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UNITED STATES OF AMERICA

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PHILLIP JAMES WIGLESWORTH

Tallahassee, FL 32303

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Complainant,

Against

MUR# 7205

JILL STEIN FOR PRESIDENT, JILL STEIN P.O. Box 260197 VERIFIED COMPLAINT

Respondents.

Madison, WI 53726,

COMPLAINT AGAINST JILL STEIN AND JILL STEIN FOR PRESIDENT FOR ACCEPTING FOREIGN CONTRIBUTIONS IN HER CAMPAIGN

INTRODUCTION:

I, Phillip James Wiglesworth, bring this complaint against Jill Stein, and her campaign, Jill Stein for President, and allege as follows:

I believe Dr. Jill Stein, and/or her campaign, "Jill Stein for President" (hereinafter, "JSFP"). Respondents, are using funds donated to her presidential campaign to conduct activities for the campaign, where some of those funds likely originated from non-U.S. citizens in foreign countries. I believe this is a violation of campaign finance rules outlined by the FEC.

Furthermore, upon information and belief, I feel that Respondent set out to mislead donors into believing they were only donating to help fund recount efforts, later "clarifying" that the money was going to be reserved by her campaign for the future, if the recounts proved to be under her budget or cost less than the amount raised. I believe this because after the donations website had exceeded its original stated goal of \$2.5 million, it was updated to a new goal of \$4.5 million

(and then later, \$7 million, and finally, \$9.5 million), and JSFP added several disclaimers^{1 2 3} to her site indicating that monies received in excess of what is required for the recounts could be used for other purposes in the future. In approximately one day, her campaign raised more money for the recount efforts than she had raised for her entire presidential run.⁴ See also, http://www.zerohedge.com/news/2016-11-25/mysterious-case-jill-steins-surging-recount-costs for an additional summary of other changes in her website, as well as strange facts surrounding the stated campaign goals and attorney's fees she said would be needed (article originally accessed on November 29, 2016).

There is one additional article claiming that a "bot" was helping ensure funds went into her donation account in the amount of approximately \$160,000 per hour on the hour during the first hours of the recount fundraising effort. I cannot vouch for the reliability of the author, or

The Stein/Buraka Green Party Campaign is launching an effort to ensure the integrity of our elections. With your help, we are raising money to demand recounts in Wisconsin. Michigan, and Pennsylvania—three states where the data suggests a significant need to verify machine-counted vote totals.

This effort to ensure election integrity is in your hands! We need to raise over \$2 million by this Friday, 4pm central. In true grassroots fashion, we're turning to you, the people, and not big-money corporate donors to make this happen.

Your immediate support is crucial - Please donate now and share widely." https://web.archive.org/web/2016[123205129/https://jillstein.nationbuilder.com/recount

All money raised goes toward recounts in Wisconsin. Michigan and Pennsylvania. We hope to do recounts in all three states, if we only raise sufficient money for two, we will demand recounts in two states, if we only raise enough money for one, we will demand a recount in one state,

We cannot guarantee a recount will happen in any of these states we are targeting. We can only pledge we will demand recounts in those states.

If we raise more than what's needed, the surplus will also go toward election integrity efforts and to promote voting system reform." https://web.archive.org/web/20161124204917/https://jillstein.nationbuilder.com/recount

By Friday morning, the fundraising effort was nearing \$5 million, a figure that exceeded the \$3,509,477 reported on Stein's final October 19 community finance report."

http://www.foxnews.com/politics/2016/11/25/jijl-stein-ruises-more-funds-for-recount-than-entire-presidential-campaign.html

Original recount page from November 23, \$87,122.13 raised at 10:21 pm:

[&]quot;Election Integrity depends on YOU! - Recounts in MI, PA. & WI

² Edited recount page with new disclaimer on November 24, at 12:41 am approximately 2 hours later (\$780,759.00 raised):

[&]quot;We hope to do recounts in all three states. If we only raise sufficient money for two, we will demand recounts in two states. If we only raise enough money for one, we will demand a recount in one state, if we do not raise enough for any recount (which is highly unlikely) we pledge to use the money for election integrity efforts and to promote systemic voting system reform.

https://web.archive.org/web/2016/124001441/https://iillsteiu.nation.huider.com/recount

Additional edited recount page with new goal of \$4.5 million, on November 24 at 10:49 pm (\$4,005.993.85 raised): "Because of you, the first recount is funded. We have two more to go!

Fox News article originally accessed on November 29, 2016: "Green Party presidential candidate Jill Stein hauled in \$4.8 million to help finance recount efforts in three states, a figure that eclipsed the fundraising total for her entire presidential campaign.

substantially verify this information to be true or false, so I am submitting the reference to you for your consideration and potential investigation (http://alexanderhiggins.com/soros-bot-funding-stein-recount-campaign-steady-rate-160k-per-hour/):

According to the post donations to Jill Stein's election recount campaign are being made at a steady rate of \$160,000 on the hour every hour of the day.

The constant rate of donation, 24 hours a day, suggest that a computer program is being used to post the donations as opposed to real people making grassroots donation.

However, the donations are being reported as grassroots donations from a myriad of online supporters to help her verify the integrity of the election.

However, if real individuals are in fact making the actual donations they rate of the donations should drop over night when internet traffic is low.

The rate should then steadily pick up during the course of the day up and then culminate during the "internet rush hour" when usage peaks, which is usually between 7 and 11 PM.

Since this recount effort was initiated, Jill Stein has publicly claimed that the average contribution to her campaign was \$45, and that these are all "grassroots" donations. Additionally, she claims that there are over 130,000 contributions from "around the country."

"In true grassroots fashion, we're turning to you, the people, and not big-money corporate donors to make this happen. We have received over 130,000 donations averaging \$45 each from supporters around the country."

(https://jillstein:nationbuilder.com/recount originally accessed on November 29, 2016 at 10:39 am CST). As of that time (11-29-16 at 10:39 am CST), the amount raised by JSFP for the "recount" is \$6,440,436.00. Upon hitting refresh on this webpage at 11:10 am CST, an additional \$5,000 had been raised in a matter of minutes, with \$6,445,441.00 total. By the next day, November 30, Stein's campaign had once again raised her campaign goal to 9,500,000 with the total amount of money raised at \$6,667,160.11 as of 12:48 pm CST.

As citizens who are concerned with the integrity of the elections, several of my contacts and I have been going through the public list of donors. Much to our dismay, we discovered that Dr. Stein is apparently accepting money from people in foreign countries. We feel that the influence of money from foreign donors undermines the U.S. electoral process.

RESPONDENT'S INTENT:

On November 23rd, Dr. Jill Stein began soliciting donations to her campaign online, including via her Twitter account, to support her effort for recounts in three states that went to her

opponent, Donald Trump, in the U.S. Presidential Election. Her stated goal was to file for recounts in the States of Wisconsin, Pennsylvania and Michigan, although it appears that she may have since missed her Pennsylvania deadline, whether intentionally or by accident.

Dr. Stein's rationale for the recount is apparently to make sure that no foreign countries have interfered with the U.S. Presidential election, a rationale bolstered by admittedly unverified claims which were made by the Obama administration and/or the Clinton campaign regarding "Russian interference" with voter registration and the election.

However, the FBI and the Department of Homeland Security stated that there is no evidence whatsoever that any hacking took place during the actual election.^{5 6} In addition, it is impossible for "hacking" to have occurred in Michigan, which runs on paper ballots and has nothing even connected to the internet to be hacked, according to a head Michigan election official.⁷

The FEC website outlines the reason for the ban on foreign contributions.⁸ If Jill Stein is to be believed that she cares about election integrity and fraud, she should immediately return any donations received from non-citizens. In light of the suspicions that foreign citizens could be donating, she should add a disclaimer to her website stating that all money accidentally received from foreign citizens will be immediately returned, since this is illegal. If she does not immediately make this change, the FEC should audit the integrity of these donations as soon as possible.

³ "Do you believe foreign hackers could have affected election results? We are conducting these recounts because independent election experts have pointed to 'statistical anomalies' in the presidential election results in Michigan. Pennsylvania and Wisconsin. Experts who have studied our voting system for years have concluded many of our voting machines are hackable. Whether these machines were hacked by foreign or domestic agents will be determined by using the mechanisms available to us in each state we conduct a recount. Statistical anomalies could arise through other means, as well," http://www.jill2016.con/hacking

[&]quot;"The FBI confirmed during the campaign that hackers had penetrated two states' voter registration systems. But when the Ohama administration blamed Russia for election-season cyberattacks, it said it could not declare with confidence that Russia had been behind the voter-database hacks.

The Department of Homeland Security has said it saw no evidence of vote hacking on Election Day." http://www.politico.com/story/2016/11/jill-stein-recount-three-states-election-hacks-231814

¹ USA Today, "Michigan elections official casts doubt on vote-hacking concerns:" "Chris Thomas, the director of Michigan's Bureau of Elections, said Michigan doesn't use the electronic voting machines identified in the report as being the sources of potential hacking, "We are an entire paper and optical scan state," Thomas told the on Wednesday, "Nothing is connected to the Internet." http://www.usutoday.com/stary/news/unition-now/2016/11/23/michigan-elections-official-casts-doubt-vote-hacking-goncerns/9436t)07-U originally accessed on November 29, 2016.

^{* &}quot;The Prohibition: The Federal Election Campaign Act (FECA) prohibits any foreign national from contributing, donating or spending funds in connection with any federal, state, or local election in the United States, either directly or indirectly. It is also unlawful to help foreign nationals violate that ban or to solicit, receive or accept contributions or donations from them. Persons who knowingly and willfully engage in these activities may be subject to fines and/or imprisonment. http://www.fec.gov/pages/brochures/foreign.shtml

FACTS:

- 1. Dr. Jill Stein (Respondent) is a candidate for President of the United States as a member of The Green Party in the 2016 general election. Her campaign is known as "Jill Stein for President", or "JSFP". JSFP operates a website for the campaign which has been used to communicate with the public about Respondent's campaign, solicit electronically-processed donations for the campaign, and issue press releases to the public, both before and after the election took place. (http://www.jill2016.com/)
- 2. On November 23rd, 2016, Respondent announced that she was challenging the results of the election in the state of Wisconsin by requesting a recount of the votes in that state. At the same time, Respondent announced that the campaign required donations to help pay for that recount effort. Since Wisconsin state law requires the candidates' campaigns to pay for the recounts, the campaign would require more donated funds subject to FEC rules to support this effort. The JSFP website solicited these donations through the same website, under the same campaign disclaimer. (https://jillstein.nationbuilder.com/recount)
- 3. Because of the way the website is designed, anyone who donates money to the campaign is able to announce that they donated money through various social media platforms, including Twitter. As many thousands of people began to announce their donations to the recount effort, I began to notice that several people whose Twitter accounts claim to originate in foreign countries were announcing that they, too, donated to the JSFP campaign. In checking some of the names associated with those twitter accounts, background information on several of the individuals made it even more apparent that they are, in fact, residing in foreign countries. As well, some of those individuals likely are not U.S. citizens due to statements either made by themselves, published biographies, places of employment, etc. Since it cannot be verified at this time by a private citizen such as myself with certainty who all is a citizen and who all is not, a list was compiled of as many questionable Twitter accounts in foreign countries that may belong to non-U.S. citizens who donated to JSFP campaign as we were able to track down, with the intention of handing this list to someone with the capability of verifying citizenship, and enforcing our laws.

