

STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

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

File No. \_\_\_\_\_

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**VERIFIED RESPONSE OF JIM SULLIVAN**

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In response to the Verified Complaint of Theodore A. Lipscomb, Sr. ("Complaint"), Jim Sullivan asserts that the Complaint is without basis, such that the relief it seeks should be denied. For the reasons herein, Mr. Sullivan should be included on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. The Complaint focuses on the actions of four individuals who circulated nomination papers for Mr. Sullivan to appear on the ballot. It alleges that those individuals also circulated nomination papers for other candidates to appear on the same ballot for the same office. As established by their affidavits attached to this Verified Response, those four individuals did not know that circulating nomination papers for multiple candidates is inconsistent with the processes directed by Wisconsin law. Nor did either Mr. Sullivan or his campaign know or have reason to know that any of these individuals were circulating nomination papers for other candidates. In light of these facts, which definitively establish a good-faith error and the absence of any fraudulent intent, the Complaint should be denied and Jim Sullivan should be included on the ballot.

## RELEVANT FACTS

1. Respondent Jim Sullivan is an elector of Milwaukee County. He resides at 2650 N. 72nd Street in Wauwatosa, Wisconsin 53213.

2. Mr. Sullivan has a long record of public service. Beginning in 2000, he served as an alder on the Wauwatosa Common Council. He served in that role until joining the Wisconsin State Senate, where he served as the elected representative of the Fifth Senate District from 2007 to 2011. Since leaving the State Senate, Mr. Sullivan has served as Director of Milwaukee County Child Support Services.

3. Jim Sullivan is a candidate for Milwaukee County Executive in the nonpartisan spring 2020 election. The Sullivan campaign filed its nominating papers with the Milwaukee County Election Commission (“the Commission”) on January 7, 2020. (Williams Aff., ¶5)

4. Those nominating papers included 2,690 signatures of Milwaukee County electors seeking Jim Sullivan’s inclusion on the ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (Williams Aff., ¶5) The Commission subsequently validated at least 2,397 of those elector signatures. This exceeds, by a significant margin, the threshold of 2,000 signatures for inclusion on the ballot.

5. The 2,690 elector signatures submitted by the Sullivan campaign span 265 pages of nominating papers. (See Williams Aff., ¶5 & Ex. A) No fewer than 32 different individuals each circulated at least one page of those nominating papers. (See Williams Aff., ¶6 & Ex. A)

6. The Complaint focuses on only four of those individuals—Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas. (Complaint, ¶9) It argues that the Commission should disallow the pages of the Sullivan campaign’s nominating papers circulated by Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas. (Complaint, ¶9) Those pages contain a total of 1,101 validated signatures, fewer than half of the validated signatures submitted by the Sullivan campaign. (*See Williams Aff.*, ¶6 & Ex. A) The Complaint does not challenge, and therefore concedes, that the 1,101 signatures it seeks to remove were provided by qualified electors who correctly completed the nomination process.

7. All four of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas were paid canvassers who collected elector signatures on nominating papers for the Sullivan campaign. (A. Pettis Aff., ¶4; Trotter Aff., ¶4; K. Pettis Aff., ¶4; Thomas Aff., ¶4) Campaigns routinely pay canvassers to collect signatures on nominating papers. (*Williams Aff.*, ¶7)

8. The Sullivan campaign hired the canvassers through a vendor, Simon Warren, who in turn subcontracted with Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas. (*Williams Aff.*, ¶8) Simon Warren expressly assured the Sullivan campaign, in response to a direct question asked before he was retained, that Jim Sullivan was the only candidate for County Executive on whose behalf he and his subcontractors were circulating nominating papers. (*Williams Aff.*, ¶9)

9. Notwithstanding these assurances, Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas also collected signatures on nominating papers for other candidates seeking inclusion on the ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (A. Pettis Aff., ¶5; Trotter Aff., ¶5; K. Pettis Aff., ¶5; Thomas Aff., ¶5)

10. In doing so, none of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas knew that circulating nomination papers for multiple candidates is inconsistent with the processes directed by Wisconsin law. (A. Pettis Aff., ¶6; Trotter Aff., ¶6; K. Pettis Aff., ¶6; Thomas Aff., ¶6)

