

**CRIMINAL COMPLAINT**

STATE OF WISCONSIN

DA Case No. 2010ML005265

Plaintiff,

vs.

Complaining Witness:

Special Agent Peter Thelen

Miles, Maria L.  
538 W. Hadley Street  
Milwaukee, WI 53212  
DOB: 04/11/1973

Court Case No.

Clancy, Kevin L.  
2225 Layard Ave.  
Racine, WI 53404  
DOB: 04/13/1983

Court Case No.

Defendants,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: ELECTION FRAUD - FALSELY PROCURING VOTER REGISTRATION - PTAC, AS A PARTY TO A CRIME (As to defendant Maria L. Miles)**

The above-named defendant between approximately June 12, 2008 and June 30, 2008, at 200 East Wells Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally and falsely procure voter registration, contrary to sec. 12.13(1)(b), 12.60(1)(a) and 939.05, Wis. Stats.

**Count 2: ELECTION FRAUD - FALSELY PROCURING VOTER REGISTRATION - PTAC, AS A PARTY TO A CRIME (As to defendant Kevin L. Clancy)**

The above-named defendant between approximately June 10, 2008 and June 30, 2008, at 200 East Wells Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally and falsely procure voter registration, contrary to sec. 12.13(1)(b), 12.60(1)(a) and 939.05, Wis. Stats.

**AS TO EACH COUNT:**

Upon conviction of these offenses, Class I Felonies, the defendants may be fined not more than \$10,000 or imprisoned for not more than 3.5 years or both, as to each count and as to each defendant.

The above-named complaining witness is a Wisconsin Department of Justice Division of Criminal Investigation Special Agent and bases this complaint upon information and belief that:

Following the 2008 general presidential election, the Wisconsin Department of Justice ("DOJ") Division of Criminal Investigation ("DCI") initiated an investigation into reports that several Special Registration Deputies ("SRDs") employed by the organization Association of Community Organizations for Reform Now ("ACORN") in advance of the 2008 general presidential election had submitted falsified voter registration applications as well as multiple applications for the same individuals.

On March 25, 2009, DCI Special Agents Peter Thelen and Daniel Layber conducted an interview of defendant Maria Miles at her residence. The agents explained to her that they were investigating the alleged falsification of voter registration applications. Defendant Miles indicated that she became involved with ACORN after an individual named Edward [later identified as Edward Williams] came to Miles' job at the YMCA to put up flyers seeking individuals to become SRDs. Miles indicated that she soon began working for ACORN as an SRD.

Miles indicated that on the first day as an SRD, ACORN required her and other SRDs to sign up five individuals within a six-hour period. She stated that the number increased by five per day until it reached the number of 20 per day. Miles stated that if an SRD was unable to obtain 20 signatures in one day, they would be docked one hour's worth of pay, which Miles believed to be approximately \$9 per hour. She stated that if the SRDs did not meet their goal of obtaining 20 signatures for three consecutive days, the individual would be fired by ACORN.

Miles indicated that on Juneteenth Day in the summer of 2008, ACORN SRDs were required to obtain 40 signatures. Your complainant knows that Juneteenth Day in 2008 was June 19, 2008. Miles remembered specifically on that day that approximately seven ACORN SRDs sat in a group and handed their clipboards to each other. She stated they each registered each other's names on the registration voter lists to obtain the 40 signatures. Miles indicated that the individuals she recalled being involved in this were defendant Kevin Clancy, Gabriele Robinson, Howard Watkins, an unidentified female and three males that she referred to as the "three dorks."

Miles told Agents Thelen and Layber that if the SRDs obtained 80 signatures within four days, Monday through Thursday, they would be allowed to take Friday off and still get paid as if they worked. She indicated that she believed the SRDs would also receive a \$10 or \$20 gas card for obtaining 80 signatures during the week.

Miles indicated that at one point, Gabriele Robinson began sleeping with their supervisor, Edward Williams. Miles stated she would go to Robinson's residence and hang out for the day. She stated at the end of the day, Williams signed off as though they turned in their 20 signatures for that day, giving them their pay. Miles stated that she and Robinson did this at least once a week, and that they received payments for those days when they did not turn in registrations because Robinson was sleeping with Williams.

Miles also advised the agents that individuals would travel in groups and, if an individual registered a citizen to vote, the other SRDs would tell the citizen, "It doesn't hurt if you sign this one also." Thus, multiple SRDs received a signature from the same person. Miles stated they were "all hoodlums" working for ACORN and they all had criminal histories, and that they were going to "do whatever they had to do" to be able to gain their money at the end of each day.

