



September 21, 2026

Katherine "Kat" Rueckert
P.O. Box 11192
Jackson, WY 83001

Sent via email to Katherine.rueckert@gmail.com

Dear Ms. Rueckert:

I am in receipt of your Wyoming Election Code Violation Complaint Form dated August 21, 2026. I have fully reviewed your complaint alleging certain violations of the Wyoming Election Code by Matt Carr. As I am not a lawyer, I also retained outside counsel to review the complaint at the firm of Crowley Fleck Attorneys in Casper, Wyoming.

Pursuant to Wyoming Statute 22-26-121(b), any person may file a written complaint with the county clerk regarding any violation of the Election Code by any county or municipal candidate. Matt Carr is currently a candidate for Teton County Sheriff, thus a county candidate.

Wyoming Statute 22-26-21(b) also states that if the county clerk finds that the complaint has merit and suspects a violation of the Election Code, the county clerk shall refer the complaint to the county attorney for the county in which the candidate resides for investigation and prosecution, hence why I made the decision to hire outside counsel.

In your complaint, it is alleged that Sheriff Carr engaged in bribery under the Election Code, which is governed by Wyoming Statute 22-26-109 and 110. 22-26-109 states:

- (a) Offering bribe consists of willfully advancing, paying, offering to pay or causing to be paid, or promising, directly or indirectly, any money or other valuable thing to a person, for any of the following purposes:
 - a. To induce a person to vote or refrain from voting for or against a candidate or ballot proposition or to sign or not sign a petition;
 - b. To induce an election official to mark, alter, suppress, or change a ballot that has been cast, an election return, any certification of election or petition.

Wyoming statute 22-26-110 makes it unlawful to accept a bribe for any of the reasons stated in 22-26-109. Under 109, Mr. Carr would need to pay or provide a valuable thing, in this case a job, to induce Rojas to vote or refrain from voting a certain way. Given the present facts, Mr. Carr is alleged to have provided Mr. Rojas with a job in exchange for his removal from the election race. Not to induce Mr. Rojas to vote or refrain from voting. As a result, the complaint does not appear to allege sufficient facts to establish either Sheriff Carr or Mr. Rojas committed bribery under the Election Code. Because there are no factual allegations supporting a claimed violation of 22-26-109, a referral on this basis would not be appropriate.

The complaint further alleges that Mr. Carr was in violation of Wyoming statute 22-26-118, which states:

Causing or attempting to cause a candidate to withdraw or refuse nomination or election consists of any person, or agent, or officer, or any company, or corporation either causing or attempting to cause any person or persons nominated as candidate or elected at any election, to withdraw, or refrain from accepting such nomination or election by threatening loss of employment, business or patronage, if he or they accept such candidacy or election, or making it a condition of employment, business or patronage, that such a candidacy or election shall not be accepted.

Under the language of this statute, a person is guilty of causing or attempting to cause a candidate to withdraw or refuse nomination or election if they "threaten loss of employment, business or patronage if they accept candidacy or election". Here the facts, as alleged, would establish an effort to cause a candidate to withdraw. However, there are no facts alleged in the complaint to suggest that Mr. Carr or Mr. Rojas threatened one another with loss of employment, business or patronage if the other continued to run as an opponent. Even if the Clerk were to accept the allegation that Sheriff Carr offered Mr. Rojas a job if he would drop out of the race, that is not conduct prohibited by 22-26-118. As a result, the complaint does not support facts sufficient to find that Mr. Rojas or Sheriff Carr engaged in prohibited conduct in order to cause the withdrawal of a candidate.

Lastly, the complaint alleges several allegations of statutory violations for provisions that are not found in Election Code. Wyoming Statute 22-26-121 (b) limits a clerk's authority to "any violation of the Election Code." The statute does not vest a clerk with the authority to refer or even review complaints that allege conduct that falls outside of the limited purview of Title 22.

The review of the nature of the allegations and the governing legal authority indicates that the complaint lacks sufficient basis for further referral and investigation.

Sincerely,



Maureen E. Murphy
Teton County Clerk