

**BEFORE THE STATE OF WISCONSIN ELECTIONS COMMISSION**

---

IN THE MATTER of the Nomination Papers  
Filed by Jeff Wright with Respect to the  
Spring 2025 Election for Wisconsin State  
Superintendent of Public Instruction.

File No. \_\_\_\_\_

---

**VERIFIED COMPLAINT OF NATALIA TAFT**

---

The Complainant, Natalia Taft by her attorneys Maistelman & Associates, LLC by Attorney Michael S. Maistelman, alleges and shows as follows:

1. The Complainant, Natalia Taft ("Complainant"), is a qualified elector in the state of Wisconsin whose residential address is 1301 Cleveland Avenue, Racine, Wisconsin 53405.

2. The Respondent, Jeff Wright ("Respondent"), is upon information and belief a candidate in the Spring 2025 Election for Wisconsin State Superintendent of Public Instruction and whose residential address as listed on his Campaign Finance Statement is E3048 Marble Quarry Rd, Plain, Wisconsin 53577.

3. On or about January 6th, 2025, Respondent filed with the State of Wisconsin Elections Commission ("Elections Commission") Nomination Papers for Non-Partisan Office for the position of Wisconsin State Superintendent of Public Instruction. A typical Nomination paper of Respondent is attached hereto as Exhibit A and incorporated herein.

4. Upon information and belief, Respondent's Nomination papers were allegedly circulated between December 1, 2024, through January 6th, 2025.

5. Respondent's Nomination papers allegedly consisted of a sufficient number of signatures so as to equal two thousand (2000) signatures, the amount required for placement on the ballot for Spring 2025 Election for Wisconsin State Superintendent of Public Instruction. Petitioner is not aware of how many of Respondent's nomination signatures the Elections Commission has accepted or rejected.

## CHALLENGES TO HEADING OF NOMINATION PAPERS

6. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.

7. Wis. Stat. § 8.10(2)(b) requires that the heading of a nomination paper contain the following:

(b) Each nomination paper shall have substantially the following words printed at the top:

I, the undersigned, request that the name of (insert candidate's last name plus first name, nickname or initial, and middle name, former legal surname, nickname or middle initial or initials if desired, but no other abbreviations or titles residing at (insert candidate's street address) be placed on the ballot at the (spring or special) election to be held on (date of election) as a candidate **so that voters will have the opportunity to vote for (him or her) for the office of (name of office). I am eligible to vote in (name of jurisdiction or district in which candidate seeks office.)** [emphasis added]. I have not signed the nomination paper of any other candidate for the same office at this election.

8. Respondent, in contravention to Wis. Stat. § 8.10(2)(b) failed to list the full name of the office, to wit: Wisconsin Superintendent of Public Instruction nor the jurisdiction, (Wisconsin) in the heading on each and every page of his Nomination Papers.

9. Wis. Adm. Code § EL 2.05(5), entitled *Treatment and Sufficiency Nomination Papers* provides: “

Where any required item of information on a nomination paper is incomplete, the filing officer shall accept the information as complete if there has been substantial compliance with the law.

10. Respondent fails to even have the name *Wisconsin* anywhere in the header of his nomination paper.

11. In 2022, staff at the Wisconsin Elections Commission stated in two emails that “Wisconsin”, in a state-wide office must be listed as the jurisdiction in the header of the nomination papers. *See* Exhibit B attached hereto and incorporated herein.

12. There does not appear to be any court cases that address whether the full title of the office and jurisdiction of the office that a candidate is running for is substantially compliant if the candidate fails to list the full title of the office and the jurisdiction that they are running in.

13. There does appear to be any Elections Commission’s rulings that held that failure to provide the public with the full title of the office and the jurisdiction that a candidate is running is in substantial compliance.

14. It would seem to be mandatory that the nomination header must, at the very least, provide the public with the full title of the office and jurisdiction that the candidate is running in. The header states: “... **so that voters will have the opportunity to vote for (him or her) for the office of (name of office). I am eligible to vote in the jurisdiction or district in which the candidate named above seeks office.**” [emphasis added].

15. How can an elector know that they support someone for an office where the name of the office is not fully listed and that they are eligible to vote in the jurisdiction or district in which the candidate seeks office unless the jurisdiction is clearly stated in the header.