Miles indicated that she knows she registered Kevin Clancy's brother at least twice, and that she registered Gabriele Robinson at least twice. She also stated she registered SRD Howard Watkins at least two or three times, and that each SRD would be signing up several individuals.

On April 8, 2009, Special Agent Peter Thelen interviewed Iliah Redic at her residence. Redic stated that she was employed by ACORN as an SRD in the summer of 2008. She stated her supervisor was named Edward. Redic stated she worked for ACORN for approximately two months. She stated she was let go because she did not have enough signatures for two days and because she missed work on another day due to other employment.

Redic stated that at the beginning of her employment with ACORN, SRDs were required to have five signatures per day, and that it increased to ten signatures the second day. Redic also stated that on the day of the Juneteenth parade, SRDs were required to get 40 signatures. She said that she was told if SRDs got 40 signatures on that day, they only had to get five the next day. Redic indicated that at times she saw other SRDs signing each other's voter registration forms. Redic stated she knew that people were putting names down twice and also getting names out of the phone book.

On June 3, 2009, Special Agent Thelen and Special Agent Christina McNichol interviewed defendant Kevin Clancy. Clancy stated he worked for ACORN as a special registration deputy during the summer of 2008. He stated he was hired by Edward Williams, who was a heavysset black male who hired all of the SRDs at ACORN. Clancy stated he was paid approximately \$8 per hour to obtain signatures. He believed that ACORN had a quota of signatures that went from 15 on the first day to 20 on the second day. He stated if they did not meet their required quota on two or more days, the SRDs would be terminated. Clancy believed he only worked for ACORN for a short period of time.

Clancy indicated that he signed up his brother, Gerald Clancy, on at least two occasions. He also indicated he signed up his mother four or five times. He also said he would go to the same park every day and sign up the same people every day while employed by ACORN. He stated he did this to keep his job because of the quota that was placed on him. Clancy did not recall sitting in a group and passing around forms, but he did indicate that at the end of the day, individuals would sign each other's papers, as they wanted to make sure they reached their quota for the day so that they did not get released by ACORN. He stated this probably happened four or five days per week. Clancy indicated that Maria Miles and "Gabriele" were very close and that Gabriele and Maria would get one person to sign both of their forms. Clancy indicated that on some occasions, he also signed up the same people with Maria and Gabriele, although he could not recall on how many occasions this happened. He stated he never forged any signatures, but he believed Gabriele and Maria did.

On January 20, 2010, Agents Thelen and McNichol interviewed Edward Williams at his residence. Williams stated that he began his employment with ACORN in approximately January of 2008 as a special registration deputy. He stated at one point, he reached the level of Political Organizer within ACORN. He stated he was then a supervisor at the ACORN office in Milwaukee. He said each supervisor had their own group of SRDs that they recruited and for whom they were responsible. Williams indicated that as a supervisor, he was responsible for looking over the voter registration applications that were turned in every day, which he reviewed for completion. He said the SRDs were told on a daily basis that they were not allowed to sign up the same people, nor were they allowed to submit duplicate or fraudulent registrations.

Williams was asked if ACORN had a quota for SRDs. Williams indicated there was a quota that the SRDs had to make or they would not be allowed to work at ACORN. He stated that after the SRDs returned from City Hall after being deputized, he would take the SRDs on the street and they were required to obtain five voter registration applications for that day. He stated if the individual was unable to obtain five, he would have a discussion with that person to see if this was really a job they could do. He stated on the second day, SRDs were required to get 10 voter registration applications, and on the third day that number went up to 15. He stated that if the SRD was able to obtain the required 15 signatures within a short period of time, they were allowed to take off the rest of the day and would get paid for a full day's work. He indicated that SRDs were let go if they were unable to obtain the quota set by ACORN. He said there was a little flexibility in terms of the number of days that could go by without meeting the quota.

Williams stated that on Juneteenth Day, he told the SRDs to get 40 voter registration applications. He said if they were able to get 40 registration applications on that day, they could take the rest of the week off. Williams said there was a huge amount of fraudulent applications turned in that day. He at first was very excited that a large amount of applications were turned in, but that after reviewing them, he found that a majority of them were fraudulent. Williams stated he felt the quotas were necessary to separate the good workers from the bad workers, and that everyone should have to produce if they were working.

