

STATE OF WISCONSIN: COUNTY OF MILWAUKEE

RECEIVED

BEFORE THE CITY OF MILWAUKEE ELECTION COMMISSION

2024 JAN -5 A 9:45

IN THE MATTER of the Nomination Papers
Filed by Ieshuh Griffin with Respect to the
Spring Election for the 15th Aldermanic
District in the City of Milwaukee

File No. _____

CITY OF MILWAUKEE
ELECTION COMMISSION

**VERIFIED COMPLAINT OF
RUSSELL W. STAMPER II**

The Complainant, Russell W. Stamper II, by his attorneys Maistelman & Associates, LLC by Attorney Michael S. Maistelman, alleges and shows as follows:

1. The Complainant, Russell W. Stamper II ("Complainant"), is an elector of the City and County of Milwaukee residing at 2437 N. Sherman Blvd., in the City and County of Milwaukee, Wisconsin and currently holds the office of 15th District Alderperson for the City of Milwaukee.
2. The Respondent, Ieshuh Griffin ("Respondent"), is upon information and belief a candidate in the Spring 2024 Election for the 15th District Alderperson seat for the City of Milwaukee and whose address is listed as 2722A Richards Street, in the City and County of Milwaukee, Wisconsin.
3. On or about January 2, 2024, Respondent filed with the City of Milwaukee Election Commission ("Election Commission") Nomination Papers for Non-Partisan Office for the position of 15th District Alderperson for the City of Milwaukee. 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 2, 2024.
5. Respondent's Nomination papers allegedly consisted of a sufficient number of signatures so as to equal two-hundred (200) signatures, the amount required for placement on the

ballot for 15th Aldermanic District for the City of Milwaukee. Petitioner is not aware of how many of Respondent's nomination signatures the Election Commission has accepted or rejected.

CHALLENGES

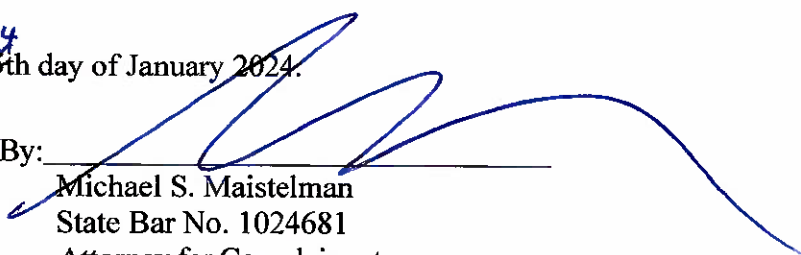
6. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.
7. Please see attached Exhibit B, for specific objections and the attached affidavits and pictures.

CONCLUSION

8. Accordingly, Respondent has not submitted a sufficient number of signatures to be placed on the ballot for the Spring Election for the 15th Aldermanic District of the City of Milwaukee.
9. This Verified Complaint is made pursuant to § El Bd 2.07(1), Wis. Admin. Code, and § 9.10(3)(b), Wis. Stats., and pursuant to § El Bd 10.03(6), Wis. Admin. Code, was served on Respondent via U.S. mail postage prepaid prior to filing
10. This Verified Complaint is made pursuant to § El Bd 2.07(1), Wis. Admin. Code, and § 9.10(3)(b), Wis. Stats., and pursuant to § El Bd 10.03(6), Wis. Admin. Code, was served on Respondent via U.S. mail postage prepaid prior to filing.

WHEREFORE, Complainant respectfully requests that the Election Commission of the City of Milwaukee conduct an investigation pursuant to § El Bd 2.07(5), Wis. Admin. Code, in conjunction with such other public officials as the Election 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 4th day of January 2024.

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

P.O. ADDRESS:
8989 N Port Washington Rd
Suite 208
Milwaukee, WI 53217
414-908-4254
msm@maistelmanlaw.com

VERIFICATION

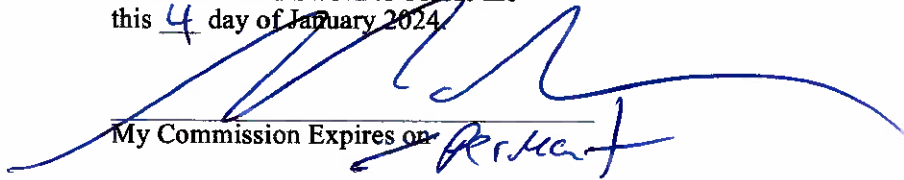
Russell Stamper II being first duly sworn, on oath, deposes and says as follows:

1. That he is an elector and a resident of the City and County of Milwaukee, Wisconsin and resides in the 15th Aldermanic District in the City of Milwaukee and is the current Alderperson in the 15th Aldermanic District.
2. That he 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, he believes them to be true.

Dated at Milwaukee, Wisconsin this 4th day of January 2024


Russell Stamper II
Complainant

Subscribed and Sworn to before me
this 4 day of January 2024.


