

Before The City of Milwaukee Election Commission

Miliele Coggs,
Complainant

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2024 JAN -8 A 10: 37
CITY OF MILWAUKEE
ELECTION COMMISSION

V.

Brandon Payton,
Respondent

I Brandon R Payton (respondent) respond to Complaint's complaint as follows:

Preliminary Objections

EL 2.07 (3) (a) provides:

The burden is on the Challenger to establish any efficiency. If the Challenger establishes that the information on the nomination paper is insufficient the burden is on the challenged candidate to establish its sufficiency. The invalidity or disqualification of one or more signatures on a nomination paper shall not affect the validity of any other signatures on that paper.

ANSWER

1. In the header of the following nomination papers where it acts for the 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 failing to place municipality at the bottom of the page next to their address of the following pages 22,23,34.

Answer Milwaukee is wrote in the section where the candidates municipality for voting purposes is being that there is no town or village of Milwaukee it's believed that the fact that Milwaukee's wrote in the box is sufficient, also for pages 22,23,34 The candidate is the circulator and what's municipality is stated in the header on the same nomination paper

Page 2: line 6 address is out of the district/may not exist.

Answer Agreed

Page 3: line 2/ line 6 address unclear/ address is a commercial business no one lives there
Twisters 508 West Center Street.

7.P. ~~PG~~ PG 1

Answer Address reads

3245 North 16th Street is legible and should be allowed/ Agreed

Page 7: line 7 and 9 is a tavern not a residence.

Answer Pictures supporting that there are four apartments above the tavern claim should be denied

Page 8: line 6 and 7 are signed by the same person.

Answer no evidence has been provided, and the respondent lacks knowledge or information sufficient to form belief as to the truth of the allegation and therefore denies

Page 10: lines 2 and 3 are signed by the same person line 6 illegible incomplete name.

Answer no evidence has been provided, and the respondent lacks knowledge or information sufficient to form belief as to the truth of the allegation and therefore denies

As to line 6 Elbert Jones is legible and claim should be denied

Page 11: line 1 illegible incomplete name

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

Answer line 1 Gaddis Stribling is legible and should be allowed

Line 7 address is 2319 West Capitol with a search of the web you would find out that the address coincides with a AODA treatment facility with residence having one address for that particular building no apartment numbers

Page 12: line 2 address out of the district and may not exist.

Answer Agreed

Page 16: line 10 address is out of the district and or illegible.

Answer 3359 North 8th Street is indeed legible and in the district claim should be denied

Page 17: line 8 address is illegible

Answer signer Mara Davis with the address 2654 North 4th Street is legible and claim should be denied

Page 18 line 9 address is illegible

Answer address 3216 N. Achilles is indeed legible and the claim should be denied

Page 22: lines 3 and 4 are signed by the same person
line 5 and 6 are signed by the same person

Answer no evidence has been provided, and the respondent lacks knowledge or information sufficient to form belief as to the truth of the allegation and therefore denies

Page 24: line 1 address illegible

Answer 3027 North 19th is legible and in district 6 and claim should be denied.

Page 25: line 3 address out of the district

Answer The original of nomination papers the name was scratched out before submitting nomination papers to W.E.C.

Page 28 line two address is inhibited

Answer video evidence that 1310 W. Atkinson is indeed habited.

Page 32: line 1 address is illegible

Answer The address 2718 / 2720 North Richards is legible and I have a notarized affidavit stating that the property is a duplex owned by the signee

Page 33/34: line 1 address does not exist

Answer sign notarized affidavit from the signee Charles Lampley

For the reasons outlined in my response, I have met the threshold for my name to be placed on the ballot, and I'll seek dismissal with prejudice of the Complaint's complaints and request for my disqualification from the April 2, 2024 spring election for District 6 Alderman

I Brandon Payton states that the above responses to the complaints allegations are true based on my personal knowledge and as to those stated on information and belief I believe them to be true.