- 4. During the fundraising efforts for the recount, JSFP updated its fundraising goal from the original \$2.5 million estimate, to \$4.5 million, a \$7 million estimate, and finally, a \$9.5 million estimate as of November 30, 2016. This initial fundraising update was made even before Wisconsin announced to JSFP how much the recount effort was estimated to cost. JSFP updated their recount efforts to include Pennsylvania and Michigan, in addition to the original recount effort in Wisconsin.
- 5. On Monday, November 28th, 2016, Pennsylvania announced that the filing date to request a recount had already expired as of November 21st, 2016. Stein is now suing to try and get this recount, despite her apparent lack of planning and knowledge, and despite her ability to hire attorneys with the millions donated to her campaign for this effort. Additionally, even though Pennsylvania has denied Stein's request for a citizen recount due to missing the deadline of Nov 21st, Stein has not informed the public and/or donors of this fact, and continues to increase fundraising goals to include paying for a Pennsylvania recount. I believe this is intentional, ongoing public deception.

SUPPORTING DOCUMENTATION:

Included with this complaint is a copy of the spreadsheet (See Exhibit A, attached) where we recorded the known, publicly-visible details of the Twitter accounts belonging to possible non-U.S. citizens in foreign countries who claim to have donated to JSFP recount fundraiser. With each individual account, an included link to a web-archive of their public statement announcing that they donated to JSFP, as well as a web-archive of their main profile pages on Twitter, which list their alleged locations. Because Twitter allows users to remain private, this list is likely only a

⁹ Washington Examiner, "Pennsylvania State Department says Stein missed recount deadline:" "According to Wanda Murren, spokeswoman for the Pennsylvania Department of State," the Philadelphia Inquirer reported Monday, "the deadline for a voter-initiated recount was Monday, Nov. 21."

<u>http://www.wishingtonex@niner.com/penusylvamin-state-department-says-stein-missed-recount-deadline/article/2608305;</u> originally accessed November 29, 2016.

¹⁰ Philly.com, "Stein campaign files Pennsylvania recount suit:" <a href="http://www.philly.com/philly/blogs/real-time/Despite-successful-fundraising-effort-recount-oil-Pennsylvania-remains-difficult.html.originally accessed November 29, 2016.

¹¹ The JSFP recount website still contains the following language, with no disclaimer that Pennsylvania has denied her request due to missing the deadline, as of November 30, 2016, after updating her campaign goal to \$9,5 million: "We are supporting a voter-initiated recount in PA, in election districts where at least three voters in each precinct file affidavits with their County Board of Elections within the specified time frame." https://iillstein.mailonbujkler.com/recount originally accessed on November 30, 2016 at 1:17 pm CST.

partial list of those who are claiming to have donated, and it would be impossible for someone such as myself to access all of them.

This spreadsheet also includes web-archive links to JSFP recount page showing that the funding goals changed and disclaimers changed.

Copies of original, first-hand visual evidence have been safeguarded for the future via printing by multiple parties interested in adding their names as complainants via addenda, and many others, in an effort to prevent corporate censorship, obstruction of justice through deletion or editing, or otherwise any form of online tampering with any websites where we have sourced our information, whether on the part of the campaign, the owners of the sourced websites, or the Twitter account holders themselves.

PRAYER:

WHEREFORE, Complainant prays that the Federal Election Commission commence an investigation into whether Respondents have violated federal campaign laws through the above-mentioned activities, and render such other relief that the Commission may deem necessary, just, and equitable. Furthermore, the Respondent should be required to immediately submit a supplemental report regarding her campaign finances to clarify the sources of these contributions. The FEC should request that the JSFP campaign and Jill Stein immediately cease any and all recount efforts until such time as the integrity of the donors to her campaign can be confirmed. All other penalties, remedies or sanctions allowable by law should be enforced.

To wit, I, the, undersigned, submit the foregoing complaint and attached supporting documentation against Jill Stein and her campaign, Jill Stein for President.

Dated this 15t day of December, 2016, at Tallahassee, Florida.

Respectfully submitted,

Phillip James Wiglesworth

Staff Sergeant, U.S. Army (Retired)

Complainant

EXHIBIT A:

CERTIFICATION:

I, Phillip James Wiglesworth, being 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. To the best of my knowledge and ability all evidence submitted was not obtained in violation of any law, rule or regulation, and further, I acknowledge that section 1001 of title 18 United States Code applies to the information provided.

m

Phillip James Wiglesworth

STATE OF FLORIDA COUNTY OF Lea

Sworn to (or affirmed) and subscribed before me this _____ day of vectober, 2016, by

Notary Públic, State of Florida
Commissions FF 920537
My comm. expires Sept. 21, 2919

Personally Known _____ OR Produced Identification ____

Type of Identification Produced FLQL W242 17017 4450

ADDENDUM:

Additional Complainants to Phillip Wiglesworth Complaint Against Jill Stein and Jill Stein for President are as follows:

1. Amy Rebecca James, J.D.

Anna, Texas 75409

Website: tinyurl.com/recountjill

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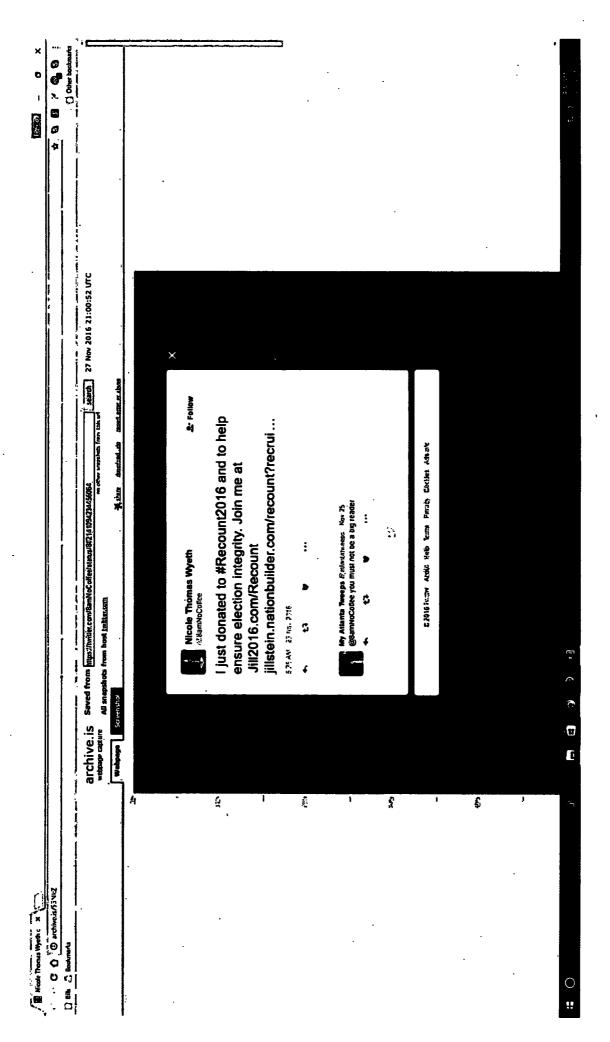
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Because God Knows The World Needs Another Blog

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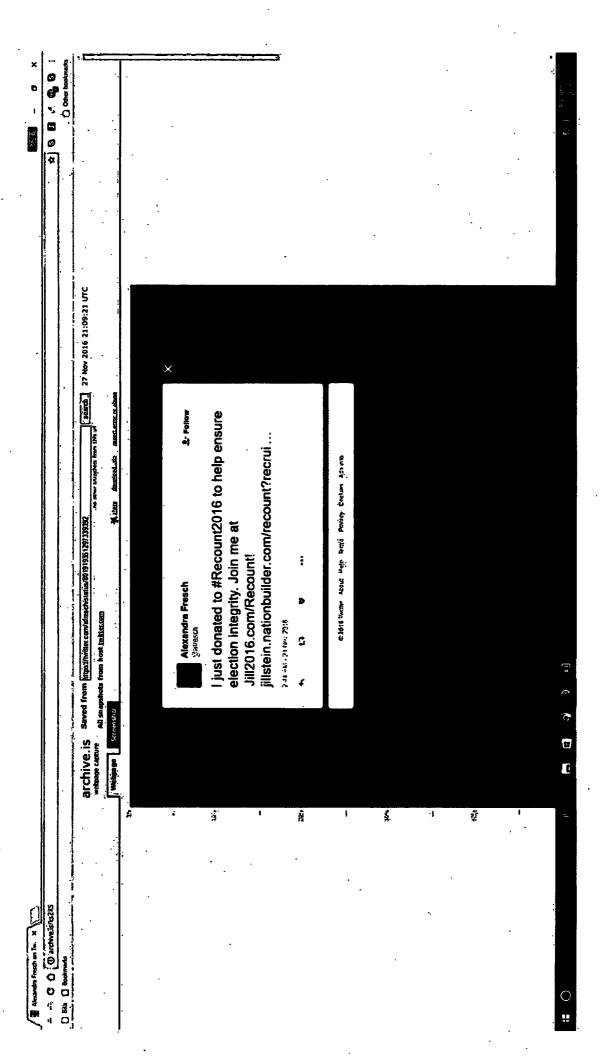
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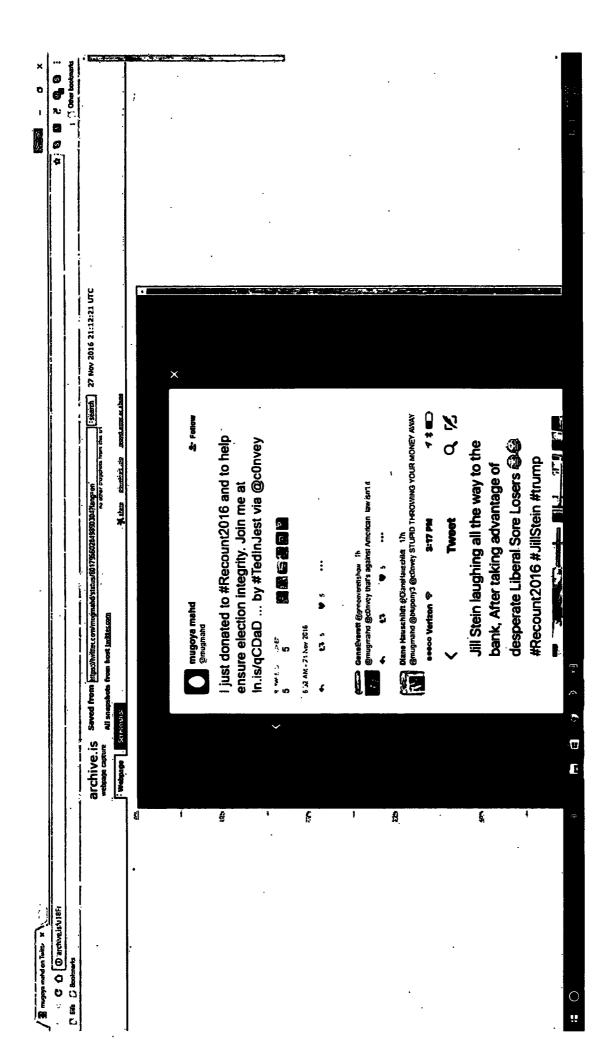
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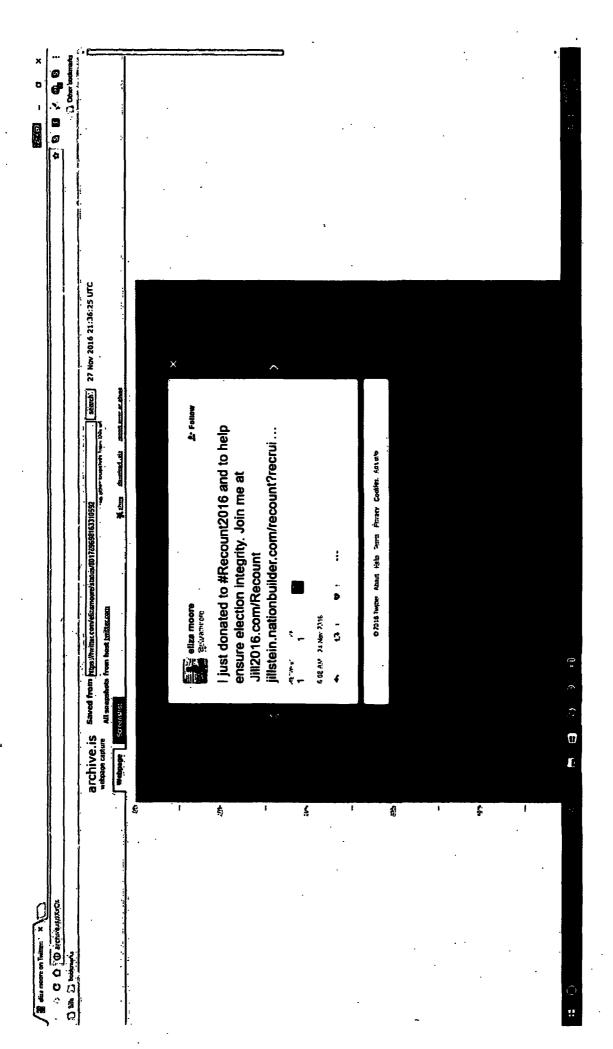