My Commission Expires on Permanet

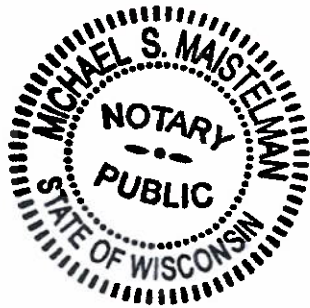


Exhibit A

NOMINATION PAPER FOR NONPARTISAN OFFICE

Candidate's name (required; no titles may be used): Jeshua Griffin

Candidate's residential address (required) No P.O. Box addresses: 2225 N Richards St

Street, fire, or rural route number; box number (if rural route); and name of street or road

Candidate's municipality for mailing purposes (required if different than residential address or voting municipality): P.O. Box 72057

Type of election (required): Spring Special

Branch, district or seat number (required if applicable): WI 53212

State (required): WI

Zip code: 53212

Name of jurisdiction or district in which candidate seeks office (required): 15th district Alderperson

Candidate's municipality for voting purposes (required): Town Village City Milwaukee

(name of municipality)

Election date (required) Do not use primary date: 4-2-24

Mo/Da/Yr

Title of office (required): Alderperson (15th district)

I, the undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as a candidate so that voters will have the opportunity to vote for him or her for the office listed above. 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 addresses 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
<u>Marybeth Brugg</u>	<u>Marybeth Brugg</u>	<u>2025 N 14 # 215</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Chester Triplett</u>	<u>Chester Triplett</u>	<u>2025 N 14th St # 215</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Ernie Matthews</u>	<u>Ernie Matthews</u>	<u>2025 N 14th St # 208</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Oscar Golden</u>	<u>Oscar Golden</u>	<u>2025 N 14th # 217</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Mattie Lane</u>	<u>Mattie Lane</u>	<u>2025 N 14th Street # 211</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>John Michaels</u>	<u>John Michaels</u>	<u>2025 N 14th # 212</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Juliana Herbert</u>	<u>Juliana Herbert</u>	<u>2025 N 14th # 201</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Reginald Vened</u>	<u>Reginald Vened</u>	<u>2025 N 14th St 203</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Dontae Washington</u>	<u>Dontae Washington</u>	<u>2025 N 14th St 202</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>
<u>Seena Johnson</u>	<u>Seena Johnson</u>	<u>2025 N 14th # 211</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Milwaukee</u>	<u>12/15/23</u>

Jeshua Griffin (Name of circulator) certify: I reside at 2722 N Richards St Milwaukee (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. 56.03. 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(16).

12/15/23 (Date)

Jeshua Griffin (Signature of circulator)

EXHIBIT B

CHALLENGES TO SIGNATURES ON NOMINATION PAPERS.

1. PG 1 – line 1-5-7 not legible.
2. PG 3 – line 4 – no legible name and address 2000 n 31 # 209 does not exist – See affidavit of Les Johns. Picture - #1.
3. PG 3 - Line 6 and 9 addresses are not legible.
4. PG 4 – line 5 name is not legible – no printed name – name is incomplete.
5. PG 5 – line 5-6-7 and 9 are out the district – 3805 n 36th & 3200 w Juneau & 2935 n 21st & 2925 n 28th.
6. Pg 6 - line 3 and 4 are not legible, no full name. Line 4 & 5 no printed name.
7. PG 6 - line 8 -9 out the district - 1625 n 9th & 3076 n 42nd.
8. PG 8 - line 7 is out the district - 3334 w highland.
9. Pg 9 – line 1-2 -3-4-6-8-9-10 these people do not live there. See affidavit of Les Johns.
10. Pg 10 – line 1 is out the district - 2424 N 57th st.
11. Pg 10 - line 9 address not legible.
12. PG 13 – line 6 out the district - 3103 n 29th.
13. Pg 13 - line 10 – name not print or legible
14. PG 16 – line 5 no apt number – incomplete address – 1338 w fond du lac.
15. PG 17 – line 5 – no printed name.
16. PG 17 - line 9 & 10 is a vacant lot – 1601 w Hadley – See affidavit of Les Johns. Picture # 2.
17. PG 20 – line 3 is out the district – 2506 n 124th.
18. PG 21 – line 9 & 10 are out the district – 3175 n 35th.
19. PG 22 – line 6 - 1601 w walnut vacant lot - See affidavit of Les Johns. Picture #3.
20. PG 22 – line 9 is not printed and not legible.
21. PG 23 – line 3 is a vacant lot - 2817 w north ave – See affidavit of Les Johns. Picture #4.
22. PG 24 – line 2 does not exist – 3419 w north ave – See affidavit of Les Johns. Picture #5
23. PG 25 - line 10 is vacant lot – 2947 w center – See affidavit of Les Johns. Picture # 6.
24. PG 27 – line 8 is a 2612 w center - is vacant or does not exist Picture # 7.

STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Alitha Anderson, property manager for, who reside at
St Mark Place located at 2025 W. 14th St

state the following:

Marvin Biggle was a resident but has been
deceased since 2022

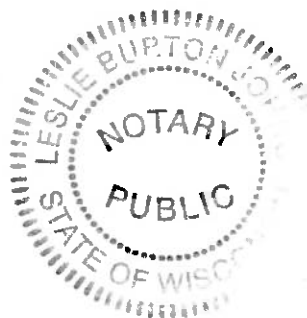
Dated in Milwaukee, Wisconsin this 4 day January 2024.

Signature: Alitha Anderson

Name Printed: Alitha Anderson

Dated this 4th day of January 2024.

Leslie Burton Adams
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/25



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Alitha Anderson Property Manager, who reside at
located at 2025 N. 14th Street

state the following:

CHESTER TRIPLETT DOES NOT RESIDE AT 2025 N14th
Apt Number #215. LINE #2 page 9.

Dated in Milwaukee, Wisconsin this 4th day January 2024.

Signature: Alitha Anderson

Name Printed: Alitha Anderson

Dated this 4th day of January 2024.

Janis Burt Johnson
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/30/2025



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Alitha Anderson Property Manager, who reside at
located at 2025 N. 14th Street

state the following:

Ar Michael's Does NOT RESIDE AT 2025 N 10th
Apt 212. line #6. page 9.

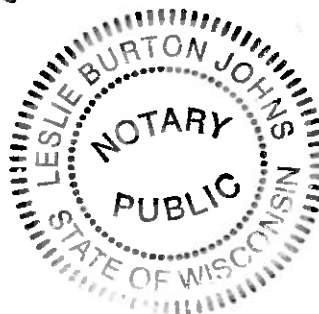
Dated in Milwaukee, Wisconsin this 4th day January 2024.