16. The Elections Commission found substantial compliance even if a candidate lists additional information in the header of their nomination papers. *See Deborah Lynn Kerr v. Shandowlyon Lyzette Hendricks-Williams*, Case No. EL 21-04. In the *Kerr* case the Respondent listed the title “Dr.” in front of her name on her nomination papers, in violation of Wis. Stat. § 8.10(2)(b). In the *Kerr* case as opposed to the current case before you there was no confusion to the public as to the name of the office or

jurisdiction that candidate was running in. However, this is not the case in the matter before you. In this matter, Respondent failed to include material information, i.e., the jurisdiction and title of the office that he is running in. Therefore, Respondent's nomination papers were incomplete of crucial and material information.

### **CONCLUSION**

17. Accordingly, Respondent has not submitted a sufficient number of signatures to be placed on the ballot for the Spring 2025 Election for Wisconsin State Superintendent of Public Instruction.

18. This Verified Complaint is made pursuant to E.L. §§ 2.05 - 2.07, Wis. Admin. Code, and Wis. Stat. Ch.8, and was served upon Respondent via electronic mail at the following email address as listed on Respondent's CF-1: jeff@jeffwrightforwisconsin.com.

**WHEREFORE**, Complainant respectfully requests that the Elections Commission conduct an investigation pursuant to E.L. §§ 2.05 - 2.07, Wis. Admin. Code, in conjunction with such other public officials as the Elections Commission, or the Executive Director thereof, may deem appropriate and determine the Nomination papers of the Respondent to be insufficient for the reasons set forth in this Verified Complaint.

Dated at Milwaukee, Wisconsin, this 8th day of January 2025.

By: Michael S Maistelman  
Michael S. Maistelman  
State Bar No. 1024681  
Attorney for Complainant

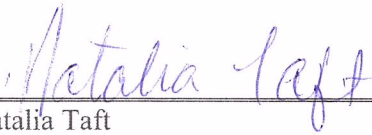
P.O. ADDRESS:  
7524 N. Navajo Rd.  
Milwaukee, WI 53217  
414-908-4254  
414-447-0232 (fax)  
414-333-9700 (cell)  
msm@maistelmanlaw.com

VERIFICATION

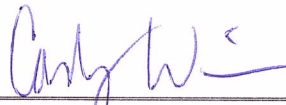
Natalia Taft, being first duly sworn, on oath, deposes and says as follows:

1. That she is a qualified elector in the state of Wisconsin whose residential address is 1301 Cleveland Avenue, Racine, Wisconsin 53405.
2. That she has read the foregoing Verified Complaint and that the same is true and correct, except as to those matters therein stated upon information and belief and, as to those matters, she believes them to be true.

Dated at Milwaukee Wisconsin this 8<sup>th</sup> day of January 2025

  
\_\_\_\_\_  
Natalia Taft  
Complainant

Subscribed and Sworn to before  
me this 8<sup>th</sup> day of January 2025.

  
\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission Expires: 11/21/2027.





I, the undersigned, request the name of

# Jeff Wright

Residing at E3048 Marble Quarry Rd, Plain, WI 53577, be placed on the ballot for the Spring election to be held on April 1, 2025 as a candidate, so that voters will have the opportunity to vote for him for the office of **State Superintendent of Public Instruction**.

Candidate's Municipality for Voting Purposes: Town of Bear Creek. Candidate mailing address: P.O Box 64, Prairie Du Sac, WI 53578.

I am eligible to vote in the jurisdiction or district in which the candidate named above seeks office. I have not signed the nomination paper of any other candidate for the same office at this election.

The municipality used for mailing purposes, when different than municipality of residence, is not sufficient. The name of the municipality of residence must always be listed.

