

**State of Wisconsin
Before The Elections Commission**

IN THE MATTER OF THE COMPLAINT OF:

THERESA SIPES



Complainant,

v.

CELESTINE JEFFREYS
Office of the City Clerk
100 N. Jefferson Street
Green Bay, WI 54301,

Respondent.

VERIFIED COMPLAINT

Complainant, by and through undersigned counsel, alleges the following:

1. Complainant is a qualified “elector” pursuant to Wis. Stat. chs. 5 and 6 within the City of Green Bay, Wisconsin. Ms. Sipes is also a member of the Republican Party of Brown County¹ (“RPBC”) Executive Board and currently serves as a Chief Election Inspector for the City of Green Bay.
2. Respondent is the Clerk of the City of Green Bay, Wisconsin. As City Clerk, Respondent is an “election official” pursuant to Wis. Stat. chs. 5 and 6 and is named in her official capacity. Respondent, appointed by Green Bay Mayor Genrich, is responsible for the administration of elections within the City, including the issuance and processing of absentee ballots, pursuant to Wis. Stat. chs. 6 and 7.

JURISDICTION

3. The Wisconsin Elections Commission (the “Commission”) has jurisdiction over this complaint pursuant to Wis. Stat. § 5.06(1), which provides that if “any elector of a jurisdiction or district served by an election official believes that a decision or action of the official or the failure of the official to act” violates Wisconsin election law, including violations related to “ballot preparation, election

¹ RPBC is the Brown County entity of the Republican Party of Wisconsin.

administration or conduct of elections,” such “elector may file a written sworn complaint with the commission” against the election official requesting relief.

4. This Complaint is timely under Wis. Stat. § 5.06(3) given that violations were identified only several days prior to this filing, the results of the violations are ongoing and the Spring Election has not yet occurred.

5. Pursuant to Wis. Stat. § 5.05(1), the Commission has general authority for the administration of chapters 5 through 12 of the Wisconsin Statutes and is empowered to ensure compliance with election laws by election officials, including municipal clerks and the Respondent herein.

6. The Commission is further vested with the authority to investigate such complaints, order compliance, and take appropriate remedial action. The Commission may, pursuant to Wis. Stat. § 5.06(2), investigate, hold a hearing, and order appropriate remedies.

COMPLAINT

7. In connection with the April 7, 2026, Wisconsin Spring Election (the “Spring Election”), in at least 152 instances, Respondent’s office mailed more than one absentee ballot to the same individual voter in violation of Wisconsin election law and creating substantial risk of confusion, double voting and increasing the opportunity for and possibility of fraud.

8. The illegal issuance of multiple absentee ballots to individual voters was widespread, impacting multiple wards throughout the City of Green Bay.

SUMMARY OF FACTS

9. On or about March 30, 2026, the RPBC, Complainant and the Republican Party of Wisconsin (“RPW”) received reports of a City of Green Bay voter who completed and returned an absentee ballot and shortly thereafter received another absentee ballot for the same election. (“Voter 1”). Voter 1 reportedly contacted Respondent’s office and was told that a system “glitch” had resulted in some voters receiving duplicate ballots.

10. In response to the report from Voter 1, RPW contacted Respondent to confirm that her office in fact sent multiple ballots to individual voters for the Spring Election and requested information to determine why ballots were illegally issued, the number of voters and wards impacted, and whether Respondent would take action to prevent the illegally issued ballots from being voted in the Spring Election.

11. On April 1, 2026, RPW received a second report of a voter receiving multiple absentee ballots for the Spring Election. This report involved another Green Bay voter in Ward 34 (“Voter 2”). Voter

2 made an online request for Respondent to mail a ballot for the Spring Election to a temporary Florida address. Again, Voter 2 received, completed and returned a ballot only to receive another ballot for that same Spring Election several days later at the same temporary Florida address.

12. Upon information and belief, neither Voter 1 nor Voter 2 completed or returned more than one ballot for the Spring Election, but instead, being very concerned about the illegal issuance of multiple ballots to individual voters and fearing the breadth of the illegal activity, both voters immediately reported the violations.

13. Having received no reply from Respondent, on April 2, 2026, RPW contacted the Commission to inform staff of the confirmed reports that individual Green Bay voters were issued multiple absentee ballots for the Spring Election. The Commission's Deputy Administrator promptly responded and indicated that he would also inquire about the allegations.