On July 8, 2009, SA Thelen interviewed Carolyn Castore at her residence. Castore was the political director for ACORN for the state of Wisconsin in 2008. She stated that she employed approximately five organizer managers, one of whom was Edward Williams who worked from March 2008 until July 20, 2008. Castore indicated that people who wished to become SRDs came to the ACORN office to apply. They were then sent to City Hall to go through training and deputizing. Agent Thelen asked Castore if the SRDs were told they could not become SRDs if they had a felony conviction. Castore indicated that ACORN relied on City Hall to conduct backgrounds on the SRDs because ACORN did not conduct background checks. Castore indicated that if the SRDs were deputized by City Hall, they were "good to go" as far as ACORN was concerned.

Castore explained that the organizer manager would be responsible for looking over the registrations of the SRDs every day and then filling out batch sheets. Castore admitted that this was not done on all occasions, which is why it was possible for fraud to occur. She stated because managers would not be monitoring the registration cards on a daily basis, SRDs could submit the same name multiple times.

Castore indicated that on Juneteenth Day, SRDs were encouraged, but not required, to get more cards done on that day. She stated that Edward Williams probably misunderstood this and made it a requirement that the SRDs get more cards done. She stated as a result of Williams' requirement, the level of fraud was a lot worse on that particular day. She stated that Williams would have been in charge of the SRDs during May, June, and July of 2008.

Castore advised Agent Thelen that in late May 2008, the organization Community Voters Project moved into the area. She witnessed the fraudulent registration cards increase a great number, leaving her to conclude that the area was probably saturated with people attempting to register voters. She stated that because SRDs were unable to get signatures, they would sometimes submit fraudulent forms.

Your complainant has reviewed copies of the City of Milwaukee Board of Election Commissioners Deputy Voter Registrar cards for both defendants. Those cards show that Maria Miles was deputized as an SRD on June 12, 2008, and that Kevin Clancy was deputized on June 10, 2008.

Your complainant knows that the City of Milwaukee Election Commission is located at 200 East Wells Street, City of Milwaukee, and that Voter Registration Applications are processed at that location. Your complainant has reviewed copies of Voter Registration Applications involving the defendants and other individuals mentioned above. Those records show that defendant Kevin Clancy registered himself to vote on June 11, 2008. He also registered to vote as a new elector on June 19, 2008, with SRD John Eggars and again as a new voter on June 19, 2008, with SRD defendant Maria Miles.

Those records also show that Defendant Maria Miles registered to vote as a new voter on June 12, 2008. Defendant Kevin Clancy was the SRD for that application. Maria Miles registered to

vote three more times on June 19, 2008, with SRDs Kevin Clancy, Iliah Redic, and Howard Watkins.

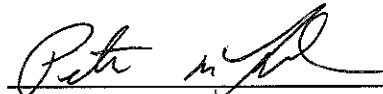
Also on June 19, 2008, Maria Miles and Kevin Clancy both registered Robert Easterling as a new voter. Those records also show that on the same day, SRDs Howard Watkins and Maria Miles registered Merphis Slocum as a new voter. On June 17, SRD Howard Watkins registered a change of address with SRD Dion Crawford, and then again registered a change of address on June 19, 2008, with SRD Maria Miles.

\*\*\*\*End of Complaint\*\*\*\*

Subscribed and sworn to before me and approved for filing this 8th day of March, 2010.



David W. Maas  
Assistant Attorney General  
State Bar No. 1025522



Complaining Witness

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-- Felony Complaint --

STATE OF WISCONSIN

CIRCUIT COURT  
CRIMINAL DIVISION

MILWAUKEE COUNTY

STATE OF WISCONSIN

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Court Case No.

Defendant,

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SUMMONS

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**THE STATE OF WISCONSIN TO THE DEFENDANT:**

A complaint, a copy of which is attached, having been made before me accusing you of the crime of Election Fraud-Falsely Procuring Voter Registration, Party to a Crime, contrary to Wisconsin Statutes sections 12.13(1)(b), 12.60(1)(a) and 939.05.

You are therefore summoned to appear in the Circuit Court of Milwaukee County on April 20, 2010, at 1:00 p.m., in Room 221 of the Safety Building, 821 West State Street, Milwaukee, Wisconsin 53233, to make your initial appearance in court and answer the complaint.

If you fail to appear in court as directed, a warrant for your arrest may be issued.

Dated at Milwaukee, Wisconsin, this 8 day of March, 2010.

Respectfully submitted,



David W. Maas  
Assistant Attorney General  
State Bar No. 1025522

P.O. Mailing Address  
Wisconsin Department of Justice  
17 West Main Street  
Madison, WI 53707  
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