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September 10, 2026

Via Overnight Courier and E-Mail (elections@wi.gov)

Wisconsin Elections Commission
201 West Washington Avenue, 2nd Floor
Madison, WI 53703

Re: Verified Complaint Under Wis. Stat. § 5.06 – *Justin Gavery v. Maricha Harris, et al.*

Dear Commissioners and Administrator Wolfe:

On behalf of Complainant, Justin Gavery, a qualified Milwaukee elector and election observer at Milwaukee's Central Count, I am filing the enclosed Verified Complaint under Wis. Stat. § 5.06(1) against Maricha Harris, Deputy Director of the Milwaukee Election Commission ("MEC"), and Paulina Gutiérrez, MEC's Executive Director, in connection with the August 11 Primary Election.

The Complaint concerns several claims in connection with numerous failures and violations of Wisconsin election laws and procedures related to Primary Election. Each failure detailed in the Complaint is independently unlawful, an abdication of basic diligence and competence, or an abuse of discretion. Taken together, these failures show that MEC could not reliably administer a partisan primary—an election with a fraction of the turnout and operational demand of a General Election. Read alongside the similar failures in prior elections, they reveal not isolated error but a persistent pattern that demands the Wisconsin Elections Commission's sustained oversight before November 3, 2026. This Complaint is filed immediately after WEC's failure to act on its own yesterday.

Certificate of Service. Pursuant to Wis. Admin. Code § EL 20.03(6), I hereby certify that a complete copy of the Verified Complaint and all accompanying materials has been (or is in the process of being) served upon Respondents contemporaneously with this filing, *via* both email (voterinfo@milwaukee.gov) and personal delivery to MEC Offices at City Hall, 200 E. Wells Street, Room 501, Milwaukee, WI 53202.

Please do not hesitate to contact me if you have any questions or require additional information

Thank you,

A handwritten signature in black ink, appearing to read 'N. Boerke', with a long horizontal flourish extending to the right.

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