

STATE OF WISCONSIN: COUNTY OF MILWAUKEE

BEFORE THE CITY OF MILWAUKEE ELECTION COMMISSION

IN THE MATTER of the Nomination Papers
Filed by Brandon R. Payton with Respect to
the Spring Election for the 6th Aldermanic
District in the City of Milwaukee

File No. _____

**VERIFIED COMPLAINT OF
MILELE A. COGGS**

The Complainant, Milele A. Coggs, by her attorneys Maistelman & Associates, LLC by Attorney Michael S. Maistelman, alleges and shows as follows:

1. The Complainant, Milele A. Coggs (“Complainant”), is an elector of the City and County of Milwaukee residing at 2114 N 1st Street, in the City and County of Milwaukee, Wisconsin and currently holds the office of 6th District Alderperson for the City of Milwaukee.

2. The Respondent, Brandon R. Payton (“Respondent”), is upon information and belief a candidate in the Spring 2024 Election for the 6th District Alderperson seat for the City of Milwaukee and whose address is listed as 2936 N. 19th 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 6th District Alderperson for the City of Milwaukee.

4. Upon information and belief, Respondent’s Nomination papers were allegedly circulated between December 1, 2023, 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

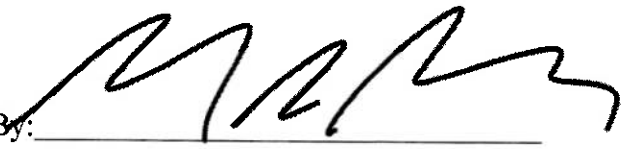
ballot for 6th Aldermanic District for the City of Milwaukee. Petitioner is not aware of how many of Respondent's nomination signatures the Election Commission has accepted or rejected.

CHALLENGES

6. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.
7. Please see attached Exhibit A, for specific objections.
8. Accordingly, Respondent has not submitted a sufficient number of signatures to be placed on the ballot for the Spring Election for the 6th 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.

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 5th day of January 2024.

By: 

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

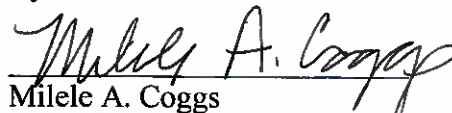
P.O. ADDRESS:
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VERIFICATION

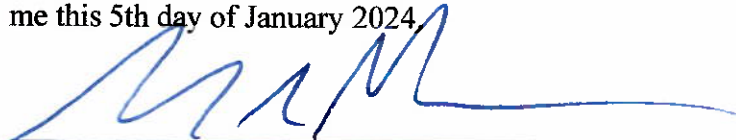
Milele A. Coggs being first duly sworn on oath, deposes and says as follows:

1. That she is an elector and a resident of the City and County of Milwaukee, Wisconsin and resides in the 6th Aldermanic District in the City of Milwaukee and is the current Alderperson in the 6th Aldermanic District.
2. That she 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, she believes them to be true.

Dated at Milwaukee, Wisconsin this 5th day of January 2024.


Milele A. Coggs
Complainant

Subscribed and Sworn to before
me this 5th day of January 2024.



My Commission is Permanent

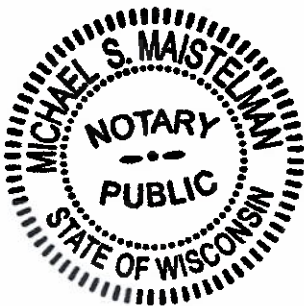


Exhibit A

BRANDON PAYTON NOMINATION PAPER ISSUES

In the header of the following Nomination Papers where it asks for "Candidates municipality for voting purposes" the City box was not checked.

Pages: 2,3,4,5,6,7,8,9,10,11,13,14,15,16,17,18,19,22,23,28,29,31,32,33

Circulator failed to place municipality at the bottom of the page next to their address on the following pages:

22,23,34,

Page 2: Line 6 - address is out of the district and may not exist.

Page 3: Line 2 - address unclear

Line 6 . address is to a commercial business (Twisters 508 W. Center St).
No one lives there.

Page 7: Lines 7 & 9 - is a tavern not a residence.

Page 8: Lines 6 & 7 - are signed by the same person.