11. The Sullivan campaign also asked each of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas if they had circulated nomination papers for other candidates for Milwaukee County Executive. (A. Pettis Aff., ¶7; Trotter Aff., ¶7; K. Pettis Aff., ¶7; Thomas Aff., ¶7) Each of them asserted that they had not. (A. Pettis Aff., ¶7; Trotter Aff., ¶7; K. Pettis Aff., ¶7; Thomas Aff., ¶7) None of them understood the legal significance of the question. (A. Pettis Aff., ¶7; Trotter Aff., ¶7; K. Pettis Aff., ¶7; Thomas Aff., ¶7)

12. None of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas had any intention to harm the Sullivan campaign, to harm the campaign of any other candidate for Milwaukee County Executive, or to conduct themselves in a way inconsistent with the process directed by Wisconsin law. (A. Pettis Aff., ¶8; Trotter Aff., ¶8; K. Pettis Aff., ¶8; Thomas Aff., ¶8) None of them intended to interfere with any

campaign or with the election process more broadly. (A. Pettis Aff., ¶9; Trotter Aff., ¶9; K. Pettis Aff., ¶9; Thomas Aff., ¶9)

13. Neither Jim Sullivan nor the Sullivan campaign had any intent to stray from the Wisconsin's election procedures in any way. (Williams Aff., ¶11)

14. Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas recognize that it would be unfair to respond to their errors by imposing penalties upon any campaign, including the Sullivan campaign. (A. Pettis Aff., ¶10; Trotter Aff., ¶10; K. Pettis Aff., ¶10; Thomas Aff., ¶10)

15. Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas also recognize that it would be unfair to respond to their errors by denying the intent of the electors who signed the nomination papers they circulated in support of placing Jim Sullivan's name on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (A. Pettis Aff., ¶11; Trotter Aff., ¶11; K. Pettis Aff., ¶11; Thomas Aff., ¶11)

### **GOVERNING LEGAL PRINCIPLES**

The Legislature has clearly expressed that Wisconsin election law, in chapters 5 through 12 of the Wisconsin Statutes, "shall be construed to give effect to the will of the electors, if that can be ascertained from the proceedings, notwithstanding informality or failure to fully comply with some of their provisions." Wis. Stat. § 5.01(1).

In accord with section 5.01(1), Wisconsin courts have consistently and repeatedly held that election statutes are directory, rather than mandatory. *See, e.g., In re Chairman*

*in Town of Worcester (Gradinjan v. Boho)*, 29 Wis. 2d 674, 682, 139 N.W.2d 557 (1966) (citing cases in support of assertion that, “[i]n keeping with sec. 5.011, Stats. [a forerunner of today’s § 5.01(1)], this court has quite consistently construed the provisions of election statutes as directory rather than mandatory so as to preserve the will of the elector”); *Pet. of Anderson (Anderson v. Budzien)*, 12 Wis. 2d 530, 533, 107 N.W.2d 496 (1961) (“Throughout the statutes with reference to elections the intent of the legislature is apparent. It is to encourage and assist qualified electors to cast their ballots for candidates of their choice.”); *State ex rel. Bancroft v. Stumpf*, 21 Wis. 586 [\*579], 587-88 [\*580–\*81] (1867) (holding that, where municipality had only two rather than three election directors, “the irregularity did not vitiate the election, because the statutory regulations for conducting an election are directory and not jurisdictional in their character; the main object of such laws being to afford all persons entitled to vote an opportunity to exercise the elective franchise, to prevent illegal votes, and to ascertain with certainty the true number of votes cast, and for whom”).