Signature: Alitha Anderson

Dated this 4th day of January 2024.

Name Printed: Alitha Anderson

Leslie Burton Johns
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/25



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, NORA E. GOLDEN, who reside at
2025 N 14th St MILW. WI #217

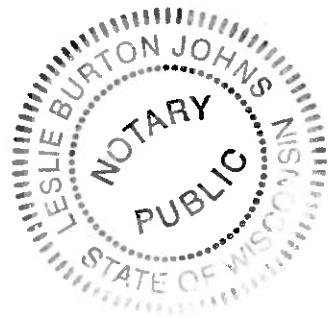
state the following:

I DO NOT KNOW OSCAR GOLDEN AND I HAVE
LIVED IN THIS APT FOR 12 YEARS.

Dated in Milwaukee, Wisconsin this 4 day January 2024.
Signature: Nora E. Golden
Name Printed: NORA E. GOLDEN

Dated this 4th day of January 2024.

Leslie Burton Johns
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/2025



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, TEX D SEALS _____, who reside at
2025 N 14TH #108

state the following:

I did not know MR ERIC MATTAW
ON LINE 3 PAGE 9
IT HAVE HERE FOR 2 yrs

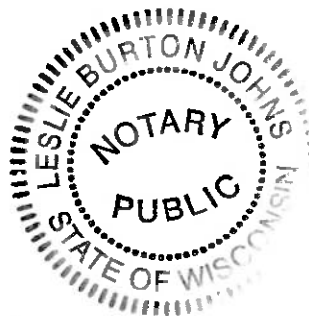
Dated in Milwaukee, Wisconsin this 4 day January 2024.

Signature: Tex D Seals

Name Printed: TEX D SEALS

Dated this 4th day of January 2024.

Leslie Burton Johns
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/21



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, JEANA JOHNSON, who reside at
2025 N 14th #211

state the following:

I HAVE lived here for seven years
and Mattie Love & Sarra Johnson
does not live here from page nine
line five & line 10

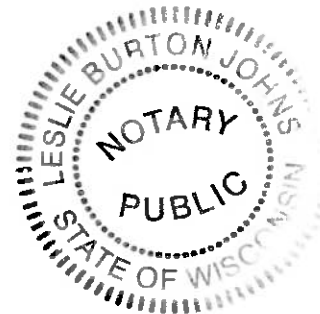
Dated in Milwaukee, Wisconsin this 4th day January 2024.

Signature: Jeana Johnson

Name Printed: JEANA JOHNSON

Dated this 4th day of January 2024.

Leslie Burton Johns
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/25



STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Barbara Pugh, who reside at
Li^{at} #2025 N14th 202

state the following:

I Live here for two years
Dontae Washington @ Dose Do Live here
From page 9 Line 9

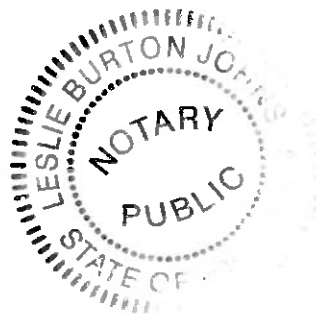
Dated in Milwaukee, Wisconsin this 4 day January 2024.

Signature: Barbara Pugh

Name Printed: Barbara Pugh

Dated this 4th day of January 2024.

Leslie Burton Johnson
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/25



**STATE OF WISCONSIN
CITY OF MILWAUKEE ELECTION COMMISSION**

AFFIDAVIT

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Reginald Vernell, who reside at
2025 N. 14th St. Apt 203

state the following:

I didn't sign paper nomination
for Lesha Griffith (Griffin) on
December 15th 2023.

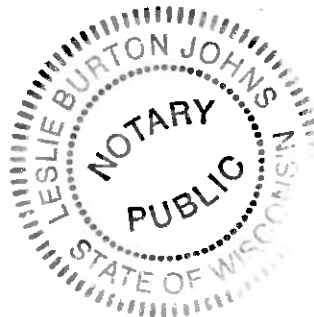
Dated in Milwaukee, Wisconsin this 4th day January 2024.

Signature: Reginald Vernell

Name Printed: Reginald Vernell

Dated this 4th day of January 2024.