Page 10: Lines 2 & 3 - are written by the same person.

Line 6 - Illegible incomplete name

Page 11: Line 1 - Illegible incomplete name

Line 7 - Addresses not complete, address is a storefront with apartments upstairs, address does not have an apartment number.

Page 12: Line 2 - Address is out of district & may not exist.

Page 16: Line 10 - Address is out of district and/or illegible.

Page 17: Line 8 - Address is illegible.

Page 18: Line 9 - Address is illegible.

Page 22: Lines 3 & 4 - Signed by the same person.

Lines 5 & 6 - Signed by the same person.

Page 24: Line 1 - Address illegible.

Page 25: Line 3 - Address is out of district.

Page 28: Line 2 - Address is uninhabited

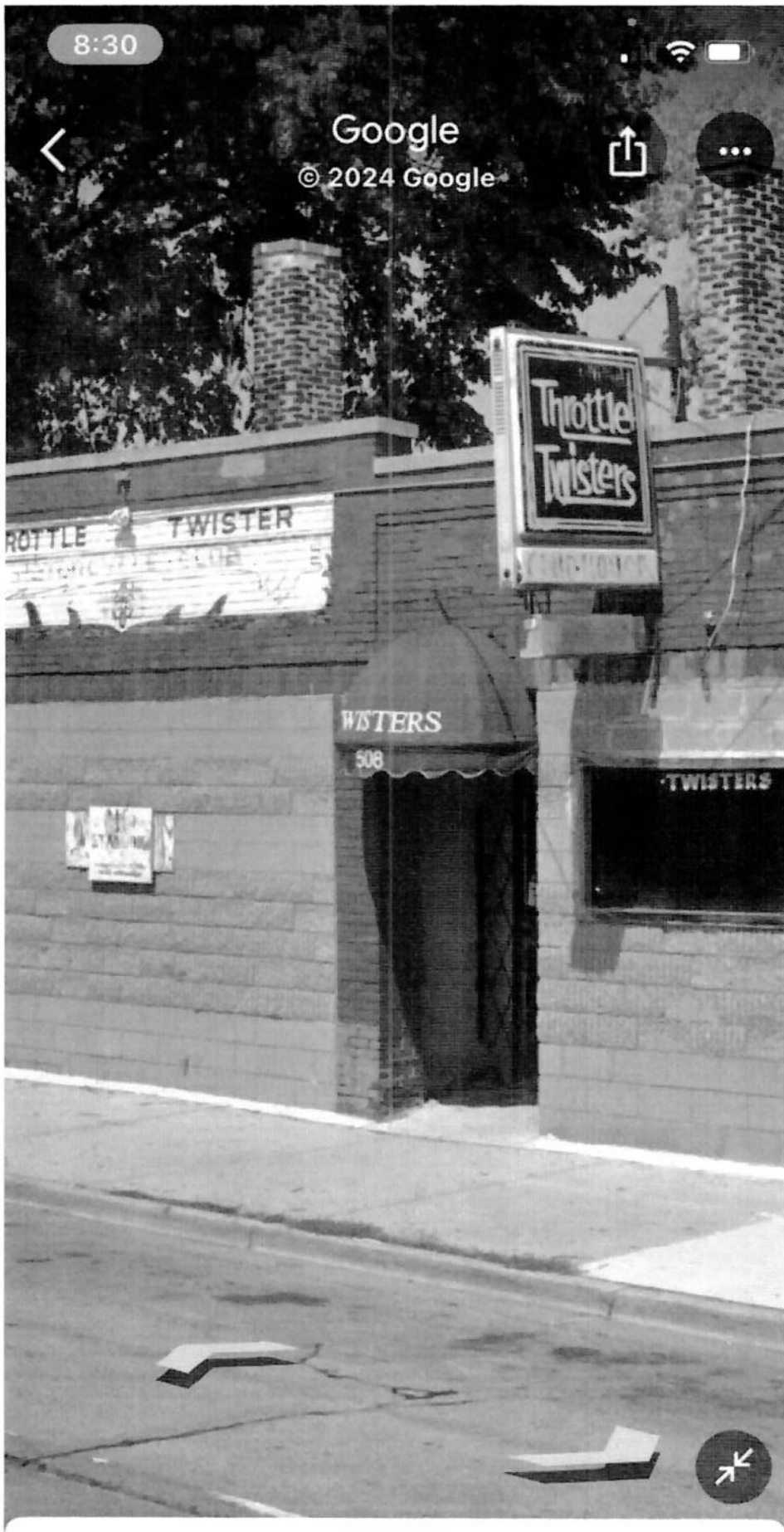