14. Despite RPW's direct inquiries days earlier, Respondent confirmed the issuance of multiple ballots to individual voters in a Fox 11 news article that was published at approximately 1:11 PM on April 2, 2026. Through that article, Respondent admitted that her office issued multiple ballots to at least 152 Green Bay voters. Respondent downplayed the seriousness of the situation and claimed that the issuance of multiple ballots to individual voters was a mistake caused by a snowstorm. <https://fox11online.com/news/political/green-bay-duplicate-absentee-ballots-mailed-2026-spring-general-election-city-clerk-celestine-jeffreys> (last accessed Apr. 4 2026) ("I really don't think it's acceptable for these type of things to happen, so I would hope that whatever the problem is, they would figure it out and make sure that it doesn't happen again,' [Alderman] Eck said.").

15. The Commission provided RPW with a substantive response after the Fox 11 article was published, confirming that Respondent admitted issuing multiple ballots to at least 152 Green Bay voters. The Commission acknowledged the seriousness of Respondent's actions and need for more information and a formal explanation but asserted that it could not "independently initiate a formal investigation outside the complaint processes that are established by law" and provided information on filing a sworn complaint.

16. Respondent finally replied to RPW later April 2nd, providing a list of impacted wards and a copy of a letter mailed to impacted voters. Critically, this communication did not include any details regarding how the illegally issued ballots would or could be tracked, identified, and handled at Green Bay Central Count on Election Day should any individual attempt to cast such ballot.

17. Having received little information on whether the illegal issuance of additional ballots can and will be mitigated, RPW sent a follow-up email on April 3, 2026, requesting further explanation, which remains outstanding as of the date of this Complaint.

APPLICABLE LAW

18. Providing only qualified voters with a single ballot is, of course, the foundation of every election in our democratic republic and the necessity that elections express the will of the electorate is undermined when ballot-issuance controls are either evaded, ignored or simply break down. Wis. Stat. § 5.01(1).

19. When allowing for qualified electors to vote absentee, the Wisconsin Legislature emphasized that there must be strict compliance with all absentee voting laws and procedures because “voting by absentee ballot is a privilege exercised wholly outside the traditional safeguards of the polling place.” Wis. Stat. § 6.84(1). All provisions of the absentee voting process, both requirements of the elector and the election official must therefore “be construed as mandatory” and strictly imposed “in order to ensure the integrity of the absentee ballot process.” Wis. Stat. § 6.84(2).

20. Wisconsin’s absentee voting framework is structured to ensure that only qualified electors receive and can cast only one ballot per election. Wis. Stat. § 6.86 provides that the municipal clerk shall issue one absentee ballot to each qualifying elector upon proper application. The statutory scheme does not contemplate or authorize the mailing of another absentee ballot to the same voter for the same election absent a valid spoiling request under Wis. Stat. § 6.86(5).

21. Wisconsin law places a strict duty upon municipal clerks to ensure that the principle of one vote per qualified elector is upheld, and ballot-issuance controls strictly administered:²

- a. Section 6.86(1)(ar), Wis. Stats., requires that a municipal clerk "shall not issue an absentee ballot unless the clerk receives a written application therefor from a qualified elector." The statute uses the singular, "an absentee ballot" upon "a written application," thereby expressly prohibiting the issuance of multiple absentee ballots to individual voters. The singular issuance of one ballot to one qualified voter is present throughout the absentee ballot issuing process in Wis. Stat. § 6.86.
- b. Wisconsin Election law strictly limits the possibility of issuing a second absentee ballot to narrow circumstances with specific procedures. Section 6.86(5), Wis. Stats., provides the

² See also, Wis. Admin. Code Ch. EL 12.

only mechanism by which a clerk may issue a replacement absentee ballot to a qualified elector. Under Wis. Stat. § 6.86(5), a clerk can only issue a replacement absentee ballot if “an elector returns a spoiled or damaged absentee ballot to the municipal clerk” and *only* then can the clerk subsequently “issue a new ballot to the elector” while further requiring that the clerk “shall destroy the spoiled or damaged ballot.”

22. Municipal clerks have a duty to properly administer elections and an appropriately high affirmative obligation to ensure proper ballot issuance procedure. Wis. Stat. § 7.15(1).

RESPONDENT’S VIOLATIONS OF LAW

23. Whether the issuance of these duplicate ballots resulted from willful conduct, reckless disregard for numerous statutory obligations, or gross negligence in the administration of the absentee ballot process, the result is the same: Respondent violated numerous Wisconsin election laws by circulating at least 152 unauthorized ballots into the public with little to no chain of custody, each capable of being completed, witnessed, and returned.

24. Specifically, Respondent not only violated her duty to properly administer Wisconsin’s Spring Election under Wis. Stat. § 7.15 and utterly failed to ensure proper ballot issuance procedures, but she further violated numerous portions of Wis. Stat. § 6.86 discussed above.