“The difference between mandatory and directory provisions of election statutes lies in the consequence of non-observance: An act done in violation of a mandatory provision is void, whereas an act done in violation of a directory provision, while improper, may nevertheless be valid.” *Olson v. Lindberg*, 2 Wis. 2d 229, 235, 85 N.W.2d 775 (1957) (quoting 29 C.J.S. Elections § 214). “Statutes giving directions as to the mode and manner of conducting elections will be construed by the courts as directory, unless a noncompliance with their terms is expressly declared to be fatal, or will change or render

doubtful the result.” *Id.* Where, however, the Legislature has not included an express and clear command, “the statutes should be construed as directory.” *Matter of Hayden (Johnson v. Hayden)*, 105 Wis. 2d 468, 483, 313 N.W.2d 869 (Ct. App. 1981). “A statute which merely provides that certain things shall be done in a given manner and time without declaring that conformity to such provisions is essential to the validity of the election should be construed as directory.” *Roth v. La Farge Sch. Dist. Bd. of Canvassers*, 2001 WI App 221, ¶27, 247 Wis. 2d 708, 634 N.W.2d 882 (quoting *Hayden*, 105 Wis. 2d at 483).

Wisconsin courts have “consistently sought to preserve the will of the electors by construing election provisions as directory if there has been substantial compliance with their terms.” *Roth*, 2001 WI App 221, ¶27 (quoting *McNally v. Tollander*, 100 Wis. 2d 490, 497, 302 N.W.2d 440 (1981)). “Strict compliance with a directory statute is not required.” *Hayden*, 105 Wis. 2d at 483 (citing *Pet. of Anderson*, 12 Wis. 2d at 534). For this reason, “[d]eviations from directory provisions of election statutes are usually termed ‘irregularities,’ and... do not vitiate an election.” *Olson*, 2 Wis. 2d at 235.

In *Lanser v. Koconis*, the Supreme Court noted that it is “fully cognizant of possible abuses of the absentee voter’s law and share[s] the concern of the legislature in preventing any such abuse.” 62 Wis. 2d 86, 93, 214 N.W.2d 425 (1974). But, the Court held, without “evidence of any fraud, connivance, or attempted undue influence,” there is no basis “to disenfranchise these voters who acted in conformance with the statutory requirements.” *Id.* Accordingly, when faced with “purely technical” complaints,

Wisconsin courts seek “to fulfil[1] the spirit of our election law,” construing statutory provisions as “directory only” and accepting “substantial compliance therewith.” *Sommerfeld v. Bd. of Canvassers*, 269 Wis. 299, 304, 69 N.W. 2d 235 (1955).

Section 8.04 of the Wisconsin Statutes sets out two principles. First, no elector may sign nomination papers for multiple candidates seeking the same office in the same election. Second, no person may circulate nominating papers for multiple candidates seeking the same office in the same election. Section 8.04 contains no language—much less an express declaration—that would support construing the provision as mandatory rather than directory. *Cf. Sommerfeld*, 269 Wis. at 303 (holding that, in context of election statutes, “the word ‘shall’ can be construed to mean ‘may’”).

## ARGUMENT

### I. The Complaint Should Be Denied.

#### A. The statutory provision on which the Complaint rests should be construed as directory, rather than mandatory.

In accord with Wis. Stat. § 5.01(1) and more than 150 years of Wisconsin Supreme Court precedent, the provisions of Wis. Stat. § 8.04 should be applied in a directory, rather than a mandatory, manner. Those provisions are “purely technical.” *Sommerfeld*, 269 Wis. at 304. Nothing in the provisions suggests, much less “expressly declare[s],” that “noncompliance” is “fatal, or will change or render doubtful the result.” *Olson*, 2 Wis. 2d at 235 (quoting 29 C.J.S. Elections § 214).

Section 8.04 stands in stark contrast to section 9.01 (governing recounts), which the Supreme Court held to be mandatory in *State ex rel. Shroble v. Prusener*, 185 Wis. 2d



102, 517 N.W.2d 169 (1994). But section 9.01 deals with the process for seeking a recount of election results, and it expressly asserts that the process set forth is exclusive. *See* Wis. Stat. § 9.01(11) (“EXCLUSIVE REMEDY”); *Shroble*, 185 Wis. 2d at 112-13 (reversing court of appeals’ decision that process set forth in section 9.01 was directory because the statute “plainly and unambiguously provides the exclusive remedy for Shroble to challenge the alleged canvassing error”).

