment rights. For example, in *Smadi v. True*, Case No. 18-cv-02149-JPG, 2021 WL 2853262 (S.D. Ill., July 8, 2021), the district court ruled although a federal prisoner could not assert a *Bivens* damages claim against federal prison officials for violating the First Amendment by interfering with the prisoner’s mail, *id.* at \*4-5, the prisoner was entitled to

seek declaratory relief for the claimed First Amendment violation. *Id.* at \*5. Similarly, in *Chapman v. Pickett*, 586 F.2d 22, 26-27 (7th Cir. 1978) the Seventh Circuit held that defendants in a federal prisoner's complaint based on the First Amendment Free Exercise Clause were immune from damages claims, but the plaintiff remained free to pursue claims for declaratory or injunctive relief on remand. In short, this Court has ample authority to grant the declaratory relief that Plaintiffs seek under the law they assert to support their claim.

### **CONCLUSION**

For the reasons set forth in this brief, Defendants' motion to dismiss should be denied.

Dated this 6th day of May 2022.

LAFFEY, LEITNER & GOODE LLC  
Counsel for Plaintiffs

*s/ Mark M. Leitner*

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# **EXHIBIT B**

# 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, \_\_\_\_\_, being duly sworn, state that  
Candidate's name

I am a candidate for the office of \_\_\_\_\_  
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.<sup>1</sup>

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

				Town of <input type="checkbox"/> Village of <input type="checkbox"/> City of <input type="checkbox"/>
House or fire no.	Street Name	Mailing Municipality and State	Zip code	Municipality of Residence for Voting

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

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

STATE OF WISCONSIN } \_\_\_\_\_ (Signature of candidate)  
County of \_\_\_\_\_ } ss.  
(County where oath administered)

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
(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.

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.



## Instructions for Completing the Declaration of Candidacy

All candidates seeking ballot status for election to any office in the State of Wisconsin must properly complete and file a **Declaration of Candidacy**. This form must be **ON FILE** with the proper filing officer no later than the deadline for filing nomination papers or the candidate's name will not appear on the ballot. A facsimile will be accepted if the FAX copy is received by the filing officer no later than the filing deadline **and** the signed original declaration is received by the filing officer with a postmark no later than the filing deadline.

### **Information to be provided by the candidate:**

- Type or print your name on the first line.
- The title of the office and **any district, branch, or seat number** for which you are seeking election must be inserted on the second line. *For legislative offices insert the title and district number, for district attorneys insert the title and the county, for circuit court offices insert the title, county and branch number, and for municipal and school board offices insert the title and any district or seat number.*
- Type or print the political party affiliation or principle supported by you in five words or less on the third line. *Nonpartisan candidates may leave this line blank.*
- **Felony convictions: Your name cannot appear on the ballot if you have been convicted of a felony in any court in the United States for which you have not been pardoned. Please see footnote on page 1 for further information with respect to convictions for misdemeanors involving a violation of public trust. These restrictions only apply to candidates for state and local office.**
- Your current address, including your municipality of residence for voting purposes, must be inserted on the fourth line. This must include your entire mailing address (**street and number, municipality where you receive mail**) and the name of the municipality in which you reside and vote (town, village, or city of \_\_\_). If your address changes before the election, an amended Declaration of Candidacy must be filed with the filing officer. Wis. Stat. § 8.21. *Federal candidates are not required to provide this information, however an address for contact purposes is helpful.*
- Type or print your name on the fifth line as you want it to be printed on the official ballot. You may use your full legal name, former legal surname, or any combination of first name, middle name, and initials, surname or nickname with last name.

**Note:** The Wisconsin Elections Commission has determined that, absent any evidence of an attempt to manipulate the electoral process, candidates are permitted to choose any form of their name, including nicknames, by which they want to appear on the ballot.

No titles are permitted. In addition, names such as “Red” or “Skip” are permitted, but names which have an apparent electoral purpose or benefit, such as “Lower taxes,” “None of the above” or “Lower Spending” are not permitted. It is also not permissible to add nicknames in quotes or parentheses. For example, John “Jack” Jones or John (Jack) Jones are not acceptable, but John Jones, Jack Jones or John Jack Jones are acceptable.

This form must be sworn to and signed in the presence of a notary public or other person authorized to administer oaths, such as a county or municipal clerk. Wis. Stat. §§ 8.21(2), 887.01(1).

### **Information to be provided by the person administering the oath:**

- The county where the oath was administered.
- The date the Declaration of Candidacy was signed and the oath administered.
- The signature and title of the person administering the oath. If signed by a notary public, the notary seal is required and the date the notary's commission expires must be listed.

All candidates for offices using the nomination paper process must file this form (*and all school district candidates must file the EL-162sd*) with the appropriate filing officer no later than the deadline for filing nomination papers. Wis. Stats. §§ 8.10 (5), 8.15 (4)(b), 8.20 (6), 8.21, 8.50 (3)(a), 120.06 (6)(b). Candidates nominated for local office at a caucus must file this form with their municipal clerk within 5 days of receiving notice of nomination. Wis. Stat. § 8.05 (l)(j).

# **EXHIBIT A**

## Wisconsin Elections Commission

### Candidate Tracking by Office

2022 General Election - 11/8/2022

Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
<b>Office :</b>	<b>GOVERNOR</b>				<b>Incumbent:</b>	<b>Tony Evers</b>			
	0106427	Adam John Fischer 10130 S MCGRAW DR OAK CREEK, 53154	Republican	08/04/2021	9/6/2021				Pending
	0106165	Christopher Ralph Michael Donahue 921 PLAINVIEW RD LA CROSSE, 54603	Independent, Libertarian	12/13/2019					Pending
	0106399	Jess Daniel Hisel 236 N WOOD ST SPRING GREEN, 53588	Free Party	07/07/2021					Pending
	0106404	James Timothy Kellen 181 KENDALL ST BURLINGTON, 53105	Republican	03/08/2021					Pending
	0106410	Joan Ellis Beglinger 3528 TIMBER LN CROSS PLAINS, 53528	Independent	04/02/2022	1/3/2022	02/07/2022			Pending
	0106417	Levi C Borntreger 1712 PRIMA LAGO TER LAKELAND, 33810	Independent	06/18/2021					Pending
	0106334	Ryan Patrick Sweeney 1225 7th St S., Apt 403 La Crosse, 54601-5413	Independent	06/14/2020					Pending
	0106367	Leonard Edward Larson Jr E5715 Cty Rd BB Menomonie, 54751-5680	Republican	09/18/2020					Pending
	0106431	John Joseph Macco 1874 Old Valley Rd DePere, 54115	Republican	08/18/2021					Pending
	0106416	Yousef Sameer Zahran 3760 S 15th St Milwaukee, 53221	Democratic	06/07/2021	8/25/2021				Pending
	0104890	Rebecca Kleefisch N6011 HILLSIDE DRIVE SULLIVAN, 53178	Republican	03/04/2022					Pending