Signatures of Electors	Printed Name of Electors	Residential Address (No P.O. Box Addresses) Street and Number or Rural Route (Rural address must also include box or fire no.)	Municipality of Residence Check the type and write the name of your municipality for voting purposes.	Date of Signing Mo/Day/Year
	Sabrina Sedlar	4325 W Tripoli Ave Milwaukee, WI 53220	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12-21-24
	Ashley Roemer	2251 W Vogel Ave	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12/21/24
	Adan Ortega	3201 S. 60th St.	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12-21-24
	Ritey Roemer	2251 W Vogel Ave	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12-21-24
	Emily Roemer	2251 W Vogel Ave	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12/21/24
	Lily Sedlar	4325 W Tripoli Ave	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12/21/24
	Meghan Sedlar	33901 Dream St.	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City Burlington	12/21/24
	Laura Roemer	2251 W. Vogel Ave	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12/21/24
	Malek Abu-Shawish	6821 Bobolink Road	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Racine	12/21/24
	James Sedlar	4325 W Tripoli Ave Milwaukee, WI 53220	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City Milwaukee	12/21/24

MIKE ROEMER

(Name of circulator)

CERTIFICATION OF CIRCULATOR

certify: I reside at

2251 W VOGEL AVE, MLW 53221

(Circulator's residential address - Include number, street, and municipality.)

I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. §6.03. I personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I intend to support this candidate. I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a).

12/21/2024

(Date)

12/28/24 MR

Mike Roemer

(Signature of circulator)

# RE: Nomination Paper Review

Davies, Cody C - ELECTIONS <CodyC.Davies@wisconsin.gov>

Wed 04/27/2022 09:26

To: Carly Wilson <wilson@nationconsulting.com>;

Cc: ELECTIONS HelpDesk <elections@wisconsin.gov>;

Yep, absolutely. As long as you're including Wisconsin on there somewhere to indicate that it's the applicable jurisdiction for this office, you'd still be substantially complying with the statutory language.

---

**From:** Carly Wilson <wilson@nationconsulting.com>  
**Sent:** Monday, April 25, 2022 11:39 AM  
**To:** Davies, Cody C - ELECTIONS <CodyC.Davies@wisconsin.gov>  
**Cc:** ELECTIONS HelpDesk <elections@wisconsin.gov>  
**Subject:** RE: Nomination Paper Review

**CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Ok, so if I added Wisconsin but didn't change the "I am eligible to vote in the jurisdiction...." etc part that would still be fine and in substantial compliance?

Carly Wilson (she/her/hers)  
Senior Associate  
Nation Consulting  
(414) 940-7946

---

**From:** Davies, Cody C - ELECTIONS <CodyC.Davies@wisconsin.gov>  
**Sent:** Monday, April 25, 2022 11:26 AM  
**To:** Carly Wilson <[wilson@nationconsulting.com](mailto:wilson@nationconsulting.com)>  
**Cc:** ELECTIONS HelpDesk <[elections@wisconsin.gov](mailto:elections@wisconsin.gov)>  
**Subject:** RE: Nomination Paper Review

Good morning,

This is pretty close. The only recommended edit would be to include Wisconsin as the jurisdiction in there somewhere. It's up to you as to how you want to do that, but the name of the jurisdiction is still required even for statewide offices. I believe other folks have replaced the "I am eligible to vote in the jurisdiction or district in which the candidate named above seeks office" with "I am eligible to vote in the State of Wisconsin" or something similar, which would satisfy the substantial compliance piece of the nomination paper statutes. Again, though, how to update the wording in the header is completely up to you folks.

Please let me know if you have any additional questions or concerns and I'd be happy to assist.

Thank you, Cody



Cody Davies  
Elections Administration Specialist  
Wisconsin Elections Commission  
(608) 264-6763  
codyc.davies@wi.gov

---

**From:** ELECTIONS HelpDesk <[elections@wisconsin.gov](mailto:elections@wisconsin.gov)> **Sent:** Monday, April 25, 2022 11:19 AM **To:** Davies, Cody C - ELECTIONS <[CodyC.Davies@wisconsin.gov](mailto:CodyC.Davies@wisconsin.gov)> **Subject:** FW: Nomination Paper Review

---

**From:** Carly Wilson <[wilson@nationconsulting.com](mailto:wilson@nationconsulting.com)>  
**Sent:** Monday, April 25, 2022 10:58 AM  
**To:** ELECTIONS HelpDesk <[elections@wisconsin.gov](mailto:elections@wisconsin.gov)>  
**Subject:** Nomination Paper Review

**CAUTION:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Could you please let me know if there is any issues with these nomination papers before we start circulating them?

Thanks,

Carly Wilson (she/her/hers)  
Senior Associate  
Nation Consulting  
(414) 940-7946