Section 8.04 is a directory statute, because it provides a textbook example of an election statute that “merely provides that certain things shall be done in a given manner and time without declaring that conformity to such provisions is essential to the validity of the election.” *Roth*, 2001 WI App. 221, ¶27. It follows that, without “evidence of any fraud, connivance, or attempted undue influence” there is no basis “to disenfranchise these voters who acted in conformance with the statutory requirements.” *Lanser*, 62 Wis. 2d at 93.

The vast majority of case law construing election statutes as directory involves procedures relating to absentee ballots. *See, e.g., In re Chairman in Town of Worcester*, 29 Wis. 2d at 682 (citing cases). That is, those were cases about how stringently to apply provisions that would, if enforced, disqualify the votes of individual electors, where the contested votes at issue could tip the election result. In those instances, courts have “consistently sought to preserve the will of the electors by construing election provisions as directory if there has been substantial compliance with their terms.” *Roth*, 2001 WI App 221, ¶27 (quoting *McNally*, 100 Wis. 2d at 497). This long-standing, consistently

applied practice comports with the law’s emphasis on “giv[ing] effect to the will of the electors, if that can be ascertained from the proceedings, notwithstanding informality or failure to fully comply with some of their provisions.” Wis. Stat. § 5.01(1).

Here, these principles strongly militate in favor of construing section 8.04 as a directory statute. To do otherwise—to credit the argument set forth in the Complaint—would override the will of each and every one of the at least 2,397 electors who validly signed nomination papers to include Jim Sullivan on the ballot. That would contradict not only more than 150 years of Wisconsin precedent and section 5.01(1), which asserts the fundamental premise of elections in this state, but also common sense.

**B. Because there is no evidence of fraud here, the Complaint should be denied.**

Here, there is not even a hint of “of any fraud, connivance, or attempted undue influence.” *Lenser*, 62 Wis. 2d at 93. To the contrary, the Sullivan campaign took affirmative steps to ensure that its paid canvassers were not circulating nominating papers for any other candidates seeking be included on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (Williams Aff., ¶9; A. Pettis Aff., ¶7; Trotter Aff., ¶7; K. Pettis Aff., ¶7; Thomas Aff., ¶7) Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas all assured the Sullivan campaign that they were not circulating nominating papers for any other candidates seeking be included on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (A. Pettis Aff., ¶7; Trotter Aff., ¶7; K. Pettis Aff., ¶7; Thomas Aff., ¶7) In making these assurances to the Sullivan campaign, none of Alisha Pettis, Lesa Trotter, Keith Pettis, and

Dominique Thomas understood the legal significance of the question, had any intention to harm the Sullivan campaign or the campaign of any other candidate for Milwaukee County Executive, to conduct themselves in a way inconsistent with the process directed by Wisconsin law, or to interfere with the election process. (A. Pettis Aff., ¶¶7-9; Trotter Aff., ¶¶7-9; K. Pettis Aff., ¶¶7-9; Thomas Aff., ¶¶7-9) Nor did Jim Sullivan or the Sullivan campaign have any intent to stray from Wisconsin's election procedures in any way. (Williams Aff., ¶11) Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas recognize that it would be unfair to respond to their errors by imposing penalties upon any campaign, including the Sullivan campaign. (A. Pettis Aff., ¶10; Trotter Aff., ¶10; K. Pettis Aff., ¶10; Thomas Aff., ¶10)

**C. Applying the statutory provision as the Complaint suggests would undermine the will of every elector who signed Jim Sullivan's nominating papers.**

Wisconsin election law "shall be construed to give effect to the will of the electors, if that can be ascertained from the proceedings, notwithstanding informality or failure to fully comply with some of their provisions." Wis. Stat. § 5.01(1). In the present circumstances, conforming with that long-standing, consistently applied principle requires dismissing the Complaint. At least 2,397 Milwaukee County electors validly signed nominating papers to include Jim Sullivan on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. Their will should be respected.