# Wisconsin Elections Commission

## Candidate Tracking by Office

2022 General Election - 11/8/2022

Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
	0105556	Timothy Scott Ramthun N641 RAMTHUN LANE CAMPBELLSPORT, 53010	Republican	02/10/2022	4/20/2022	03/01/2022			Pending
	0106482	Kevin Nicholson PO BOX 454 HARTLAND, 53029	Republican	01/24/2022					Pending
	0105937	Robert Meyer 123 Dewey Street Sun Prairie, 53590-2321	Republican	03/28/2022	1/28/2022				Pending
	0103465	Tony Evers 99 CAMBRIDGE ROAD MADISON, 53704	Democratic	06/07/2021		04/20/2022			Pending
	0104538	Edd Hou-Seye 1441 PARKVIEW TER SHEBOYGAN, 53081	Democratic	09/28/2021	9/22/2021				Pending
<b>Office Subtotal : 16</b>									
<b>Office :</b>	<b>LIEUTENANT GOVERNOR</b>				<b>Incumbent:</b>	<b>Mandela Barnes</b>			
	0106441	Cindy Werner 8899 W TRIPOLI AVE MILWAUKEE, 53228	Republican	10/18/2021	11/9/2021				Pending
	0106478	Angela S. Kennedy 1400 W CUSTER AVE GLENDALE, 53209	Democratic	04/05/2022	12/8/2021				Pending
	0106314	Jonathan Wichmann 6955 S RIVERWOOD BLVD FRANKLIN, 53132	Republican	02/15/2022	5/26/2020	02/07/2022			Pending
	0104723	David D. King 2939 S 38TH ST MILWAUKEE, 53215	Republican	08/17/2021	8/16/2021				Pending
	0106461	Will Martin 3329 DEBRA LN RACINE, 53403	Republican	01/15/2022	12/7/2021				Pending
	0104439	Roger Roth 1024 E Overland Appleton, 54911	Republican	02/18/2022		05/02/2022			Pending

# Wisconsin Elections Commission

## Candidate Tracking by Office

2022 General Election - 11/8/2022

Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
	0104671	Peng Her P.O. Box 8081 Madison, 53708	Democratic	12/17/2021					Pending
	0106440	Patrick Testin 5369 FAIRVIEW DRIVE STEVENS POINT, 54482	Republican	09/24/2021	9/24/2021	05/01/2022			Pending
	0106443	Kyle Yudes 626 HOBART ST EAU CLAIRE, 54703	Republican	10/26/2021	10/22/2021				Pending
	0105535	David Bowen 4080 N 21ST STREET, #3 MILWAUKEE, 53209	Democratic	11/11/2021		05/02/2022			Pending
	0106448	Lena Taylor PO Box 117 Milwaukee, 53201	Democratic	12/30/2021					Pending
	0106426	David Varnam 705 E. Elm St Lancaster, 53813	Republican	01/17/2022					Pending
	0106439	Ben Voelkel PO Box 620614 Middleton, 53562	Republican	09/23/2021					Pending
	0106263	Sara Russell Rodriguez 19585 TIMBERLINE DR BROOKFIELD, 53045	Democratic	11/07/2021		03/15/2022			Pending
<b>Office Subtotal : 14</b>									
<b>Office :</b>	<b>ATTORNEY GENERAL</b>				<b>Incumbent:</b>	<b>Josh Kaul</b>			
	0106408	Eric Toney N7115 LEONARD DRIVE FOND DU LAC, 54935	Republican	07/14/2021		04/25/2022			Pending
	0106411	Ryan Owens 3553 RICHIE ROAD VERONA, 53593	Republican	01/17/2022					Pending
	0105758	Matthew Joseph Bughman S69W19037 LEMBEZEDER DR MUSKEGO, 53150	Libertarian	10/04/2021					Pending

# Wisconsin Elections Commission

## Candidate Tracking by Office

2022 General Election - 11/8/2022

Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
	0106511	Karen Mueller 18261 57TH AVE CHIPPEWA FALLS, 54729	Republican	03/18/2022	3/28/2022				Pending
	0105879	Joshua Kaul 2380 WEST LAWN AVE MADISON, 53711	Democratic	01/17/2022		05/02/2022			Pending
	0105531	Adam Jarchow PO Box 620704 Middleton, 53562	Republican	01/30/2022					Pending
<b>Office Subtotal : 6</b>									
<b>Office :</b>	<b>SECRETARY OF STATE</b>				<b>Incumbent:</b>	<b>Doug La Follette</b>			
	0104948	Amy Lynn Loudenbeck 10737 S State Rd. 140 Clinton, 53525	Republican	01/10/2022		05/02/2022			Pending
	0106437	Neil Harmon 8717 W CLEVELAND AVE WEST ALLIS, 53227	Libertarian	09/07/2021	9/16/2021				Pending
	0100216	Doug La Follette 1211 RUTLEDGE STREET, #3 MADISON, 53703	Democratic	03/17/2022	3/17/2022	01/14/2022			Pending
	0106428	Justin D. Schmidtka 1126 JAYMAR ST GREEN BAY, 54313	Republican	08/06/2021	9/1/2021				Pending
	0106320	Jay Schroeder 1295 N LAKE ST NEENAH, 54956	Republican	01/05/2022					Pending
	0106549	Alexia Sabor 5027 W. North Ave Milwaukee, 53208	Democratic	04/20/2022					Pending
<b>Office Subtotal : 6</b>									
<b>Office :</b>	<b>STATE TREASURER</b>				<b>Incumbent:</b>	<b>Sarah Godlewski</b>			
	0103690	Dawn Marie Sass 356 Sugar Avenue Belleville, 53508-9046	Democratic	08/10/2021	8/10/2021				Pending

# Wisconsin Elections Commission

## Candidate Tracking by Office

2022 General Election - 11/8/2022

Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
	0106438	Aaron Richardson 2676 McGaw Rd Fitchburg, 53711	Democratic	09/20/2021	9/21/2021				Pending
	0106167	Orlando Owens 6901 N. 40TH PL MILWAUKEE, 53209	Republican	06/28/2021	8/11/2021				Pending
	0106424	Angelito Tenorio 7440 W Greenfield Ave #14778 West Allis, 53214-6145	Democratic	07/14/2021					Pending
	0106014	John Samuel Leiber 504 GALWAY TERRACE COTTAGE GROVE, 53527	Republican	04/18/2022					Pending
	0106491	Gillian Battino 142347 Rolling Meadows Ln Wausau, 54401	Democratic	02/23/2022					Pending
<b>Office Subtotal : 6</b>									
<b>Office :</b>	<b>UNITED STATES SENATOR</b>				<b>Incumbent:</b>	<b>Ron Johnson</b>			
	0200863	Adam Siik Benedetto 5730 DOGWOOD PL MADISON, 53705	Republican	N/A	1/6/2022	N/A			Pending
	0200746	Tom Nelson 117 E MCARTHUR ST APPLETON, 54911	Democratic	N/A	4/13/2022	N/A			Pending
	0200852	Deliala Gaustad N3172 490TH ST. BAY CITY, 54723	Patriot Party	N/A	1/25/2021	N/A			Pending
	0200853	Irish Mike Mangan N7363 COUNTY ROAD Y SHEBOYGAN, 53083	Republican	N/A	6/18/2021	N/A			Pending
	0200857	Jeff Rumbaugh 2035 UNIVERSITY AVE MADISON, 53726	Democratic	N/A	9/9/2021	N/A			Pending
	0200864	Neal Long 2060 SWANSTONE CIR DE PERE, 54115	Libertarian	N/A	3/1/2022	N/A			Pending