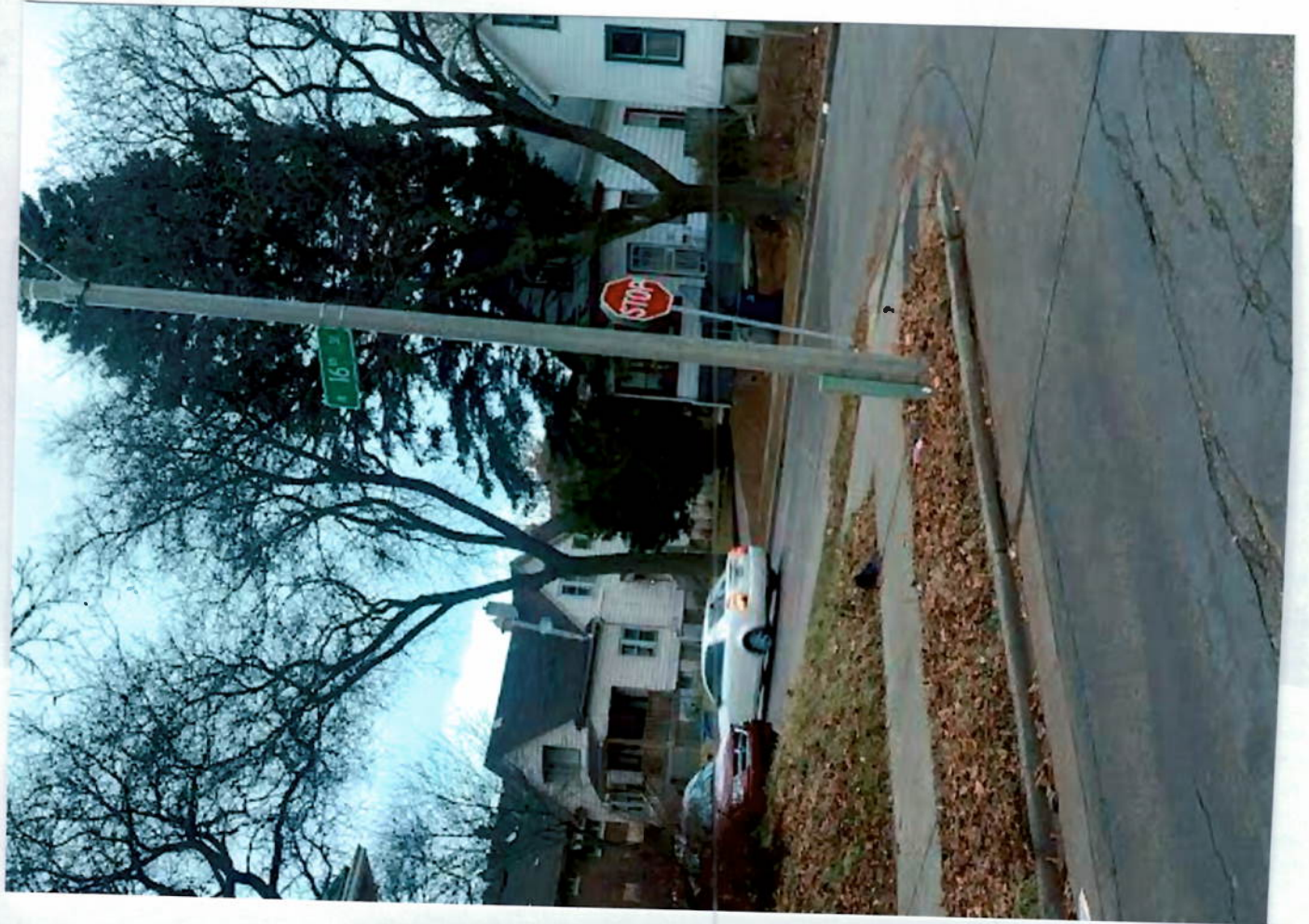
Leslie Burton Johns
Notary Public, Milwaukee County, Wisconsin
My Commission Expires on 6/5/2025





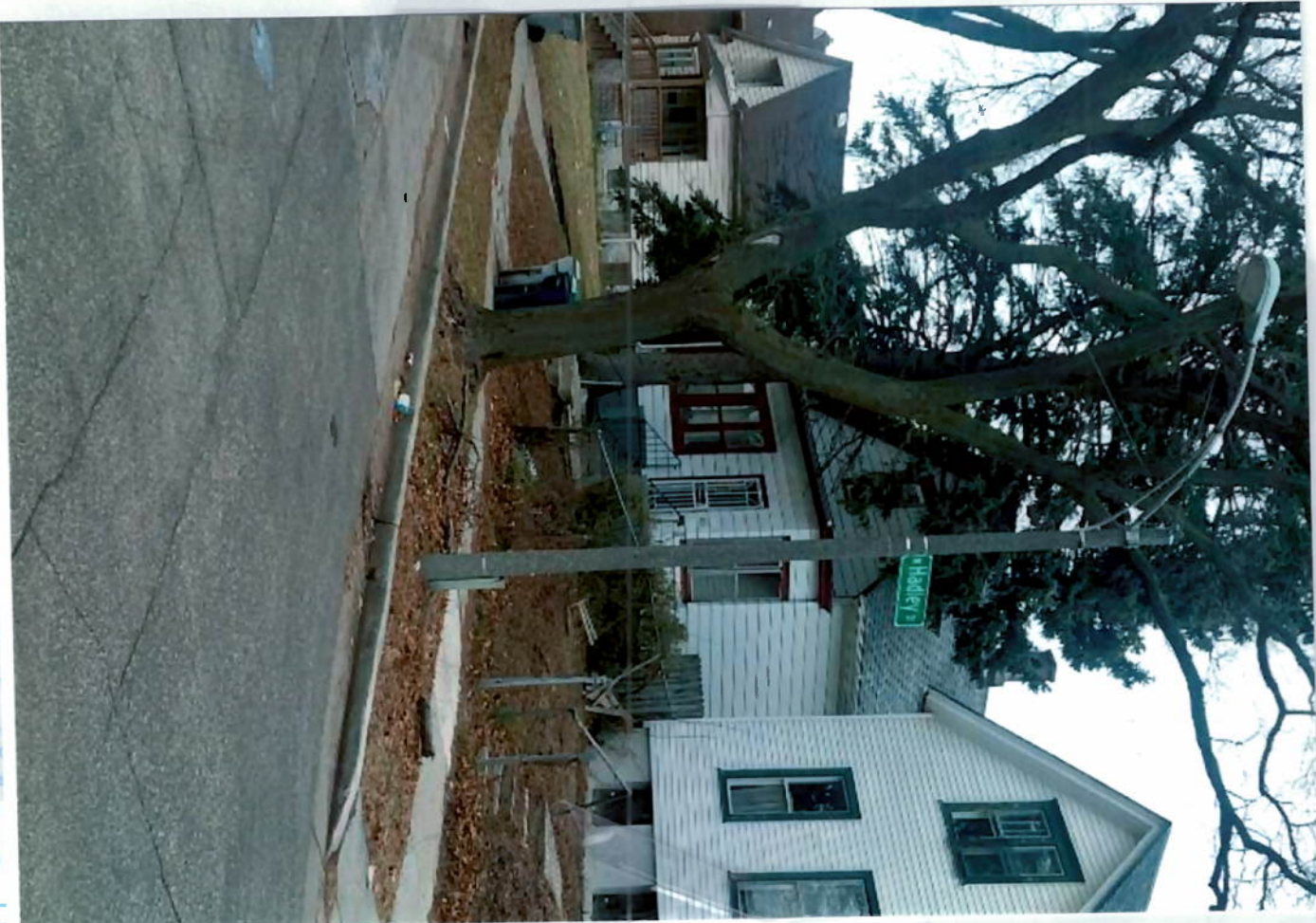
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#2 - on back