Page 32 Line 1 - Address is illegible

Page 33/34: Line 1 - Address does not exist

8:30



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508 W Center St

2 years ago · See more dates >

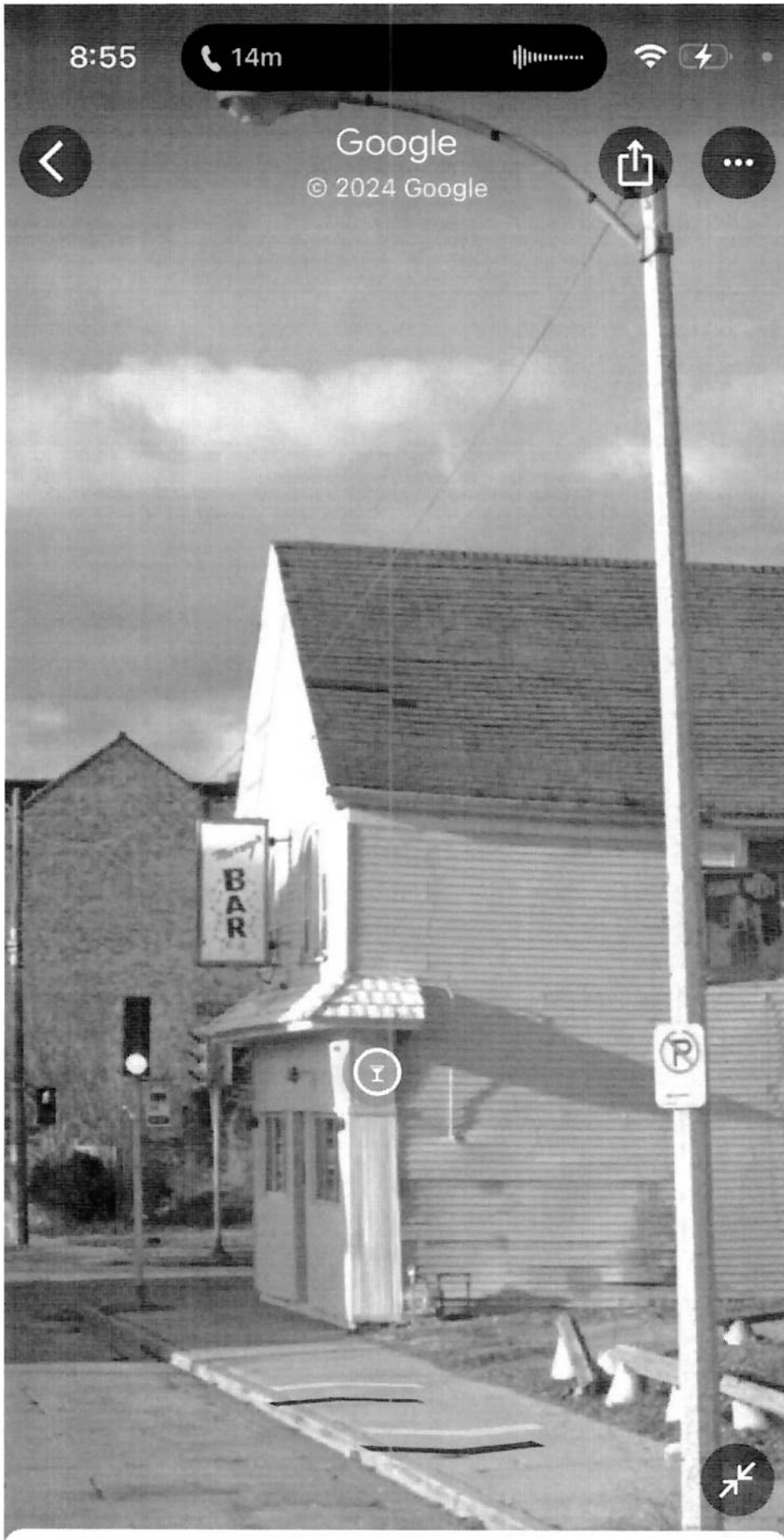
8:55

14m



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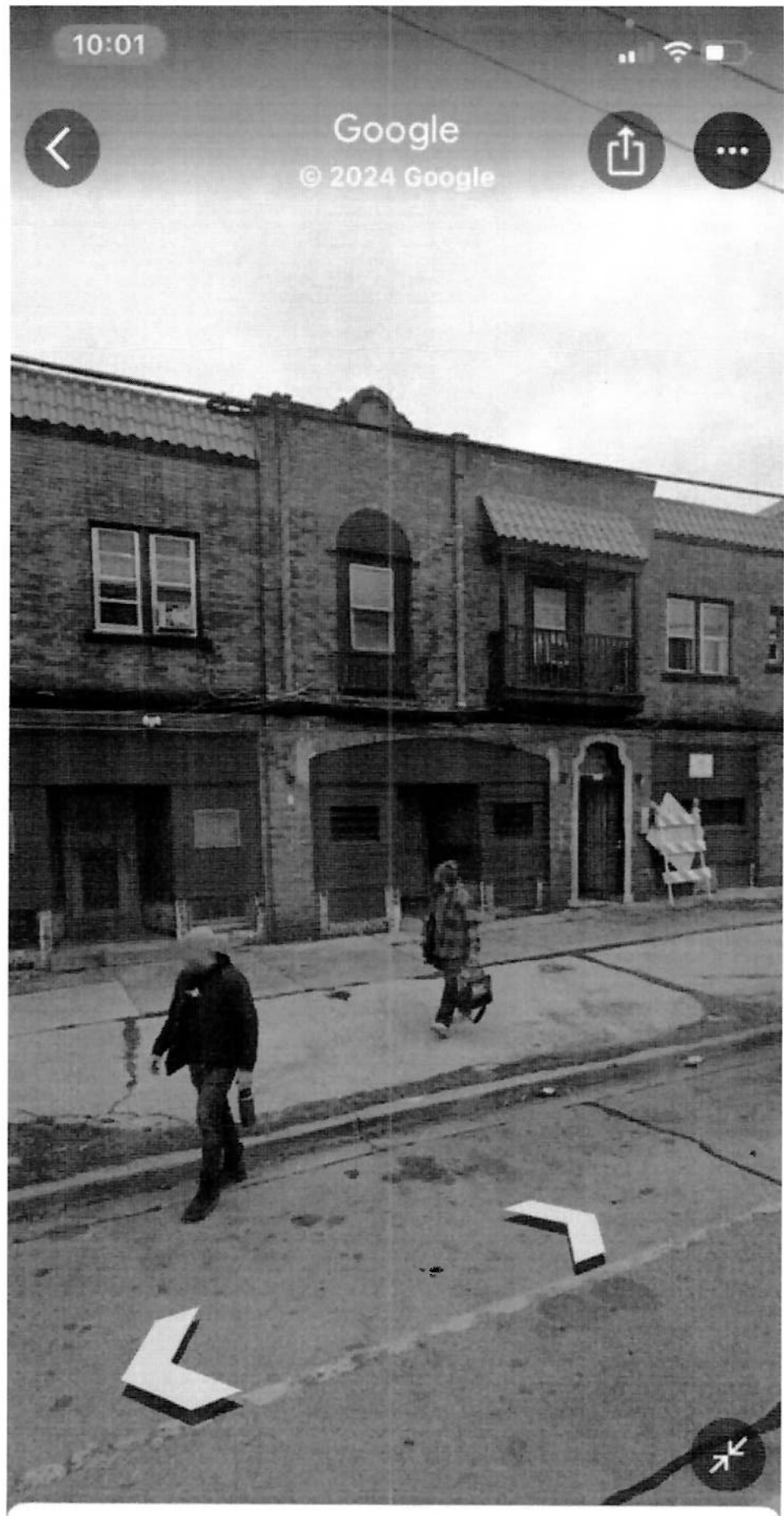
2460 W Hopkins St