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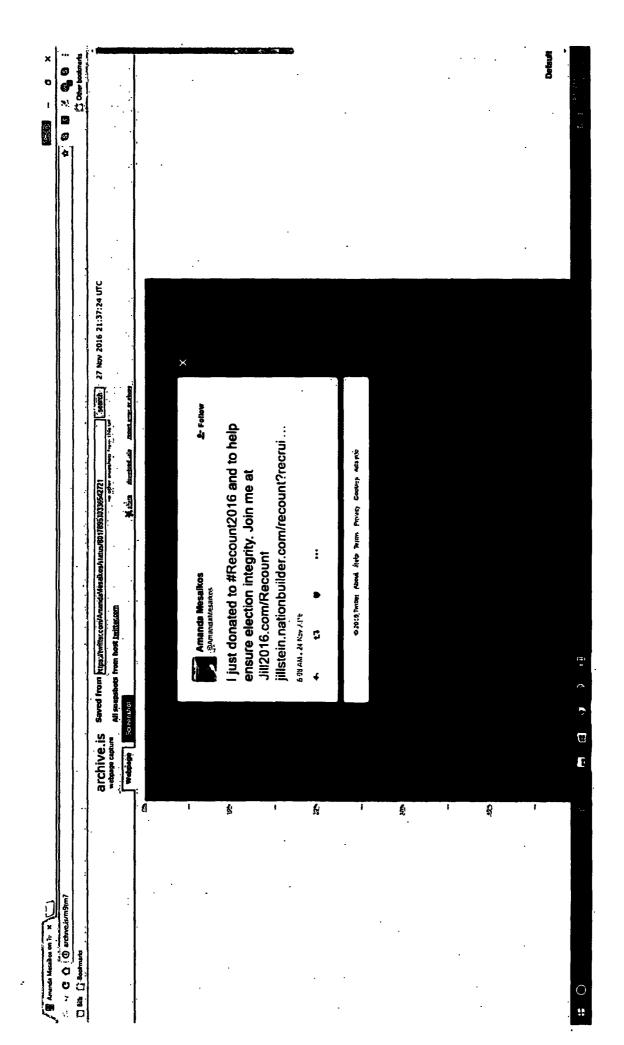
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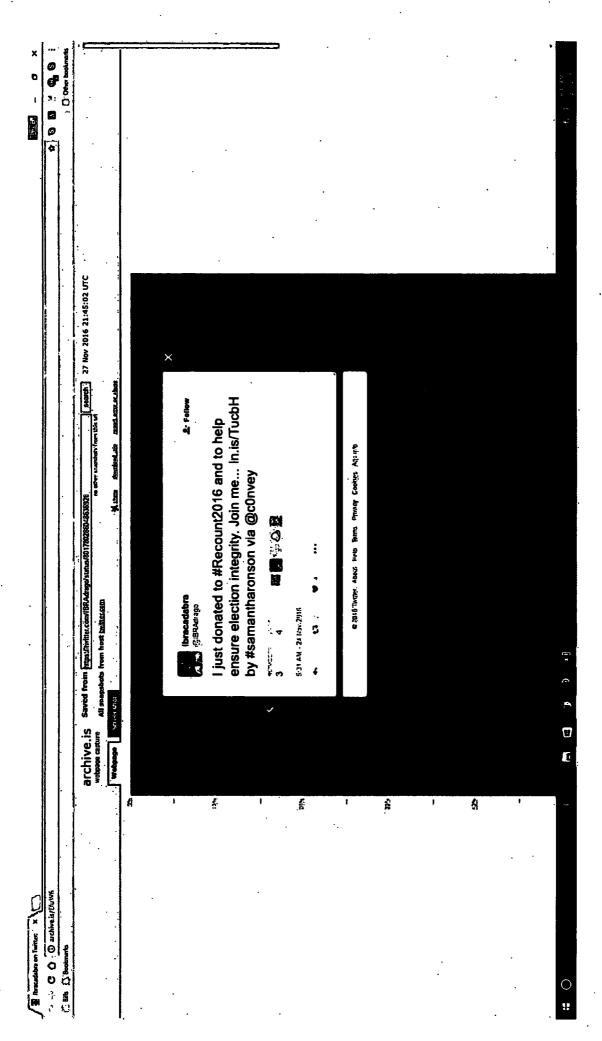
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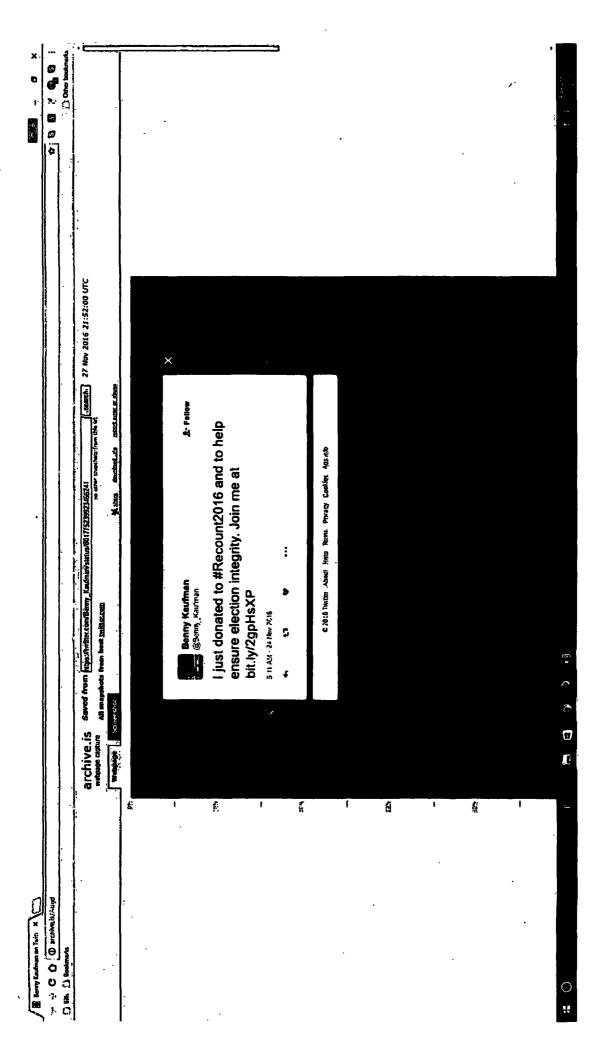
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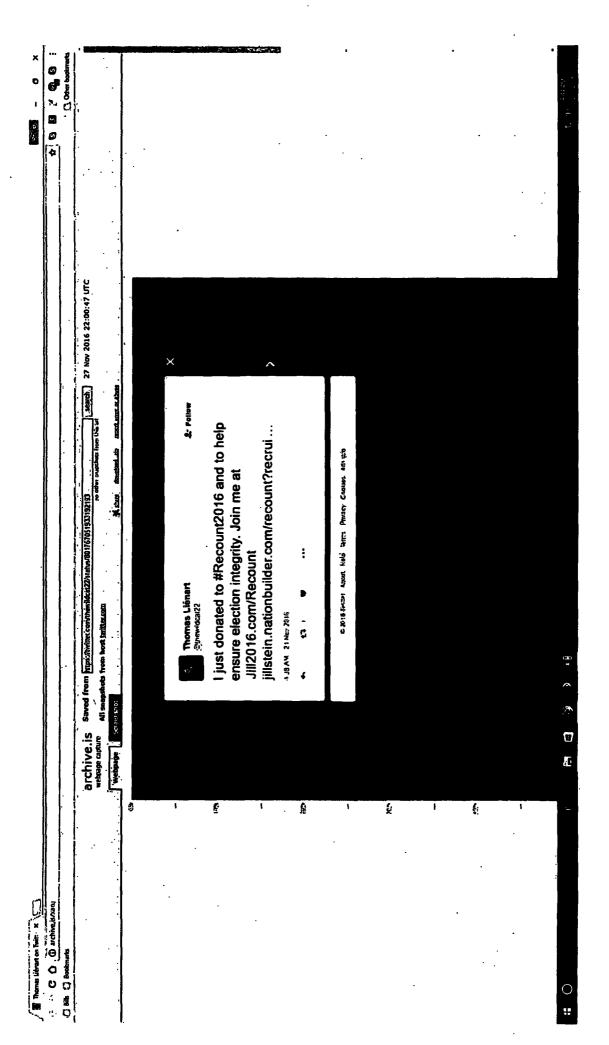
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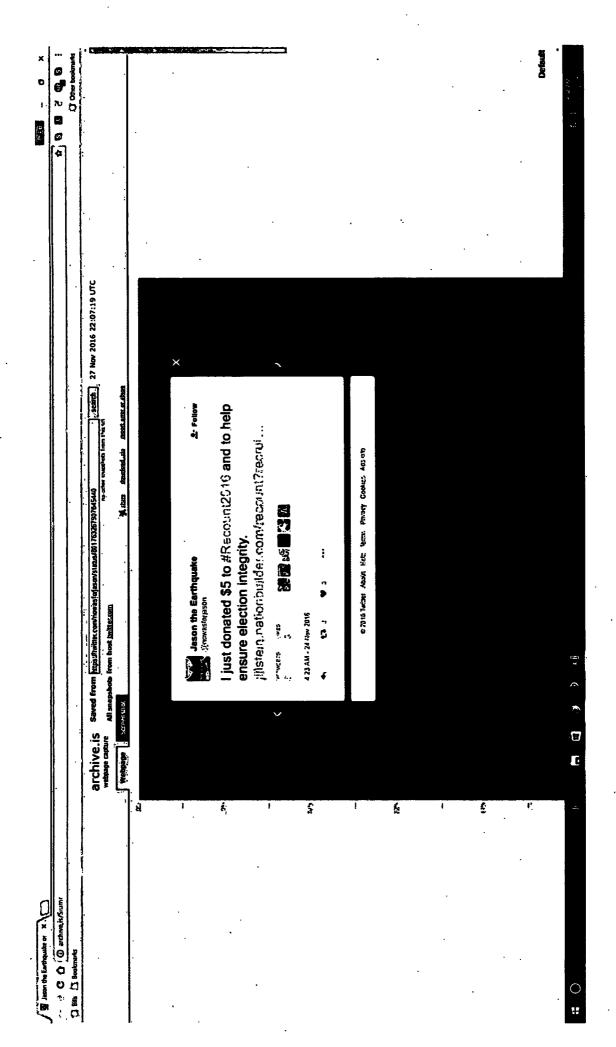
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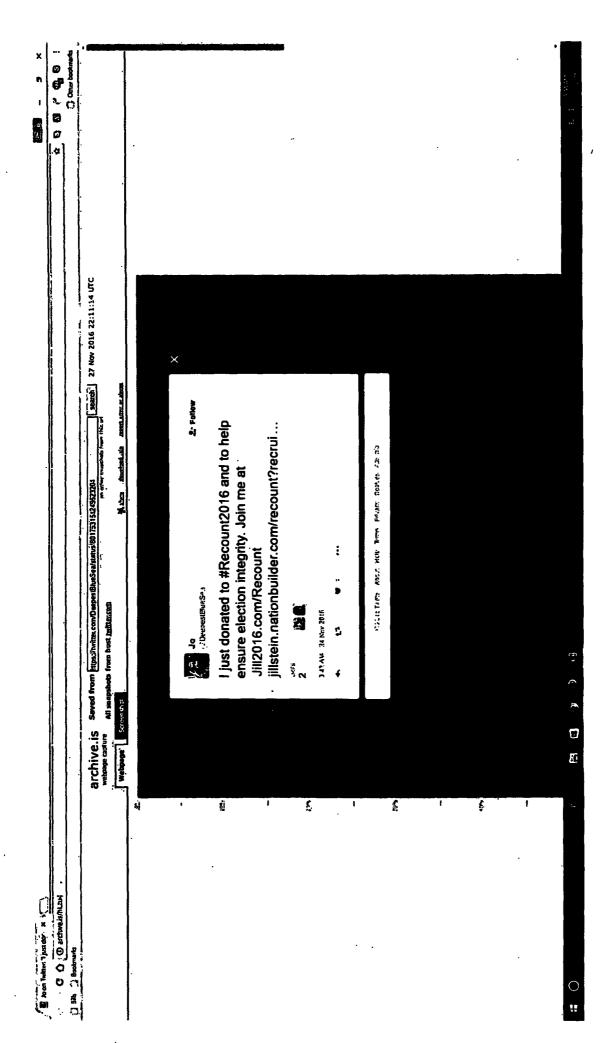