The Complaint seeks to override all of their wishes by excluding Mr. Sullivan from the ballot, even though none of those electors violated the election procedure or had any way of knowing that some of them were signing nominating papers that were

circulated by a canvasser who had also circulated nominating papers for another candidate (or that such a practice would be inconsistent with Wisconsin election procedures). For this reason, Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas recognize that it would be unfair to respond to their errors by denying the intent of the electors who signed the nomination papers they circulated in support of placing Jim Sullivan's name on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive. (A. Pettis Aff., ¶11; Trotter Aff., ¶11; K. Pettis Aff., ¶11; Thomas Aff., ¶11)


Were the Commission to hold the errors of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas against the electors who signed nominating papers to include Jim Sullivan's name on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive, it would not only disenfranchise the 1,101 electors who signed nominating papers circulated by those four canvassers, but also the remaining electors—at least 1,296 of them—who signed nominating papers that were completed in full compliance with the procedures set forth in section 8.04.

### **CONCLUSION**

For the reasons state above, the Complaint should be denied and Jim Sullivan should be included on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive.

January 13, 2020

STAFFORD ROSENBAUM LLP

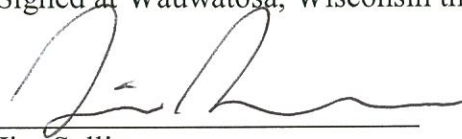
By   
Jeffrey A. Mandell  
*Attorney for Jim Sullivan*

222 West Washington Avenue, Suite 900  
Post Office Box 1784  
Madison, Wisconsin 53701-1784  
jmandell@staffordlaw.com  
608.210.6303


**VERIFICATION**

Jim Sullivan, being first duly sworn, on oath, deposes and says that he has read the foregoing Verified Response of Jim Sullivan and that all factual assertions it contains are true and accurate within his personal knowledge, except for those assertions expressly cited to another source.

Signed at Wauwatosa, Wisconsin this 13th day of January 2020.

  
Jim Sullivan

Subscribed and sworn to before me  
this 13th day of January, 2020.

  
Notary Public, State of Wisconsin  
My commission expires: Permanent



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. \_\_\_\_\_

**AFFIDAVIT OF WILLIAM WILLIAMS**

STATE OF MINNESOTA

ST. LOUIS COUNTY

William Williams, being duly sworn, states as follows:

1. I am over 18 years of age.
2. I make this affidavit in reference to the above-captioned matter.
3. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.
4. I serve as lead strategist for Jim Sullivan's current campaign for Milwaukee County Executive.

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5. In that capacity, I filed the Sullivan campaign's nominating papers with the Milwaukee County Election Commission on January 7, 2020. A complete copy of those papers—which span 265 pages—is attached to this Affidavit as Exhibit A. Those nominating papers included 2,690 signatures of Milwaukee County electors seeking Jim Sullivan's inclusion on the ballot of the nonpartisan spring 2020 election for Milwaukee County Executive.

6. No fewer than 32 different individuals each circulated at least one page of nominating papers for elector signatures. The Complaint filed by Theodore A. Lipscomb, Sr. focuses on only four canvassers. The pages circulated by those four canvassers contain a total of 1,101 validated signatures, fewer than half of the validated signatures submitted by the Sullivan campaign.

7. In my experience, campaigns routinely pay canvassers to collect signatures on nominating papers.

8. The Sullivan campaign hired the canvassers through a vendor, Simon Warren, who in turn subcontracted with Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas.

9. Simon Warren expressly assured the Sullivan campaign, in response to a

direct question asked before he was retained, that Jim Sullivan was the only candidate for County Executive on whose behalf he and his subcontractors were circulating nominating papers.


10. Neither I nor the Sullivan campaign knew that any of the circulators who collected signatures submitted in support of placing Jim Sullivan's name on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive had also circulated nomination papers for other candidates for Milwaukee County Executive.

11. Neither I nor the Sullivan campaign had any intent to stray from Wisconsin's election procedures in any way.


12. In my view, it would be unfair to impose penalties on the Sullivan campaign based on the alleged errors of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas.

13. In my view, it would be unfair to deny the intent of those who signed nomination papers in support of placing Jim Sullivan's name on the primary ballot of the nonpartisan spring 2020 election for Milwaukee County Executive, based on the alleged errors of Alisha Pettis, Lesa Trotter, Keith Pettis, and Dominique Thomas.