1 year ago · See more dates >

10:01



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1301 W Atkinson Ave

1 year ago - See more dates >

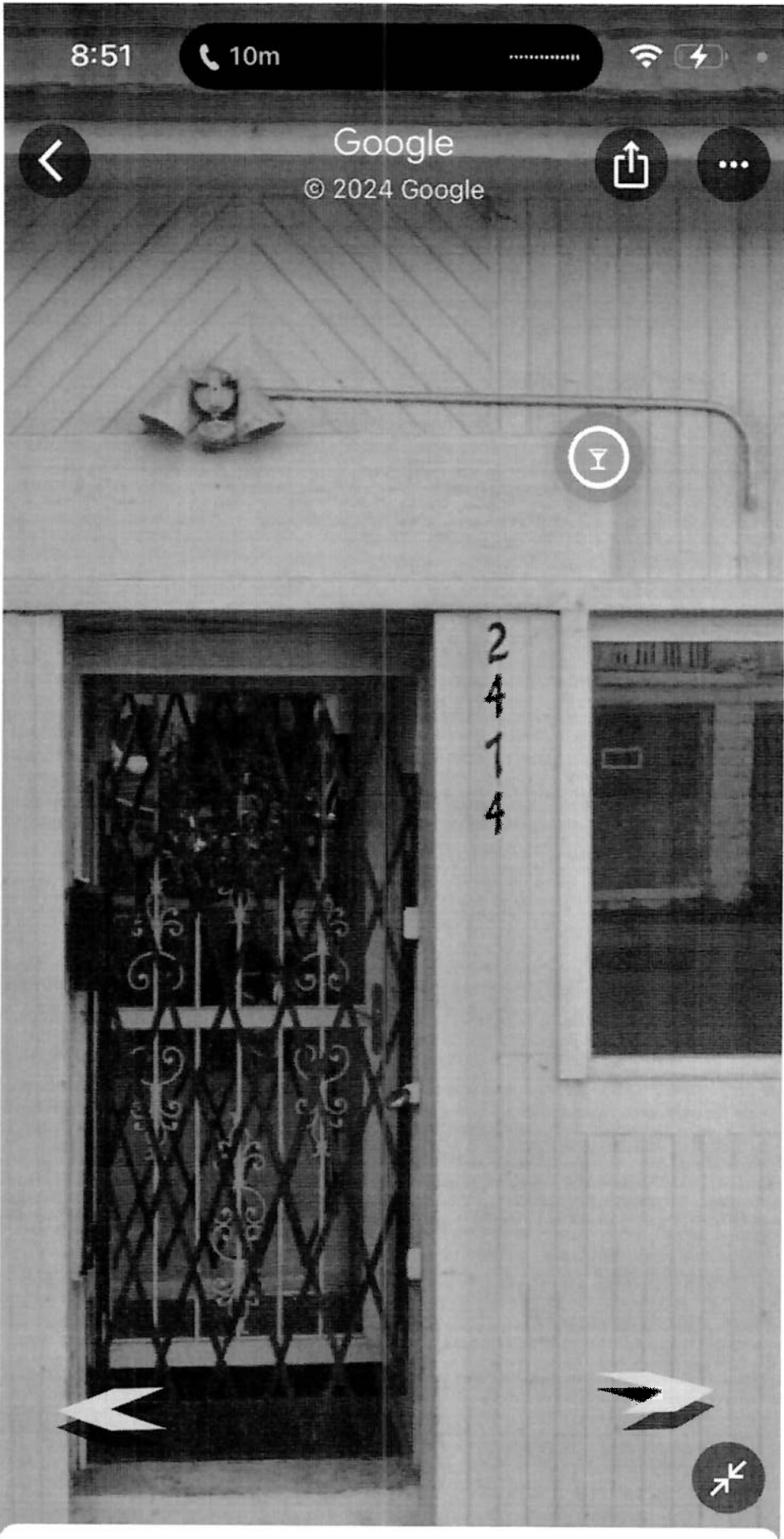
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10m



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2474 W Hopkins St

1 year ago · See more dates >