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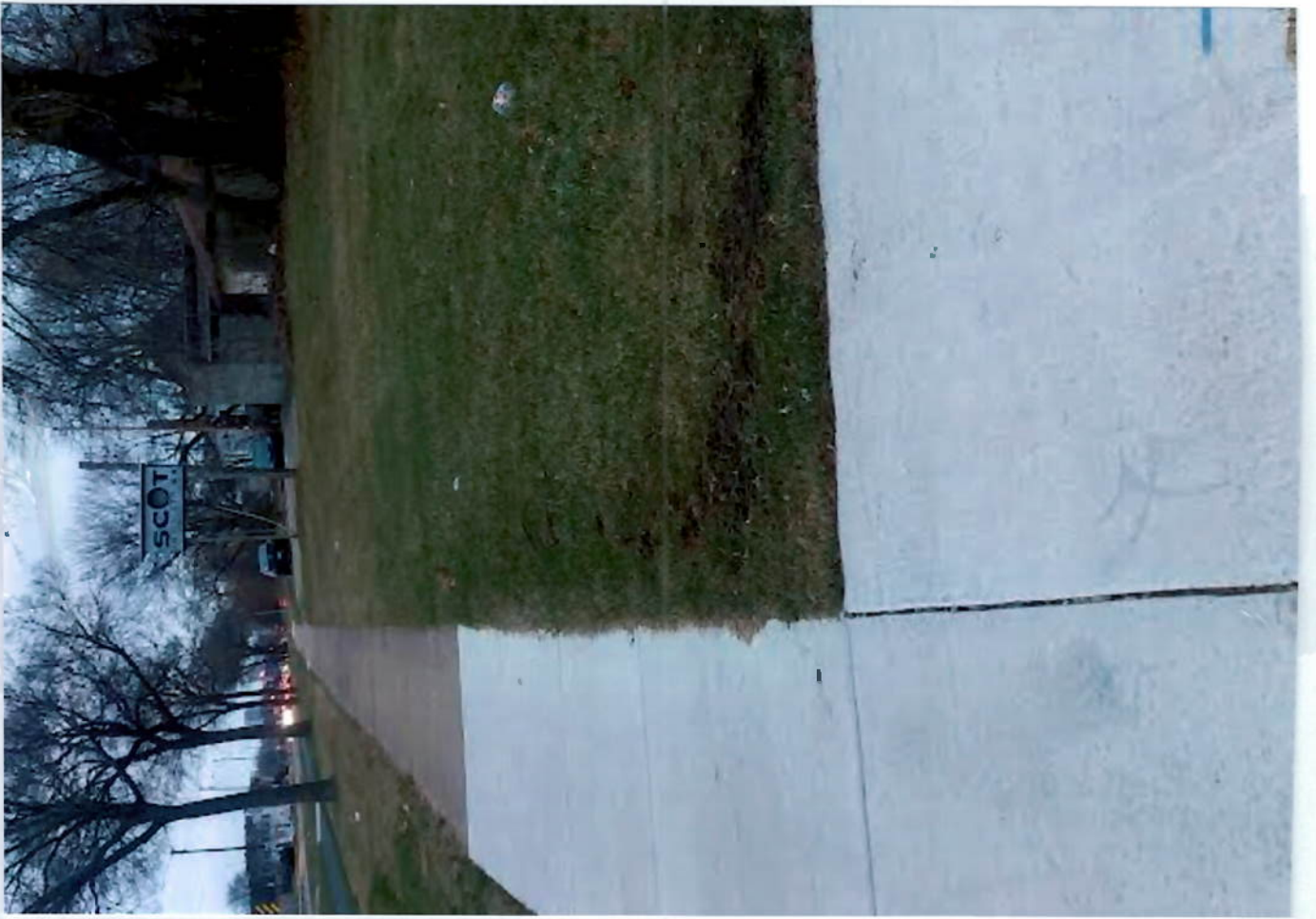


Date of Birth	SSN/Tax ID#	ADDRESS (Residential or Business Street Address)
Residency Status	<input type="checkbox"/> U.S. Citizen <input type="checkbox"/> Resident Alien <input type="checkbox"/> Non-Resident Alien	For Foreign Persons, Passport Number and Country of Issuance, or other similar identification number

Please note: The Bank may ask to see a copy of the driver's license or other form of government issued identification for each owner/guarantor and the controlling individual. In lieu of a passport number, foreign persons may also provide an alien identification card number, or number and country of issuance of any other government issued document evidencing nationality or residence and bearing a photograph or similar signature.

ONLINE ACCESS (Easy Access Line of Credit ONLY) - Customer may view, make payments, and obtain an Advance by using the Bank's iBusinessBanking online together with other amounts then outstanding in the Account, would exceed the Credit Line. If Bank makes an Advance that causes the balance of the Account to exceed the Credit Line, that amount in excess of the Credit Line will be immediately due and payable. Bank is under no obligation to make an Advance in excess of the Credit Line and the Bank shall not be liable for any such Advance. The Customer understands and agrees that the Administrator of the iBB Company ID above will be given the permission to request an Advance on behalf of the Customer.