  
\_\_\_\_\_  
William Williams

Subscribed and sworn to before me  
this 13<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
Notary Public, State of Minnesota  
My commission expires: Jan 31, 2023



# EXHIBIT A

[These pages are not provided again here,  
as the Commission received them from  
the Sullivan campaign on January 7, 2020]

STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

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

File No. \_\_\_\_\_

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**AFFIDAVIT OF KEITH PETTIS**

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STATE OF WISCONSIN

MILWAUKEE COUNTY

Keith Pettis, being duly sworn, states as follows:

1. I am an adult resident of the State of Wisconsin. I make this affidavit in reference to the above-captioned matter.
2. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.
3. I am a resident of Milwaukee County.
4. I circulated nomination papers for Jim Sullivan to appear on the ballot of the Spring 2020 election as a candidate for Milwaukee County Executive.
5. I also circulated nomination papers for at least one other individual to

appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive.

6. At the time that I circulated nomination papers for more than one individual to appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive, I was not aware that a circulator may not solicit signatures for multiple candidates for the same office in the same election.

7. Jim Sullivan's campaign asked me if I had circulated nomination papers for other candidates for Milwaukee County Executive, and I said that I had not. I did not understand the legal significance of the question.

8. It was never my intent to harm Jim Sullivan's campaign, or any other individual's campaign, or to cause any campaign to submit signatures that do not comply with Wisconsin law.

9. I circulate nomination papers as a way to make extra money. I did not intend to interfere with any campaign or the election process more broadly.

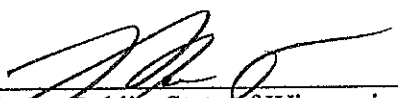
10. In my view, it would be unfair to impose penalties on any campaign based on my error.

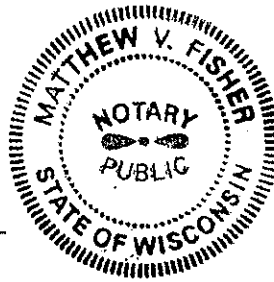
11. In my view, it would be unfair to deny the intent of those who signed

nomination papers that I circulated, to put Jim Sullivan's name on the ballot, due to my unintentional mistake.

  
\_\_\_\_\_  
Keith Pettis

Subscribed and sworn to before me  
this 12<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
Notary Public, State of Wisconsin  
My commission expires: Permanent



STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

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

File No. \_\_\_\_\_

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**AFFIDAVIT OF DOMINIQUE THOMAS**

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STATE OF WISCONSIN

MILWAUKEE COUNTY

Dominique Thomas, being duly sworn, states as follows:

1. I am an adult resident of the State of Wisconsin. I make this affidavit in reference to the above-captioned matter.
2. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.
3. I am a resident of Milwaukee County.
4. I circulated nomination papers for Jim Sullivan to appear on the ballot of the Spring 2020 election as a candidate for Milwaukee County Executive.
5. I also circulated nomination papers for at least one other individual to

appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive.

6. At the time that I circulated nomination papers for more than one individual to appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive, I was not aware that a circulator may not solicit signatures for multiple candidates for the same office in the same election.

7. Jim Sullivan's campaign asked me if I had circulated nomination papers for other candidates for Milwaukee County Executive, and I said that I had not. I did not understand the legal significance of the question.

8. It was never my intent to harm Jim Sullivan's campaign, or any other individual's campaign, or to cause any campaign to submit signatures that do not comply with Wisconsin law.

9. I circulate nomination papers as a way to make extra money. I did not intend to interfere with any campaign or the election process more broadly.

10. In my view, it would be unfair to impose penalties on any campaign based on my error.

11. In my view, it would be unfair to deny the intent of those who signed

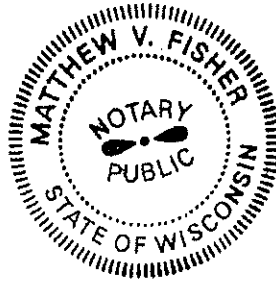


nomination papers that I circulated, to put Jim Sullivan's name on the ballot, due to my unintentional mistake.

Dominique Thomas  
Dominique Thomas

Subscribed and sworn to before me  
this 12<sup>th</sup> day of January, 2020.