25. Respondent violated Wis. Stat. § 6.86(1)(ar) by issuing more than one absentee ballot to at least 152 individual voters who, upon information and belief, submitted a single application under which each voter was only eligible for a single ballot in the Spring Election.

26. The Legislature created exactly *one* exception for the issuance of another absentee ballot: the formal spoiling process under § 6.86(5), under which an elector affirmatively requests a replacement for a “spoiled or damaged absentee ballot”, but the law first requires that the elector return the original ballot to the clerk and that the clerk first destroy the original *before* issuing the replacement. The fact that the Legislature crafted this narrow, carefully controlled exception implies that all other issuance of duplicate ballots is prohibited. The express authorization of replacement ballots *only* if the original is first destroyed means that no other method of issuing another ballot to the same qualified elector for the same election is lawful.

27. Respondent’s issuance of multiple ballots to at least 152 individual electors bypassed every safeguard contained in §§ 6.86(5) and (6), placing two official but illegal ballots into circulation for each affected voter without any request by any elector and most importantly of all, without the return and destruction of the first ballot sent to that elector.

28. Respondent breached her duty under Wis. Stat. § 7.15 to administer elections and ensure that all procedures comply with applicable law. Violations of all election laws, but especially ballot-issuance violations of this magnitude, are extremely serious, require investigation, and any election officials responsible must be held accountable.

29. The issuance of multiple absentee ballots to individual voters by Wisconsin clerks is unfortunately not without precedent. In September 2024, the City of Madison Clerk's office mailed approximately 2,215 duplicate absentee ballots to voters across ten wards in advance of the November 2024 General Election. Upon information and belief, despite the scope of the Madison incident, no formal complaint was filed, no investigation was initiated by the Commission, and no corrective order was issued. The absence of any formal Commission action following the Madison incident may have contributed to a permissive environment in which municipal clerks, including Respondent, fail to treat the absentee ballot issuance process with the seriousness the law demands.

30. The Commission should use this Complaint as an opportunity to conduct a serious formal investigation and establish that the mailing of multiple absentee ballots to any individual voters violates Wisconsin law and will not be tolerated. Clear precedent from the Commission on this issue would provide necessary guidance to all municipal clerks statewide and help prevent future violations.

31. Regardless of whether the issuance of multiple absentee ballots to individual voters was the result of intentional action, reckless conduct, or gross negligence, the Commission should investigate the circumstances giving rise to these violations. At minimum, the Commission should:

- a. Initiate a formal investigation into the cause, the responsible election officials, and the full scope of the issuance of illegal absentee ballots, including the system “glitch” referenced by the Clerk’s office;
- b. Determine whether Respondent and/or any other City of Green Bay officials have implemented adequate safeguards to attempt to identify and segregate illegally issued ballots received at Green Bay Central Count on Election Day;
- c. Immediately order Respondent and/or the City of Green Bay to provide a detailed written plan for tracking and handling any duplicate ballots returned for the April 7, 2026, Spring Election;
- d. Determine whether any corrective action, including additional training, oversight, or other remedial measures, is warranted to prevent similar errors in future elections; and

- e. Take any additional action the Commission deems appropriate to ensure compliance with Wisconsin election law by Respondent and/or future clerks and for future elections.

PRAYER FOR RELIEF

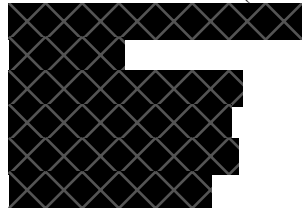
32. WHEREFORE, Complainant respectfully requests that the Wisconsin Elections Commission:

- a. Accept this Complaint for filing under Wis. Stat. § 5.06;
- b. Conduct a thorough investigation into the foregoing allegations;
- c. Order Respondent and/or the City of Green Bay to provide a detailed written plan for tracking and handling any duplicate ballots returned for the April 7, 2026, Spring Election;
- d. Order such corrective and remedial action as the Commission deems necessary and appropriate to ensure compliance with Wisconsin election law by Respondent and/or future clerks and for future elections;
- e. Grant such other and further relief and/or take such further action as the Commission deems necessary and/or appropriate.

Respectfully submitted this 6th day of April, 2026.

NJB LAW & CONSULTING LLC

/S/ Signed electronically by Nicholas J. Boerke
Nicholas J. Boerke (WI Bar No. 1083216)



Verification of Complainant on following page.

VERIFICATION


I, Theresa Sipes, being first duly sworn upon oath, state that I personally read the above Complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.


Theresa Sipes, Complainant
April 6th, 2026

STATE OF WISCONSIN)
) ss.
COUNTY OF Brown)

Subscribed and sworn to before me
this 6th day of April, 2026.




Notary Public, State of Wisconsin

My commission expires: Aug 4, 2028