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	0200851	Peter Peckarsky	Democratic	N/A	7/6/2021	N/A			Pending
<b>Office Subtotal : 7</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 1</b>				<b>Incumbent:</b>	<b>Bryan Steil</b>			
	0200858	Albert Namath 6402 10TH AVE KENOSHA, 53143	Democratic	N/A	9/27/2021	N/A			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 2</b>				<b>Incumbent:</b>	<b>Mark Pocan</b>			
	200696	Mark Pocan 4062 BAKKEN STENLI RD BLACK EARTH, 53515	Democratic	N/A	4/22/2022	N/A			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 3</b>				<b>Incumbent:</b>	<b>Ron Kind</b>			
	0200859	Justin Bradley 1005 GOHRES ST LA CROSSE, 54603	Democratic	N/A	9/27/2021	N/A			Pending
	0200850	Brett M. Knudsen 412 LILLY CT. HOLMEN, 54636	Democratic	N/A	3/24/2021	N/A			Pending
	0200838	Mark Neumann 4500 STONE BRIDGE RD LA CROSSE, 54601	Democratic	N/A	3/23/2022	N/A			Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 4</b>				<b>Incumbent:</b>	<b>Gwen S. Moore</b>			
	0200812	Tim Rogers 5936 N 38TH ST MILWAUKEE, 53209	Republican	N/A	4/12/2021	N/A			Pending



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	0200855	Travis Clark 9418 N GREEN BAY RD BROWN DEER, 53209	Republican	N/A	8/2/2021	N/A			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 5</b>				<b>Incumbent:</b>	<b>Scott Fitzgerald</b>			
	0200854	Bradley Whitfield 373 MANCHESTER LN HARTLAND, 53029	Democratic	N/A	8/2/2021	N/A			Pending
	0200861	Jessica Katzenmeyer 7139 W GREENFIELD AVE WEST ALLIS, 53214	Democratic	N/A	11/15/2021	N/A			Pending
	0200848	Ronald S. Remmel 2012 MILLER ST WEST BEND, 53095	Democratic	N/A	2/1/2021	N/A			Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 6</b>				<b>Incumbent:</b>	<b>Glenn Grothman</b>			
	0200853	Irish Mike Mangan N7363 COUNTY ROAD Y SHEBOYGAN, 53083	Republican	N/A	6/18/2021	N/A			Pending
	0200860	Douglas H. Mullenix 365 LAKE RD MENASHA, 54952	Republican	N/A	10/5/2021	N/A			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE IN CONGRESS DISTRICT 7</b>				<b>Incumbent:</b>	<b>Tom Tiffany</b>			
	0200865	David W, Kunelius II 1833 ARROW CT ARBOR VITAE, 54568	Republican	N/A	4/28/2022	N/A			Pending
	200826	Tom Tiffany 9463 BACKWOODS LN MINOCQUA, 54548	Republican	N/A	4/19/2022	N/A			Pending
<b>Office Subtotal : 2</b>									

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<b>Office : REPRESENTATIVE IN CONGRESS DISTRICT 8</b>					<b>Incumbent:</b>	<b>Mike Gallagher</b>			
	0200788	Robin Kettleson 208 1/2 E COLLEGE AVE APPLETON, 54911	Democratic	N/A	7/27/2021	N/A			Pending
	0200849	Jacob J. VandenPlas 6418 VIGNES RD STURGEON BAY, 54235	Libertarian	N/A	1/15/2021	N/A			Pending
	0200759	Robbie Hoffman 11015 COUNTY ROAD Y LUXEMBURG, 54217	Environmental	N/A	2/7/2022	N/A			Pending
<b>Office Subtotal : 3</b>									
<b>Office : STATE SENATOR DISTRICT 1</b>					<b>Incumbent:</b>	<b>André Jacque</b>			
	0104808	Andre M Jacque 1615 LOST DAUPHIN RD. DE PERE, 54115	Republican	01/16/2022		03/08/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : STATE SENATOR DISTRICT 3</b>					<b>Incumbent:</b>	<b>Tim Carpenter</b>			
	0100881	Tim Carpenter 2957 South 38th Street Milwaukee, 53215-3519	Democratic	08/29/2021	9/1/2021	02/16/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : STATE SENATOR DISTRICT 5</b>					<b>Incumbent:</b>	<b>Dale Kooyenga (Filed Notification of Noncandidacy)</b>			
	0106543	Tom Palzewicz 5027 W. North Ave Milwaukee, 53208	Democratic	04/20/2022					Pending
	0106171	Jessica Katzenmeyer 7139 W GREENFIELD AVE APT # 10 WEST ALLIS, 53214	Democratic	04/22/2022	3/16/2022	04/12/2022			Pending
	0104860	Dale Kooyenga 3360 SUNNYVIEW LANE BROOKFIELD, 53005	Republican	07/14/2021	1/19/2022	01/12/2022			Pending
<b>Office Subtotal : 3</b>									

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<b>Office :</b>		<b>STATE SENATOR DISTRICT 7</b>			<b>Incumbent:</b>	<b>Chris Larson</b>			
	0104991	Chris J. Larson 3233 S. Herman St Milwaukee, 53207-2851	Democratic	04/26/2022	4/27/2022				Pending
	0106495	Peter Graham Gilbert 4110 S Lake Dr, Unit 140 St Francis, 53235-5953	Republican	02/08/2022	10/25/2021				Pending
<b>Office Subtotal :</b>		<b>2</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 9</b>			<b>Incumbent:</b>	<b>Devin LeMahieu</b>			
	0106434	Jeanette Deschene 1602 S 15TH ST MANITOWOC, 54220	Republican	04/08/2022	4/27/2022	04/11/2022			Pending
	0105206	Devin LeMahieu 21 S 8TH ST OOSTBURG, 53070	Republican	10/23/2021	4/20/2022	04/28/2022			Pending
<b>Office Subtotal :</b>		<b>2</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 11</b>			<b>Incumbent:</b>	<b>Stephen L. Nass</b>			
	0102660	Steve Nass N8330 JACKSON ROAD WHITEWATER, 53190	Republican	01/17/2022	4/26/2022	04/22/2022			Pending
	0106402	Dylan Jackson Kurtz 4001 CURRY LANE JANESVILLE, 53546	Republican	03/04/2021					Pending
<b>Office Subtotal :</b>		<b>2</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 13</b>			<b>Incumbent:</b>	<b>John Jagler</b>			
	0105237	John Jagler 601 CLYMAN ST WATERTOWN, 53094	Republican	02/23/2022		04/28/2022			Pending
<b>Office Subtotal :</b>		<b>1</b>							

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<b>Office :</b>		<b>STATE SENATOR DISTRICT 15</b>			<b>Incumbent:</b>		<b>Janis A. Ringhand (Filed Notification of Noncandidacy)</b>		
	0105472	Mark Spreitzer 1718 HENDERSON AVENUE BELOIT, 53511	Democratic	03/09/2022		04/19/2022			Pending
<b>Office Subtotal :</b>		<b>1</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 17</b>			<b>Incumbent:</b>		<b>Howard L. Marklein</b>		
	0104815	Howard Marklein S11665 SOELDNER ROAD SPRING GREEN, 53588	Republican	01/15/2022		04/02/2022			Pending
	0106429	Tripp Stroud 5820 LAKE VIEW RD SPRING GREEN, 53588	Democratic	08/05/2021	8/10/2021				Pending
<b>Office Subtotal :</b>		<b>2</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 19</b>			<b>Incumbent:</b>		<b>Roger Roth</b>		
	0106422	Mark Christopher Scheffler 522 E PACIFIC ST. APPLETON, 54911	Democratic	07/02/2021	7/9/2021				Pending
	0106537	Andrew K. Thomsen 2187 SUNRISE DR APPLETON, 54914	Republican	04/18/2022	4/11/2022				Pending
	0106157	Rachael Ann Cabral-Guevara 190 RIVER ISLAND CT APPLETON, 54914	Republican	03/17/2022		02/03/2022			Pending
	0106503	Anthony W. Phillips 7463 N Purdy Parkway Appleton, 54913	Republican	03/12/2022	3/16/2022				Pending
	0106506	KRISTIN M ALFHEIM PO BOX 644 Appleton, 54912-0644	Democratic	03/16/2022					Pending
<b>Office Subtotal :</b>		<b>5</b>							