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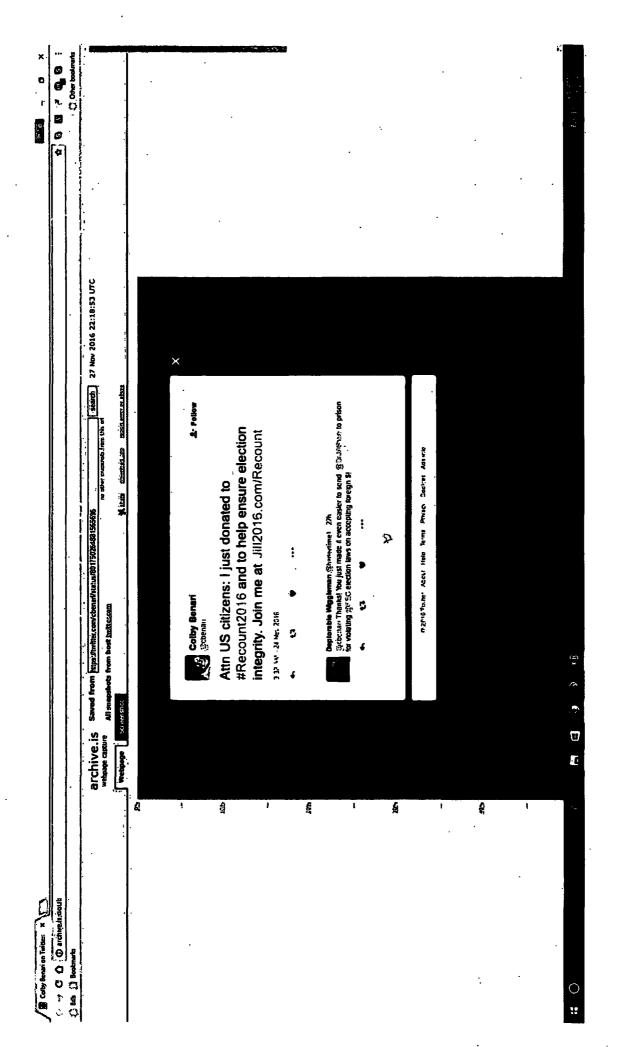
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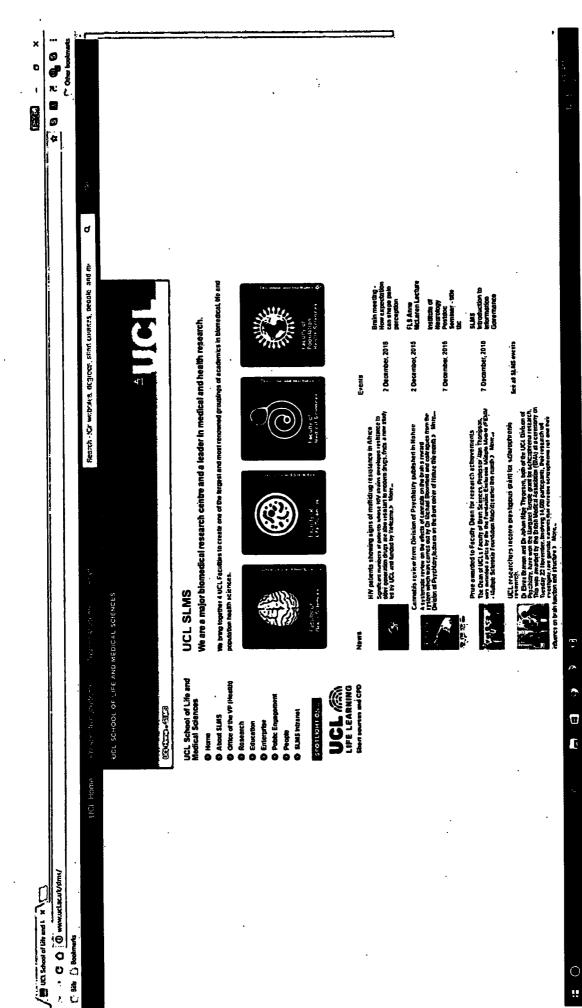
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A About Shabbir Hussain

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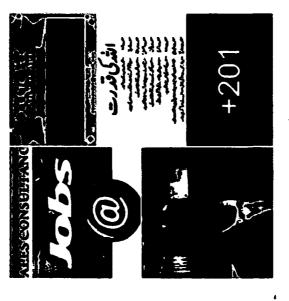


Lahore, Pakistan Hometown

ABOUT SHABBIR

My name is Shabbeer Hussain. I am network marketing professional, financial advisor, management consultant, trainer and business coach. I am committed to serving the individual and corporate market places by providing quality financial planning, insurance, investments and

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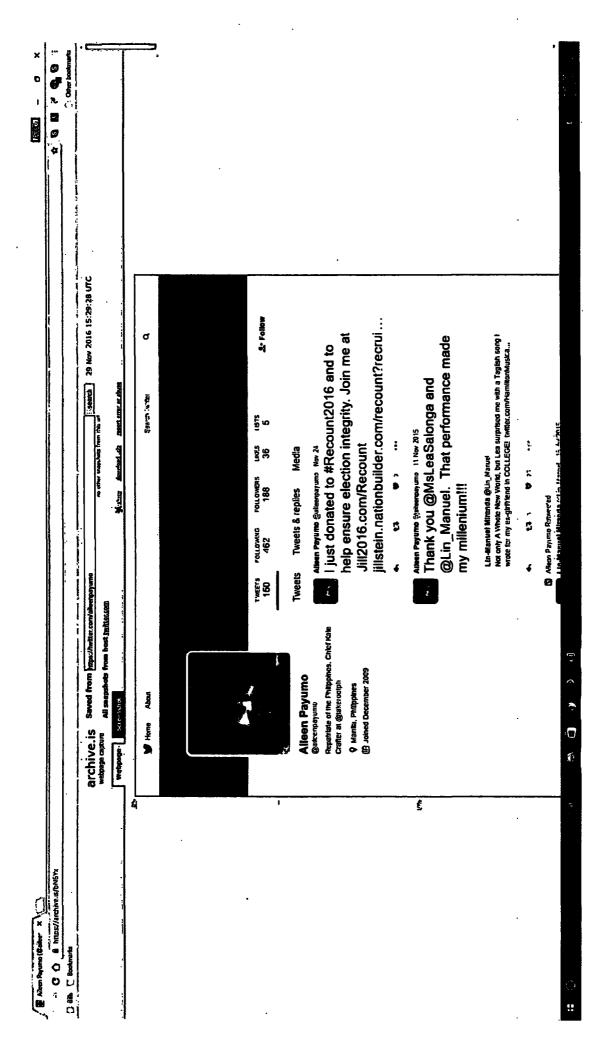


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Researcher



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I om a researcher in Artificial Intelligence warking at Loncaster University from Septembor 2016 My research is centered around the following areas and topics.