1/8/24

I, Brandon R. Payton, certify that I personally read the attached complaint, and that the above allegations are true based on my personal knowledge and, as to those stated on information and believe, I believe them to be true.

Brandon R. Payton
(Signature of candidate)

STATE OF WISCONSIN

County of Milwaukee
(County where oath administered)

} ss.

Subscribed and sworn to before me this 8 day of January, 2024.

Deborah L. Craig
(Signature of person authorized to administer oaths)

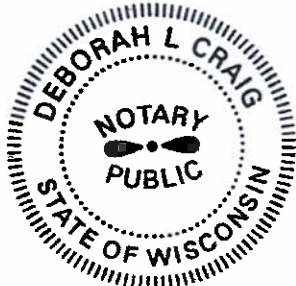
NOTARY SEAL
REQUIRED, IF OATH
ADMINISTERED BY
NOTARY PUBLIC

Notary Public or other official _____
(Official title, if not a notary)

If Notary Public: My commission expires 3/23/2027 or is permanent.

The information on this form is required by Wis. Stat. § 8.21, Art. XIII, Sec. 3, Wis. Const., and must be filed with the filing officer in order to have a candidate's name placed on the ballot. Wis. Stats. §§ 8.05 (1)(j), 8.10 (5), 8.15 (4)(b), 8.20 (6), 120.06 (6)(b), 887.01.

EL-162 | Rev. 2019-06 | Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984
608-266-8005 | web: elections.wi.gov | email: elections@wi.gov

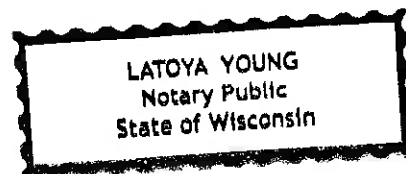


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ELECTION COMMISSION

I Tamika P. Toombs signed nomination papers supporting Brandon R Payton. My address is 3145 N. 8th street. I also signed for my brother Namon Toombs who's address is 3145 N. 8th street. He has a disability that prevents him from being able to write.

Tamika P. Toombs
Date 1-07-2024

I Latoya Young a Notary public for Milwaukee County State of Wisconsin, do hereby certify that Tamika Toombs personally appeared before me this day and acknowledge the due execution of the foregoing instrument. Witness my hand and official Seal, this 7th day of January 2024



I Carmelita Grace-Kennis signed nomination papers supporting Brandon R Payton. My address is 2718 & 2720 N. Richards St. Which is a duplex property that I own.

Sunday
Date 1/7/24 Carmelita Grace

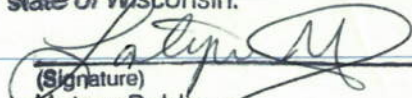
I LaToya Young a notary public for Milwaukee County and Wisconsin state do hereby certify that Carmelita Grace-Kennis personally appeared before me this day and acknowledged the due execution of the foregoing instrument. Witness my hand and official seal, this 7th day of January 2024.

LATOYA YOUNG
Notary Public
State of Wisconsin

I Charles Lampley live
at 2936 N. 19th street I signed
~~the~~ nomination papers supporting
Brandon Payton on 1/2/24 and
mistakenly wrote 2930 because the
pen I was using was running out
of Ink what looks like & is a 6.