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<b>Office :</b>		<b>STATE SENATOR DISTRICT 21</b>			<b>Incumbent:</b>		<b>Van H. Wanggaard</b>		
	0106557	JAY STONE 10501 82nd St Pleasant Prairie, 53158-1210	Republican	04/29/2022					Pending
	0104422	Van H. Wanggaard 1246 BLAINE AVENUE RACINE, 53405	Republican	04/06/2022	4/19/2022	04/06/2022			Pending
	0106465	Kendall Curtis 5316 OLYMPIA LN GREENDALE, 53129	Democratic	01/24/2022	1/26/2022	02/23/2022			Pending
<b>Office Subtotal :</b>		<b>3</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 23</b>			<b>Incumbent:</b>		<b>Kathy Bernier</b>		
	0106023	Jesse Lee James PO BOX 201 ALTOONA, 54720	Republican	01/17/2022			04/13/2022		Pending
	0106449	Sandra Scholz 4162 134TH Street Chippewa Falls, 54729	Republican	11/09/2021	11/12/2021	04/13/2022			Pending
	0106474	Brian Westrate E11030 Deer Rd. W Fall Creek, 54742	Republican	01/07/2022					Pending
<b>Office Subtotal :</b>		<b>3</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 25</b>			<b>Incumbent:</b>		<b>Janet Bewley</b>		
	0105505	Romaine Robert Quinn 2769 13 1/2 Ave Cameron, 54822	Republican	04/03/2022					Pending
	0106519	Kelly Jean Westlund 501 11th Ave East Ashland, 54806	Democratic	04/04/2022					Pending
<b>Office Subtotal :</b>		<b>2</b>							
<b>Office :</b>		<b>STATE SENATOR DISTRICT 27</b>			<b>Incumbent:</b>		<b>Jon B. Erpenbach</b>		
	0106466	Robert Relph 4600 Garfoot Road Cross Plains, 53528	Republican	12/27/2021	12/8/2021				Pending

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	0104973	Dianne Hesselbein 1420 N. HIGH POINT RD. MIDDLETON, 53562	Democratic	12/27/2021		01/11/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>STATE SENATOR DISTRICT 29</b>				<b>Incumbent:</b>	<b>Jerry Petrowski (Filed Notification of Noncandidacy)</b>			
	0105951	Brent Jacobson 792 FAIRWAY DRIVE MOSINEE, 54455	Republican	03/11/2022	4/12/2022	03/14/2022			Pending
	0106514	Jon P. Kaiser 701 E 3RD ST N LADYSMITH, 54848	Republican	03/28/2022	5/2/2022				Pending
	0106552	Cory Tomczyk 146223 BEAVER RD MOSINEE, 54455	Republican	05/03/2022	4/26/2022	05/01/2022			Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>STATE SENATOR DISTRICT 31</b>				<b>Incumbent:</b>	<b>Jeff Smith</b>			
	0104251	Jeffrey E Smith S7747 NORRISH ROAD EAU CLAIRE, 54701	Democratic	01/17/2022		01/11/2022			Pending
	0106497	Amber Provance 108 3rd Street Pepin, 54759-9711	Republican	02/14/2022	3/10/2022	03/14/2022			Pending
	0106486	David Estenson N37830 THOMPSON COULEE RD WHITEHALL, 54773	Republican	04/14/2022	2/11/2022				Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>STATE SENATOR DISTRICT 33</b>				<b>Incumbent:</b>	<b>Chris Kapenga</b>			
	0104883	Chris Kapenga N9W31035 CONCORD CT DELAFIELD, 53018	Republican	05/05/2022	5/4/2022	01/24/2022			Pending
<b>Office Subtotal : 1</b>									

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<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 1</b>					<b>Incumbent: Joel Kitchens</b>				
	0105512	Joel Coulombe Kitchens 1117 COVE ROAD STURGEON BAY, 54235	Republican	04/08/2022		04/28/2022			Pending
	0106539	Milt Swagel E3246 Krok Rd Kewaunee, 54216-9606	Republican	04/21/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 2</b>					<b>Incumbent: Shae Sortwell</b>				
	0106062	Mark Kiley 555 South Main st. apt2 Mishicot, 54228	Democratic	04/26/2022					Pending
	0105544	Shae Sortwell 13219 County Road Q Two Rivers, 54241	Republican	07/03/2021		02/03/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 3</b>					<b>Incumbent: Ron Tusler</b>				
	0105788	Ron Tusler W5721 FIRELANE 12 MENASHA, 54956	Republican	04/11/2022	4/18/2022	01/11/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 4</b>					<b>Incumbent: David Steffen</b>				
	0106567	Ashton David Arndorfer 244 Summit Street Green Bay, 54301	Democratic	05/05/2022					Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 5</b>					<b>Incumbent: Jim Steineke (Filed Notification of Noncandidacy)</b>				
006	0106489	Joy Goeben 750 BROOKWOOD CIR HOBART, 54155	Republican	02/22/2022	3/3/2022		05/02/2022	379	Pending
005	0106481	Tim Greenwood 1404 Buchanan Ct. Kaukauna, 54130	Republican	03/30/2022	2/1/2022		05/02/2022	230	Pending

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	0106487	Kraig Knaack N3979 Washington Ave, #14 Freedom, 54130	Republican	04/01/2022					Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 6</b>			<b>Incumbent:</b>	<b>Gary Tauchen (Filed Notification of Noncandidacy)</b>				
	0106483	David Kohn N3832 Cty. Rd. F Bonduel, 54107	Republican	01/25/2022	1/27/2022				Pending
007	0106470	Dean Martin Neubert W7808 County Rd. MM Hortonville, 54944	Republican	12/28/2021	12/29/2021		05/03/2022	377	Pending
	0106476	Nathan J. Michael W14874 County Rd M Tigerton, 54486	Republican	01/04/2022	11/3/2021	04/20/2022			Pending
	0200856	Roy Martin 1010 BARTELT ST GRESHAM, 54128	Libertarian		7/29/2021				Pending
	0106447	Matthew Kyle Albert 4001 Towne Lakes Cir., Apt 5201 Grand Chute, 54913	Republican	11/23/2021	11/16/2021				Pending
	0106520	Jacob Tarlton 1004 N Main St. Apt 7 Seymour, 54165	Independent Conservative for Education Reform	04/12/2022	4/22/2022	04/12/2022			Pending
	0106430	Roy Harvey Martin 1010 Bartelt st., P.O. box 434 gresham, 54128-0434	Libertarian	04/16/2022					Pending
	0106485	Peter Schmidt W3847 Old Dump Road Bonduel, 54107	Republican	04/18/2022	1/31/2022				Pending
	0106501	Craig Arrowood 216 S. Smalley Shawano, 54166	Republican	03/14/2022	3/14/2022				Pending