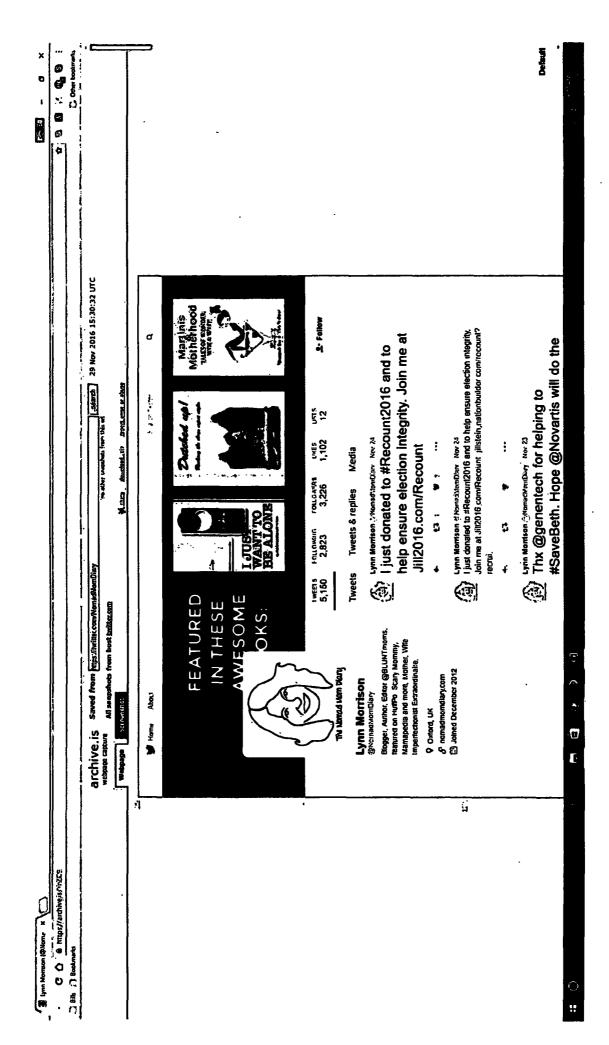
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- Socio-technical System Governance

and ethical nums, and social commitments (e.g. promises and the expectations they create) I look at such prescriptions from the perspectives of formalisation, automotion and governance architectures Specifically, my research locuses on prescriptions such as institutions (laws and contracts), societal

Fermativation contributes rigarous mathematical accounts of previously vague concepts such as institutions and norms in order to understand those concepts and provide clear definitions that can be disservinated and cuiticized Without forma?sation, it is difficult to say in precise rerms when a both human and atthcial agents By formatising various types of prescription in a general way we are oble to define how autonomour, agents should, ideally, behave according to sets of legal and ethical particular law or norm is in force and what the legal or ethical behavior is this is a problem for norms and what the meaning of those legal and ethical norms is

Automation takes fornalisation one step further by devising appropriate specification languages and implement regulatory and normative behavior in a general way, at the obstract level of the written bay. reosoning mechanisms to support human and artificial agents in behaving appropriately according to to govern societies and guide complex autonomous and distributed software systems in behaving othically and legally. Moreover, legal and ethical norms are not necessarily easy to understand in computational obstractions for narms, institutions and so on Without automation, it is difficult to precise terms for human agents. Hence, automation involves contributing software tools and legal and othical prescriptions