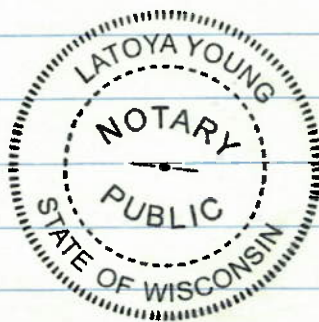
x Charles Lampley

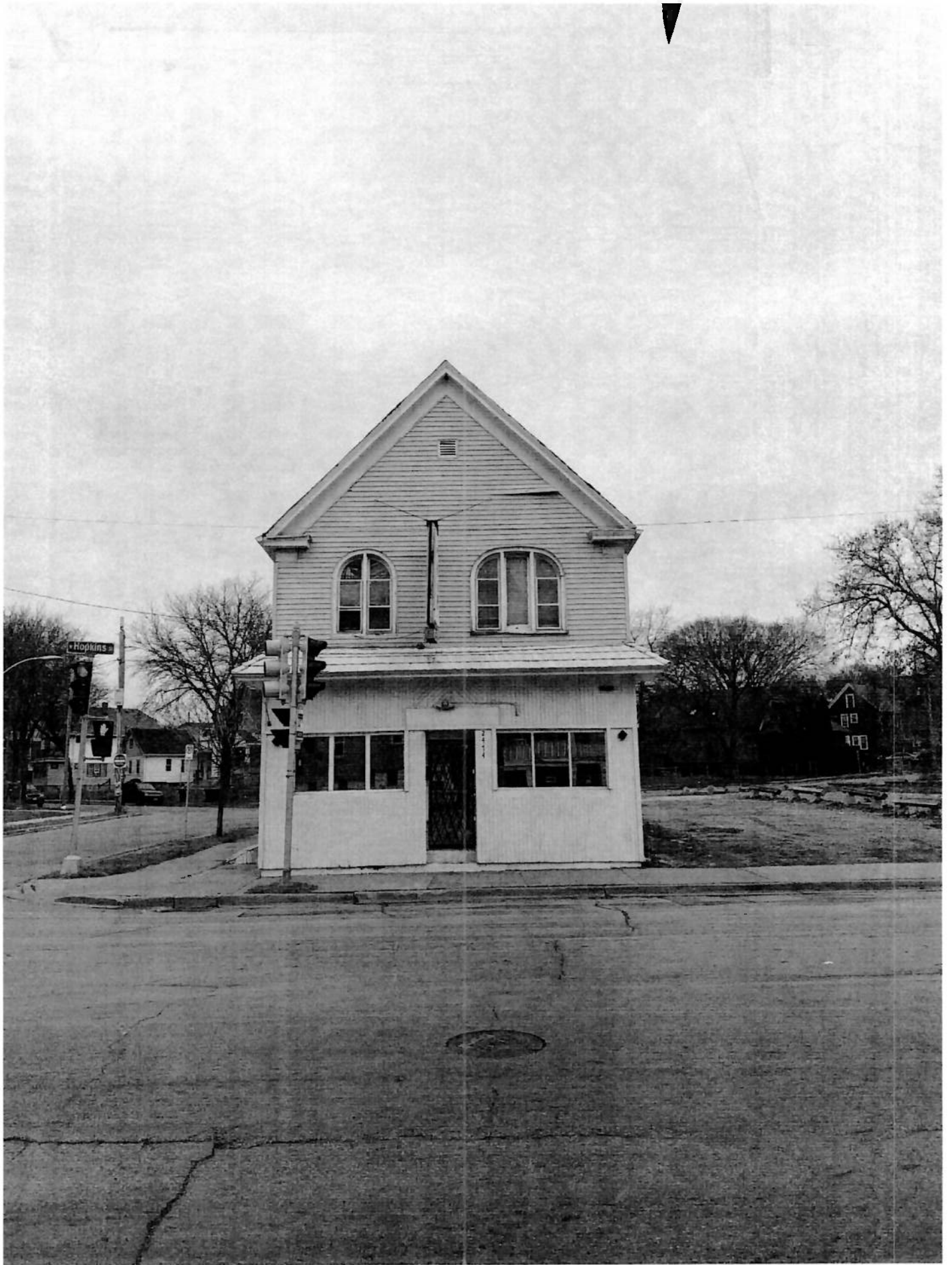
Subscribed and sworn to before me, i.
my presence, the 5th day of January
a Notary Public in and for the
state of Wisconsin.