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	0106407	Marcus Gruenster W7693 ELM ST. SHIOCTON, 54170	Independent	01/18/2022	2/9/2021				Pending
<b>Office Subtotal : 10</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 7</b>				<b>Incumbent:</b>	<b>Daniel G. Riemer</b>			
	0105193	Daniel Graan Riemer 3022 S. 39th Street Milwaukee, 53215-3559	Democratic	03/19/2022		05/02/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 8</b>				<b>Incumbent:</b>	<b>Sylvia Ortiz-Velez</b>			
	0106241	Sylvia Velez 2004 S 8th Street, Apt A Milwaukee, 53204	Democratic	12/22/2021		05/01/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 9</b>				<b>Incumbent:</b>	<b>Marisabel Cabrera</b>			
	0105683	Marisabel Cabrera P.O. BOX 44344 MILWAUKEE, 53214	Democratic	08/14/2021		05/02/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 10</b>				<b>Incumbent:</b>	<b>David Bowen</b>			
008	0106533	Bryan L. Kennedy 5669 N Bethmaur Lane Glendale, 53209-4202	Democratic	04/18/2022	4/25/2022		05/05/2022	272	Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 11</b>				<b>Incumbent:</b>	<b>Dora Drake</b>			
	0106248	Dora Drake 6561 N 73rd St Milwaukee, 53223	Democratic	04/22/2022		04/26/2022			Pending
<b>Office Subtotal : 1</b>									

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<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 12</b>		<b>Incumbent:</b>		<b>LaKeshia N. Myers</b>
<b>Office Subtotal : 0</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 13</b>		<b>Incumbent:</b>		<b>Sara Rodriguez</b>
	0106546	Sarah Marie Harrison 850 GOLDEN MEADOW CT BROOKFIELD, 53045	Democratic	04/23/2022	5/2/2022	04/26/2022			Pending
	0106505	Tom Michalski 1785 Wedgewood Drive East Elm Grove, 53122	Republican	04/13/2022	3/8/2022	04/25/2022			Pending
	0106513	Erik Ngutse E3 2600 PEBBLE VALLEY RD. WAUKESHA, 53188	Republican	03/23/2022	9/3/2021				Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 14</b>		<b>Incumbent:</b>		<b>Robyn Vining</b>
	0106017	Robyn Beckley Vining 2546 n 66th st Wauwatosa, 53213	Democratic	05/03/2021		05/02/2022			Pending
	0106566	Keva Turner 1345 South 71st Street, Upper West Allis, 53214	Republican	05/06/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 15</b>		<b>Incumbent:</b>		<b>Joe Sanfelippo</b>
	0106525	Dave Maxey 17240 W. Rogers Dr New Berlin, 53146-1814	Republican	04/13/2022					Pending
	0105703	Dmitry Stefan Becker 3520 S. Cari-Adam Dr. New Berlin, 53146-3008	Republican	05/02/2022					Pending

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	0106400	Dustin David Hartl 9102 WEST CLEVELAND AVENUE, APT. 6 WEST ALLIS, 53227	Democratic	03/28/2022					Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 16</b>				<b>Incumbent:</b>	<b>Kalan Haywood</b>			
	0106079	Kalan Haywood 129 W. BROWN STREET MILWAUKEE, 53212	Democratic	07/16/2021		03/30/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 17</b>				<b>Incumbent:</b>	<b>Supreme Moore Omokunde</b>			
	0106253	Avrohom Akiva Eisenbach 3361 N 54TH ST MILWAUKEE, 53216	Republican	04/24/2022					Pending
	0106075	Supreme Moore Omokunde 2629 N 59th St Milwaukee, 53210	Democratic	04/27/2022		05/02/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 18</b>				<b>Incumbent:</b>	<b>Evan Goyke</b>			
	0105334	Evan Goyke 2734 W STATE STREET MILWAUKEE, 53208	Democratic	04/20/2022		04/21/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 19</b>				<b>Incumbent:</b>	<b>Jonathan Brostoff (Filed Notification of Noncandidacy)</b>			
	0106550	Ryan Clancy 2543 S Howell Ave. Milwaukee, 53207	Democratic	04/25/2022	4/28/2022				Pending
	0106553	Niko Ruud 1717 E Kane Pl, Apt 42 Milwaukee, 53202	Democratic	04/25/2022					Pending

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	0105485	Jonathan Brostoff 3000 N STOWELL AVE. MILWAUKEE, 53211	Democratic	03/22/2022		03/14/2022			Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 20</b>				<b>Incumbent:</b>	<b>Christine M. Sinicki</b>			
	0103687	Christine M. Sinicki 3132 SOUTH INDIANA AVENUE MILWAUKEE, 53207	Democratic	05/02/2022		04/15/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 21</b>				<b>Incumbent:</b>	<b>Jessie Rodriguez</b>			
	0106490	Patrick Hintz 1711 Manistique Ave South Milwaukee, 53172	Democratic	02/22/2022	5/20/2021				Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 22</b>				<b>Incumbent:</b>	<b>Janel Brandtjen</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 23</b>				<b>Incumbent:</b>	<b>Deb Andraca</b>			
	0106162	Deb Andraca 4707 N. CUMBERLAND BLVD. WHITEFISH BAY, 53211	Democratic	03/18/2021		01/16/2022			Pending
	0106538	Purnima Nath 6155 W VILLA LN BROWN DEER, 53223	Republican	04/20/2022	5/2/2022				Pending
<b>Office Subtotal : 2</b>									

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Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 24</b>		<b>Incumbent:</b>		<b>Dan Knodl</b>
<b>Office Subtotal : 0</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 25</b>		<b>Incumbent:</b>		<b>Paul Tittl</b>
<b>Office Subtotal : 0</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 26</b>		<b>Incumbent:</b>		<b>Terry Katsma</b>
004	0105585	Terry A. Katsma 705 ERIE AVE OOSTBURG, 53070	Republican	04/08/2022	4/11/2022	01/27/2022	05/02/2022	400	Approved
<b>Office Subtotal : 1</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 27</b>		<b>Incumbent:</b>		<b>Tyler Vorpapel</b>
	0106468	Patrick Johnson 644 School St Kohler, 53044-1430	Republican	12/17/2021	12/27/2021				Pending
	0105572	Tyler John Vorpapel 503 SOUTH HILLS DRIVE PLYMOUTH, 53073	Republican	01/16/2022		05/02/2022			Pending
	0106528	Amy E Binsfeld W1648 Santana Dr Sheboygan, 53083	Republican	04/14/2022					Pending
<b>Office Subtotal : 3</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 28</b>		<b>Incumbent:</b>		<b>Gae Magnafici</b>
<b>Office Subtotal : 0</b>									

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Receipt #	ID	Candidate	Party	Campaign Registration Statement	Declaration of Candidacy Date	Statement of Economic Interests Date	Nomination Papers Date	Valid Signatures	Ballot Status
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**Office :**      **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 29**      **Incumbent:**      **Clint Moses**

**Office Subtotal : 0**

**Office :**      **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 30**      **Incumbent:**      **Shannon Zimmerman**

0105714	Shannon Zimmerman 429 JEFFERSON ST RIVER FALLS, 54022	Republican	05/05/2022						Pending
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**Office Subtotal : 1**

**Office :**      **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 31**      **Incumbent:**      **Amy Loudenbeck**