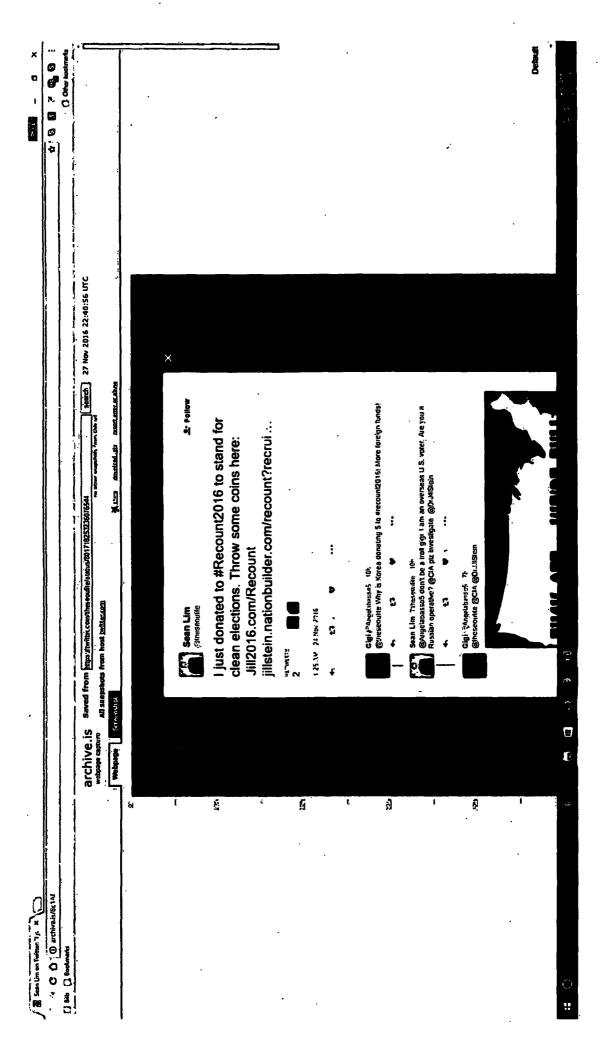
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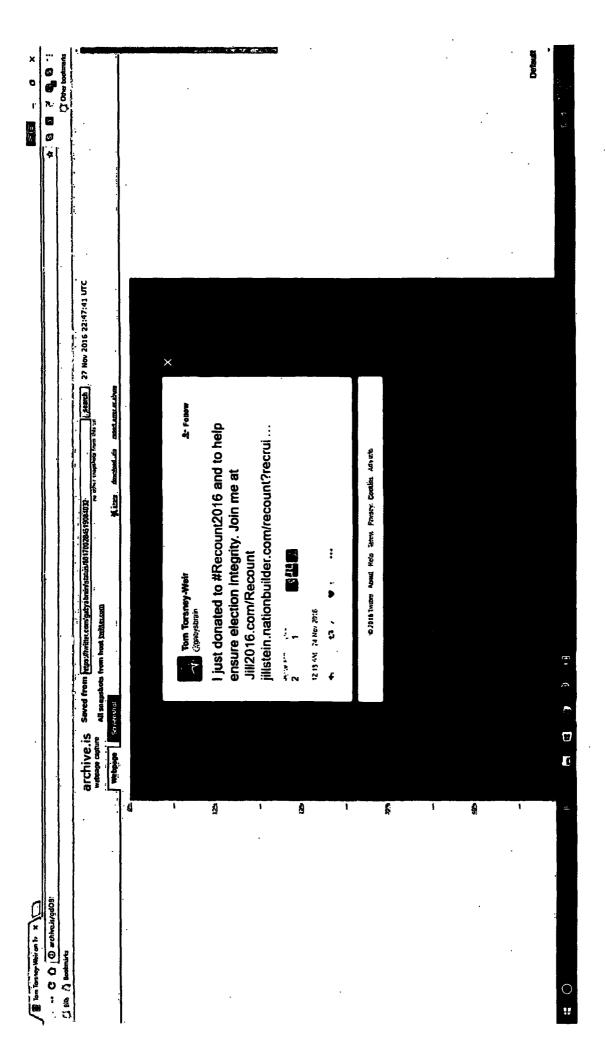
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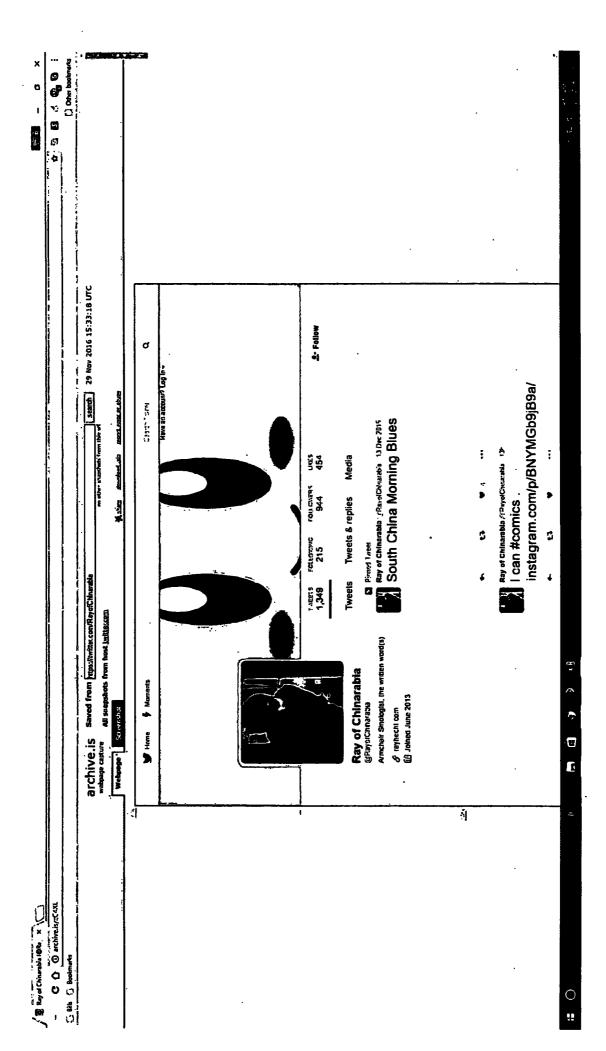
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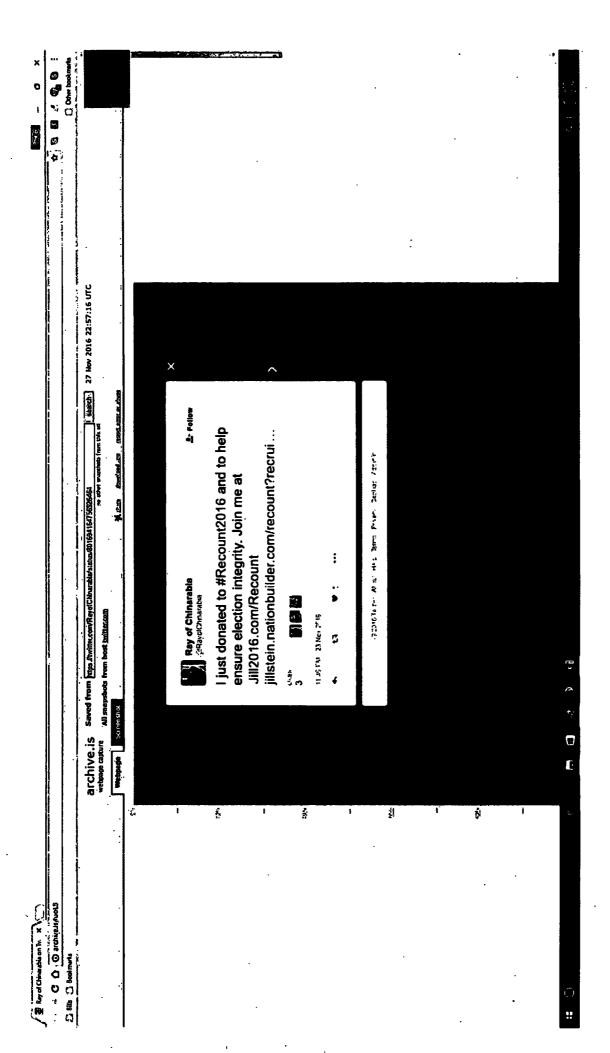
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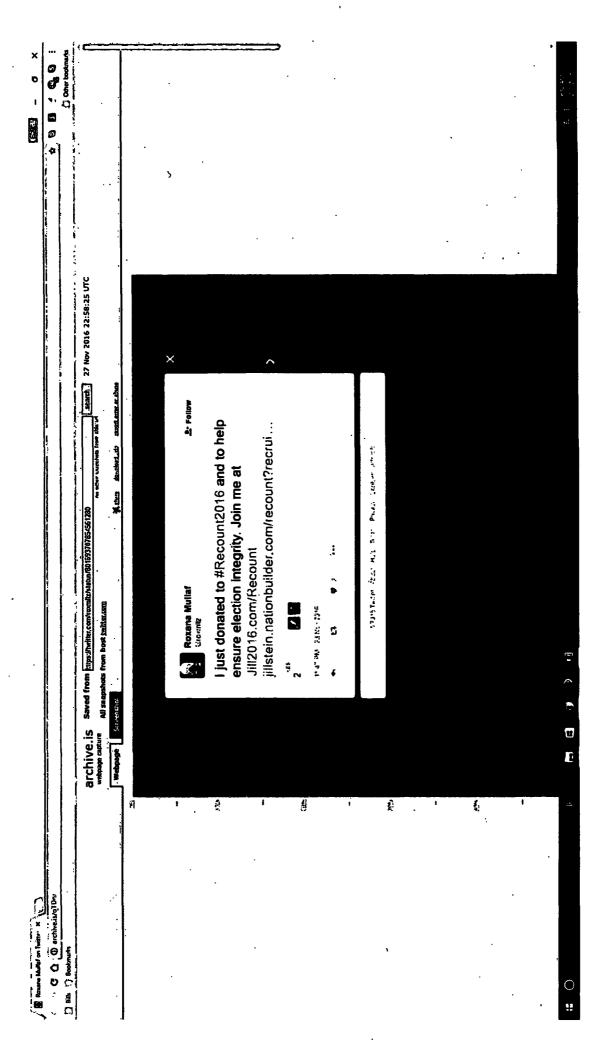
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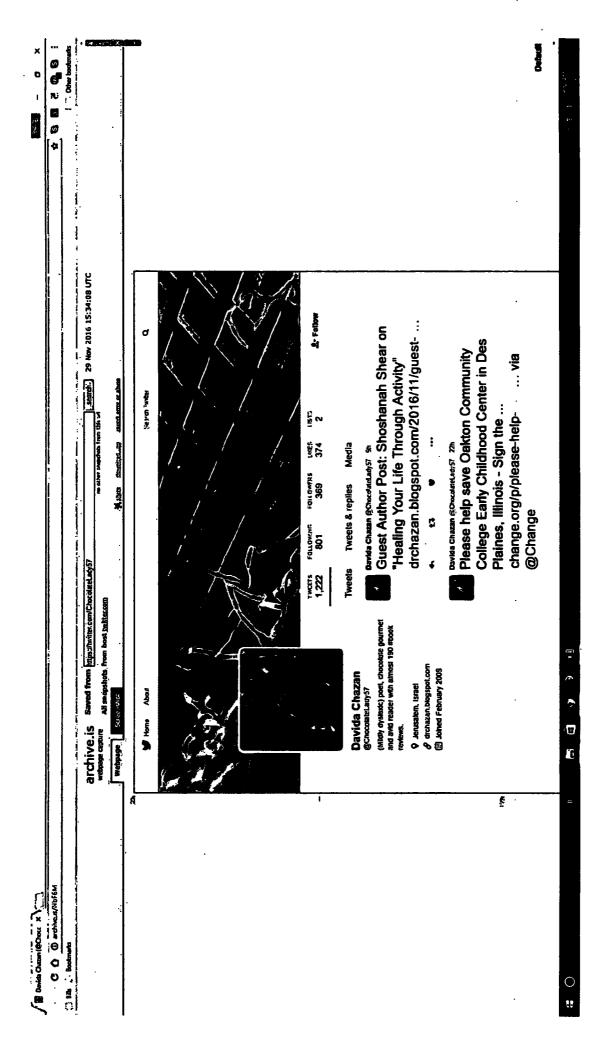
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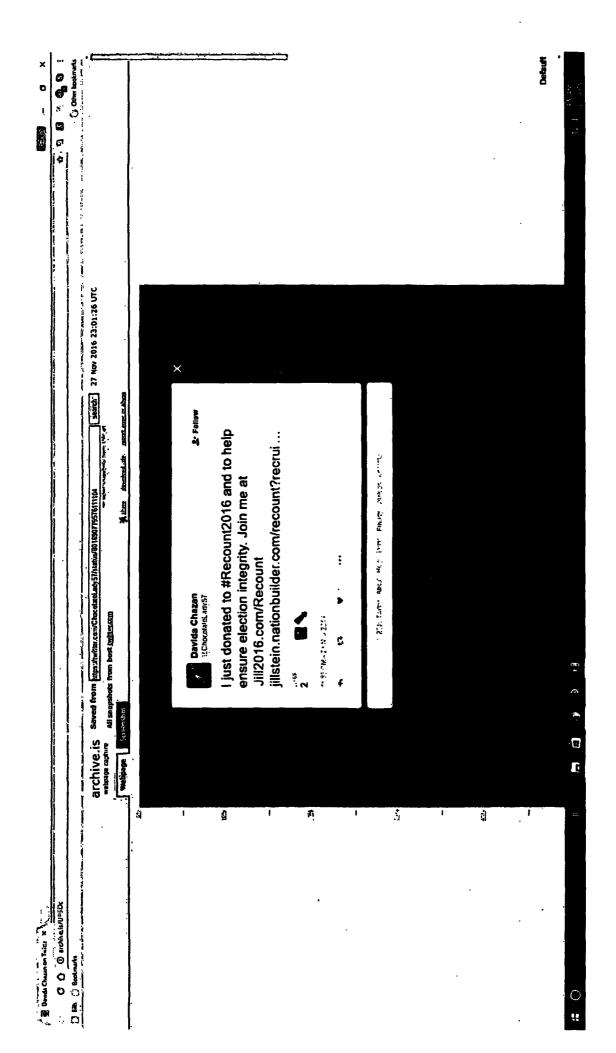


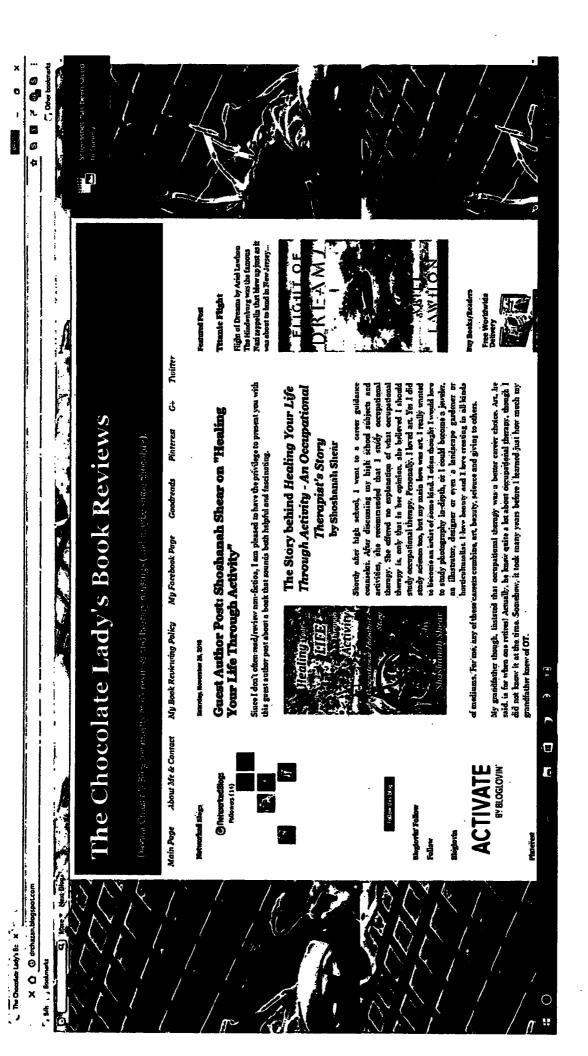
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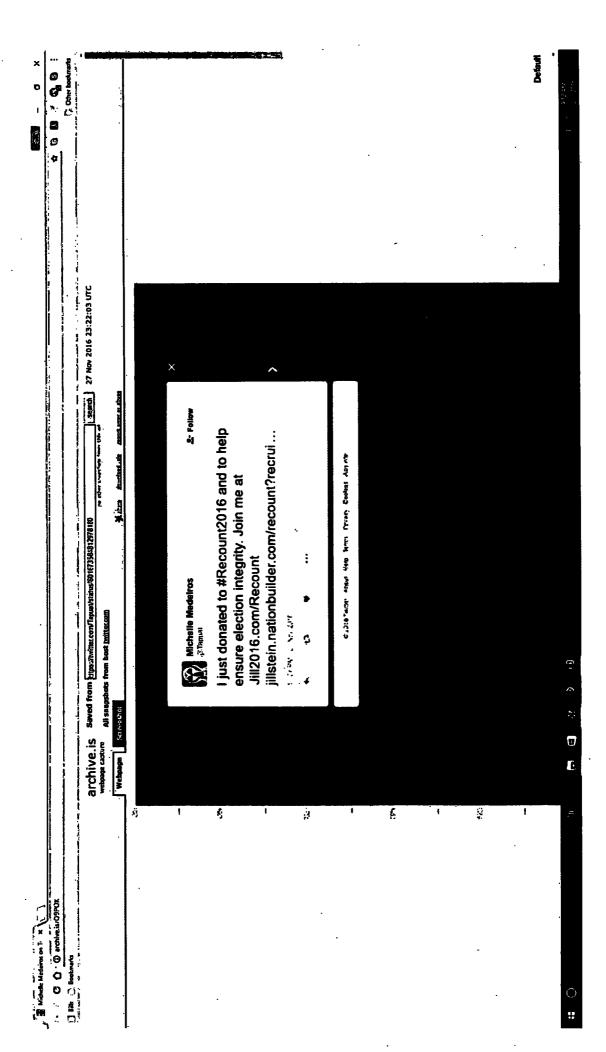