[Signature]  
Notary Public, State of Wisconsin  
My commission expires: Permanet



STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

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

File No. \_\_\_\_\_

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**AFFIDAVIT OF ALISHA PETTIS**

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STATE OF WISCONSIN

MILWAUKEE COUNTY

Alisha Pettis, being duly sworn, states as follows:

1. I am an adult resident of the State of Wisconsin. I make this affidavit in reference to the above-captioned matter.
2. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.
3. I am a resident of Milwaukee County.
4. I circulated nomination papers for Jim Sullivan to appear on the ballot of the Spring 2020 election as a candidate for Milwaukee County Executive.
5. I also circulated nomination papers for at least one other individual to

appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive.

6. At the time that I circulated nomination papers for more than one individual to appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive, I was not aware that a circulator may not solicit signatures for multiple candidates for the same office in the same election.

7. Jim Sullivan's campaign asked me if I had circulated nomination papers for other candidates for Milwaukee County Executive, and I said that I had not. I did not understand the legal significance of the question.

8. It was never my intent to harm Jim Sullivan's campaign, or any other individual's campaign, or to cause any campaign to submit signatures that do not comply with Wisconsin law.

9. I circulate nomination papers as a way to make extra money. I did not intend to interfere with any campaign or the election process more broadly.

10. In my view, it would be unfair to impose penalties on any campaign based on my error.

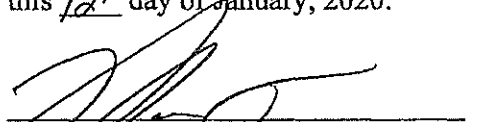
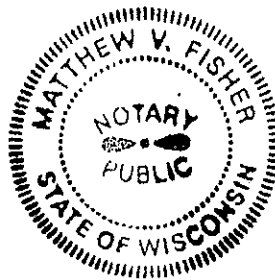
11. In my view, it would be unfair to deny the intent of those who signed

nomination papers that I circulated, to put Jim Sullivan's name on the ballot, due to my unintentional mistake.



Alisha Pettis

Subscribed and sworn to before me  
this 12<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
Notary Public, State of Wisconsin  
My commission expires: Permanet

STATE OF WISCONSIN

COUNTY OF MILWAUKEE

BEFORE THE MILWAUKEE COUNTY ELECTION COMMISSION

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

File No. \_\_\_\_\_

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**AFFIDAVIT OF LESA TROTTER**

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STATE OF WISCONSIN

MILWAUKEE COUNTY

Lesa Trotter, being duly sworn, states as follows:

1. I am an adult resident of the State of Wisconsin. I make this affidavit in reference to the above-captioned matter.
2. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.
3. I am a resident of Milwaukee County.
4. I circulated nomination papers for Jim Sullivan to appear on the ballot of the Spring 2020 election as a candidate for Milwaukee County Executive.
5. I also circulated nomination papers for at least one other individual to

appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive.

6. At the time that I circulated nomination papers for more than one individual to appear on the ballot of the Spring 2020 election as candidates for Milwaukee County Executive, I was not aware that a circulator may not solicit signatures for multiple candidates for the same office in the same election.

7. Jim Sullivan's campaign asked me if I had circulated nomination papers for other candidates for Milwaukee County Executive, and I said that I had not. I did not understand the legal significance of the question.

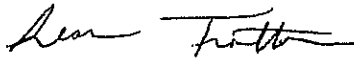
8. It was never my intent to harm Jim Sullivan's campaign, or any other individual's campaign, or to cause any campaign to submit signatures that do not comply with Wisconsin law.

9. I circulate nomination papers as a way to make extra money. I did not intend to interfere with any campaign or the election process more broadly.

10. In my view, it would be unfair to impose penalties on any campaign based on my error.

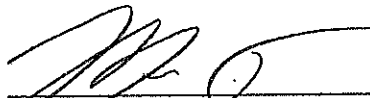
11. In my view, it would be unfair to deny the intent of those who signed

nomination papers that I circulated, to put Jim Sullivan's name on the ballot, due to my unintentional mistake.



Lesla Trotter

Subscribed and sworn to before me  
this 12 day of January, 2020.



Notary Public, State of Wisconsin  
My commission expires: Permanent