0106500	Maryann Zimmerman W7582 R AND W TOWNLINE RD WHITEWATER, 53190	Republican	04/17/2022						Pending
0106464	Ellen L Schutt 429 Arthur Drive Clinton, 53525	Republican	01/16/2022						Pending
0106536	Jason B Dean N9300 KNUTESON DR WHITEWATER, 53190	Republican	04/19/2022						Pending
0106319	Christopher Elsworth Hansen 418 Beloit St., Apt. 2 Walworth, 53184-9796	Independent, American Solidarity Party	05/05/2022						Pending

**Office Subtotal : 4**

**Office :**      **REPRESENTATIVE TO THE ASSEMBLY DISTRICT 32**      **Incumbent:**      **Tyler August**

0106545	Bartholomew Ray Williams 2420 Skyline Drive West Bend, 53090-1147	Republican	04/22/2022	4/27/2022					Pending
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	0104912	Tyler August 943 CUMBERLAND TRAIL LAKE GENEVA, 53147	Republican	05/03/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 33</b>				<b>Incumbent:</b>	<b>Cody Horlacher (Filed Notification of Noncandidacy)</b>			
	0106565	Dale W Oppermann 1117 Hillebrand Drive Jefferson, 53549	Republican	05/05/2022					Pending
	0105729	Don Vruwink 24 W ASH LANE MILTON, 53563	Democratic	04/19/2022		01/17/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 34</b>				<b>Incumbent:</b>	<b>Rob Swearingen</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 35</b>				<b>Incumbent:</b>	<b>Calvin Callahan</b>			
	0106155	Calvin Callahan N11910 COUNTY HIGHWAY CC TOMAHAWK, 54487	Republican	07/14/2021	4/13/2022	03/24/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 36</b>				<b>Incumbent:</b>	<b>Jeffrey L. Mursau</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 37</b>				<b>Incumbent:</b>	<b>William Penterman</b>			
	0106405	Cathy Ann Houchin 604 LONG ST WATERTOWN, 53098	Republican	03/30/2021					Pending

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	0106406	Nathan Pollnow N3863 FRANK ROAD REESEVILLE, 53579	Republican	03/25/2021					Pending
	0106403	Jennifer Lea Meinhardt 114 SOUTH MONROE STREET WATERTOWN, 53094	Republican	03/05/2021					Pending
	0106394	Benjamin Schmitz 7629 COUNTY HWY N SUN PRAIRIE, 53590	Independent, American Solidarity Party	04/25/2022					Pending
	0105226	Steven Eugene Kauffeld W8370 LONG ROAD WATERTOWN, 53098	Republican	03/18/2021					Pending
	0106412	William L Penterman 247 S WATER ST COLUMBUS, 53925	Republican	04/14/2021		03/30/2022			Pending
	0106564	Maureen Ann McCarville 513 Flambeau Parkway DeForest, 53532	Democratic	05/03/2022					Pending
<b>Office Subtotal : 7</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 38</b>				<b>Incumbent:</b>	<b>Barbara Dittrich</b>			
	0106042	Barbara Dittrich 380 YOSEMITE RD OCONOMOWOC, 53066	Republican	05/03/2022	4/20/2022	04/28/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 39</b>				<b>Incumbent:</b>	<b>Mark L. Born</b>			
	0105189	Mark L Born 135 Franklin St Beaver Dam, 53916-2211	Republican	04/12/2022		04/27/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 40</b>				<b>Incumbent:</b>	<b>Kevin Petersen</b>			
	0104400	Kevin Petersen N1433 DRIVAS ROAD WAUPACA, 54981	Republican	04/16/2022	4/28/2022	04/27/2022			Pending



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	0106540	Henry Fries E2449 E Old Mill Run Waupaca, 54981-8263	Independent	04/29/2022	4/25/2022				Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 41</b>				<b>Incumbent:</b>	<b>Alex A. Dallman</b>			
	0106199	Alex Dallman 820 SUNNYSIDE ROAD UNIT 13 GREEN LAKE, 54941	Republican	03/22/2022		04/26/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 42</b>				<b>Incumbent:</b>	<b>Jon Plumer</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 43</b>				<b>Incumbent:</b>	<b>Don Vruwink</b>			
	0106541	Jenna Jacobson 124 Ash Street Oregon, 53575	Democratic	04/20/2022	4/27/2022				Pending
	0106488	Marisa Voelkel 2547 N BURDICK RD JANESVILLE, 53548	Republican	02/18/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 44</b>				<b>Incumbent:</b>	<b>Sue Conley</b>			
	0106193	Sue S Conley 202 Hillside Ct Janesville, 53545-4342	Democratic	06/18/2021		04/15/2021			Pending
	0104765	Spencer Zimmerman 462 S. RANDALL AVE #3 JANESVILLE, 53545	Republican	04/20/2022		04/22/2022			Pending
<b>Office Subtotal : 2</b>									

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<b>Office :</b>		<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 45</b>			<b>Incumbent:</b>		<b>Mark Spreitzer (Filed Notification of Noncandidacy)</b>		
	0105792	Clinton Anderson 921 Cleveland Street Beloit, 53511	Democratic	03/14/2022					Pending
	0104897	Jeffrey William Klett 1980 Boulder Lane Beloit, 53511-6705	Republican	04/28/2022					Pending
	0106534	Ben Dorscheid N8852 HANNAH RD BELLEVILLE, 53508	Democratic	04/24/2022	4/20/2022				Pending
<b>Office Subtotal :</b>		<b>3</b>							
<b>Office :</b>		<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 46</b>			<b>Incumbent:</b>		<b>Gary Alan Hebl (Filed Notification of Noncandidacy)</b>		
	0106563	Andrew Hysell 1529 O'Keeffe Ave Sun Prairie, 53590	Democratic	05/03/2022					Pending
	0106560	Syed Abbas 2221 SHERMAN AVENUE MADISON, 53704	Democratic	04/28/2022					Pending
	0106531	Melissa Ratcliff 242 Forrester Drive Cottage Grove, 53527	Democratic	04/15/2022					Pending
	0106187	Andrew McKinney 4574 AMERICAN WAY COTTAGE GROVE, 53527	Republican	04/27/2022	4/20/2022				Pending
<b>Office Subtotal :</b>		<b>4</b>							
<b>Office :</b>		<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 47</b>			<b>Incumbent:</b>		<b>Jimmy Anderson</b>		
	0106559	LAMONTE MAURICE NEWSOM 1025 S Sunnyvale Ln, C Madison, 53713	Republican	05/02/2022					Pending
	0105709	Jimmy Anderson 5807 VERDE VIEW RD. FITCHBURG, 53711	Democratic	01/11/2022		02/21/2022			Pending
<b>Office Subtotal :</b>		<b>2</b>							

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<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 48</b>					<b>Incumbent:</b>	<b>Samba Baldeh</b>			
<b>Office Subtotal : 0</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 49</b>					<b>Incumbent:</b>	<b>Travis Tranel</b>			
	0104591	Travis Tranel 2231 LOUISBURG ROAD CUBA CITY, 53807	Republican	01/16/2022		02/28/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 50</b>					<b>Incumbent:</b>	<b>Tony Kurtz</b>			
	0106073	Tony Kurtz PO Box 23 Wonewoc, 53968	Republican	05/06/2022					Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 51</b>					<b>Incumbent:</b>	<b>Todd Novak</b>			
	0105503	Todd Novak 202 W Division St Dodgeville, 53533-0002	Republican	06/14/2021	5/5/2022	04/25/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 52</b>					<b>Incumbent:</b>	<b>Jeremy Thiesfeldt</b>			
	0105982	Joe Lavrenz 280 N SEYMOUR ST APT J204 FOND DU LAC, 54935	Democratic	04/25/2022					Pending
002	0106502	Jerry L. O'Connor N5964 JOSEPH CT FOND DU LAC, 54937	Republican	04/27/2022	4/27/2022	04/28/2022	04/27/2022	389	Pending
	0106517	Lawrence Foster 156 COTTAGE AVE FOND DU LAC, 54935	Republican	04/04/2022					Pending