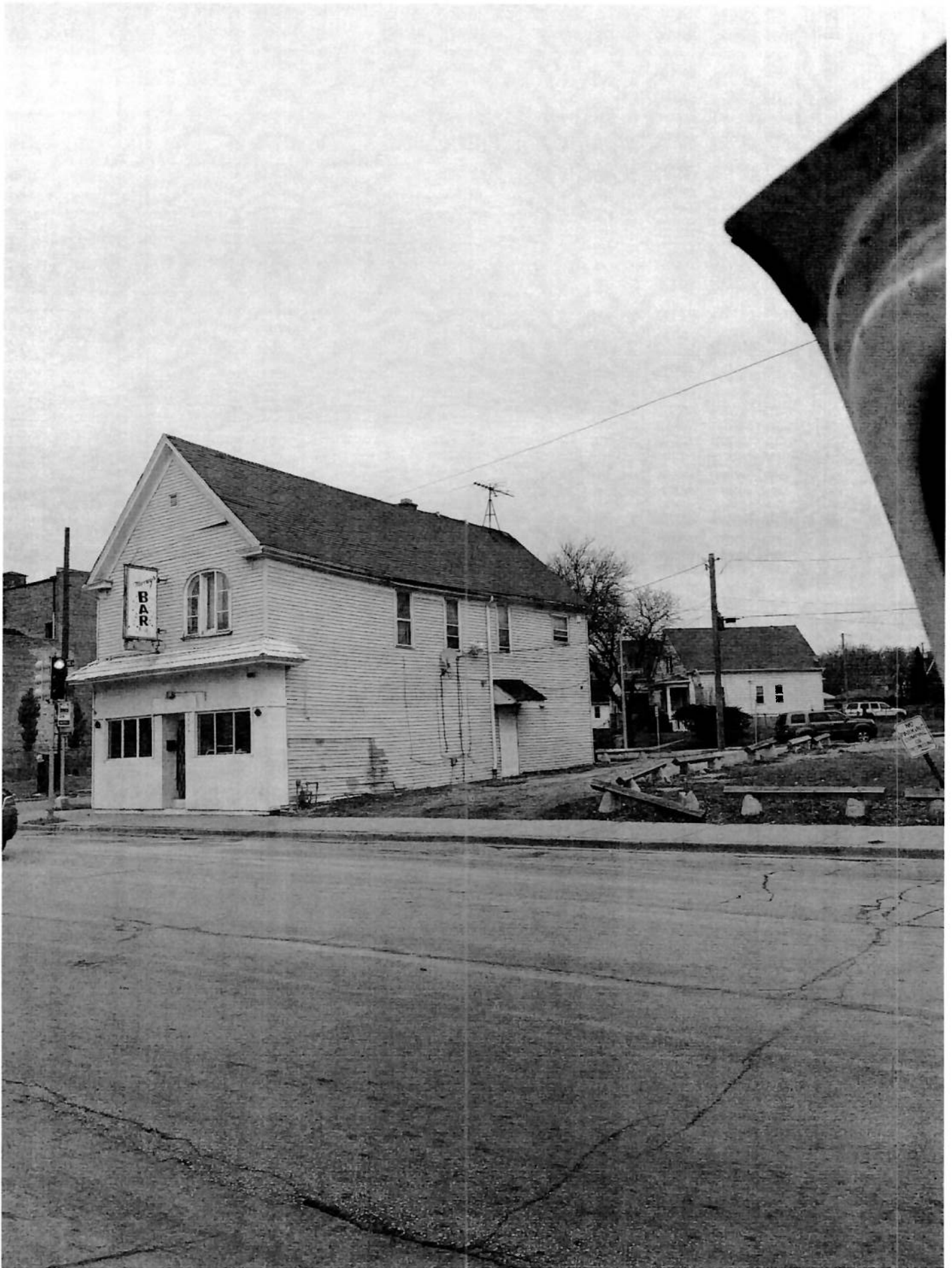


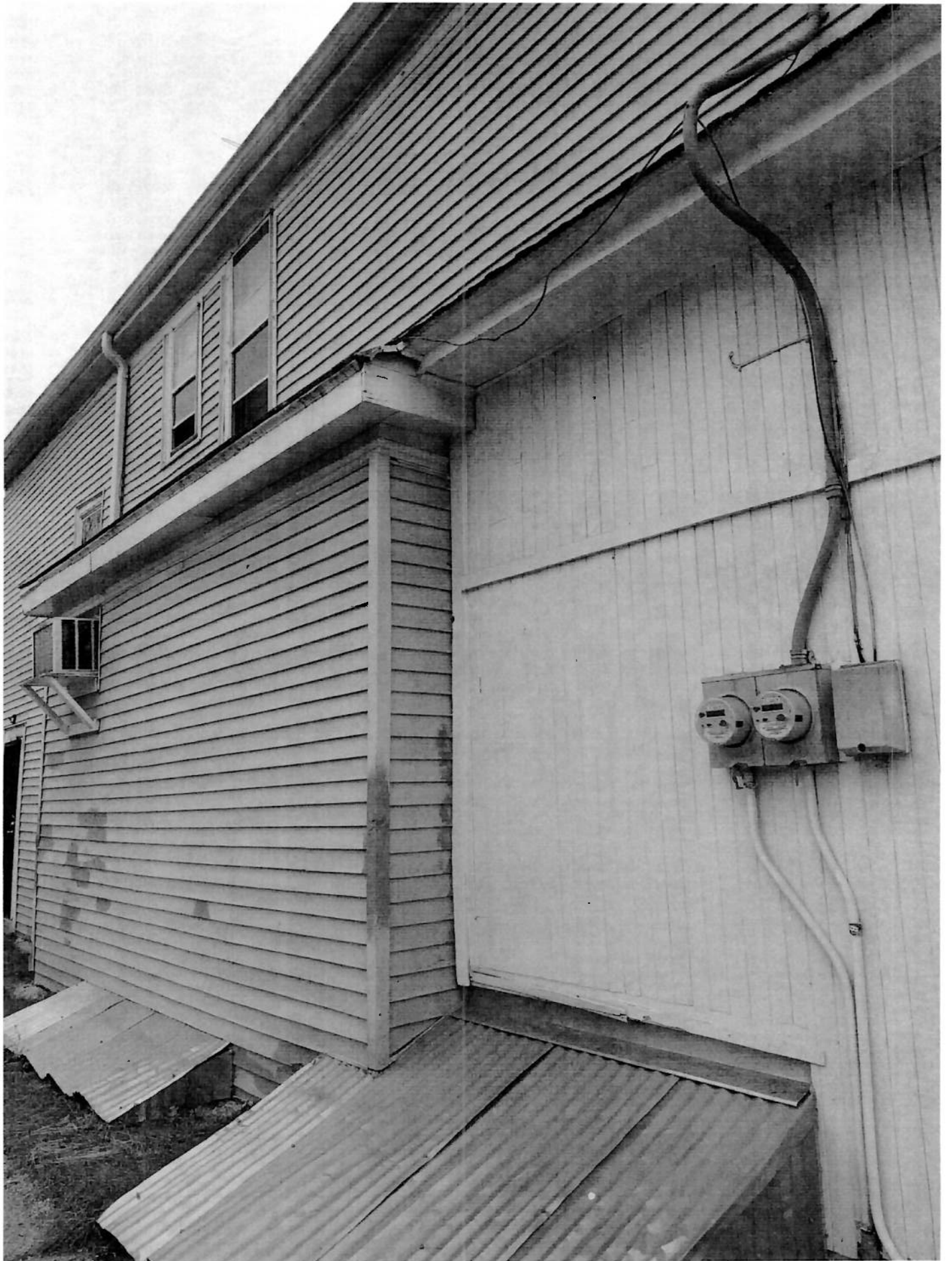