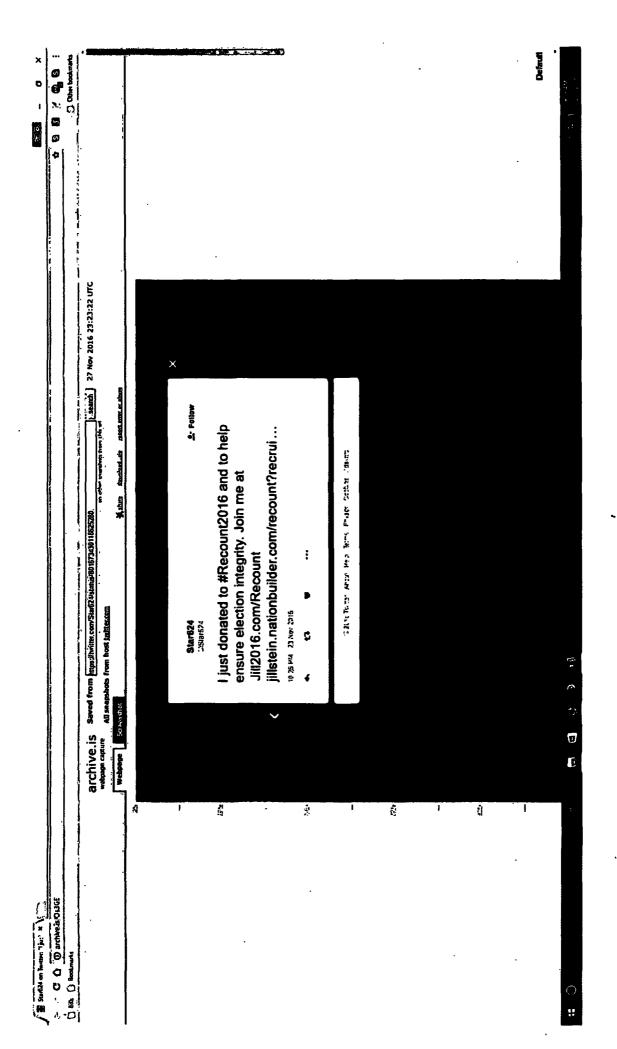


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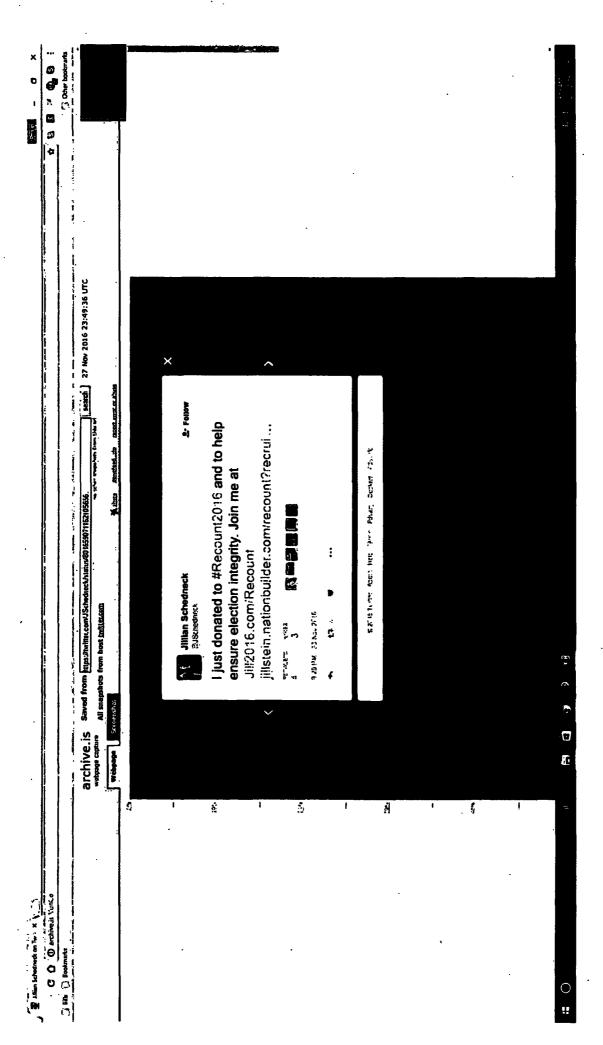