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	0106480	Robert P. Thresher 368 ARLINGTON AVE FOND DU LAC, 54935	Republican	01/25/2022	1/18/2022				Pending
<b>Office Subtotal : 4</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 53</b>				<b>Incumbent:</b>	<b>Michael Schraa</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 54</b>				<b>Incumbent:</b>	<b>Gordon Hintz</b>			
	0106496	Lori Ann Palmeri 212 W PARKWAY AVE OSHKOSH, 54901	Democratic	04/21/2022		04/29/2022			Pending
	0106147	Aaron Wojciechowski 75A Dawes St. Oshkosh, 54901	Democratic	03/07/2022		03/14/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 55</b>				<b>Incumbent:</b>	<b>Rachael Cabral-Guevara</b>			
	0106522	Becky Nichols 402 ELM ST MENASHA, 54952	Democratic	04/01/2022					Pending
	0106494	Nate Gustafson 1820 County Road II Apt 27 Neenah, 54956	Republican	03/17/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 56</b>				<b>Incumbent:</b>	<b>Dave Murphy</b>			
	0106509	Patrick Virgil Hayden 325 E TIMBERLINE DR APPLETON, 54913	Democratic	03/18/2022					Pending
<b>Office Subtotal : 1</b>									

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<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 57</b>		<b>Incumbent:</b>		<b>Lee Snodgrass</b>
	0106018	Lee Snodgrass 415 S. OLDE ONEIDA STREET, APT. 204 APPLETON, 54911	Democratic	07/02/2021		05/02/2022			Pending
	0106561	Michael Smith 407 N OUTAGAMIE ST APPLETON, 54914	Republican	05/03/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 58</b>		<b>Incumbent:</b>		<b>Rick Gundrum</b>
	0105927	Rick Gundrum 301 WINTER LANE SLINGER, 53086	Republican	04/11/2022		04/11/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 59</b>		<b>Incumbent:</b>		<b>Timothy Ramthun</b>
009	0105963	Ty Alan Bodden 419 N MILITARY ROAD HILBERT, 54129	Republican	04/18/2022	5/6/2022		05/06/2022		Pending
001	0106499	Vinny Egle N188 US Hwy 45 Kewaskum, 53040	Republican	03/10/2022	4/25/2022		04/25/2022	398	Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 60</b>		<b>Incumbent:</b>		<b>Robert Brooks</b>
	0106475	Samuel Krieg 879 Amber Lane Port Washington, 53074	Republican	01/04/2022	2/14/2022				Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 61</b>		<b>Incumbent:</b>		<b>Samantha Kerkman</b>
	0106547	Michael S Farrell 20518 84TH PL BRISTOL, 53104	Republican	04/22/2022					Pending

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	0106521	Mike Honold 22000 Burlington Road Union Grove, 53182	Republican	04/07/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 62</b>				<b>Incumbent:</b>	<b>Robert Wittke</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 63</b>				<b>Incumbent:</b>	<b>Robin J. Vos</b>			
	0106493	Adam Steen P.O. Box 364 Sturtevant, 53177	Republican	02/28/2022					Pending
	0104283	Robin Vos 960 ROCK RIDGE RD. BURLINGTON, 53105	Republican	05/03/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 64</b>				<b>Incumbent:</b>	<b>Tip McGuire</b>			
	0106236	Edward William Hibsch 866 Sheridan Rd Kenosha, 53140-1149	Republican	04/25/2022					Pending
	0106119	Thaddeus Patrick McGuire 3554 Sheridan Rd. Kenosha, 53140	Democratic	07/31/2021		05/02/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 65</b>				<b>Incumbent:</b>	<b>Tod Ohnstad</b>			
	0105282	Tod Oliver Ohnstad 3814 18TH AVENUE KENOSHA, 53140	Democratic	05/17/2021		01/18/2022			Pending
<b>Office Subtotal : 1</b>									

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<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 66</b>		<b>Incumbent:</b>		<b>Greta Neubauer</b>
	0106526	Carl Hutton 1325 Hayes Ave Racine, WI, 53405	Libertarian	04/13/2022		04/29/2022			Pending
	0105919	Gretchen Stephens Neubauer 600 21st Street, N2B Racine, 53403	Democratic	04/05/2022		04/05/2022			Pending
<b>Office Subtotal :</b>					<b>2</b>				
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 67</b>		<b>Incumbent:</b>		<b>Rob Summerfield</b>
	0106442	Bryce Thon 4028 155th Avenue Bloomer, 54724	Libertarian	10/19/2021	9/20/2021	04/18/2022			Pending
<b>Office Subtotal :</b>					<b>1</b>				
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 68</b>		<b>Incumbent:</b>		<b>Jesse James (Filed Notification of Noncandidacy)</b>
	0106479	Karen Hurd 835 S. Liberty Street, Apt 14 Fall Creek, 54742	Republican	04/11/2022	1/26/2022				Pending
	0106498	Chris Connell 6572 N SHORE DR Eau Claire, 54703	Republican	03/04/2022					Pending
	0106204	William E Bogdonovich W8644 CHICKADEE RD WILLARD, 54493	Independent, Independent	02/01/2022					Pending
	0106484	Hillarie Roth 435 S WILLSON DR ALTOONA, 54720	Republican	01/21/2022	2/7/2022				Pending
<b>Office Subtotal :</b>					<b>4</b>				
<b>Office :</b>					<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 69</b>		<b>Incumbent:</b>		<b>Donna M. Rozar</b>
	0103120	Donna M. Rozar 711 West Blodgett Street Marshfield, 54449-1808	Republican	04/22/2022	4/13/2022	04/29/2022			Pending
<b>Office Subtotal :</b>					<b>1</b>				

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<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 70</b>					<b>Incumbent:</b>		<b>Nancy Lynn VanderMeer</b>		
	0105734	Remberto Andres Gomez 1808 Goodland Ave. Tomah, 54660	Democratic	05/02/2022					Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 71</b>					<b>Incumbent:</b>		<b>Katrina Shankland</b>		
	0106225	Scott Cassidy Soik 415 W RIVER DR W STEVENS POINT, 54481	Republican	04/20/2022					Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 72</b>					<b>Incumbent:</b>		<b>Scott S. Krug</b>		
<b>Office Subtotal : 0</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 73</b>					<b>Incumbent:</b>		<b>Nick Milroy</b>		
	0106548	Laura R. Gapske 1913 E 7th Street Superior, 54880-3577	Democratic	04/25/2022	4/28/2022	04/26/2022			Pending
	0104678	Nick Milroy 4543 S. SAM ANDERSON ROAD SOUTH RANGE, 54874	Democratic	07/15/2021		04/25/2022			Pending
<b>Office Subtotal : 2</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 74</b>					<b>Incumbent:</b>		<b>Beth Meyers (Filed Notification of Noncandidacy)</b>		
	0106507	Kevin Francis Schanning 12365 SCENIC DR IRON RIVER, 54847	Democratic	03/30/2022		04/27/2022			Pending
	0106516	Chanz J Green P.O. Box 204 Grand View, 54839	Republican	03/31/2022					Pending



