

STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

IN THE MATTER of the Nomination Papers
Filed By Jim Sullivan with Respect to the
Spring Election for Milwaukee County
Executive

File No. _____

VERIFIED COMPLAINT OF Theodore A. Lipscomb, Sr

1. The Complainant, Theodore A. Lipscomb, Sr. (“Complainant”), is an elector of the City of Glendale and County of Milwaukee residing at 1104 West Montclair Avenue, Glendale, Wisconsin 53217.

2. The Respondent, Jim Sullivan (“Respondent”), is upon information and belief a candidate in the Spring 2020 Election for Milwaukee County Executive and whose address is listed as 2650 N. 72nd Street, Wauwatosa, Wisconsin 53213.

3. On or about January 7, 2020, Respondent filed with the Milwaukee County Election Commission (“Election Commission”) Nomination Papers for Non-Partisan Office for the position of Milwaukee County Executive. 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 11, 2019 through January 7, 2020.

5. Upon information and belief, the Respondent submitted two-thousand six hundred and ninety (2,690) signatures to the Election Commission.

6. Upon information and belief, the Election Commission verified two-thousand four hundred ninety-five (2,495) of Respondent's submitted signatures.

7. David Crowley ("Crowley") is upon information and belief a candidate in the Spring 2020 Election for Milwaukee County Executive and whose mailing address is listed as PO Box 18065, Milwaukee, Wisconsin 53218.

8. On or about January 7, 2020, Crowley filed with the Milwaukee County Election Commission ("Election Commission") Nomination Papers for Non-Partisan Office for the position of Milwaukee County Executive.

6. Upon information and belief, Crowley's Nomination papers were allegedly circulated between December 1, 2019 through January 3, 2020.

CHALLENGES TO CIRCULATOR INFORMATION

6. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.

7. Wis. Stats. Sec. 8.04 provides:

Nomination paper signatures. If any person signs nomination papers for 2 candidates for the same office in the same election at different times, the earlier signature is valid and the later signature is invalid. **If any person circulates a nomination paper for 2 candidates for the same office in the same election at different times, the earlier paper is valid and the later paper is invalid.** [Emphasis added]

Wis. Stats. Sec. 8.04

8. That Crowley and Respondent used many of the identical persons to circulate their respective nomination papers for the Spring 2020 Election for Milwaukee County Executive.

9. That pursuant to Wis. Stats. Sec. 8.04, the below Nomination Pages of Respondent shall be invalidated in their entirety:

Crowley

Circulator Name: Alisha Pettis

Circulator Address:

2438A N 54th Street,

Milwaukee, WI 53210

Nomination Page #: 43

Date: 12/19/2019

Respondent

Circulator Name: Alisha Pettis

Circulator Address:

2438A N 54th Street

Milwaukee, WI 53210

Nomination Page(s) # and Date:

Page(s) #:

61, 119, 120, 161, 165, 166, 170, 171,
172, 173, 174, 175, 176, and 177

Each Dated: 12/28/2019

Page(s) #: 69 and 126

Each Dated: 12/29/2019

Page(s) #: 54, 62, 77, 78, 101, 102,
109, 114, 115, 257, and 258

Each Dated: 12/30/2019

Page(s) #: 133, 139, 239, 244, 251,
253, 255, and 259

Each Dated: 12/31/2019

Page(s) #: 241, 242, 243, 245, 246,
247, 248, 254, 256 and 260

Each Dated: 1/1/2020

Page(s) #: 87, 140, 147, 148, 149,
234, 235, 236, 237, 238, and 252

Each Dated: 1/2/2020

Page #: 132

Dated: 1/5/2020

Page(s) #: 43, 44, 51

Each Dated: 1/6/2020

Crowley

Circulator Name: Lesa Trotter

Circulator Address:

4305 N 18th Street, Milwaukee, WI 53209

Nomination Page #: 69

Page Dated: 12/16/2019

Respondent

Circulator Name: Lesa Trotter

Circulator Address:

4305 N 18th Street, Milwaukee, WI 53209

Nomination Page(s) # and Date:

Pages: 76, 142, 143, 180, 181, 182, 183,
184, 185, 186, 187, 188, 192, 193, 194,
195, 197, 198, and 199

Each Dated: 12/29/2019

Pages: 196

Dated: 1/1/2019 [sic]

Pages: 106, 107, 112, 155, 156, 157, 211,
212, 213, 216, 217, 218, and 219

Each Dated: 1/4/2020

Pages: 169, 214, and 215

Dated: 1/5/2020

Crowley

Circulator Name: Keith Pettis
Circulator Address:
3745 N. 39th Street, Milwaukee 53216
Nomination Page #: 233
Date: 12/16/2019