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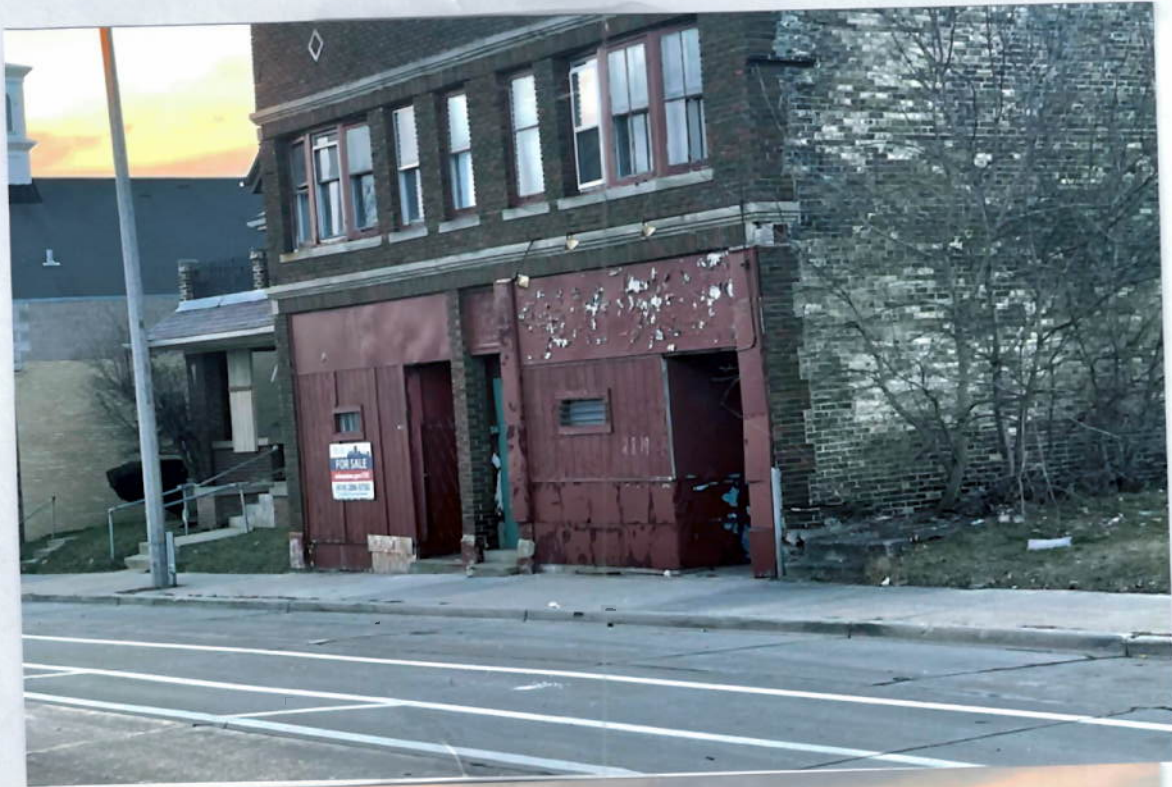