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	0106556	John Adams 30900 County Highway C Washburn, 54891	Democratic	04/27/2022	5/2/2022	04/28/2022			Pending
	0105504	Beth Meyers PO Box 907, PO Box 907 Bayfield, 54814-0907	Democratic	03/09/2021		03/29/2022			Pending
<b>Office Subtotal : 4</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 75</b>				<b>Incumbent:</b>	<b>David Armstrong</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 76</b>				<b>Incumbent:</b>	<b>Francesca Hong</b>			
	0106285	Francesca Hong 101 N Blount St, #801 Madison, 53703	Democratic	03/11/2022		04/29/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 77</b>				<b>Incumbent:</b>	<b>Shelia Stubbs</b>			
	0105959	Shelia Stubbs 4 WAUNONA WOODS CT MADISON, 53713	Democratic	04/12/2022	4/18/2022	05/02/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 78</b>				<b>Incumbent:</b>	<b>Lisa B. Subeck</b>			
	0105466	Lisa Beth Subeck 818 S. GAMMON RD., UNIT 4 MADISON, 53719	Democratic	07/14/2021		05/02/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 79</b>				<b>Incumbent:</b>	<b>Dianne H. Hesselbein</b>			
	0106504	Luke Fuszard 8934 RED BERYL DR MIDDLETON, 53562	Democratic	03/13/2022	3/15/2022	03/18/2022			Pending

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	0106542	Alex Joers 703 Cricket Ln, Unit 3 Middleton, 53562-5672	Democratic	04/29/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 80</b>				<b>Incumbent:</b>	<b>Sondy Pope (Filed Notification of Noncandidacy)</b>			
	0106532	Mike Bare 543 Harvest Lane Verona, 53593	Democratic	04/17/2022					Pending
	0106529	Dale Edward Paul Yurs 219 Harmon Cir. Belleville, 53508	Democratic	04/14/2022					Pending
	0106530	Anna Halverson 202 Lake St. Mount Horeb, 53572	Democratic	04/14/2022					Pending
	0106551	Chad Elliott Kemp 374 MESA RD VERONA, 53593	Democratic	04/25/2022					Pending
<b>Office Subtotal : 4</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 81</b>				<b>Incumbent:</b>	<b>Dave Considine</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 82</b>				<b>Incumbent:</b>	<b>Ken Skowronski (Filed Notification of Noncandidacy)</b>			
	0105770	Charles Christopher Wichgers W156 S7388 QUIETWOOD DR. MUSKEGO, 53150	Republican	04/16/2022		04/28/2022			Pending
<b>Office Subtotal : 1</b>									

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<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 83</b>					<b>Incumbent:</b>	<b>Chuck Wichgers</b>			
	0106535	Nik Rettinger 149 Shore Drive Mukwonago, 53149	Republican	04/19/2022	4/18/2022				Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 84</b>					<b>Incumbent:</b>	<b>Mike Kuglitsch</b>			
	0101520	Bob Donovan 5302 WOODBRIDGE LN S GREENFIELD, 53221	Republican	05/02/2022	5/2/2022				Pending
003	0106492	David Karst 11961 W WHITAKER AVE GREENFIELD, 53228	Republican	02/25/2022	4/29/2022		04/29/2022	321	Pending
<b>Office Subtotal : 2</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 85</b>					<b>Incumbent:</b>	<b>Patrick Snyder</b>			
<b>Office Subtotal : 0</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 86</b>					<b>Incumbent:</b>	<b>John Spiros</b>			
	0104954	John Spiros 1406 E. FILLMORE MARSHFIELD, 54449	Republican	04/08/2022	3/17/2022	04/14/2022			Pending
<b>Office Subtotal : 1</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 87</b>					<b>Incumbent:</b>	<b>James W. Edming</b>			
	0105521	Michael Bub 427 BILLINGS AVE MEDFORD, 54451	Republican	04/22/2022	4/25/2022				Pending
	0104063	James W. Edming N4998 EDMING ROAD GLEN FLORA, 54526	Republican	04/27/2022	4/15/2022	04/27/2022			Pending

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	0106421	Tom Rasmussen 218 SOUTH MAIN STREET MEDFORD, 54451	Independent, Libertarian	07/08/2021	7/12/2021				Pending
	0106518	Wade Andrew Mueller 246037 Bungalow Road Athens, 54411-5002	Libertarian	04/01/2022					Pending
<b>Office Subtotal : 4</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 88</b>				<b>Incumbent:</b>	<b>John Macco</b>			
<b>Office Subtotal : 0</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 89</b>				<b>Incumbent:</b>	<b>Elijah Behnke</b>			
	0106393	Elijah Behnke 4761 COUNTY ROAD J OCONTO, 54153	Republican	03/17/2022		04/26/2022			Pending
	0106562	Jane E. Benson 3672 Hallers Creek Road Suamico, 54313-8419	Democratic	05/01/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 90</b>				<b>Incumbent:</b>	<b>Kristina Shelton</b>			
	0106190	Kristina Marie Shelton 1045 S. WEBSTER AVE GREEN BAY, 54301	Democratic	05/24/2021		04/28/2022			Pending
	0106510	Micah Behnke 823 Crooks St Green Bay, 54301	Republican	03/17/2022					Pending
<b>Office Subtotal : 2</b>									
<b>Office :</b>	<b>REPRESENTATIVE TO THE ASSEMBLY DISTRICT 91</b>				<b>Incumbent:</b>	<b>Jodi Emerson</b>			
	0105971	Jodene Kay Emerson 519 CHAUNCEY ST EAU CLAIRE, 54701	Democratic	07/15/2021		05/02/2022			Pending
<b>Office Subtotal : 1</b>									



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<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 96</b>					<b>Incumbent:</b>	<b>Loren Oldenburg</b>			
	0106030	Loren Oldenburg E4299 COUNTY RD Y VIROQUA, 54665	Republican	04/23/2022	4/27/2022	04/27/2022			Pending
	0106290	Jayne Marie Swiggum 50272 OLD GAYS ROAD GAYS MILLS, 54631	Democratic	05/05/2022					Pending
	0106423	Karen M Mischel 515 S RUSK AVE VIROQUA, 54665	Democratic	07/09/2021					Pending
<b>Office Subtotal : 3</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 97</b>					<b>Incumbent:</b>	<b>Scott Allen</b>			
<b>Office Subtotal : 0</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 98</b>					<b>Incumbent:</b>	<b>Adam Neylon</b>			
<b>Office Subtotal : 0</b>									
<b>Office : REPRESENTATIVE TO THE ASSEMBLY DISTRICT 99</b>					<b>Incumbent:</b>	<b>Cindi Duchow</b>			
	0105948	Rick Braun S29W29571 ANCESTRAL DR GENESEE, 53188	Republican	07/15/2021					Pending
	0106523	Alec Thomas Dahms 1028 Wellington Way Hartland, 53029-2706	Democratic	04/08/2022		04/11/2022			Pending
	0105660	Cindi Duchow N22 W28692 LOUIS AVENUE PEWAUKEE, 53072	Republican	04/10/2022		04/28/2022			Pending
<b>Office Subtotal : 3</b>									
<b>Total Candidates : 268</b>									