Crowley

Circulator Name:
Dominique Thomas
Circulator Address:
2878 N 26th Street, Milwaukee 53206
Nomination Page #: 24
Date: 12/16/2019

Respondent

Circulator Name: Keith Pettis
Circulator Address:
3745 N. 39th Street, Milwaukee 53216
Nomination Page(s) # and Date(s):
Page(s): 178 and 179
Each Dated: 12/28/2019
Pages: 150 and 151
Each Dated: 12/29/2019
Pages: 28, 29, 30, 31, 32, 33, 34, 35,
36, 37, 72, 108, and 249
Each Dated: 12/30/2019

Respondent

Circulator Name:
Dominique Thomas
Circulator Address:
2878 N 26th Street, Milwaukee 53206
Nomination Page(s) # and Date(s):
Page(s): 40, 49, 50, and 80
Each Dated: 12/30/2019
Page: 53
Dated: 12/31/2019
Page(s): 163, 164, and 168
Each Dated: 01/04/2020
Page(s): 52, 59, 60, 70, 71 and 82
Each Dated: 1/5/2020

CONCLUSION

10. Accordingly, Respondent has not submitted a sufficient number of signatures to be placed on the ballot for the Spring Election for the Non-Partisan Office for the position of Milwaukee County Executive.

11. 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. *See Exhibit C, Affidavit of Mailing.*

WHEREFORE, Complainant respectfully requests that the Milwaukee County Election Commission 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 10th day of January 2020.

By: Theodore A. Lipscomb

Complainant
1104 West Montclair Avenue
Glendale, WI 53217
theo@votersforlipscomb.com
414-350-0609

VERIFICATION

Theodore A. Lipscomb, Sr., being first duly sworn, on oath, deposes and says as follows:

1. That he is an elector and a resident of Milwaukee County, Wisconsin.
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.

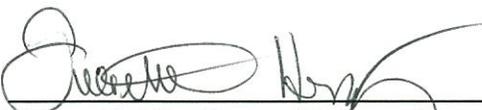
Dated at Milwaukee, Wisconsin this 10th day of January 2020



Theodore A. Lipscomb, Sr.

Complainant

Subscribed and Sworn to before
me this 10th day of January 2020.



Notary Public, State of Wisconsin
My Commission Is Permanent.

9.22.2020



EXHIBIT A

Complaint by Theodore Lipscomb in Matter of Nomination Papers of Jim Sullivan
NOMINATION PAPER FOR NON-PARTISAN OFFICE

I, the undersigned, request that the name of

Jim Sullivan

Residing at 2650 N 72nd Street, Wauwatosa, WI 53213, be placed on the ballot at the spring election to be held on April 7, 2020 so that voters will have the opportunity to vote for him for the office of

Milwaukee County Executive



10

JIM SULLIVAN
MILWAUKEE COUNTY EXECUTIVE

I am eligible to vote in Milwaukee County. 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 the municipality of residence, is not sufficient. The name of the municipality of residence must always be listed.

Signatures of Electors	Print Name	Street & Number	Municipality of Residence	Zip Code	Date of Signing	Telephone/Email
<i>Liz Haynes</i>	Laire Haynes	3530 N 57th	Milwaukee		12/30 /2019	
<i>Paul</i>	Janice Carter	5757 N 92	Milwaukee		12/30 /2019	
<i>Paul</i>	Al West	2867 N 76th	Milwaukee		12/30 /2019	
<i>Octavia Hank</i>	Octavia Hank	3033 N 76th	Milwaukee		12/30 /2019	
<i>Veronica Riley</i>	Veronica Riley	4167 N. 84th	Milwaukee		12/30 /2019	
<i>Adrian Buck</i>	Adrian Buck	3431 N. 8th	Milwaukee		12/30 /2019	
<i>Gary Heaggar</i>	Gary Heaggar	7602 W. Melvina St.	Milwaukee		12/30 /2019	
<i>Linda R Hines</i>	Linda R Hines	5049A N 41st	Milwaukee		12/30 /2019	
<i>Johnny Hall Jr</i>	Johnny HALL JR	5049A N 41st	Milwaukee		12/30 /2019	
<i>Adrian Kelley</i>	ADRIAN C KELLE	5049A N 41st	Milwaukee		12/30 /2019	

CERTIFICATION OF CIRCULATOR

Dominique Thomas
(Name of Circulator)

certify: I reside at 2878 N 20th St Milwaukee, WI 53206
(Circulator's residence - 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. §6.03. 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(3)(a).

12/30/19, 2019
(Date)

Dominique Thomas
(Signature of Circulator)