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#4





4



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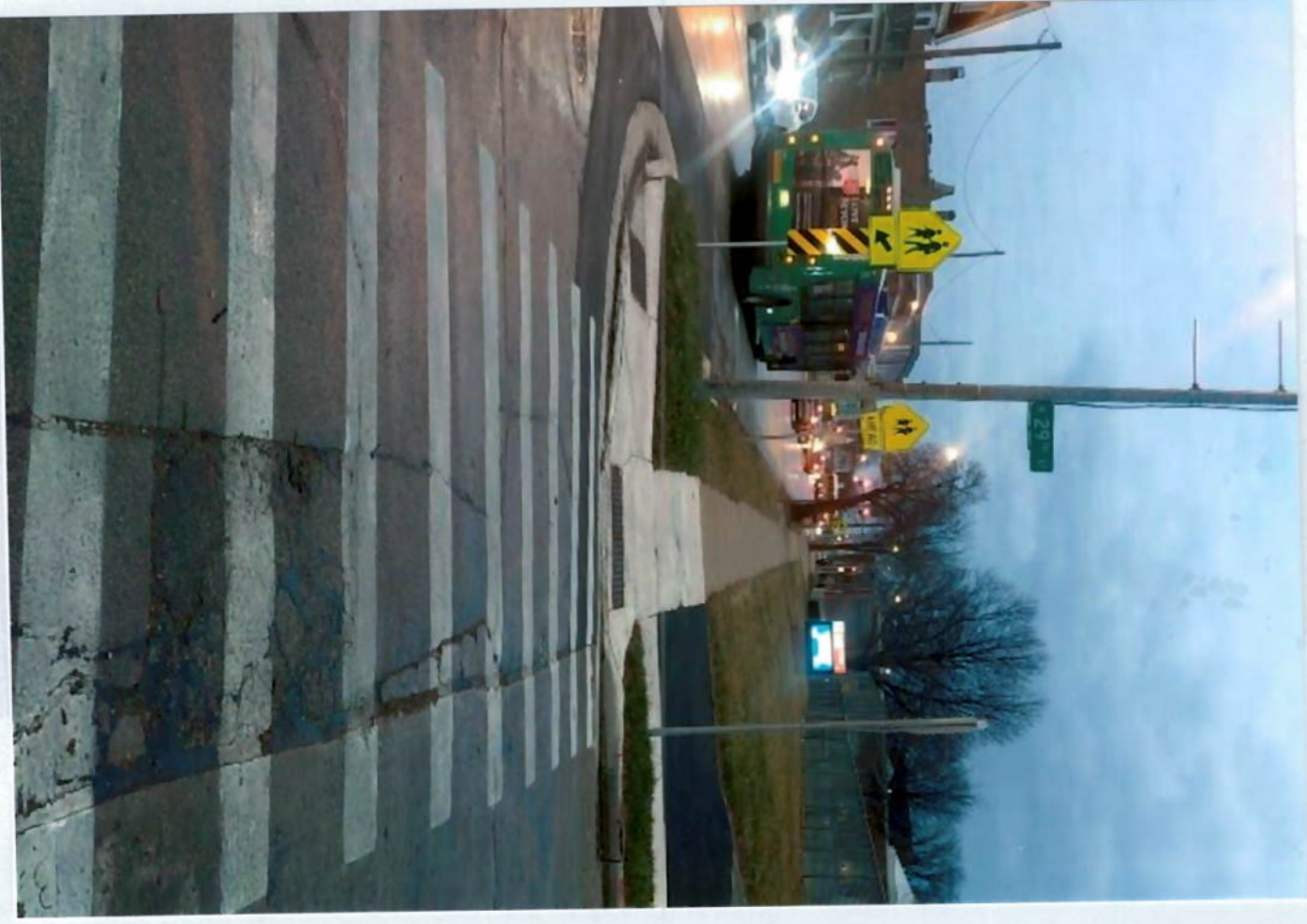
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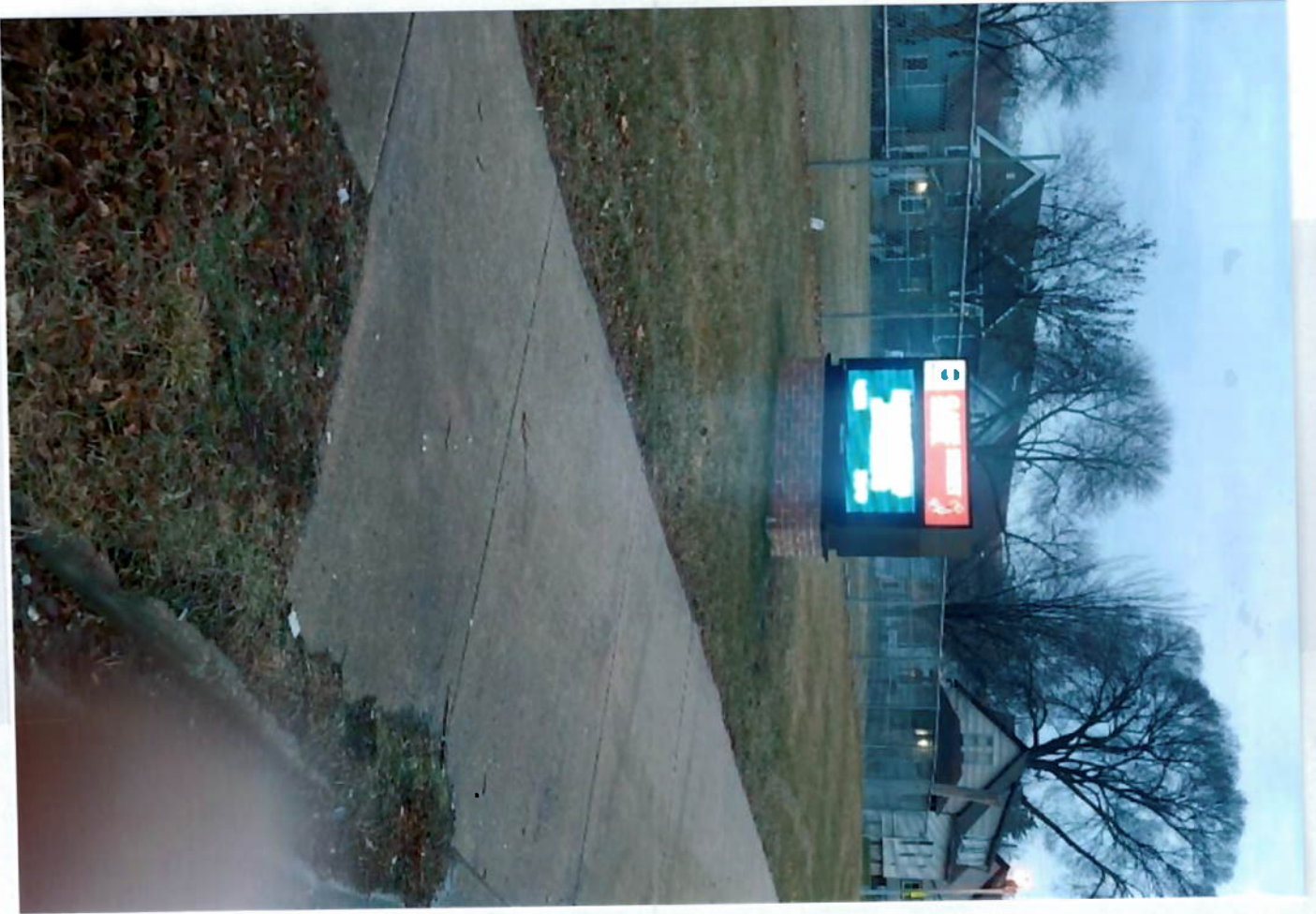