(Signature)
Notary Public

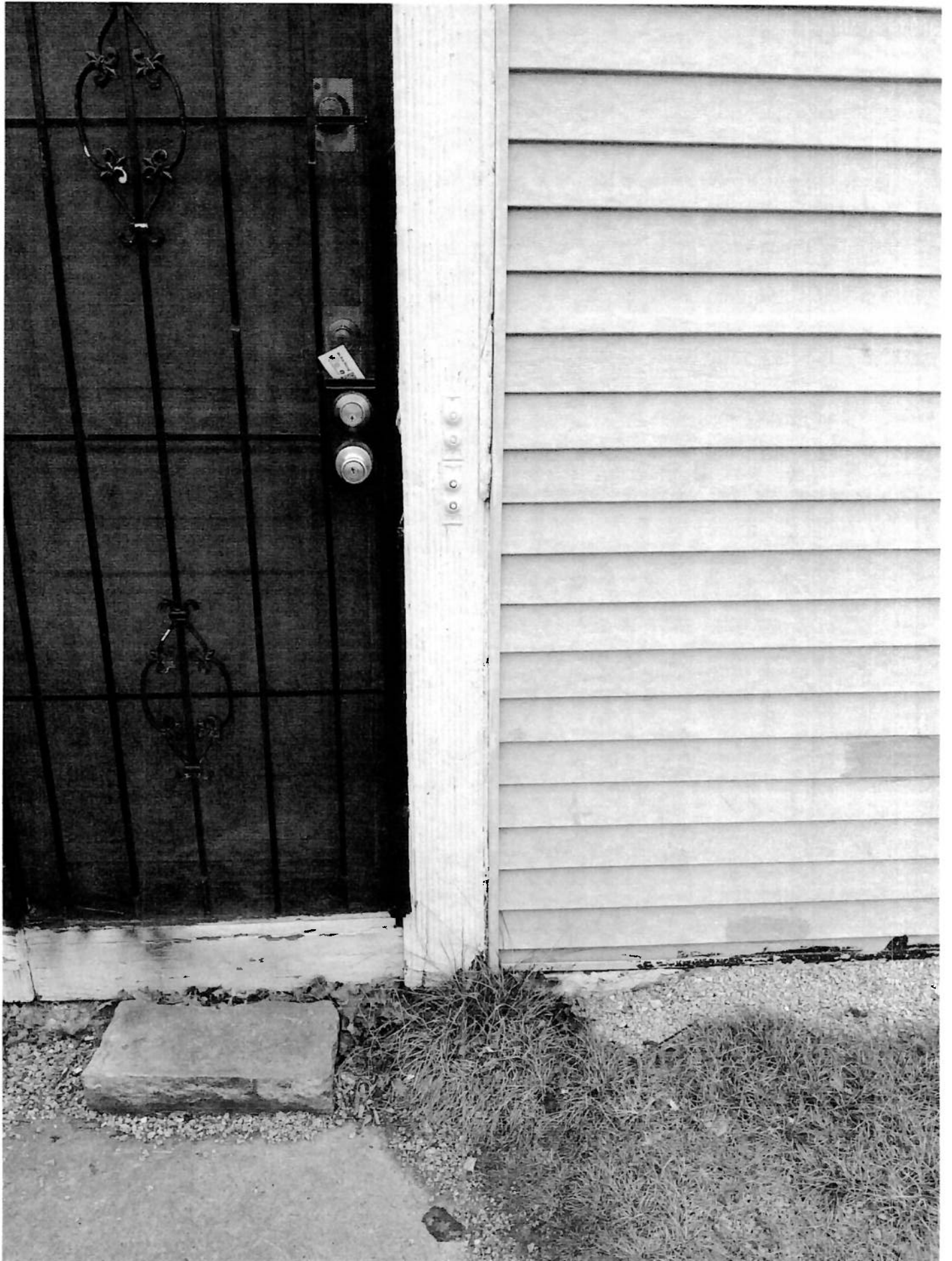
My commission expires 11-03-2025