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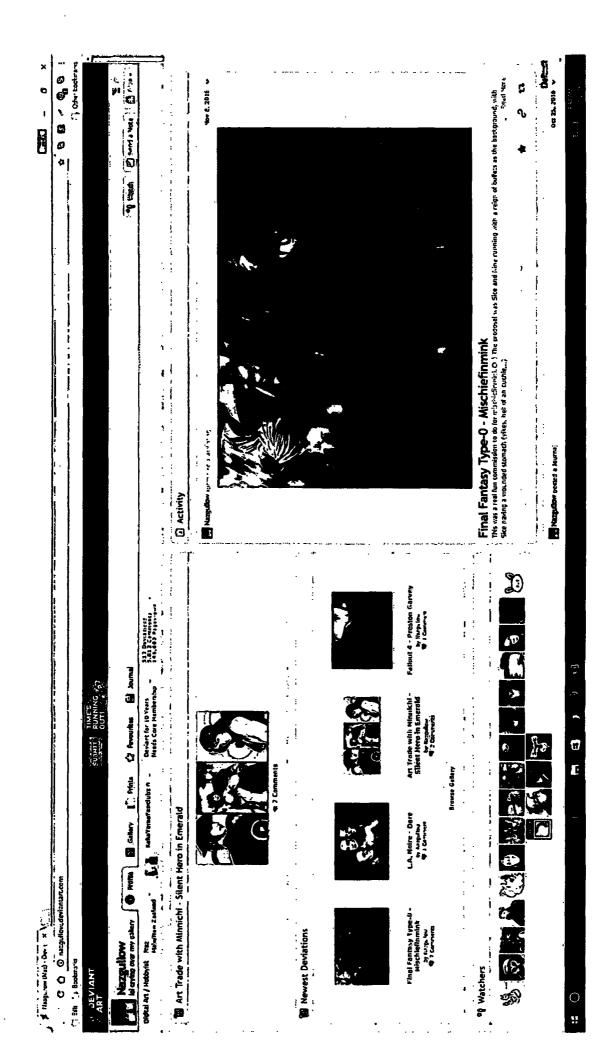
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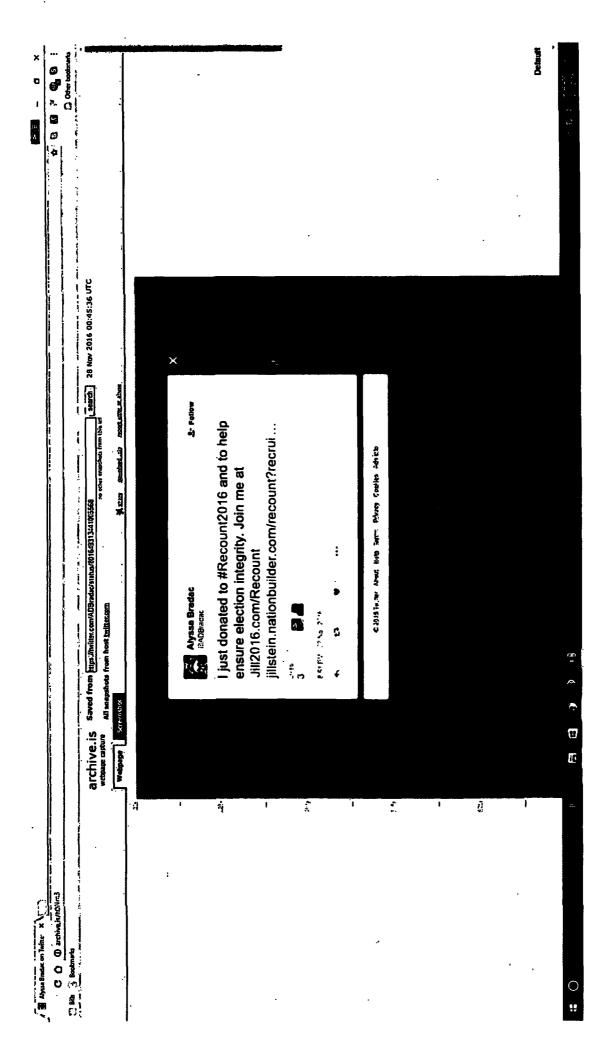
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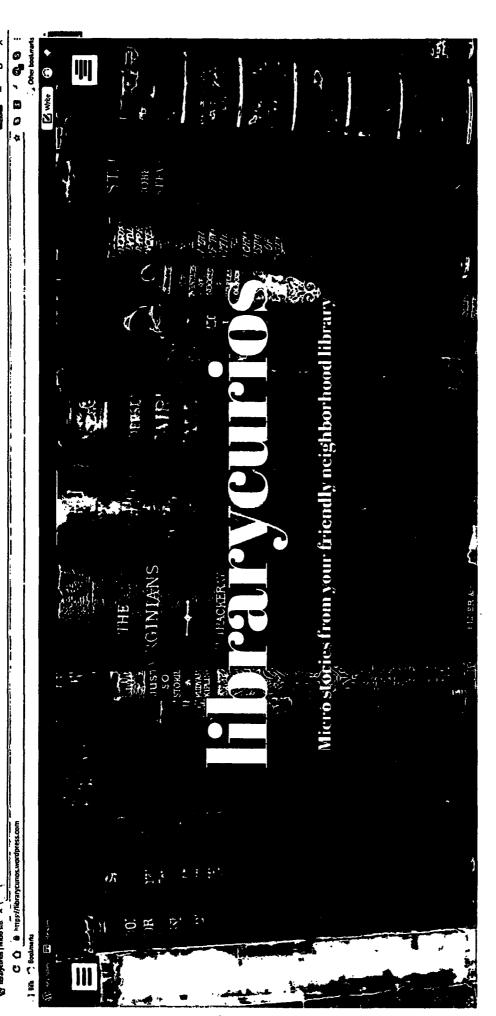
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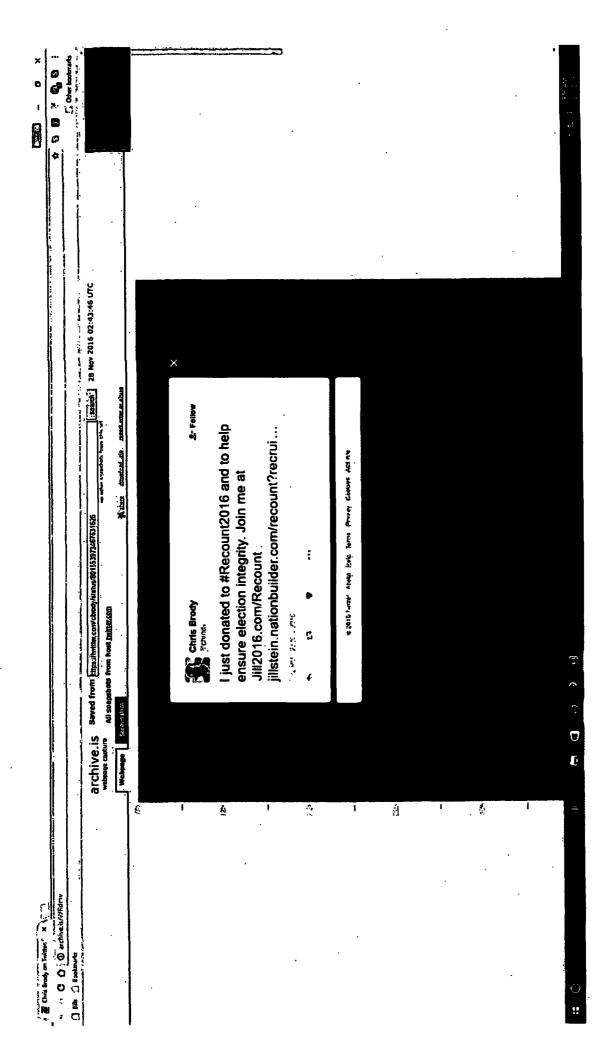
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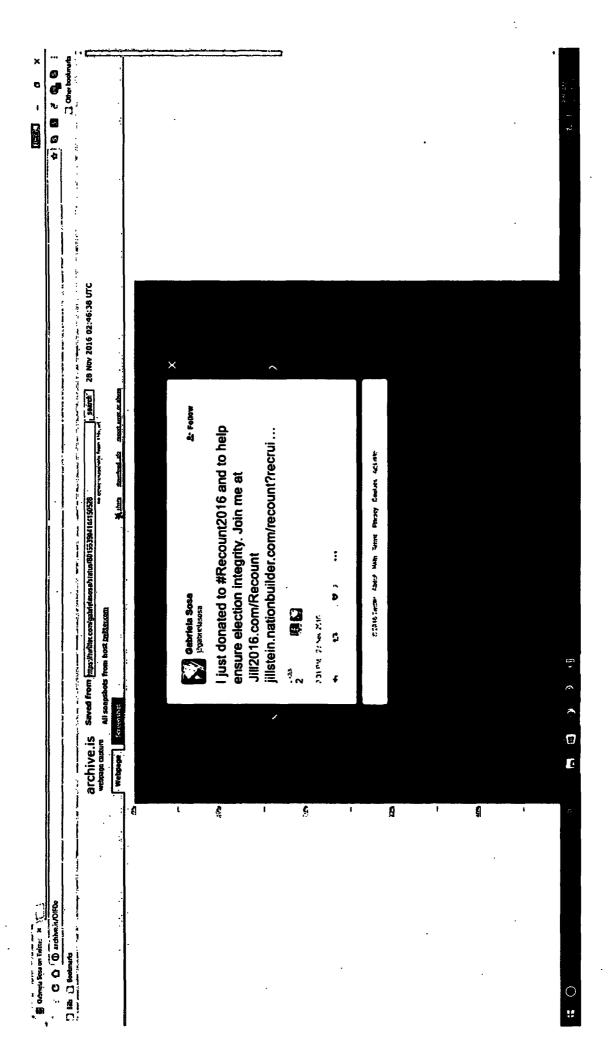
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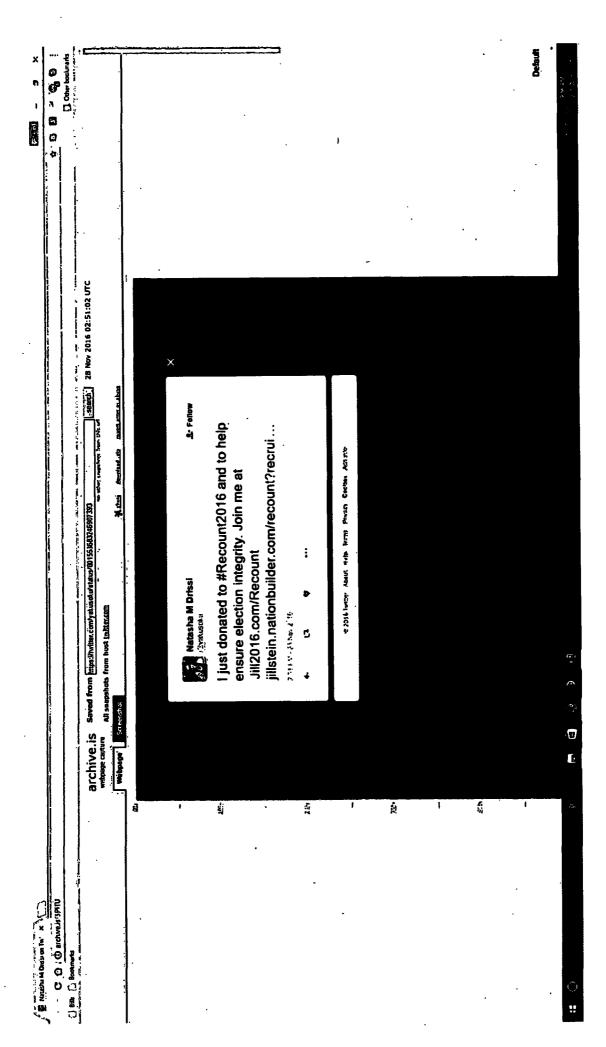
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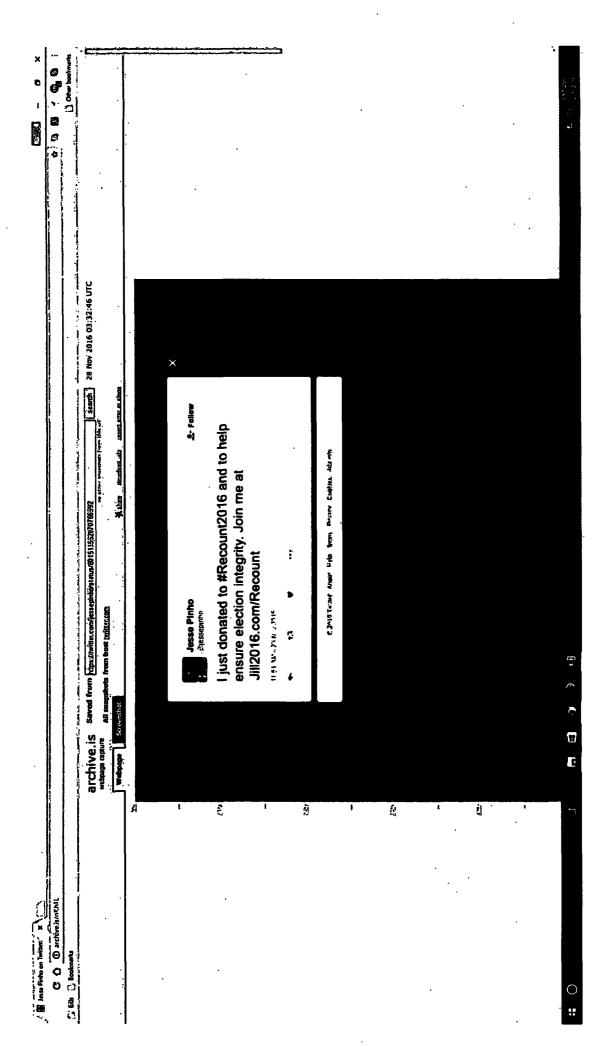
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We are raising money to demand recounts in Wisconsin, Michigan, and Pennsylvania- three states The Stein/Baraka Green Party Campaign is launching an effort to ensure the integrity of our elections. where there is a significan need to verify machine-counted vote totals. Please donate to this initiative today. To give you a sense of the problem, the voling machines used in Wisconsin were banned in California after they were shown to be highly vulnerable to hacking and malicious programming due to lacking security features.

databases, private email servers, and voter databases in certain states, many Americans are "After a divisive and painful presidential race, in which foreign agents hacked into party wondering if our election results are reliable. That's why the unexpected results of the election and reported anomalies need to be investigated before ihe 2016 presidential election is certifled. We deserve elections we can trust." — Dr. Jill Stein. This is about more than the results of this one election. This is about protecting our democracy and ensuring that "We the People" can have confidence in reported results.

maintain integrity in our elections. Please donate to this effort We need your help to make sure your votes were counted accurately on Election Day. Please donate now to help to protect our democracy.

you, the people, and not big-money corporate donors to make this happen, This effort to ensure election integrity is in your hands! In order Friday, 4pm central. In true grassroots fashlon, we're turning to to make this happen, we need to raise over \$2 million by this



Click Here to Donate Today!

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		\$29	5	\$	Congratulations on meeting the recount costs for Wisconsin Desires monastra may for the first round			
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				Congratulations on meeting the recount and legal costs for Wisconsin and Pennsylvania! Raising	
	Other \$ 0.00	0.00		money to pay for the first two recounts so quickly is a miraculous feat and a tribute to the power of grassroots organizing.	
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	.(Pennsylvania's voter-initiated recount (due Monday), we will focus on raising the recided funds	, and the second
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	•			Wisconsin increases Recount Filing Fee to	
1				Outrageous \$3.5-million	
	\$29	£	\$	Friends. I have an important message for you. We	
				need your help to stand up to the powerful forces trains to block our recover remains for citizen	
				democracy. We received word yesterday that the	
	Other \$	0.00		final estimate for the filing fee for the recount in	
4.				Wisconsin is \$3.5 million - an outrageous cost increase from the initial settlmate of \$1.1 million	
Training to the state of the st			Next	that was given to us by WI state elections officials	
				based on the last statewide recount. But thanks to	Default
				over 130,000 small donors like you, we have	
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