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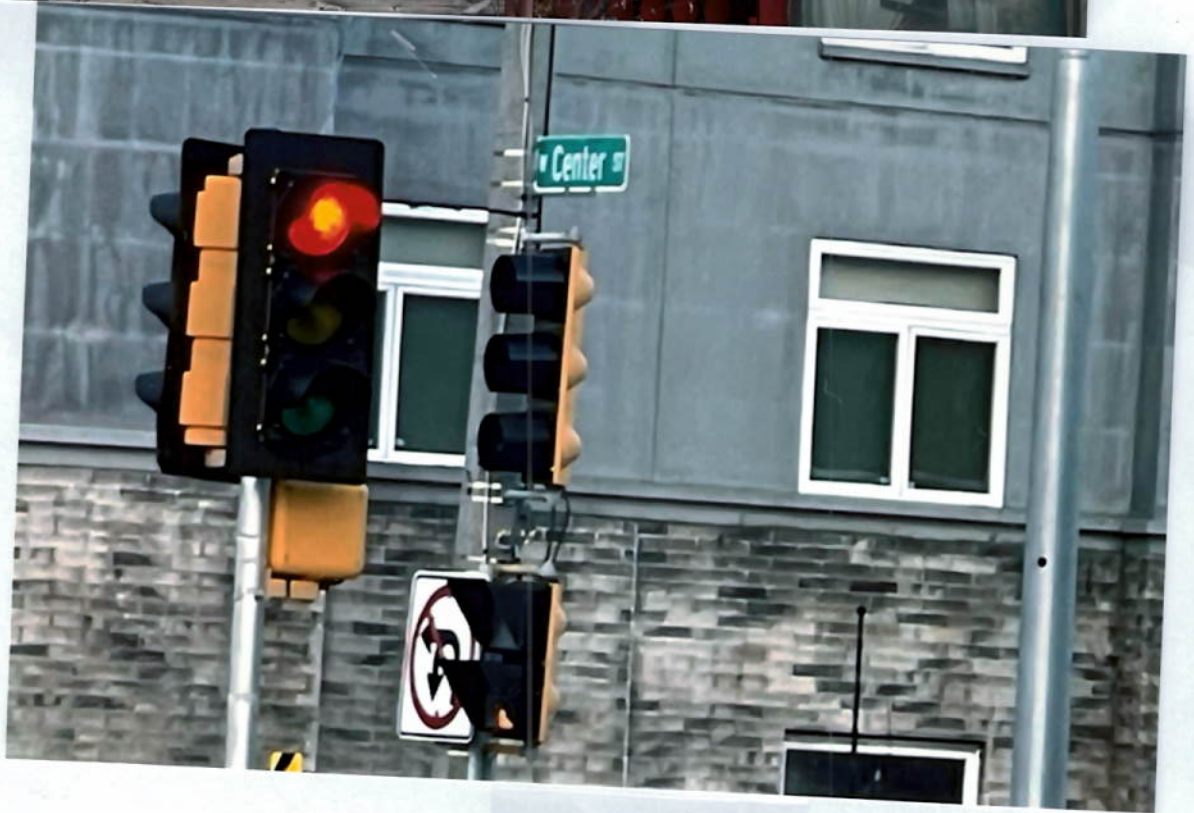
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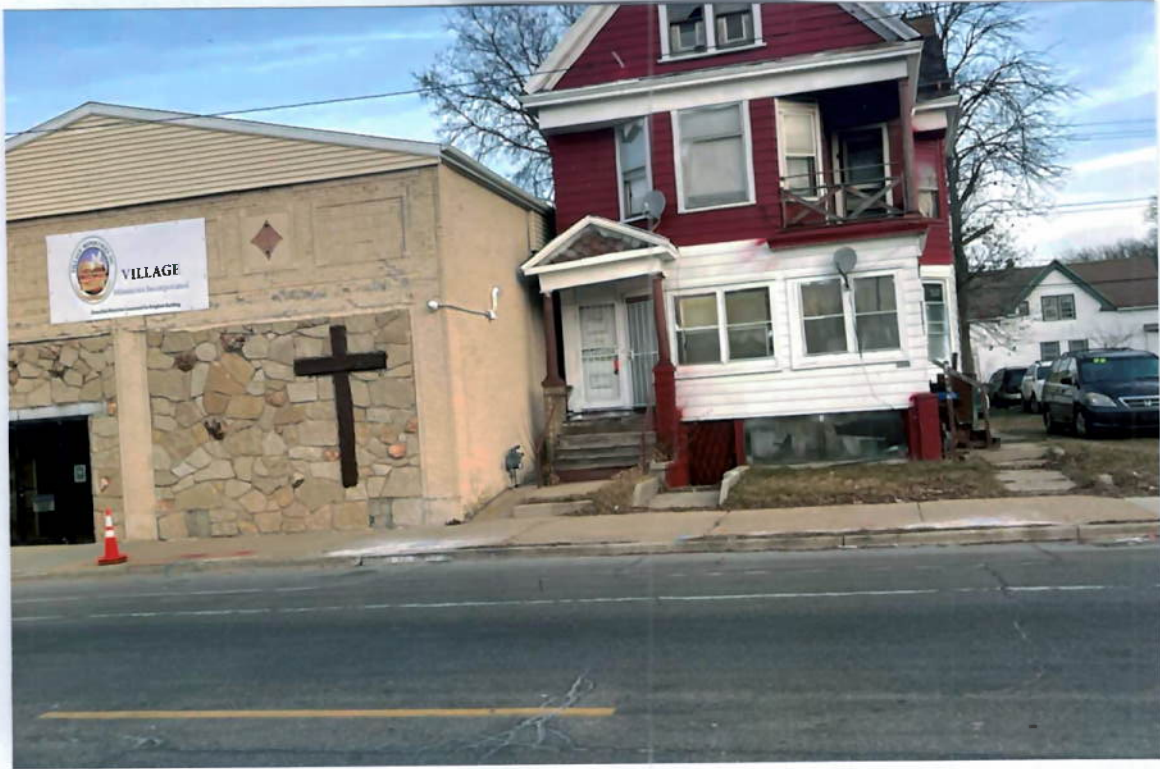
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