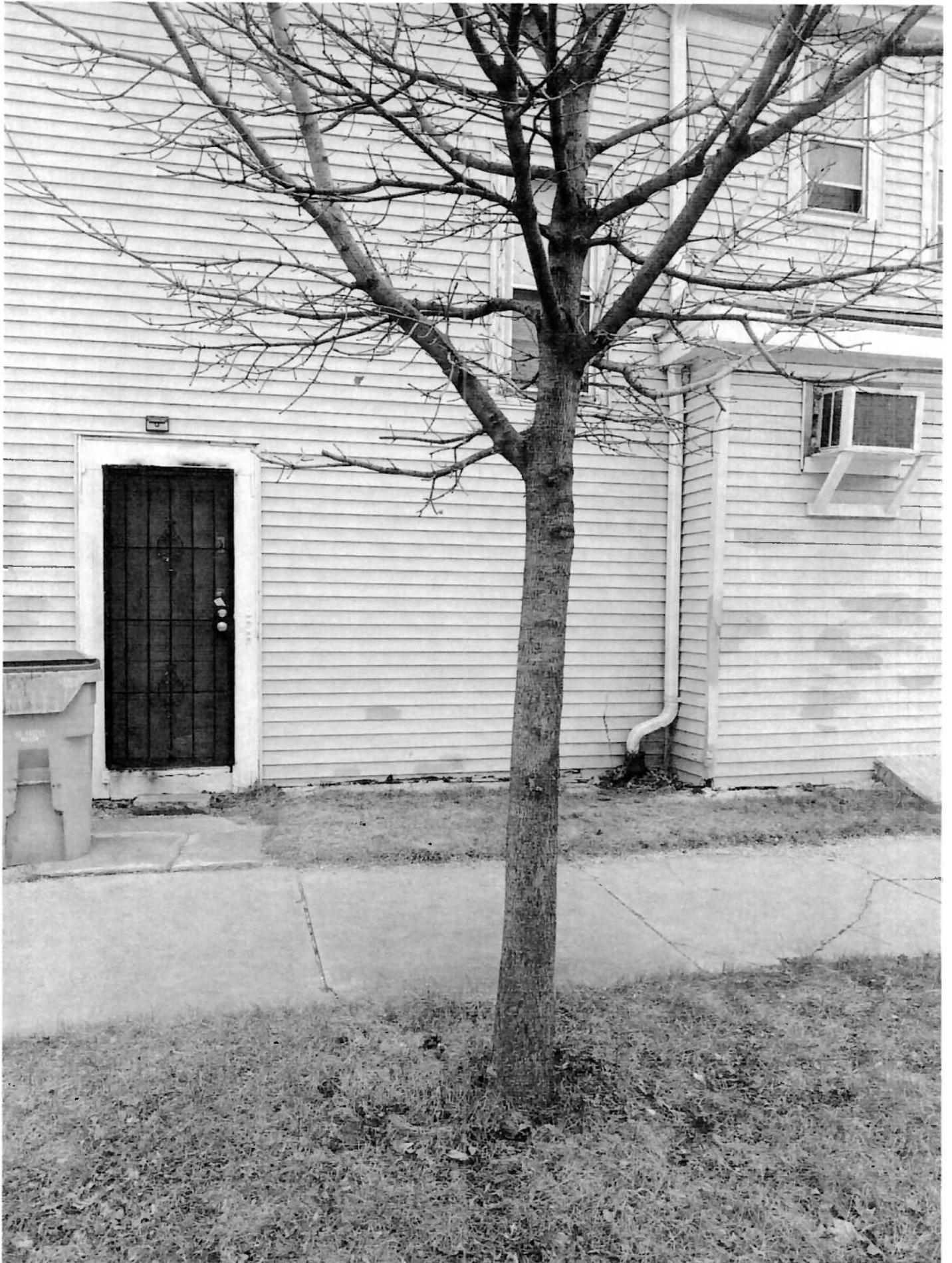












3359 N. 8th St

